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RECEIVED
 OFFICE OF THE PUBLIC AUDITOR
 PROCUREMENT APPEALS
 JUN 27 2008
 TIME: 3:27 PM
 BY: *RJM*
 FILE No. OPA-PA -08-008

Attorneys for the Purchasing Agency

**BEFORE THE OFFICE OF PUBLIC AUDITOR
 PROCUREMENT APPEAL**

In the Appeal of:)	Docket No.: OPA-PA-08-008
)	
)	
)	
Latte Treatment Center, Inc.,)	AGENCY REPORT
)	
Appellant.)	
)	

INTRODUCTION

Pursuant to 2 GAR, Div. 4, Chapter 12 §§ 12104-12105, the Department of Mental Health and Substance Abuse (“DMHSA”) hereby submits its Agency Report answering all allegations set forth in the appeal filed by Latte Treatment Center, (“LTC”). All documents required under 2 GAR, Div. 4, Chapter 12, § 12105 are being submitted to the Office of the Public Auditor as part of the official procurement record and filed and served concurrently with this agency report.

ORIGINAL

1 DMHSA seeks a ruling by the Office of the Public Auditor that LTC has made an
2 improper appeal, and thus moves the Public Auditor to dismiss LTC's appeal for lack of
3 jurisdiction under 5 GCA 5425, after reviewing all the supporting documents. The matters
4 complained of by LTC are not grounds for an appeal under Guam law. If the Public Auditor
5 does not dismiss the appeal, we request that DMHSA be granted a hearing on the merits

6 The Office of the Public Auditor has ordered that the procurement record, the agency
7 report and all other documents be filed and served on all parties by the purchasing agency on
8 or before June 27, 2008. DMHSA has complied with this request.

9
10 **RESPONSE TO STATED GROUNDS FOR APPEAL**

11 1. LTC is completely unable to state why it should have been awarded the
12 contract. To constitute a viable appeal, it should state why it would provide better services or
13 do so more cheaply. It can do neither. The proposed award must violate Guam law in order to
14 be set aside. 5 GCA 5452.

15 2. The party awarded the contract has represented that it can perform the contract
16 more cheaply. In the judgment of DMHSA, it is also more qualified. LTC's costs have been
17 questioned in the past (Ex. 2).

18 3. Dr. Luis Valdez, the main provider of services at LTC, is not a licensed
19 psychologist on Guam. The Allied Health Board is currently reviewing his application for a
20 license on Guam in light of his alleged history of practicing psychology without a license.
21 Without a license, Dr. Valdes can not perform under the contract!

22 4. LTC's argument is mainly an attack on the ethics and credibility of DMHSA
23 personnel rather than a statement of facts.

1 5. LTC has not properly documented its appeal. It has attached only its own
2 descriptions of alleged irregularities in the procurement process without an adequate
3 description thereof. Latte has submitted no proof of the irregularities or of violations of Guam
4 law.

5 6. LTC, apparently thinking that it was entitled to a government contract in
6 perpetuity, keeps confusing the renewal of its previous contract with this procurement. This is
7 an entirely new contract that is being procured, albeit for the same services. Matters relating to
8 the non-renewal of LTC's previous contract are outside the scope of a procurement appeal and
9 irrelevant. This includes a "failure to terminate" argument made by LTC which is just
10 ridiculous. Any failure to terminate LTC's contract benefited LTC since it continued to
11 operate and be paid under the contract. (Ex. 10).

12 7. Complaints regarding non-renewal or non-payment are outside the OPA's
13 jurisdiction. 5 GCA 5603. They relate to whether the government owes money to a vendor or
14 other party. *Ibid.*

15 8. Appellant argues that DMHSA did not find that LTC did not meet the bid
16 criteria. In this case, DMHSA found that another party was more qualified. That is not the
17 same thing. LTC may meet the criteria and still be denied if there is a better contractor
18 available.

19 9. A DMHSA employee did travel to a facility managed by the awardee several
20 years ago, but on a matter completely unrelated to this contract (Ex. 8). There is nothing to
21 suggest that favoritism played any part in the award or skewed the bid process. This is not a
22 violation of the ethical Standards of Conduct enacted by Part B of Article 11 of Title 5 GCA.

INDEX

1. DMHSA Timeline -- RTF Contractual/RFP Process
2. Government of Guam 06/02/06 Questioned Costs (Year Ended September 30, 2005)
3. Memorandum to Andrea Lighthouser, Acting Director, Department of Mental Health and Substance Abuse from Doris Flores Brooks, Public Auditor regarding Hotline Comments Alleging RFP Favoritism dated September 19, 2007
4. Letter addressed to Andrea Leitheiser from Carlos Perez and Luis Valdes, PhD regarding TGH RFP dated 12/21/07
5. Letter addressed to Senator Frank T. Ishizaki from Andrea M. Sablan Leitheiser, M.A., Ph.D. regarding Statement of Performance dated Dec 28, 2007
6. Letter addressed to Senator Frank T. Ishizaki from Andrea M. Sablan Leitheiser, M.A., Ph.D. regarding Procurement for DMHSA Therapeutic Group Home for Children dated December 28, 2007 with Attachments: RFP Log Sheet, Invoice Summary, Payment Summary, Statement of Performance
7. Letter to Senator Frank Blas from Annie F.B. Unpingco, LCSW dated January 13, 2008
8. E-mail correspondence from Annie Unpingco to Andrea Leitheiser cc'd to Linda Leon Guerrero regarding response to Valdes protest dated Wednesday, January 16, 2008
9. E-mail correspondence from Annie Unpingco to andrea leitheiser cc'd to Linda Leon Guerrero regarding response to Valdes protest dated Wed, 16 Jan 2008
10. Letter to Mr. Carlos Perez and Luis Valdes, Ph.D. from Assistant Attorney General David J. Highsmith regarding TGH RFP dated May 15, 2008
11. Letter to Attorney General Alicia Limtiaco from Luis A. Valdes, PhD regarding TGH RFP dated 28 May 2008

DMHSA Timeline
RTF Contractual/RFP Process

2004

RFP 2004-10. Initiated
No proposals were received per Latte letter of 16 Aug

2005

1 May Contract entered into between DMHSA and Latte
Term for 12 months (end May 06)
with annual renewal option thru Sept 2009

2006

1 May Contract entered into between DMHSA and Latte Expired

10 May Peter Roberto, Director gives note that intent to renew until Sept 07
Letter not binding as not signed by Governor

2007

Apr DMHSA can not meet contractual obligation (payment) and began
discussions of contingency plan/RFP
Dr. Valdes noted could not continue services

11 Apr **DMHSA 023-07 RFP No.1** Issued Announcement of RFP was
First one based on RFP originally awarded to Latte

17/18/25 RFP No. 1 Announced
May

8 Jun RFP No. 1 Closed

12 Jun Preproposal conference cancelled due to Public Hearing Necessity
Public hearing held same day

16 Aug Latte writes letter to Governor noting he is being ill advised
DMHSA contends violation of procurement (letter of intent not binding)
Cost

17/20 Aug RFP No. 1 Readvertised
Readvertised due to permanent injunction requirement for getting public
hearing input

27 Aug RFP No. 1 Closed Second Time

27 Aug GLS sues DMHSA and DMHSA provides contingency plan (DMHSA 07-
08035) to Honorable Barcinas
5-6 pm Parent/Community Input to Contingency Plan

31 Aug 5-6 pm Parents meet with DMHSA Staff to discuss plans

**DMHSA Timeline
RTF Contractual/RFP Process**

5 Sept **DMHSA 044-07 RFP No. 2** Initiated

7 Sept RFP No. 1 Cancelled
Cancelled due to no qualified offeror (both packages were incomplete)

10/12 Sept RFP No. 2 Announced

21 Sept RFP No. 2 Closed/Proposal Evaluation

5 Oct RFP No. 2 Cancelled
Had no qualified offeror (did not meet 70% threshold)

8 Nov **DMHSA-014-08 RFP No. 3** Initiated
Consumer input
Legal input
Clinical input

14/16 Nov RFP No. 3 Announced

26 Nov RFP No. 3 Closed

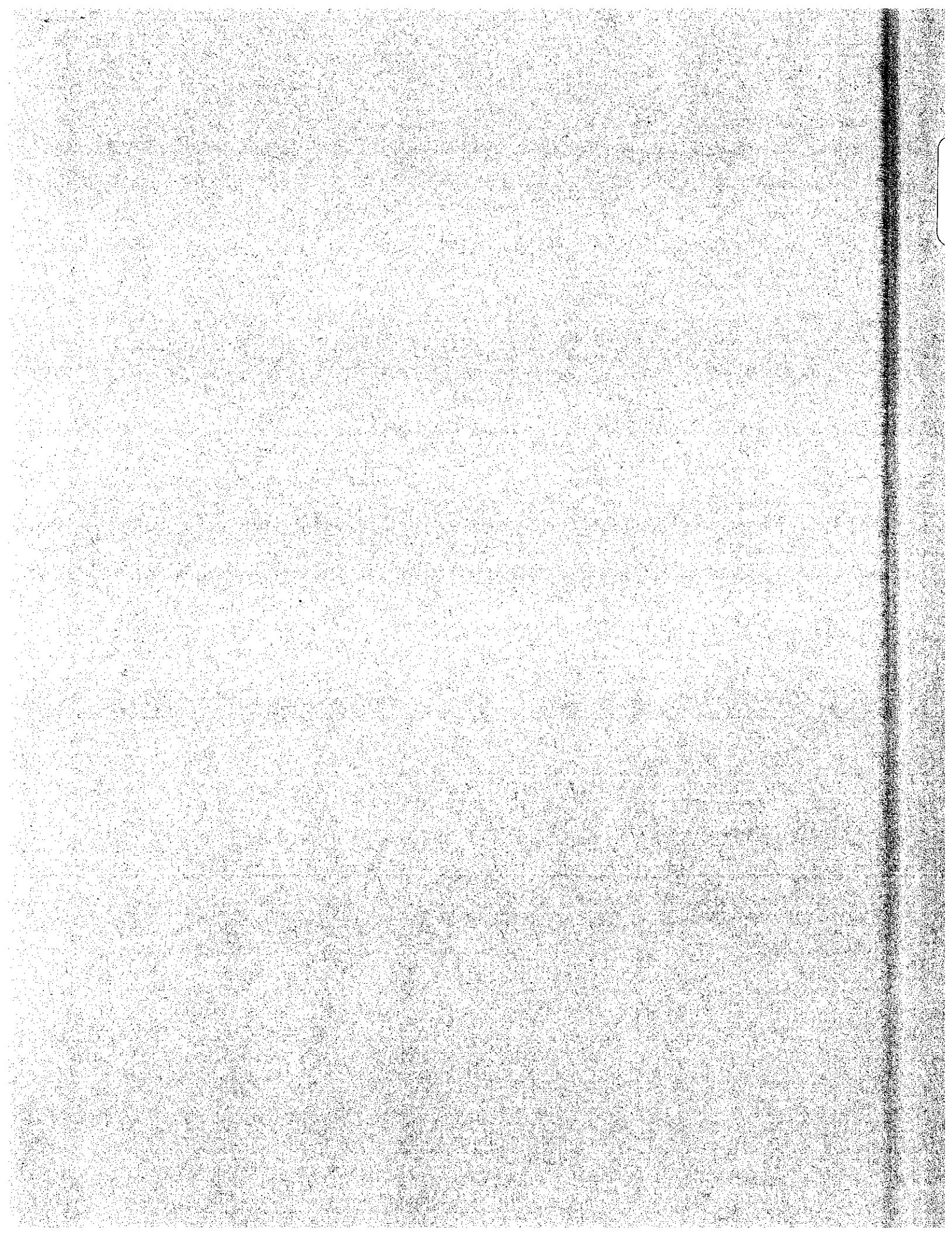
11 Dec RFP No. 3 Proposal Eval

13 Dec RFP No. 3 Selection/Non Selection Letter sent out

21 Dec Latte Protests in writing and received by DMHSA
Protest faxed to Pat Mason, AG Office

2008

17 Jan



GOVERNMENT OF GUAM
06/02/06 Questioned Costs
Year Ended September 30, 2005

Finding No: 05-14
CDFA No.: 93.104

Deloitte & Touche: Relating to the transactions with Latte Treatment Center (Ck #s 0072448, 0079088, and 0083852), similar to the above, we need a written determination of vendor selection. This determination must be dated before the contract formation and is a separate document from the contract. This document must specify the reasons for selecting Latte Treatment Center.

DMHSA Response:

In accordance 2GAR4.3112, please find attached a copy of the written determination and basis for vendor selection (DMHSA 05-05051, dated 20 May 2005). Below you will find additional information that led to determining the selection of this vendor. Furthermore, the Whereas provisions to the contract also provides the rationale for the vendor selection. DMHSA.

Excerpt for Contract with Latte Treatment Center, Inc.:

“WHEREAS, the procurement officer has provided adequate public announcement of the need for such service through a departmental Request for Proposal No. 2004-10 describing the type of services required and specifying the type of information and data required of each offeror and the relative importance of particular qualifications, in which no proposals were received; and

WHEREAS, the award of this contract has been made pursuant to findings by the Government that the Contractor is qualified based on the evaluation of services the Contractor is currently providing to children and adolescents that have been referred by the Superior Court of Guam for off-island treatment under the Government’s Residential Treatment Fund Program; and

WHEREAS, the Government finds it necessary to procure the services from the Contractor through sole source procurement recognizing that the services needed by minor placed in off-island facility requires the same level of psychiatric care and a therapeutic environment that is mirrored to that which the minor is currently receiving for treatment on Guam to be effective; and

While the contractual agreement cites sole source procurement, it also reference DMHSA’s attempt to competitively procure these services through RFP No. 2004-10 that closed July 2, 2004; of which no proposals were submitted. It should be noted that DMHSA attempted to obtain other similar services through the RFP process, as demonstrated in RFP No. 2004-11 through 2004-15, which was announced on September 26, 2004. DMHSA experienced the same outcome, where no proposals were received from community providers, which clearly demonstrates the lack of readiness of the community to provide such services. This

major obstacle was clearly recognized by the grantor during its site visit in January 2005, where DMHSA was criticized for the lack of implementation of the mandated services.

In September 2004, the Superior Court of Guam issued a Stipulation Order that required DMHSA to procure a therapeutic group home to enable a consumer (A.M.O.) being treated off-island to transition on-island. It should be noted that Shiloh Residential Treatment Center was the current provider of services under the Government of Guam's Residential Treatment Fund Program. Shiloh subsequently locally incorporated on Guam to help facilitate the transition of A.M.O. to Guam. Therefore, Latte Treatment Center was the only capable and qualified provider to transition A.M.O. to continue the same treatment on Guam as provided for off-island. This was fully supported, as reflected in DMHSA presentations to the court. The consideration to outsource the aforementioned services to Latte Treatment Center commenced as early February 2006, as conveyed to the Superior Court of Guam.

Attachments:

- ✓ DMHSA 05-05051 Letter, dated 20 May 2005: DMHSA written determination letter to SAMHSA of vendor selection.
- ✓ DMHSA 05-06046 Letter, dated 15 June 2005: DMHSA additional information to SAMHSA pertaining to vendor selection
- ✓ DMHSA email to SAMHSA, dated 17 June 2005, which indicates that DMHSA was to provide a 3-month report on Latte Treatment Center (after contract execution)
- ✓ May 16, 2005 Shiloh provided DMHSA with a letter of commitment to incorporate locally as Latte a locally registered, owned and operated center.
- ✓ DMHSA Presentation to the Superior Court of Guam, dated 21 February 2005
- ✓ DMHSA Programmatic Report, dated 21 February 2005
- ✓ TGH-Joint Shiloh Operations Proposal, date 18 February 2005
- ✓ PDN Publication for Announcement of Request for Proposal and responses received
- ✓ Superior Court of Guam supporting documents pertaining to the care of A.M.O.

Eddy J. Reyes, Deputy Director, DMHSA

From: Eddy J. Reyes, Deputy Director, DMHSA [reyese@mail.gov.gu]
Sent: Friday, June 17, 2005 11:07 AM
To: MHerman@samhsa.gov
Cc: Annie Unpingco, CASD Administrator; Director J. Peter Roberto; Karen Aguilo (kaguilo@mail.gov.gu)
Subject: Contract with Latte Treatment Center

Dear Michele,

Per our telecom, DMHSA will provide:

- A cost breakdown for day treatment, respite and therapeutic group home services.
- In Oct 05, a 3-month report (Jul-Sep), which will include:
 - o number of children served
 - o individual service plans administered
 - o evaluation summary of performance
- an update on the observations from the January site-visit report

Best Regards,
V/R
Eddy

6/8/2006

Eddy J. Reyes, Deputy Director, DMHSA

From: Eddy J. Reyes, Deputy Director, DMHSA [reyese@mail.gov.gu]
Sent: Monday, May 23, 2005 1:12 PM
To: 'MHerman@samhsa.gov'
Cc: Annie Unpingco, CASD Administrator; Director J. Peter Roberto
Subject: Status on the Implementation of Mandated Services
Importance: High
Attachments: Michele Herman.doc

Dear Michele,

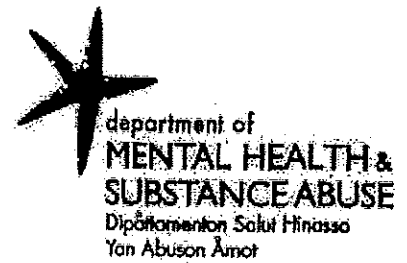
Please find attached a letter signed by the Director pertaining to the subject, in particular pertaining to the status of the therapeutic group, respite and day treatment.

We are currently in the process of finalizing a contract to outsource these services, and the attached letter provides notification to you on the way ahead to include funding. The signed copy will follow via USPS. If you have any questions, please don't hesitate to contact me.

Thank you

V/R

Eddy Reyes
Deputy Director



May 20, 2005

DMHSA 05-05051

To: Ms. Michele Herman
Department of Health & Human Services
SAMHSA
CMHS Federal Project Officer
Child, Adolescent and Family Branch
Rockville, MD, 20857

790 Gov. Carlos G. Camacho Rd,
Tamuning, Guam 96913
Phone: 671 647-5330
Fax: 671 649-6948

FELIX PEREZ CAMACHO
Governor

KALEO SCOTT MOYLAN
Lieutenant Governor

Subject: CMHI Grant - Implementation of Mandated Services

J. PETER ROBERTO
Director

Dear Ms. Herman,

EDDY J. REYES
Deputy Director

In-line with the Cooperative Agreement for the CMHI Grant, Guam is in the process of achieving a significant milestone in establishing "community-based" services to serve children and adolescents with SED, particularly respite, day treatment and therapeutic group home services.

The Department of Mental Health & Substance Abuse is currently in the process of finalizing a contract with Latte Treatment Center (LTC), Inc., which is linked to the Shiloh Residential Treatment Facility located in Texas. Although Shiloh has been providing residential services for our children for years, it has incorporated on Guam, so that the same services can be provided locally in lieu of sending our children off-island. This major concern was expressed in Guam's application for the CMHI Grant, and, in the very near future, Guam will be able to "bring one of our own home". Just as important, this partnership with LTC will enable Guam to help build the local capacity in the three mandated services. The attachment highlights the services to be provided by LTC.


It should be noted that, although the mandated service of the therapeutic group home (TGH) was identified by the community as a low priority, the Superior Court of Guam established this array of service as a priority. In any case, since the opening of TGH, Guam has been able to place an adolescent in the home in lieu of sending him off-island.

With respect to the financing of the contract, the not-to-exceed price is \$ 805 K. The Department will fund this contract entirely from CMHI project funds: federal contributions and Guam's cash match to the Cooperative Agreement. Based on the Department's assessment, this approach is in-line with the requirements of the Grant.

Since your last visit, this endeavor is seen as a major accomplishment in the establishment of mandated services, and we are aggressively in the process of getting others services started, so that our consumers and families will have a wider array of choices for recovery.

Should you have any questions on the above approach, please contact Eddy Reyes or I at 671-647-5330.

Sincerely,


J. PETER ROBERTO, ACSW
Director

Attachment: Highlights of Scope of Work with Latte Treatment Center, Inc.

Cc: Chief of Staff, Office of the Governor
Chairman and Vice-Chairman, Guam System of Care Council
Director, Bureau of Budget and Management Research
Principal Investigator, Project P Famagu' ontà

LATTE TREATMENT CENTER

Latte Treatment Center, Inc. will be contracted to provide a continuum of mental health care for children/adolescents with severe emotional disturbances to include therapeutic group home, (24 hours a day 7 days a week) day treatment and respite care, clinical supervision, monitoring, and supportive services in a "surrogate family milieu" in a normalizing treatment environment, as well as other less restrictive treatment alternatives.

Consumers of the program will be assisted in acquiring and/or improving life management skills to include: behavioral management; personal management; nutritional management; educational management; home management; medical medication management; daily activity time management; social skills; vocational skills; resource utilization; problem solving; coping behaviors; and personal safety.

Highlights of Scope of Services

To provide comprehensive services that include therapeutic group home, day treatment and respite, within a continuum of care for children/adolescents with severe emotional disturbances. Services for consumers shall include, but not limited to, the following:

- milieu therapy; recreational therapy; case management services; mobility training; socialization skills; vocational skills; community living and independent living skills training; self-care and domestic skills training; positive behavior modification training; educational management; individual and family support counseling; medication management in the administering of medications; case management services to assist consumer on their needs assessment as identified on their Individualized Service Plans (ISP) / Wraparound Plans and updated periodically by the treatment team headed by the Service Provider's Case Worker and the Department.
- Development of an Individualized Services Plan / Wraparound Plans will be coordinated by the Department's Wrap-Coordinator and Social Worker, the family/representative of the resident, and the resident.
- Programmatic Services shall include assistance in achieving greater self-determination through the following supportive services: Personal Management; Nutritional Management; Money Management; Home Management; Medication Management; Educational Management; Behavioral Management; Daily Time Management; Problem Solving; Personal Safety Awareness; Participation in Community-based and home-based activities; Supportive Counseling.

Eddy J. Reyes, Deputy Director, DMHSA

From: Eddy J. Reyes, Deputy Director, DMHSA [reyese@mail.gov.gu]
Sent: Thursday, June 16, 2005 7:38 AM
To: MHerman@samhsa.gov
Cc: Annie Unpingco, CASD Administrator; Director J. Peter Roberto
Subject: CMHI Mandated Services
Attachments: CMHS.doc

Good Morning Michele

Please find attached the information you requested during our 1 June meeting.

Additional clarification can be provided during our telecom.

V/R

Eddy



department of
**MENTAL HEALTH &
SUBSTANCE ABUSE**
Dipartamenton Salud Hinasso
Yan Abuson Anot

June 15, 2005

DMHSA 05-06046

To: Ms. Michele Herman
Department of Health & Human Services
SAMHSA
CMHS Federal Project Officer
Child, Adolescent and Family Branch
Rockville, MD 20857

790 Gov. Carlos G. Camacho Rd.
Tamuning, Guam 96913
Phone: 671 647-5330
Fax: 671 649-6948

FELIX PEREZ CAMACHO
Governor

KALEO SCOTT MOYLAN
Lieutenant Governor

Subject: CMHI Grant - Implementation of Mandated Services

J. PETER ROBERTO
Director

Dear Ms. Herman,

EDDY J. REYES
Deputy Director

In reference to our meeting on June 1, 2005 pertaining to the DMHSA memorandum to you, dated May 20, 2005, the following information is provided pertaining to DMHSA's decision on the implementation of mandated services for the CMHI Grant.

Foremost, with respect to the mandated service of therapeutic group home, it should be noted that, although the Shiloh Residential Treatment Facility is linked to the Latte Treatment Center (LTC) Incorporated, it was made clear in the contractual negotiations that day treatment, respite and therapeutic group home services to be delivered *on Guam* fully embraced the system of care principles and values. To ensure that these services are delivered and meet the expectations of DMHSA's approach to fulfill the requirements of the Cooperative Agreement, the number of admissions in a therapeutic group home setting will be defined by policies and procedures of DMHSA and the Contractor. The referral of individuals requesting utilization of the therapeutic group home program services shall be directed to the Department for assessment of appropriate placement. The Contractor and the Department will collaborate when managing the number of admissions to this program considering the needs of the child/adolescent, the current level of acuity, and any other presenting clinical conditions. The Department's policies and procedures will determine the next appropriate program available for referrals not accepted. In addition, it should be noted that the facility, where the therapeutic group home services will be delivered, is within the GFA's guidelines pertaining to the "use of funds".

Furthermore, the contract specifically states the philosophy of a System of Care, to include the Core Values and Guiding Principles, are applied within the operation and administration of the program, and are a part of the vision for community-based integrated services (i.e. child and family centered, strengths based, community based, culturally competent, access to a comprehensive array of services; individualized services using a wraparound approach; least restrictive environment; full family participation; integrated

services; care coordination; early identification and intervention; smooth transitions; rights of child protected; and non-discriminatory and culturally appropriate).

With respect to funding of the contract and under the Department's assumption that the services of LTC are in-line with the CMHI grant, the Department was able to earmark available funding *within* the budget category of contractual services. Therefore, in coordination with the Bureau of Budget Management and Research (BBMR), the Department concluded that the SAMHSA "Welcome Wagon" Notice for a re-budgeting request did not apply since it did not fit the definition of "significant re-budgeting"; however, BBMR advised the Department to inform the grantor of these actions, which was provided in the May 20, 2005 memorandum.

Based on the foregoing, the Department is confident that the negotiated contract and funding source are in-line with the provisions of the Cooperative Agreement, and appropriate mechanisms are in place to for the Department to be the gatekeeper for therapeutic group home services, as well as other services specified in the contract. The Government of Guam and LTC have finalized the contract, which will be executed by the end of June 2005, at which time DMHSA will handover the delivery of services to LTC.

Should you have any questions on the above approach, please contact me at 671-647-5330.

Sincerely,



EDDY J. REYES
Acting Director

Cc: Chief of Staff, Office of the Governor
Chairman and Vice-Chairman of the Guam System of Care Council
Director, Bureau of Budget and Management Research
Principal Investigator, Project I' Famagu' ontà

Eddy J. Reyes, Deputy Director, DMHSA

From: Eddy J. Reyes, Deputy Director, DMHSA [reyese@mail.gov.gu]
Sent: Thursday, June 16, 2005 9:07 AM
To: MHerman@samhsa.gov
Cc: Annie Unpingco, CASD Administrator, Karen Aguilo (kaguilo@mail.gov.gu); Juanit Quintanilla (jpquint@mail.gov.gu); Director J. Peter Roberto
Subject: CMHS
Attachments: CMHS.doc

Michele

Please discard the previous version, which is superceded by the attached letter.

V/R

Eddy



department of
**MENTAL HEALTH &
SUBSTANCE ABUSE**
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June 15, 2005

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EDDY J. REYES
Acting Director

Cc: Chief of Staff, Office of the Governor
Chairman and Vice-Chairman of the Guam System of Care Council
Director, Bureau of Budget and Management Research
Principal Investigator, Project I' Famagu' ontà

Shiloh Treatment Center, Inc.
3926 Bahler Manvel, Texas 77578
Phone (281) 489-1290 Fax (281) 489-8806

Department of Mental Health and Substance Abuse
Guam, USA


Re: Therapeutic Group Home

Dear DMHSA:

Shiloh Treatment Center plans to bring its child and adolescent mental health treatment programming to the island of Guam through Latte Treatment Center, Inc., an entity formed on the island for the sole purpose of providing comprehensive inpatient, residential and day treatment services within a continuum of care to the local population. Locally incorporating Latte provides the advantages of a locally registered, owned and operated center that will most economically and effectively provide the intended services that have traditionally been provided off-island.

A maximum of two managers from Shiloh are being reallocated to Guam in order to replicate the Shiloh treatment programs. These two persons will be training locally hired people to deliver direct care services as well as developing future Latte managers. The programs will use treatment methods sufficient to treat severe emotional disturbances as it has been doing for Guam citizens sent off island for many years. Modifications to the program involve integration of local customs and culture, and procedures fitting of the Guam facilities and area.

Sincerely,



Clay Hill
Board Chairman
Shiloh Treatment Center

5/16/05

STATUS OF AMO

DMHSA
21 Feb 05

2/20/2005

1

Purpose

- To provide the SCOG with:
 - the status of the Therapeutic Group Home, which is to be ready on February 21, 2005
 - A progress report on the actions taken to date, in preparation for AMO to return to Guam on March 23, 2005
 - In consultation with AMO's provider

2/20/2005

2

Dr. Valdes' Visit

- First visit:
 - 31 Jan – 04 Feb 05
 - Met with DMHSA staff and key stakeholders
 - Provided initial training to approximately 70 persons
 - Child serving agencies and stakeholders
 - Obtained good information on Guam's capacity
 - Gained valuable insight on what is needed
 - Per Dr. Valdes, Guam not yet ready to accept AMO
 - Key tasks must be completed before ready
 - Dr. Valdes provided Action Schedule and Task List
 - Dr. Valdes to submit alternative considerations

NOTE: Determined next visit and AMO return to occur March 23, 2005.

2/20/2005

3

Dr. Valdes' Visit

- Second Visit:
 - Originally planned for week of 23 March
 - Visit now planned for the week of 3 April
 - Dr. Valdes request

NOTE: DMHSA working to complete Action Schedule and Task List. The following is the status of key action items.

2/20/2005

4

Therapeutic Group Home

- Status:
 - 24 Jan
 - Purchased Agreement approved by the Governor
 - 17 Feb
 - Renovations Completed (ADA requirements)
 - 18 Feb
 - Safety and Sanitation Inspections
 - 19-20 Feb
 - Furnishing of Home
 - Week of 21 Feb
 - Place a consumer currently in Children's Inpatient Unit in TGH (institution to residential setting)

2/20/2005

5

BUDGET

- Funding resolved for FY 2005:
 - Annual Budget for acquisition/start-up/recurring costs: \$1,136,923.00
 - Funding sources
 - Residential Treatment Fund
 - Staffing
 - Department of Labor, Compact Impact Funds
 - Acquisition of TGH and staffing
 - Federal Grant – Child's Mental Health Initiative
 - Training and Equipment

2/20/2005

NOTE: Funding source for FY 2006 to be identified

6

Staffing

- Of 16 positions:
 - 11 positions filled:
 - (1) House Manager
 - (1) Social Worker II
 - (2) Psychiatric Technicians II
 - (4) Psychiatric Technician I
 - (3) Community Program Aides

2/20/2005

7

Staffing

- Of 16 positions:
 - 5 Positions to be filled (*candidates identified, interviews pending*)
 - (1) Psychiatric Social Worker II
 - (1) Administrative Assistant
 - (1) Psychiatric Technician II
 - (2) Community Program Aides
 - *NOTE: All staff on board by mid-March 2005*
- Roles and responsibilities must be defined
- Staffing pattern refined and work schedule defined

2/20/2005

8

Policies & Procedures

- Status of Policies & Procedures
 - Shiloh's Policies and Procedures
 - Purchased at a cost of \$10,000.00
 - Course of Action
 - Use Shiloh's P&Ps on an *interim* basis
 - Tailor P&Ps to meet Guam's needs
 - Train P&Ps to TGH staff, families and stakeholders
 - Update and finalize P&Ps during Dr. Valdes' next visit
 - Approve P&Ps by end of April 2005

2/20/2005

9

Other Consumers for TGH

- SCOG directed that DMBSA and other agencies identify other potential consumers who may require services at TGH
 - DMBSA has identified one other female consumer
 - Currently being treated in Children's Inpatient Unit
 - Will commence admission procedures to TGH this week
 - DMBSA will continue to identify other potential consumers
 - Aim to have three (3) other consumers in place prior to AMO's return

NOTE: Minimum capacity of TGH is five (5) consumers

2/20/2005

10

Training

- Training to be administered
 - Policies & Procedures
 - Daily operations, structure and schedule
 - Program components
 - Family Training

2/20/2005

11

Medication Management

- Need to update formulary
- Use Shiloh's pharmacy to obtain medications for AMO

2/20/2005

12

Dr. Valdes' Assessment

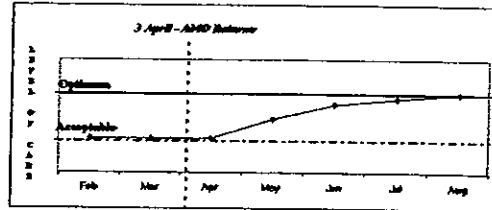
- AMO is able to return home during Dr. Valdes' next visit (April 3)
- DMHSA initiative:
 - Secure behavioral management treatment through on-site Shiloh supervision
 - Coaching and Outsourcing considerations
 - DMHSA to strive to obtain optimum care for a residential treatment facility
 - a minimum of six (6) months required to achieve an optimum level of care (See next chart)
 - Dr. Valdes supports an approach for continued Shiloh involvement during transition stages

2/20/2005

13

Coaching Model

Capacity: Acceptable to an Optimum Level of Care



NOTE: Per Dr. Valdes, while under direct Shiloh supervision, the above scheduled will permit AMO to return on April 3, 2005.

2/20/2005

14

Outsourcing Considerations

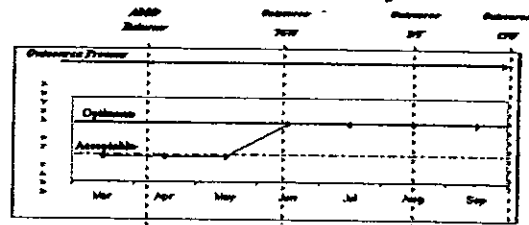
- In order to established a community-based continuum of care for children & adolescents
 - outsourcing of Children's Inpatient Unit, Day Treatment and Therapeutic Group Home is a viable and preferred option
- Outsourcing of TGH to Shiloh can occur as early as May based on Shiloh's requirements (2-month lead time required)
 - Additional time (to be defined) needed for Gov Omm requirements
 - Outsource phased implementation approach
 - TGH 4 months June 05
 - Day Treatment 6 months Aug 05
 - CIU 8 months Oct 05

2/20/2005

15

Outsource of

Therapeutic Group Home / CIU / Day Treatment

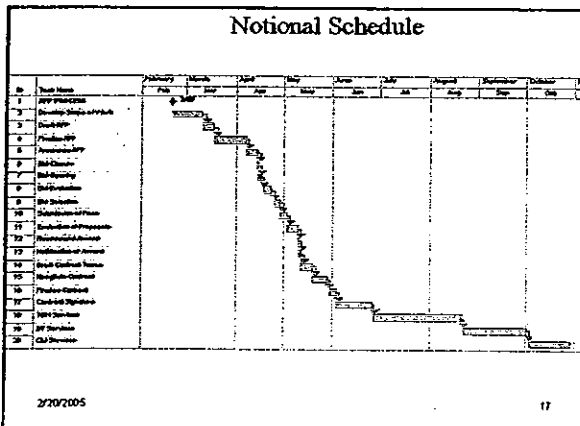


NOTE: Per Dr. Valdes, Shiloh will require minimum of two (2) months lead time for outsourcing of TGH. However, it should be noted that an additional time will be required for Gov Omm to complete all required actions prior to finalizing an outsourcing for TGH, CIU and Day Treatment (e.g. RFP Process, legal instruments, placement of Gov Omm employees, etc)

2/20/2005

16

Notional Schedule



2/20/2005

17

Conclusion

- Positive progress continues
 - TGH is acquired, furnished and ready
 - Majority of staffing hired
 - CIU consumer to begin admission procedures to TGH
 - Funding has been identified for the remainder of FY 2005
 - DMHSA initiatives aimed at providing optimum care
 - Coaching model and outsourcing in planning stages

2/20/2005

18

Conclusion

- Dr. Valdes' next visit planned for April 3
 - DMHSA to meet TGH Action Schedule and Task List for AMO return
 - Shiloh supports DMHSA's Coaching Model proposal for consistency of Behavioral Treatment Plan and building TGH local capacity
 - AMO ready to return under supervision of Shiloh staff at TGH

2/20/2005

19

Conclusion

- Outsourcing of TGH, CIU and Day Treatment supported
 - DMHSA to begin future capacity discussions for expanding optimum capacity for Day Treatment and CIU
 - Shiloh receptive to DMHSA's proposal
 - Discussions with stakeholders to commence
 - Transition period for outsourcing - Jan - Oct 05
 - Definitive steps must be identified to commit to a specific date

2/20/2005

20

Conclusion

- Although there have been growing pains and a prolonged delay in the return of AMO, the recent developments of:
 - The purchase of the Therapeutic Group Home
 - The introduction of the Coaching Model with Shiloh
 - And the a proposal to Outsource TGH, CIU and Day Treatment

Have resulted in an approach to achieve an optimum level of care and significantly improve services for our children

2/20/2005

21

Department of Mental Health & Substance Abuse
Programmatic Report

Report Date: February 21, 2005

Guam's Therapeutic Group Home (TGH) current capacity level of service:

I. Personnel:

A. Staffing: To date, 12 staff are on board. These are:

1. House Manager, (Elizabeth Perez)
2. Psychiatric Social Worker, (Vacant)
3. Social worker II/Caseworker, (Trisha Taitague)
4. Psychiatric Technician II, (Teresita Dante)
5. Psychiatric Technician II, Melanie AGUON
6. Psychiatric Technician Ii, (Mahmoud El Sayeh,
under filling as a Pt I
7. Psychiatric I, (Audrey Villagomez)
8. Psychiatric I, (Stephanie Aguon)
9. Psychiatric I, (John Baret)
10. Psychiatric I, (Rudy Atalig)
11. Community Program Aid I, (Marie Taitague)
12. Community Program Aid I, (Robert Benavente)
13. Community Program Aid I, (Odelia Duenas)
14. Administrative Assistant, (Vacant)

B. Organization Structure being finalized.

1. Organization Chart
2. Organization operation.

C. Staff roles/responsibilities being defined and clarified.

D. Work Schedule: Will implement the 4 days on 4 days off work schedule.

E. Staff Training on TGH Policies and Procedures once completed.

The plan is to incorporate and integrate Shiloh's Treatment model with the existing Wraparound Individualized Service Plan, Case-management approach, the Rays of Hope, Day Treatment, Respite Care, Home-Based Services, outpatient counseling and psychiatric services of the Department of Mental Health.

II. TGH policies and procedures revisions (patterned after Shiloh's) and is consistent with Dr. Valdes' action schedule and task list timelines.

III. TGH Mission: Maximizing the quality of Youth, family and Community Life in partnership now and towards the future...

IV. Admission Criteria Defined

1. Staff assessing admission, identifying clients via the input of the child-serving agency's Ombudsmen.
2. Referral procedure via the Wrap Team and Wrap Coordinator.
3. Social Worker II/Case-Worker sets the appointment and conducts the Assessment Intake upon referral.

V. SITE CONTROL COMPLETED; 2.21.05

OCCUPANCY FOR ADMISSION SET FROM 3.21.05 TO 4.4.05.

VI. IDENTIFY AND PRIORITIZE P&P list for revision and set time lines.

To be completed by February 28, 2005 are the following:

A. Human Resources

1. Professional Staff
2. Support Staff
3. Staff Development

B. Clinical Services

1. Admission
2. Service Planning
3. Behavioral Services
4. Medical Services
5. Infection Control
6. Psychiatric Services
7. Psychological Services
8. Day Treatment
9. Educational Services
10. Pastoral Services
11. Vocational and Employment Services
12. Recreation and Leisure

P&P to be completed by March 4, 2005 are the following:

C. Support Services

1. Food Services
2. Records

P&P to be completed by March 11, 2005 are the following:

D. Emergency and Safety

1. Emergency Plan
 - a. Medical Emergency
 - b. Psychiatric Emergency
 - c. Natural Disaster
 - d. Environmental/All-Hazard
 - e. Fire Safety Plan
2. Safety Management Plan

P&P to be completed by March 16, 2005 are the following:

E. Quality Assurance

1. Develop quality improvement plans on all the services
2. Professional accountability
3. Client satisfaction survey.

Staff to be trained on the daily operations, structure, work schedule and all the P&P revisions between the weeks of March 14 through week of March 21.

Identify and procure resources needed such as dietitian/nutritionist, behavioral specialist, psychiatric, and psychological services by March 11, 2005.

Train and implement all program components by week of March 21, 2005.

Admit first 2-3 clients between weeks of March 21 through week of March 28, 2005.

Shiloh and AMO arrives April 4, 2005.

Community Partnerships

Feb. 18, 2005

TGH-Shiloh Joint Operations Proposal

Dear Annie and Peter,

Thank you for the wonderful opportunity to meet and train with you and your staff. You are excellent people in your organization. I appreciate the hospitality and attention that I was given. My message to the many people that have inquired about Guam has been most positive. We live on one of God's wondrous creations (volcanoes, earthquakes and all)!

From the outset I have indicated my desire to help DMH build a successful program. At this stage in my professional life I am not interested in projects that are not going to last. After careful study and review of my trip to Guam I believe that a TGH is sustainable on the island but significant changes would need to be made. The task list and schedule presented to you all at the end of the visit, when completed, makes a TGH is viable for Guam. Experience with integrated programming and implementation is still a significant need.

It may or may not be possible to operate a TGH from within the department. As I mentioned, most departments of mental health moved to a regulatory function many years ago and eliminated most or all "in-house" programs. Bureaucratic systems tend to tie up good personnel who could be providing services. I emphasize that the systems are the problem. The people are generally very good. As you mentioned "out-sourcing" and regulating services that establish the "object" from which to model from would be consistent with many modern operations.

I share Annie's concern about our current time line in light of the many details that remain to be completed before the return of AMO. Nonetheless, I offer the following two options.

Option 1

Apr. 4 - Return of AMO

*Video Conferencing 3/10/05
Test 3/10/05*

early April

1. In order to open the TGH and have it fully functional and able to receive AMO within two months, a senior Shiloh staff person would work as a House Parent and Teacher's Aide on a 4 days on 4 days off basis beginning on the first day of operations.
2. Two staff persons would be assigned to this task. The two people would alternate shifts. Costs are approximately \$7000 per staff person per month plus expenses. *?*
3. Luis Valdes, Ph.D. would continue as consultant and add the duties of behavioral specialist in order to plan, develop, and oversee the ongoing implementation issues that arise when an integrated individualized service plan is executed. Costs would continue at the current \$250 per hour rate. If a monthly rate is more suited to your department a salary could be negotiated.
4. Every 6 months a member of the Shiloh management team would spend a week on Guam reviewing program implementation. Costs would range from \$10,000 to \$16,000 per week depending on degree and level of experience.
5. Releasing two senior staff persons from their current full time duties at Shiloh and releasing management on a part time basis would require hiring and training additional staff for its Texas operations.

evaluation 60-90 days

*Contingency
- Medical Cost.
- Crisis Intervention*

*Reimbursable
Provisions
for Option 1 + 2*

Shiloh Proposal

*Transitioning to Community Provider
2 months lead-time*

*10/11/05
okay*

Option 2

1. Shiloh is capable of managing and operating the CIU, TGH and Day Treatment components. There are numerous synergistic advantages to combining these three components.
2. The current TGH budget is capable of serving 5 children at \$500,000 per year. This equates with a daily rate of \$274 per day per child ($\$500,000 / 365 / 5 = \274 per day per child). This rate is average for the mainland US and would be considered a fair rate.
3. Mainland CIU daily rates are higher than TGH rates. Approximately \$300 to \$600 per day per child depending on the needs of the child. Shiloh can typically serve at this level for \$375 to \$400 per day.
4. Mainland Day Treatment rates vary widely depending on the level of service and needs of the clients. The rates are typically between \$90 and \$175 per day. Shiloh typically provides this service for \$120 to \$175 per day.
5. These rates can easily be compared to industry standards from private insurance companies, state governments and federal Medicaid reimbursement rates.
6. The current physical plant at Rays of Hope and the new TGH home are sufficient to run all three programs.
7. Most of the current staff would be retained by Shiloh, particularly upper level and experienced personnel.
8. If Shiloh operates these three components it would plan to turn the operations over to local control once services are firmly established. Current projections would be to turn over operation in 18-24 months.
9. It is possible that Shiloh could use its current structure to provide a level of quality that could reach JCAHO standards. If this were achieved on Guam, Shiloh could then use its current network presence in private insurance companies and TRICARE to attract other consumers to its CIU, TGH and Day Treatment services. Shiloh currently serves a wide range of clients including those with autism, mental retardation, serious emotional disturbance and juvenile delinquents. Shiloh has served many clients from beyond Texas' borders.
10. There are many compelling quality of service and cost saving reasons to select this option. These can be itemized as needed.

\$10 per day per child

Medical / Medication Formulary

*Hired Staff - Classified 5
KTA - on second hiring*

Adult Services

As I mentioned to you while on my trip there, I have a colleague who is the Superintendent of the main public psychiatric hospital in the State of Missouri. He has been consulting and implementing programs for adults around the country for 13 years. He has a national reputation with many publications in the adult service literature. I contacted him and he expressed an interest in exploring possibilities with you. He and I trained under the same integrated and comprehensive service delivery model beginning in 1985. He would be an extremely valuable asset to your adult services. He is sending me a packet of publications and information that I will forward to you if you are interested.

I look forward to hearing from you.

Sincerely,

Luis A. Valdes, Ph.D.,

Feb. 18, 2005

- Decision to proceed with opening by home 2/21/05*
- Valdes to participate in conf. call during court hearing*
- Mtg w/PTA*

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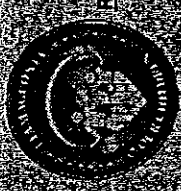
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15 years

of service to our island

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NO PHONE CALLS PLEASE



REQUEST FOR PROPOSALS

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 ...

DEPARTMENT OF MENTAL HEALTH & SUBSTANCE ABUSE

REQUEST FOR PROPOSAL (RFP)

NO. 2004-15

THERAPEUTIC FOSTER AND RESPITE SERVICES

DATE PICKED UP	CONTACT PERSON/TITLE	CONTACT NUMBERS
----------------	----------------------	-----------------

Sept. 30, 04	Sanctuary, Inc. Danny Duenas (Project Director)	475-7104 / 1 / 7102
Oct. 6, 04	GERI AGUION	477-9219 / 9220
Oct. 7, 2004	Pablo Santos	688-0916 / 649-1680
<p><i>NO SUBMISSIONS.</i> <i>Dr. Of...</i> <i>10/11/04, 3:00 PM</i></p>		

DEPARTMENT OF MENTAL HEALTH & SUBSTANCE ABUSE

REQUEST FOR PROPOSAL (RFP)

NO. 2004-14

CRISIS RESPONSE SERVICES

DATE PICKED UP	CONTACT PERSON/TITLE	CONTACT NUMBERS
----------------	----------------------	-----------------

Sept. 30, 04	Denny Duenas ^{Sanchamy, Inc.} (Project Director)	475-7104/117102
Oct. 4, 2004	PETER ADA	635-1446/1413
Oct. 6, 04	GERI AGUON	477-9019/9020
10-11-04	Lisa Melillo	649-6575
<p>NO SUBMISSIONS TmCh 10/11/04 3PM</p>		

DEPARTMENT OF MENTAL HEALTH & SUBSTANCE ABUSE

REQUEST FOR PROPOSAL (RFP)

NO. 2004-13

MEDICATION EVALUATION AND MANAGEMENT

DATE PICKED UP	CONTACT PERSON/TITLE	CONTACT NUMBERS
----------------	----------------------	-----------------

Sept. 30, 04	Sanctuary, Inc Danny Duenas (Project Director)	475-7104 / 117102
Oct. 6, 04	Geri Aguon	477-9219 / 19220
<p>NO SUBMITTALS Office, 10/11/04, 3:00 PM</p>		

DEPARTMENT OF MENTAL HEALTH & SUBSTANCE ABUSE

REQUEST FOR PROPOSAL (RFP)

NO. 2004-12

OUTPATIENT SERVICES

DATE PICKED UP	CONTACT PERSON/TITLE	CONTACT NUMBERS
----------------	----------------------	-----------------

Sept. 30, 04	Danny Duenas ^{Sanchary, Inc} (Project Director)	475-7104 / 1/7/02
Oct. 4, 2004	PETER ADA	635-1446/1413
Oct. 6, 04	GERI AGUION	475-9219 / 9220
Oct. 1, 04	Lira Melillo	648-6575
<p><i>NO SUBMISSIONS.</i></p> <p><i>On 10/1/04 3:00 PM</i></p>		

4/28/04

PUBLIC NOTICE

**REQUEST FOR PROPOSALS
 CAREWORKER AND OPERATIONAL SERVICES
 FOR THE APERON GROUP HOME
 RENO, NV 89410**

The Department of Health and Social Services, Human Resources, Health Services, and
 Job Development is seeking qualified individuals to provide careworker and operational
 services for the APERON Group Home in Reno, NV. The successful bidder will be
 responsible for providing the following services:

- Provide careworker services for 24 hours a day, 7 days a week.
- Provide operational services for 24 hours a day, 7 days a week.
- Provide food service for 24 hours a day, 7 days a week.
- Provide laundry services for 24 hours a day, 7 days a week.
- Provide housekeeping services for 24 hours a day, 7 days a week.
- Provide maintenance services for 24 hours a day, 7 days a week.
- Provide security services for 24 hours a day, 7 days a week.
- Provide transportation services for 24 hours a day, 7 days a week.
- Provide other services as required.

Interested parties should submit their proposals to the Department of Health and Social Services, Human Resources, Health Services, and Job Development, 1000
 P.O. Box 1000, Reno, NV 89410. Proposals should be received by the Department of Health and Social Services, Human Resources, Health Services, and Job Development, 1000
 P.O. Box 1000, Reno, NV 89410, on or before 10:00 AM on the date specified above.
 For additional information, contact the Department of Health and Social Services, Human Resources, Health Services, and Job Development, 1000 P.O. Box 1000, Reno, NV 89410.
 A bid opening will be held on the date and time specified above.

JOHN M. BENAVERI
 Director

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IN THE SUPERIOR COURT OF GUAM

JUVENILE SPECIAL PROCEEDINGS
CASE NO. SP 00 48-05

1 GUAM LEGAL SERVICES CORPORATION
113 Bradley Place
2 Hagåtña, Guam 96910
Telephone No.: (671) 477-9811
3 Facsimile No.: (671) 477-1320

4 Counsel for A Child with S.E.D.

7 In the Interest of
8 A CHILD WITH S.E.D.,

9 By Guam Legal Services
10 Corporation,

11 Petitioner,

12 vs.

13 J. PETER ROBERTO, in his official
14 capacity as Director of the Department of
Mental Health and Substance Abuse,

15 Respondent.

PETITION FOR
WRIT OF MANDATE
OR IN THE ALTERNATIVE
FOR JUDICIAL REVIEW

17 Petitioner, Guam Legal Services Corporation, and Daniel S. Somerfleck, for their Petition
18 for Writ of Mandate or In The Alternative for Judicial Review, states and alleges as follows:

19 1. This Court has jurisdiction over this matter pursuant to 7 GCA §§ 3107(b), 31202,
20 12104, 12105 and Section 82 of the Guam Code of Civil Procedure.

21 2. "The Child" has been determined to have a Serious Emotional Disturbance (S.E.D.)
22 by his treating professional.

23 3. The Child is a resident of Guam.

24 4. Petitioner brings this action alleging that Respondent J. Peter Roberto has failed, in
25 his official capacity as Director of the Department of Mental Health and Substance Abuse
26 (DMHSA), to provide necessary and statutorily guaranteed transition services and a transition home
27 for the Child.
28

4 **FACTS IN SUPPORT OF PETITION**

5 5. DMHSA is an institution of the Territory of Guam. DMHSA was created by 10
6 G.C.A. §86103.

7 6. That pursuant to Public Law 17-21, as codified in 10 G.C.A. §86101 *et. seq.*,
8 DMHSA's declared public policy is to provide community-based outpatient mental health, alcohol
9 and drug programs and services for the people of Guam, and to continually strive to improve,
10 enhance, and promote the physical and mental well-being of the people of Guam who experience the
11 life-disrupting effects of mental illness, alcoholism and drug abuse or who are at risk to suffer those
12 effects and who need such assistance and; to provide such assistance in an efficient and effective
13 manner in order to minimize community disruption and strengthen the quality of personal, family
14 and community life.

15 7. That pursuant to 10 G.C.A. §86102 (d) Mental Illness is defined as those diseases
16 and conditions the manifestations of which seem mostly to affect a person's behavior, feelings,
17 thinking and perception and view of the world around him to the extent that his mental health is
18 substantially impaired, including the mentally retarded.

19 8. That pursuant to 10 G.C.A. §86105 (1)(b)(e) DMHSA's services shall include partial
20 hospitalization and aftercare services to include transitional homes for the mentally ill; and inpatient
21 services to include but not limited to acute psychiatric and alcohol and drug detoxification services.
22 The department may contract in writing for the provision of inpatient services with any qualified
23 providers. The department shall be responsible for insuring that the medical care standards and
24 quality controls for inpatient services provided above are met.

25 9. The Child is a resident of Guam.

26 10. The child is a child with Serious Emotional Disturbance, who is entitled to the
27 services of DMHSA.

28 11. The Child's treating psychiatrist recommends placement in a therapeutic group home

4 on Guam to prepare the Child for eventually moving home with the Child's parent.

5 12. Petitioner's treating psychiatrist has stated that the Child is ready for transition to a
6 Therapeutic Group Home setting and continued placement at the Children's Inpatient Unit will cause
7 regression in the Child's condition.

8 13. Pursuant to 10 GCA §86105, DMHSA "shall provide mental health, alcohol and
9 substance abuse treatment services . . . Such services shall include: . . . (b) partial hospitalization and
10 aftercare services to include transitional homes for the mentally ill; (c) outpatient services to include
11 as needed team services for children, the elderly and adults; (d) individual, group, and family
12 counseling services;" (emphasis added).

13 14. Pursuant to the above, DMHSA has a clear, present and ministerial duty to ensure that
14 a qualified individual is placed, where appropriate, in a transitional home with proper outpatient,
15 counseling and other appropriate services.

16 15. The Child, through the Child's parent, has sought assistance and support in obtaining
17 residential care from DMHSA, without success.

18 16. The Child is in need of appropriate residential placement for children with S.E.D. to
19 transition the Child from the Child's inpatient placement to eventually returning home.

20 17. DMHSA has created a program called "Therapeutic Group Home" or "TGH", which
21 is a program designed to provide the facilities and services that the petitioner needs.

22 18. On information and belief, the TGH is open but not providing TGH services to any
23 child (See Attachment 1).

24 19. Because the Child will regress if not moved immediately to a transition home,
25 irreparable injury will result to the Child is not provided proper placement and services immediately.

26 20. Because the respondent has a clear duty to provide the necessary services to the Child,
27 and because the respondent has funds, a facility and staff they could provide a transition home and
28 services to the Child by other means, little or no harm will result to the Respondent if he were

4 immediately required to provide the required services to the Child.

5 21. The Petitioner is entitled to an order requiring the Respondent to implement a system
6 of adequate residential transitional mental health services for the Child.

7 22. The Petitioner has no plain, speedy or adequate remedy in the ordinary course of law.

8 23. On balance, all equities and considerations favor granting Guam Legal Services
9 Corporation an Alternative Writ of Mandate immediately.

10
11 **DEMAND FOR RELIEF**

12 **WHEREFORE** the Petitioner prays that:

13 1. An Alternative Writ of Mandate issue *ex parte* under the seal of the Court
14 commanding Respondent, its officers, members, agents and all other persons acting on its behalf to
15 provide a transitional home and appropriate services to the Child, or that Respondent be ordered to
16 show cause before this Court at a specified time and place why it has not done so or should not be
17 required to do so.


18 2. In the alternative, the Petitioner be granted judicial review and judgment in
19 accordance with Public Laws 20-220 and 24-16, and that the Court order Respondent to meet the
20 requirements of these laws.

21 3. The Petitioner be granted such other relief in law or in equity as may be proper and
22 justified whether or not prayed for herein.

23 DATED this 22 day of March, 2005.

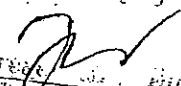
24 **GUAM LEGAL SERVICES CORPORATION**
25 *Attorneys for Child with S.E.D.*

26 By:

27 
28 **DANIEL S. SOMERLECK**
Director

26 I hereby certify that the foregoing
27 is a true and correct copy of the
original on file in the office of the
clerk of the Superior Court of Guam
Dated at Hagatña, Guam

28 MAR 27 2005


Deputy Clerk Superior Court of Guam

Inter-Agency Memorandum

March 11, 2005

To: The Honorable Judge Katherine Maraman
Superior Court of Guam

From: Administrator, Child-Adolescent Services Division (CASD)
Dept. of Mental Health & Substance Abuse

Subject: Therapeutic Group Home (TGH) and Rays of Hope (ROH)

I would like to set the record straight about Children Mental Health services on island and in particular to provide the Court answers to frequently asked questions about the status of the Therapeutic Group Home (TGH) and whether it is available and ready to serve children and youth in the community, and information about Rays of Hope (ROH).

First, the Therapeutic Group Home located on 306 Father Duenas Memorial Dr., Tamuning, Guam is structurally ready and staffed to serve children and youth "enrolled" in Project I Famagu'on-ta, who due to their severe emotional conditions need out of home placement where they can receive the necessary mental health services for stabilization and personal growth with the plan to eventually return to their home or be placed in a more permanent setting. The home is also available for children and youth who are in off-island placements and are ready to return to Guam to be placed in the home as a step-down, transitional placement prior to returning to their families. Currently, the Department of Mental Health & Substance Abuse is working on outsourcing the service management of the home to a credible off-island private organization. Until such time that the service management is outsourced the home remains under the administration of the Child-Adolescent Services Division. TGH is a 24-hour, 7 day a week operation.

Secondly, if the "enrolled" child-youth is under the psychiatric care of a private psychiatrist, the psychiatrist can elect to request placement at the Therapeutic Group Home. The staff is willing, trained, and ready to provide the therapeutic support for the child and family. It has always been the stance of CASD to provide a wholesome, therapeutic and supportive environment for the child and family and that it is the treating psychiatrist that determines the appropriate placement for the child-youth. } *

Rays of Hope (ROH) is a Therapeutic Day Treatment and Respite Care Home. The services of ROH are again for "enrolled" children and youth of Project I Famagu'on-ta. ROH Day Treatment consists of an Educational Instruction component operated by the Special Education Division of the Department of Education (DOE). This service is from 8am - 12pm, Monday - Friday, according to

the scheduled school calendar year. The second component of the Day Treatment is the afternoon therapeutic component consisting of group enrichment activities, therapy, behavior management and recreation. The Child-Adolescent Services Division (CASD) operates this part of Day Treatment. Respite Care is respite time anywhere from a few hours to three (3) days overnight stay. Accessing any of ROH and TGH services can be made through the child-youth Wrap Coordinator via the Departments referral form.

I hope this answers some of the questions frequently raised as well as clarifies any misinformation and misunderstanding. If I can be of further assistance, I can be reached at 647-5348.

Respectfully yours,


ANNIE F.B. UNPINGCO, LCSW

Cc: Judge Anita Sukola
Judge Pro Tem Linda Ingles
Dr. Kirk Bellis
✓ Attorney Daniel Somerfleck
Attorney Pat Wolff
Josita Camacho, Social Worker, CPS
Lavina Leon Guerrero, Wrap Coordinator, Project I Famagu'on-ta
CASD Correspondence Files
ROH Correspondence Files
TGH Correspondence Files

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OF GUAM

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2005 MAR 22 AM 11: 47

DMHSA
DIRECTOR'S
OFFICE

ALFREDO M. BOPILAS
CLERK OF COURT

IN THE SUPERIOR COURT OF GUAM

JUVENILE SPECIAL PROCEEDINGS
CASE NO. SP-00 48-05

1 GUAM LEGAL SERVICES CORPORATION
2 113 Bradley Place
3 Hagåtña, Guam 96910

4 *Counsel for Petitioner.*

5 In the Interest of

6 A CHILD WITH S.E.D.,

7 By Guam Legal Services
8 Corporation,

9 Petitioner,

10 vs.

11 J. PETER ROBERTO, in his official
12 capacity as Director of the Department of
13 Mental Health and Substance Abuse,

14 Respondent.

SUMMONS

15 TO: J. PETER ROBERTO, *Director*
16 DEPARTMENT OF MENTAL HEALTH
17 AND SUBSTANCE ABUSE ("DMHSA")
18 790 Gov. Carlos G. Camacho Road
19 Tamuning, Guam 96913

20 You are hereby summoned and required to serve upon:

21 DANIEL S. SOMERFLECK
22 Attorney for A Minor Child with S.E.D., whose address is:

23 GUAM LEGAL SERVICES CORPORATION

24 113 Bradley Place
25 Hagåtña, Guam 96910

26 an answer to the Petition for Writ of Mandate Or In The Alternative For Judicial Review which is
27 herewith served upon you, within twenty (20) days after service of this summons upon you,
28 exclusive of the date of the service. If you fail to do so, judgment by default will be taken against
you for the relief demanded in the Petition.

DATED: MAR 22 2005

Therese M. Blas

DEPUTY CLERK,
Superior Court of Guam

I hereby certify that this document is a true and correct copy of the original on file in the office of the clerk of the Superior Court of Guam Dated at Hagåtña, Guam

MAR 22 2005

Therese M. Blas

1 GUAM LEGAL SERVICES CORPORATION
113 Bradley Place
2 Hagåtña, Guam 96910
Telephone No.: (671) 477-9811
3 Facsimile No.: (671) 477-1320
4 Counsel for Child with S.E.D.

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OF GUAM
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2005 MAR 22 AM 11: 53
ALFREDO M. BORLAS
CLERK OF COURT
BY: _____

6 **IN THE SUPERIOR COURT OF GUAM**

7 In the Interest of

8 **A CHILD WITH S.E.D.,**

9 By Guam Legal Services
10 Corporation,

11 **Petitioner,**

12 vs.

13 **J. PETER ROBERTO, in his official**
14 **capacity as Director of the Department of**
Mental Health and Substance Abuse,

15 **Respondent.**

JUVENILE SPECIAL PROCEEDINGS
CASE NO.

SP 00 48-05

**DECLARATION OF
LOUISE M. TOVES**

16 I, LOUISE M. TOVES, hereby declare and state as follows:

17 1. I am employed as an investigator/advocate with Guam Legal Services Corporation
18 ("GLSC"). I am also a licensed Individual, Marriage, and Family Therapist on Guam. Part of my
19 duties include conducting intakes, investigations, and advocacy for persons with mental illness, to
20 include children with Serious Emotional Disturbance (S.E.D.).

21 2. I am not an interested party in this action.

22 3. On March 21, 2005, I met with the mother of a Child with S.E.D., "the Child," who
23 requested legal assistance in obtaining residential treatment services for the Child and advised me
24 of the following:

- 25 • the Child is currently admitted to the Department of Mental Health and
26 Substance Abuse (DMHSA) Children's Inpatient Unit;
- 27 • the Child is under the care and treatment of Dr. Kirk Bellis and Dr. Mary
28 Fergurgur;

- 4 • the Child is enrolled in the I Famaguonta program and Bharti is the assigned
5 worker; and
6 • On March 19, 2005, she was informed by Bharti that the Therapeutic Group
7 Home was not ready for admissions.

8 4. On March 21, 2005, I also spoke with Dr. Kirk Bellis, who advised me of the
9 following:

- 10 • He is the treating psychiatrist for the Child;
11 • the Child's behavior is currently unpredictable and the Child would benefit
12 from long term/residential treatment that involves the input of the Child's
13 treating professionals;
14 • the Child's placement at the C.I.U. is no longer therapeutic, requiring that the
15 Child transition to a residential treatment environment;
16 • the Child's needs can be met by the Therapeutic Group Home on Guam
17 (T.G.H.), with input from the Child's treating professionals; and
18 • He contacted both Dr. Luis Valdes at the Shiloh Treatment Facility and Ms.
19 Annie Unpingco, Administrator of the Child and Adolescent Services
20 Division of DMHSA, regarding the Child's need for placement but has not
21 received a definitive answer regarding admission to the T.G.H.

22 I hereby declare, under the penalty of perjury, that the foregoing statements are true and
23 correct to the best of my knowledge.

24 RESPECTFULLY SUBMITTED this 22nd day of March, 2005.

25
26 I certify that the foregoing
original on file in the office of the
clerk of the Superior Court of Guam
Dated at Hagatña, Guam

27
28 
LOUISE M. TOVES


Theresa M. Blas
Deputy Clerk, Superior Court of Guam

1 **GUAM LEGAL SERVICES CORPORATION**
2 113 Bradley Place
3 Hagåtña, Guam 96910
4 Telephone No.: (671) 477-9811
5 Facsimile No.: (671) 477-1320
6 *Counsel for A Child with S.E.D..*

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ALFREDO M. BORLAS
CLERK OF COURT
BY: _____

7 **IN THE SUPERIOR COURT OF GUAM.**

8 In the Interest of
9 **A CHILD WITH S.E.D.,**
10
11 By Guam Legal Services
12 Corporation,
13
14 **Petitioner,**
15
16 vs.
17
18 **J. PETER ROBERTO**, in his official
19 capacity as Director of the Department of
20 Mental Health and Substance Abuse,
21
22 **Respondent.**

JUVENILE SPECIAL PROCEEDINGS
CASE NO. **SP 00 48-05**

**ORDER DIRECTING ISSUANCE
OF ALTERNATIVE WRIT OF
MANDATE**

23 Good cause appearing from the verified petition on file in this action.

24 **IT IS SO ORDERED** that an Alternative Writ of Mandate be issued to the Director of the
25 Department of Mental Health and Substance Abuse, Government of Guam, Respondent in this
26 action commanding them immediately upon receipt of this Order to provide residential transitional
27 placement for the Child with S.E.D., in the least restrictive setting according to her needs and if
28 necessary expend funds to accomplish that end.

IN THE ALTERNATIVE to show cause why before this court on APR 12 2005
at 9:00 a m., Superior Court of Guam, Judicial Building, Hagatna, Guam, why it has not
done so.

ATTORNEY GENERAL'S OFFICE
2:30 P.
MAR 22 2005

4
5 **IT IS FURTHER ORDERED** that a copy of alternative writ and a copy of the petition
6 and this order be served upon Respondent before the hearing on the above order to show cause.
7

8 SO ORDERED: MAR 22 2005

9
10 **Original Signed By:**
11 **HON. ARTHUR R. BARCINAS**
12 Judge, Superior Court of Guam

13
14
15 COPIES OF THIS ORDER AND THE ALTERNATIVE WRIT
16 MUST BE FILED WITH THE CLERK OF THE
17 CLERK OF THE SUPERIOR COURT OF GUAM
18 DATED AT HAGATNA, GUAM

19
20
21
22
23
24
25
26
27
28
MAR 22 2005
Theresa M. Blas
Deputy Clerk, Superior Court of Guam

1 GUAM LEGAL SERVICES CORPORATION
113 Bradley Place
2 Hagåtña, Guam 96910
Telephone No.: (671) 477-9811
3 Facsimile No.: (671) 477-1320

4 *Counsel for Petitioners.*

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OF GUAM

2005 FEB 21 10:41 AM

ALFREDO M. FORTES
CLERK OF COURT

5
6 **IN THE SUPERIOR COURT OF GUAM**

7
8 **IN THE INTEREST OF**

9
10
11 **A.M.O.,**
12 **(DOB: 08/13/88)**

13 **Minor.**

JUVENILE PROCEEDINGS CASE
NO. JSP0191-02

14
15
16
17 **STIPULATION AND ORDER**

18
19 **THE MINOR, A.M.O. is intended to return to Guam on or about February 21, 2005. In**
20 **order that an appropriate or suitable transitional residential care facility is available prior to her return**
21 **to Guam the parties enter into the following stipulation and order:**

22
23 1. That in order to fund and to facilitate such relocation of the said minor, transitional
24 care and treatment on Guam of the minor, and of others similarly situated, management of a suitable
25 residential care facility for such purpose, and training of suitable staff, such sums as are necessary
26 not to exceed \$200,000.00 be ordered expended from the Residential Treatment Fund to the extent
27 available or, to the extent such sum is not so available, from the General Fund pursuant to 19 G.C.A.
28 §5116.

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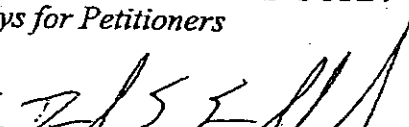
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OFFICE

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3
4 SO STIPULATED:

5 GUAM LEGAL SERVICES CORP.
6 Attorneys for Petitioners

7 By: 
8 DANIEL S. SOMERFLECK
9 Director

OFFICE OF THE ATTORNEY GENERAL

By: 
PHILIP D. ISAAC
Assistant Attorney General

10 Dated: _____

Dated: 2-16-05

11
12 TEKER, TORRES & TEKER, P.C.
Guardian Ad Litem for Minor

13 By: 
14 SAMUEL S. TEKER, Esq.

OFFICE OF THE ATTORNEY GENERAL
Juvenile Division

By: 
ALAN P. HAEUSER
Assistant Attorney General


15
16 Dated: 2-16-05

Dated: 2-15-05

17 DEPARTMENT OF EDUCATION
18 Legal Counsel

19
20 By: 
FRED NISHIHIRA

21
22 Dated: 2-18-05



Peter D. Kasan
Deputy Clerk, Superior Court of Guam

MAR 07 2005

I do hereby certify that the foregoing
is a full true and correct copy of the
original on file in the office of the
Clerk of the Superior Court of Guam

* * * * *

23
24 SO ORDERED: Feb 21, 2005.

25
26
27 
HONORABLE KATHERINE A. MARAMAN
28 Judge, Superior Court of Guam

1 GUAM LEGAL SERVICES CORPORATION
113 Bradley Place
2 Hagåtña, Guam 96910
Telephone No.: (671) 477-9811

3 *Counsel for Minor.*

4 **IN THE SUPERIOR COURT OF GUAM**

5 IN THE INTEREST OF

6
7
8 **A.M.O.,**
(DOB: 08/13/88)

9 Minor.

JUVENILE SPECIAL PROCEEDINGS
CASE NO. JSP0191-02

7
8 **MOTION FOR
DECLARATORY JUDGMENT**

10
11 **A.M.O., by and through her parents, ("Petitioner"), by their counsel Guam Legal Services**
12 **Corporation, for her Motion For Declaratory Judgment, states and alleges as follows:**

13 Pursuant to Rule 57 of the Guam Rules of Civil Procedure, the Petitioner prays for a
14 declaratory judgment on the specific issue of whether the Department of Mental Health and
15 Substance Abuse ("DMHSA") has an affirmative duty to provide a transitional home for the
16 Petitioner pursuant to 10 G.C.A. 86105 A.(1)(b) and 19 G.C.A. § 5126.

17 **WHEREFORE** Petitioner prays for an order as follows:

- 18 1. Declaring that DMHSA has an affirmative obligation to provide a transitional home;
19 2. Granting Petitioner all other and further relief to which Petitioner may be entitled.

20 **RESPECTFULLY SUBMITTED** this 9th day of July, 2004.

21 **GUAM LEGAL SERVICES CORPORATION**
Attorneys for Petitioner

22
23
24 By:


25 **KEVIN C. MURRY**
Staff Attorney

GUAM LEGAL SERVICES CORPORATION

1 113 Bradley Place
2 Hågåtña, Guam 96910
Telephone No.: (671) 477-9811

3 *Counsel for Petitioner.*

IN THE SUPERIOR COURT OF GUAM

4
5 IN THE INTEREST OF

JUVENILE SPECIAL PROCEEDINGS
CASE NO. _____

6
7 **A.M.O.,**
8 (DOB: 08/13/88)

**PETITION TO
SHORTEN TIME FOR
ANSWERING OF
THE COMPLAINT**

9 Minor.

10
11 **PETITIONER** by and through her attorneys, Guam Legal Services Corporation, for her
12 Petition to Shorten Time for Answering of the Complaint, and hereby states and alleges as follows:

13 1. The allegations contained in the Motion for Declaratory Judgment and Motion for
14 Partial Interlocutory Summary Judgment or in the Alternative for Judicial Review ("Petition") are
15 hereby incorporated herein.

16 2. Petitioner will be irreparably harmed if she is not granted the relief requested in the
17 petition.

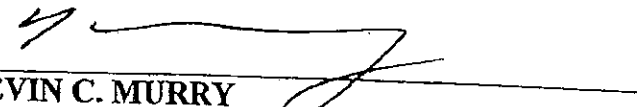
18 3. The Department of Mental Health and Substance Abuse will not be prejudiced by
19 shortening the statutory time to respond to the motions to seven (7) days exclusive of weekends.

20 **WHEREFORE** Petitioner prays for an order shortening the time allowed to respond to the
21 motions to seven (7) days exclusive of weekends, and setting a hearing on the motions immediately
22 thereafter.

23 **RESPECTFULLY SUBMITTED** this 9th day of July, 2004.

24
25 **GUAM LEGAL SERVICES CORPORATION**
Attorneys for Petitioner

26
27 By:

28 
KEVIN C. MURRY
Staff Attorney

1 **GUAM LEGAL SERVICES CORPORATION**
113 Bradley Place
2 Hagåtña, Guam 96910
Telephone No.: (671) 477-9811

3 *Counsel for Minor.*

4 **IN THE SUPERIOR COURT OF GUAM**

5 IN THE INTEREST OF

6
7
8 **A.M.O.,**
(DOB: 08/13/88)

9 **Minor.**

JUVENILE SPECIAL PROCEEDINGS
CASE NO: JSP0191-02

**MOTION FOR PARTIAL
INTERLOCUTORY
SUMMARY JUDGMENT**

10
11 **A.M.O., by and through her parents, ("Petitioner"), by their counsel Guam Legal Services**
12 **Corporation, for her Motion For Interlocutory Partial Summary Judgment, states and alleges as**
13 **follows:**

14 Pursuant to Rules 56 and 57 of the Guam Rules of Civil Procedure, the petitioner prays for
15 an order granting her partial summary judgment and declaratory judgment on the specific issue of
16 whether the Department of Mental Health and Substance Abuse ("DMHSA") has an affirmative
17 duty to provide a transitional home for the petitioner pursuant to 10 G.C.A. 86105 A.(1)(b), and 19
18 G.C.A. § 5126.

19 **WHEREFORE,** Petitioner prays for an order as follows:

- 20 1. Declaring that DMHSA has an affirmative obligation to provide a transitional home;
- 21 2. Granting Petitioner's Motion for an Interlocutory Partial Summary Judgment
22 declaring that DMHSA has an obligation to provide a transitional home for the
23 petitioner;
- 24 3. Declaring that DMHSA has known of the need for the transition home for the
25 petitioner for more than a year, and has failed to provide the facility;
- 26 4. Ordering DMHSA to immediately open and properly staff a transition home that
27 meets the needs of the petitioner, and to transition the petitioner into the facility by
28 Sept. 1, 2004.

1 **GUAM LEGAL SERVICES CORPORATION**
2 113 Bradley Place
3 Hagåtña, Guam 96910
4 Telephone No.: (671) 477-9811

5 *Counsel for Minor.*

6 **IN THE SUPERIOR COURT OF GUAM**

7 **IN THE INTEREST OF**

8 **A.M.O.,**
9 **(DOB: 08/13/88)**

10 **Minor.**

11 **JUVENILE SPECIAL PROCEEDINGS**
12 **CASE NO. JSP0191-02**

13 **MEMORANDUM OF LAW**
14 **IN SUPPORT OF**
15 **MOTION FOR PARTIAL**
16 **INTERLOCUTORY SUMMARY**
17 **JUDGMENT**

18 **A.M.O., by and through her parents, ("Petitioner"), by their counsel Guam Legal Services Corporation (GLSC), for her Memorandum in Support of Motion For Interlocutory Partial Summary Judgment, states and alleges as follows:**

19 Pursuant to Rule 56 of the Guam Rules of Civil Procedure, the petitioner asserts that, as to the issue of whether the Department of Mental Health and Substance Abuse ("DMHSA") has an affirmative duty to provide aftercare services for A.M.O., including the provision of a transitional home, there are no genuine issues of fact and the Petitioner is entitled to judgment as a matter of law.

20 This matter is before the court on the ultimate issue of what services will be provided to A.M.O. to allow for her successful return to Guam.

21 This matter comes before the court pursuant to 19-G.C.A. § 5103 of the Family Court Act of Guam. Pursuant to 19 G.C.A. § 5126 of the Act, the Department of Mental Health and Substance Abuse, as a department or agency of the Government of Guam, has the duty to render all assistance and cooperation within its jurisdictional power which may further the objects of the Family Court Act. It is clearly within DMHSA's jurisdictional power to provide the services needed by the Petitioner, and it is an affirmative duty of DMHSA, pursuant to 10 G.C.A. § 86105 to provide the

26 with a "transitional home."

...ent team meetings with th



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CLERK OF COURT

BY: _____

Office of the Attorney General

Douglas B. Moylan

Attorney General of Guam

Solicitors Division

Guam Judicial Center, Suite 2-200E

120 West O'Brien Drive

Hagåtña, Guam 96910 • USA

(671) 475-3324 • (671) 472-2493 (Fax)

www.guamattorneygeneral.com • law@mail.justice.gov.gu

Attorneys for the Government of Guam

**IN THE SUPERIOR COURT OF GUAM
HAGÁTÑA, GUAM**

In the Interest of

A.M.O. (DOB: 08/13/88),

Petitioner,

vs.

J. PETER ROBERTO, in his official capacity
as Director of the Department of Mental
Health and Substance Abuse,

Respondent.

Special Proceedings Case No.
SP0120-03

CERTIFICATION OF FUNDS

Such sums as are necessary shall be ordered expended for the Department of Mental Health and Substance Abuse Request for Proposal No. 2004-10, Care-worker and Operational Services for Therapeutic Group Home Child/Adolescent Residential Program. Funds shall be

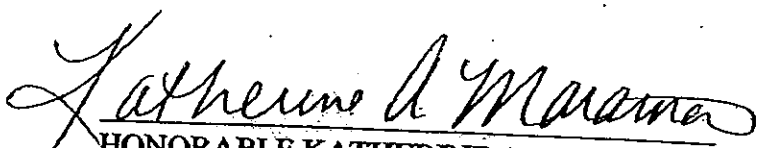
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1 ordered expended from the Residential Treatment Fund and additional funds, if needed, from
2 the General Fund pursuant to 19 GCA §5116. Such amount is expected to be paid for three
3 consumers currently receiving off-island services paid through the Residential Treatment Fund
4 in the approximate amount of \$100,000 per child, and for other consumers not in their parents'
5 custody.

6 Dated: May 27, 2004

7
8 
9 HONORABLE KATHERINE A. MARAMAN
10 Judge, Superior Court of Guam

11 Wbischoff\m.o.\cert of funds\bsna

12
13
14
15 I do hereby certify that the foregoing
16 is a full true and correct copy of the
17 original on file in the office of the
18 clerk of the Superior Court of Guam

19 MAY 28 2004

20 
21 Lorraine A. Cabrera
22 Deputy Clerk, Superior Court of Guam
23
24
25

CHAPTER 86

Department of Mental Health and Substance Abuse

§86101. Policy.

§86102. Definitions.

§86103. Creation of Department.

§86104. Effective Date of Transfer.

§86105. Powers and Duties.

§86106. Auxiliary Fund.

§86107. Council on Mental Health and Substance Abuse.

§86108. Duties of Council.

§86109. Legislative Review Process.

§86110. Expiration of Act.

§86101. Policy. It is hereby declared to be the public policy of the territory of Guam, to provide comprehensive inpatient and community-based outpatient mental health, alcohol and drug programs and services for the people of Guam, and to continually strive to improve, enhance, and promote the physical and mental well-being of the people of Guam who experience the life-disrupting effects of mental illness, alcoholism and drug abuse or are at risk to suffer those effects and who need such assistance and; to provide such assistance in an efficient and effective manner in order to minimize community disruption and strengthen the quality of personal, family and community life.

It shall be the public policy of the government of Guam to encourage the development of privately-funded community based programs for mental health, drug and alcohol abuse, in particular those programs that employ qualified local residents. As those services become developed and/or available in the Territory, the government of Guam may gradually phase out of such operations.

SOURCE: 10 GCA §85101; Added by P.L. 17-21.

§86102. Definitions. For purposes of this Chapter, the following definitions shall apply unless otherwise specifically provided.

- (a) **DEPARTMENT.** *Department* means the Department of Mental Health and Substance Abuse.
- (b) **DIRECTOR.** *Director* means the administrative head of the Department.
- (c) **COUNCIL.** *Council* means the Council on Mental Health and Substance Abuse.

Substance Abuse Agency shall be transferred to the Department of Mental Health and Substance Abuse.

(b) Upon the transfer of functions, all independent contractors and contract employees of the Mental Health and Substance Abuse Agency and the Community Health Center shall have the option of completing any existing contracts upon which they may be retained. No person who accepts a transfer to the Department shall, during the remainder of the term of his existing contract, which term shall in no event be extended:

- (1) be removed from his employment except for cause; or
- (2) have his salary or any of his benefits of government employment, if any, reduced except as such salary and benefits that may be reduced uniformly for all government employees.

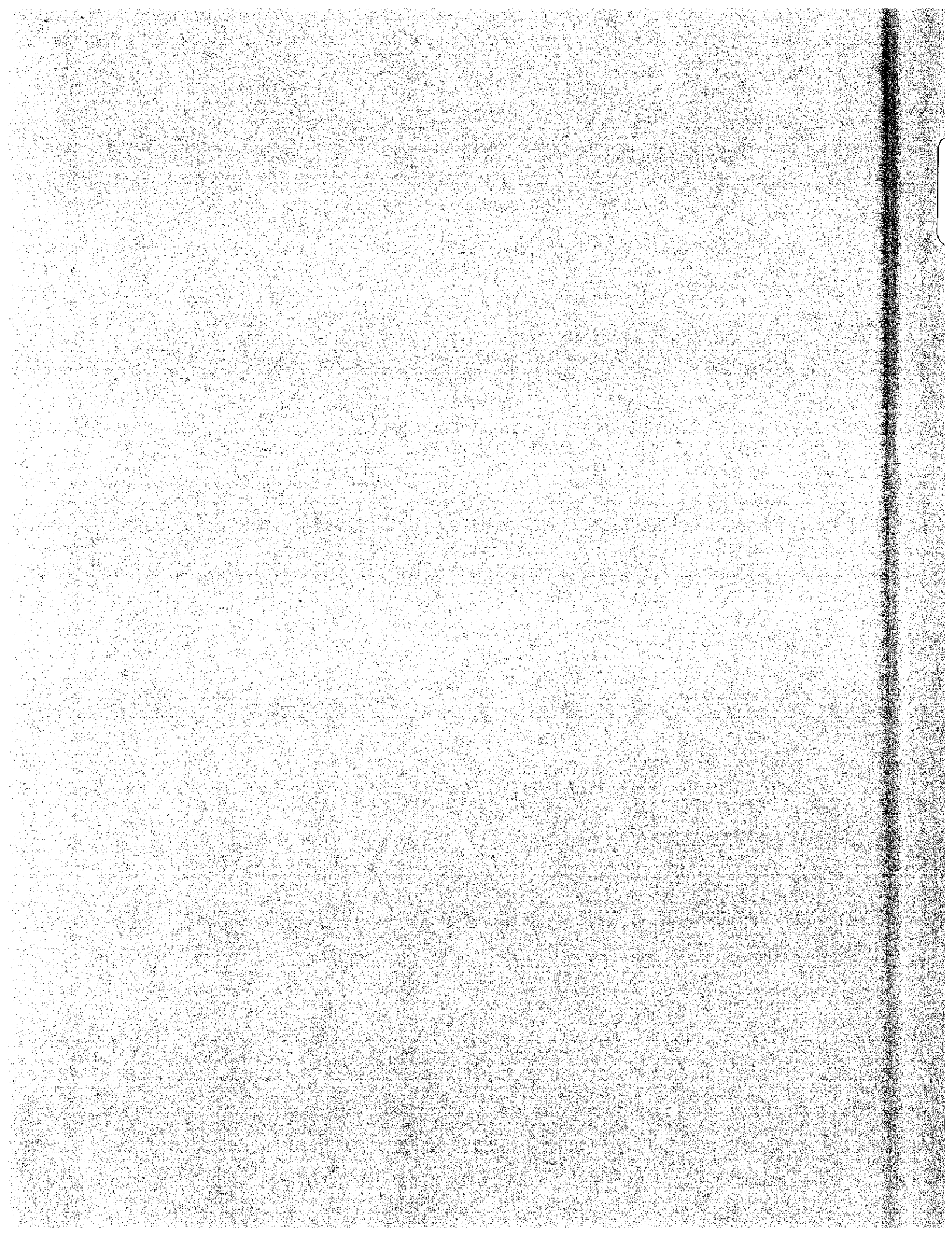
(c) Upon the transfer of functions, all classified employees of the Mental Health and Substance Abuse Agency and all classified employees except the nurses of the inpatient unit of the Community Mental Health Center of the Guam Memorial Hospital Authority shall be transferred to the Department in the same grade and step as they held at the time of transfer. They shall continue to be members of the classified service. The nurses of the inpatient unit of the Community Mental Health Center shall remain classified employees of the Guam Memorial Hospital Authority at the same grade and step.

SOURCE: 10 GCA §85104; Added by P.L. 17-21.

§86105. Powers and Duties. A. (1) The Department, adhering to Federal regulations, local physical needs, feasibility and appropriateness, shall provide mental health, alcohol and drug abuse treatment services. The Department shall establish and adopt regulations concerning fees it may charge for such services, which may be based on ability-to-pay standards as established by the Guam Memorial Hospital Authority's 'Limit of Liability' Program.

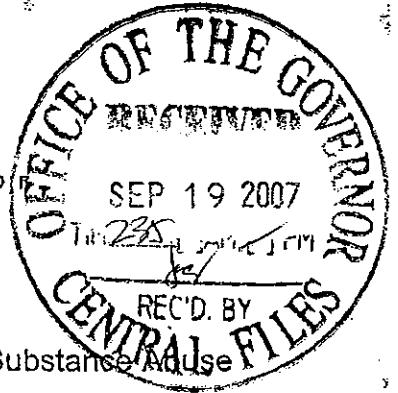
Such services shall include:

- (a) 24-hour crisis intervention services to include as needed a mobile crisis team and a hot-line;
 - (b) partial hospitalization and aftercare services to include transitional homes for the mentally ill;
 - (c) outpatient services to include as needed team services for children, the elderly and adults;
 - (d) individual, group, and family counseling services;
 - (e) inpatient services to include but not be limited to acute psychiatric and alcohol and drug detoxification services. The department may contract in writing for the provision of inpatient services with any qualified providers. The department shall be responsible for insuring that the medical care standards and quality controls for inpatient services provided above are met.
- (2) The Department shall provide mental health, alcohol and drug abuse prevention programs and services. Such programs and services shall include:
- (a) affecting policy to change conditions to minimize the availability of drugs and other





OFFICE OF THE PUBLIC AUDITOR



cc: Gov,
Lt. Gov
CAS
Legre

RE: Little

September 19, 2007

To: Andrea Lighthouser
Acting Director, Department of Mental Health & Substance Abuse

From: Doris Flores Brooks, C.P.A., C.G.F.M.
Public Auditor

Re: Hotline Comments Alleging RFP Favoritism

I attempted to contact you via phone to discuss this matter but did not receive a return call.

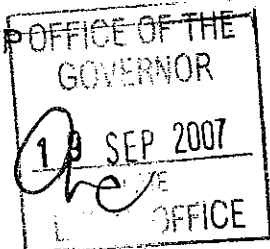
This is to inform you and your staff of several Hotline tips our office has received alleging impropriety in the RFP for contractual services for residential home treatment. Among the allegations are:

- o The arbitrary cancellation of one or more RFPs;
- o A vendor did not meet all the qualifications such as licensure and may have been allowed to bid; and
- o Certain DMHSA staff traveled to the stateside facility of one of the vendors with the travel paid by the vendor

In an interview on KUAM September 12, I noted that the government of Guam does have the right to cancel an RFP, but that the government should not be arbitrary or capricious in its cancellation of an RFP. The government should document the rationale for the cancellation of an RFP so that a reasonable person would conclude the cancellation was for good cause.

Another comment I made was in reference to 4 G.C.A. §15201, which relates to gifts to government employees. A copy of the statute is attached. If, as alleged by the KUAM news staff, DMHSA staff traveled to the facility of a vendor at the vendor's expense or as guests of the vendor, that may be a violation of § 15201. Vendor-sponsored travel also may unduly bias staff in favor of the prospective vendor.

With respect to licensure, the RFP would determine the requirement. In OPA PA 07-002, we ruled that an off-island firm should not have been awarded a contract because the firm did not have a Guam business license upon submission of the RFP, as was required by the RFP. Please note that an RFP may be drafted in such a way that a prospective vendor from off-island may submit a proposal or bid and obtain a required license prior to the award; a license does not necessarily have to be procured prior to the submission of the bid if the RFP



CP1.0907.4570

does not include such a provision. See 5 G.C.A. § 5008, a copy of which is attached.

A common audit finding is poor procurement history and lack of documentation in procurement, from specifications tailored to a particular vendor to favoritism in the selection of a particular vendor. Too many times the government of Guam is accused of not having a level playing field in procurement.

This memo is sent in the hope that you will do your utmost to ensure a fair, objective and impartial selection of the vendor. I would also urge that you seek the advice of the Attorney General in the review of your RFP and document thoroughly the process and selection of the vendor with the assistance of legal counsel.

If the selection of the vendor is not done in a fair and unbiased manner, the losing bidder may protest and appeal the selection to this office.

cc: Governor of Guam
Attorney General of Guam

Attachments: 4 G.C.A. § 15201 and 5 G.C.A. § 5008

4 GCA PUBLIC OFFICERS & EMPLOYEES
CH. 15 STANDARD OF CONDUCT

ARTICLE 2
SPECIFIED STANDARDS

- § 15201. Gifts.
- § 15202. Reporting of Gifts.
- § 15203. Confidential Information.
- § 15204. Fair Treatment.
- § 15205. Conflicts of Interest.
- § 15206. Contracts.
- § 15207. Contracts Voidable.
- § 15208. Requirements of Disclosure.
- § 15209. Disclosure Files; Disposition.
- § 15210. Restrictions on Post Employment.
- § 15211. Violation.

§ 15201. Gifts.

No employee shall solicit, accept, or receive, directly or indirectly, any gift valued singly or in the aggregate from a single source in excess of \$200, whether in the form of money, prize, service, loan, travel, entertainment, hospitality, thing or promise, or in any other form, when a reasonable person would infer that the gift is intended to influence the employee in the performance of that individual's official duties or is intended as a reward for any official action on that individual's part.

§ 15202. Reporting of Gifts.

(a) Every employee shall file a gifts disclosure statement with the Guam Ethics Commission on June 30 of each year if all the following conditions are met:

- (1) The employee, or spouse or dependent child of an employee, received directly or indirectly from any source any gift or gifts valued singly or in the aggregate from a single source in excess of \$200, whether the gift is in the form of money, services, goods, or in any other form;
- (2) The source of the gift or gifts have interests that may be affected by the official action or lack of action by the employee; and
- (3) The gift is not exempted by subsection (d) from reporting requirements under this section.

**5 GCA GOVERNMENT OPERATIONS
CH. 5 GUAM PROCUREMENT LAW**

§ 5007. Policy Against Advance Payments.

With the exception of off-island orders of the Guam Public School System, no procurement shall be made under this Chapter which shall require advance payment.

SOURCE: GC § 6950.6. New Section. Amended by P.L. 17-45:5.

NOTE: This Section added by the Committee on General Governmental Operations. The Committee has observed the waste of money, loss of interest, and difficulty in recovery should something happen to the order when advance payments are made. Thus, there is a general prohibition on such advance payments.

COMMENT: Reference to Department of Education changed to Guam Public School System pursuant to P.L. 28-045:10 (June 6, 2005).

§ 5008. Policy In Favor of Local Procurement.

All procurement of supplies and services shall be made from among businesses licensed to do business on Guam and that maintain an office or other facility on Guam, whenever a business that is willing to be a contractor is:

(a) a licensed bonafide manufacturing business that adds at least twenty-five percent of the value of an item, not to include administrative overhead, using workers who are U. S. Citizens or lawfully admitted permanent residents or nationals of the United States, or persons who are lawfully admitted to the United State to work, based on their former citizenship in the Trust Territory of the Pacific Islands; or

(b) a business that regularly carries an inventory for regular immediate sale of at least fifty percent (50%) of the items of supplies to be procured; or

(c) a business that has a bonafide retail or wholesale business location that regularly carries an inventory on Guam of a value of at least one half of the value of the bid or One Hundred Fifty Thousand Dollars (\$150,000) which ever is less, of supplies and items of a similar nature to those being sought; or

(d) A service business actually in business, doing a substantial portion of its business on Guam, and hiring at least 95% U. S. Citizens, lawfully admitted permanent residents or nationals of the United States, or persons who are lawfully admitted to the United

**5 GCA GOVERNMENT OPERATIONS
CH. 5 GUAM PROCUREMENT LAW**

States to work, based on their citizenship in any of the nations previously comprising the Trust Territory of the Pacific Islands.

Procurement of supplies and services from off Guam may be made if no business for such supplies or services may be found on Guam or if the total cost F.O.B. job site, unloaded, of procurement from off island is no greater than eighty-five percent (85%) of the total cost F.O.B. job site, unloaded, of the same supplies or services when procured from a business licensed to do business on Guam that maintains an office or other facility on Guam and that is one of the above-designated businesses entitled to preference.

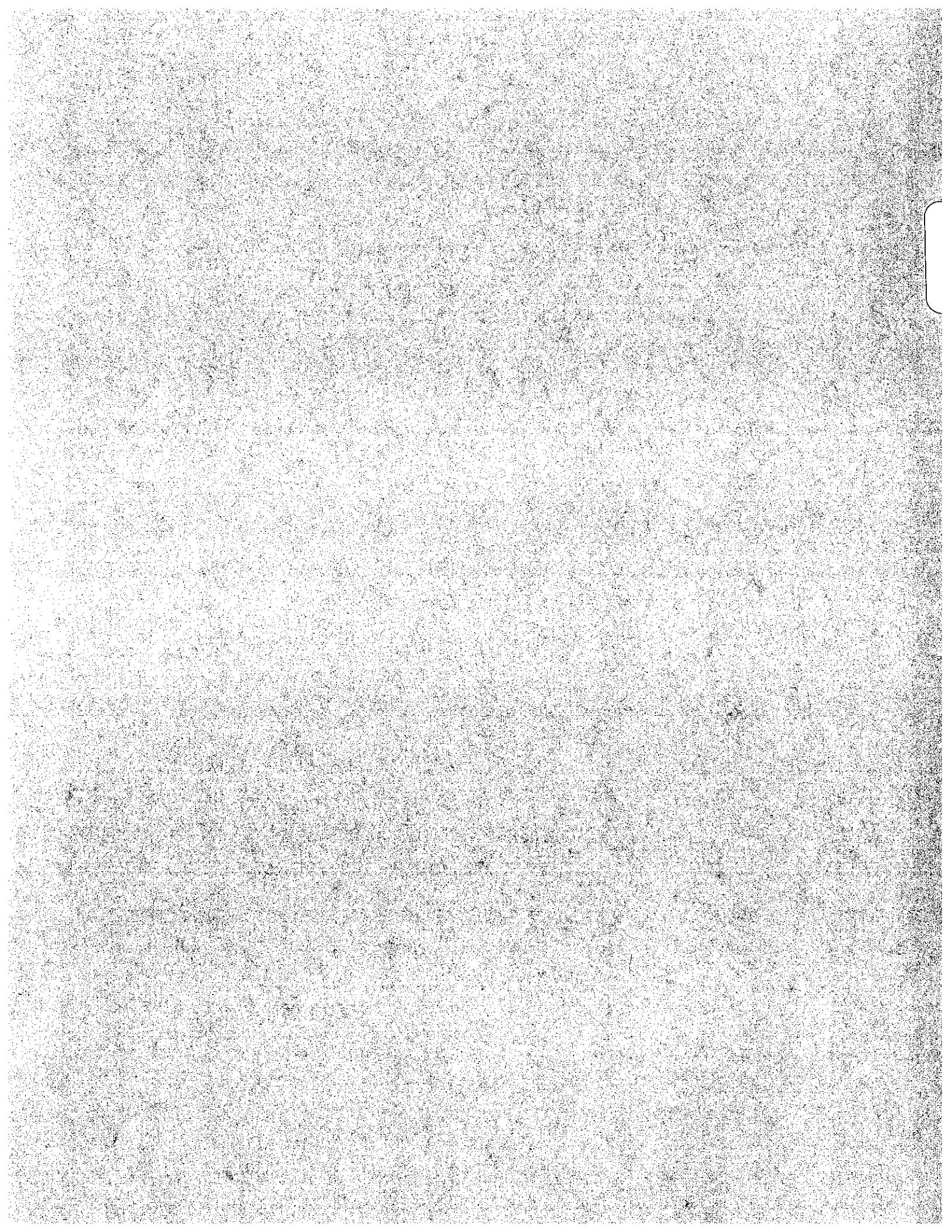
SOURCE: GC § 6950.7 added by P.L. 16-124 and repealed/reenacted by P.L. 19-4:12.

COMMENT: Originally added by Committee on General Government Operations. Follows a similar provision in Executive Order 65-12A, the former Procurement Regulations for the government of Guam. The aim is to encourage local businesses to the maximum extent possible. However, some needs of the government must be procured from off-island, especially services, and often such businesses do not have a system of agencies. Also, while local businesses are to be encouraged, they are not to be encouraged at a too-great expense to the general treasury. A safeguard is added to ensure that the comparison is equalized - so that what is compared is the total, delivered cost, not just the relative catalog costs between the on and off-island vendors. The formula "f.o.b. jobsite, unloaded" is taken from Hawaii law (HRS §103-43).

§ 5008.1. Policy in Favor of Native or Grown-in-Guam Horticultural Products.

(a) Notwithstanding any other provision of law, in any procurement of horticultural products utilizing public funds, no less than seventy-five percent (75%) of the products to be procured shall be native to Guam or grown-in-Guam, *except* for horticultural products that are on the endangered specie list, *unless* they are domestically cultivated and shall be made from among businesses authorized to transact business in Guam. '*Horticultural products,*' as used in this Section, includes:

- (1) plants;
- (2) trees;
- (3) flowers;
- (4) shrubs;
- (5) grass; *and*



Latte Treatment Center, LLC
308 Fr. Duenas Drive Tamuning, Guam 96913
Phone 671-475-5390 Fax 671-475-5392

Andrea Leitheiser, PhD
Acting Director
790 Gov Carlos C. Camacho Rd
Tamuning, Guam 96913

Re: TGH RFP

Date: 12/21/07

Dear Dr. Leitheiser:

I am turning over all matters and correspondence related to this protest to Dr. Luis Valdes, President of Latte Treatment Center. Please complete all correspondence to him as my representative from this point forward.

Pursuant to Chapter 5 of the Guam Procurement Law and Chapter 3 Source Selection and Contract Formation I am officially protesting the procurement process for RFP/DMHSASA 014-08.

Latte Treatment Center is asking for a thorough investigation of the procurement process by an entity other than DMHSA. Latte has experienced numerous irregularities and many more have been reported.

1. I am asking for copies of all documentation and data related to this RFP process pursuant to all applicable Guam laws, rules and regulations to be forwarded to the above address as soon as possible. This request includes documentation and data from all previous RFPs that have been part of this process.
2. Pursuant to the rules of protest there is much to be reviewed that cannot be reasonably ascertained within the 14 day limit on the initiation of this protest. Therefore, Latte reserves the right to submit further evidence and information as it comes available within 30 days from receipt of the above requested information.
3. Latte is requesting why the original multi-year contract (i.e. through 2009) was not renewed if funding was available for a new contract and contract negotiations were initiated on the Amendment to the contract.
4. Latte is requesting an explanation why the department is seeking to change vendors when there have been no citations for below standard performance of Latte.
5. Latte is requesting specific details as to why Latte was declined in each of the first 4 RFPs, as no explanation was provided by DMHSA, as required by Guam Procurement Law

Latte Treatment Center
RFP Protest

6. Latte is requesting why multiple RFPs were issued until Zackheim finally won.
7. Latte is requesting why an RFP was re-issued, when Zackheim responded to the wrong RFP.
8. Latte is requesting an explanation of Zackheim's admission of paying for a trip of DMHSA staff.
9. Latte is requesting confirmation that the concerned DMHSA staff, who took a paid trip to Zackheim's facility, did *not* participate in any review panel for the responses to the RFPs.
10. Latte is requesting to know why RFP language was modified to specifically address the sexual assault/misconduct allegations of the other bidder.
11. Latte is requesting to know why RFP language was altered to increasingly exclude Latte, particularly on the basis of erroneous information regarding Dr. Valdes' license and service provision status.
12. Latte is requesting whether it is lawful practice to modify information in a subsequent RFP with information gained from previous RFPs, which would create an advantage of one bidder over the other, as was done in this case.
13. Latte is requesting to know why it repeatedly stated that there was no money to pay Latte, then continued to use the Latte services and then suddenly did have money to pay Latte when there was a court order to do so.

Further basis of the protest is:

1. DMHSA failed to respond to repeated requests for information throughout this procurement process as required by procurement law.
2. DMHSA acted on and promulgated misinformation about Dr. Valdes without attempting to contact him. Information that Dr. Valdes received from the DMHSA Acting Director was knowingly erroneous. Dr. Valdes alerted DMHSA to the error but the inquisition was not stopped.
3. DMHSA repeatedly disqualified Latte Treatment Center without giving reason as required by procurement law.
4. DMHSA caused a restriction of trade for Latte by knowingly refusing to process invoices and making limited efforts to secure payment to Latte with full knowledge of the financial crisis it was creating for Latte.
5. DMHSA's nonpayment caused a restriction of trade by knowingly crippling Latte's ability to give a full response to repeated RFPs.

Latte Treatment Center
RFP Protest

6. DMHSA knowingly and neglectfully did not complete the amendment to its contract with Latte with no indication as to why, yet, continuing to use the service, demanding full compliance with the contract and not paying for the service.
7. DMHSA created and promulgated the misinformation that Latte and DMHSA did not have a contractual agreement. This misinformation led to the issuance of the original RFP and its following revisions four months prior to the end of the contract year and with no indication as to why it was not exercising the renewal option on the contract. Yet, DMHSA continued to make referrals to Latte, demanded compliance with the terms of the contract and did not pay for the service.
8. DMHSA illegally courted the off island provider with the purpose of eliminating Latte Treatment Center. No complaint has ever been filed against Latte's provision of service. To the contrary, all related agencies can attest to Latte's quality of care (e.g., GPSS, CPS, Superior Court of Guam, DYA, Project I'Famaguota and the Governor in his re-election campaign).
9. DMHSA had determined the outcome of the RFP prior to its issuance. A Latte recruit went to work for DMHSA after being told by a DMHSA administrator that Latte would no longer be around. This occurred prior to the issuance of the most recent RFP.
10. Zackheim was given unfair advantages which violates procurement law:
 - Zackheim indicated in an interview that he was working on his RFP. The timeframe he referenced was prior to the RFP being available.
 - Zackheim paid for the airline ticket for a key DMHSA employee to visit his program.
 - At one point both Latte and Zackheim were disqualified but no reasons were given as to why. It is believed that Latte was erroneously disqualified.
 - DMHSA personnel began announcing Zackheim's name during one of its failed attempts to shut Latte down.
 - The sequence of RFPs developed in such a way to increasingly exclude Latte and include Zackheim. Restrictions were added that were tailored to exclude Dr. Valdes.
 - Zackheim responded to the wrong RFP and Latte should have been awarded it at that time, instead DMHSA cancelled the RFP and continued the process until this last RFP was finally won by Zackheim.
 - The review committee ignored or was ignorant to Zackheim's lack of personnel in place for all items in the RFP.

Latte Treatment Center
RFP Protest

Specific to Guam Law:

Possible Violations in Chapter 3 Source Selection and Contract Formation

1. Item (3)(D) on page 14 of Chapter 3 on Bid Samples and Descriptive Literature

-Zackheim may have included additional literature that the committee should not have considered during the selection process; this would have to be verified upon review of Zackheim's proposal.

2. Item (3) on page 16 of Chapter 3 on Public Availability

-On two different RFPs, notice was available in the local newspaper but not available for inspection. When a Latte representative went to DMHSA to pick up a copy, once we were told that they were not available and to come back that afternoon and once we were given an unsigned copy and had to return the next day to get another one.

3. Item g. on page 16 of Chapter 3 on Bidder's List

-Zackheim was notified by DMHSA when the RFPs were available; Latte was not. DMHSA was well aware of Latte's intentions to respond to the RFPs.

4. Item (4) on page 17 of Chapter 3 on Pre-bid Conferences

-Latte did not receive invitations to pre-bid conferences nor did it receive summaries of information shared at pre-bid conferences.

5. Item (2) page 19 of Chapter 3 on Opening and Recording

-DMHSA did not make available for inspection the RFP recordings.

6. Item (2) on Page 48 of Chapter 3 on No Disclosure of Information.

-DMHSA disclosed information to Zackheim to improve his bid on subsequent RFPs. In particular when he responded to the wrong RFP and when he was disqualified.

7. Item 3129 through 3131 on page 99 of Chapter 3 on Maintenance of records of the bidding process

-This has not been made available for any of the 5 RFPs in this procurement process.

Possible Violations of Chapter 5 Guam Procurement Law

1. Item 5008 Policy in Favor of Local Procurement

Latte Treatment Center
RFP Protest

-Latte Treatment Center is a locally incorporated entity with local employees a few off island consultants and one off island director. DMHSA originally requested that Latte building the local capacity by hiring and training local citizens. This was not considered in the bidding process. Zackheim has no local employees, no local corporation and no local cultural experience.

-The original contract allowed for renewal. The RFP process was not necessary.

2. Item 5225 page 37 of Chapter 5 on Cancellation of Bids and RFPs

-No reasons for cancellation were provided on any of the RFPs in this process regardless of repeated requests for such information.

3. Item 5485 page 70-71 of Chapter 5 on Complaints that Procurement Data was Withheld

-Latte made repeated requests for information on the RFPs but received none.

4. Item 5630 (d) on page 77-78 of Chapter 5 on Favors to the Territory

-Zackheim paid for one or more plane tickets for key personnel of DMHSA to visit his program.

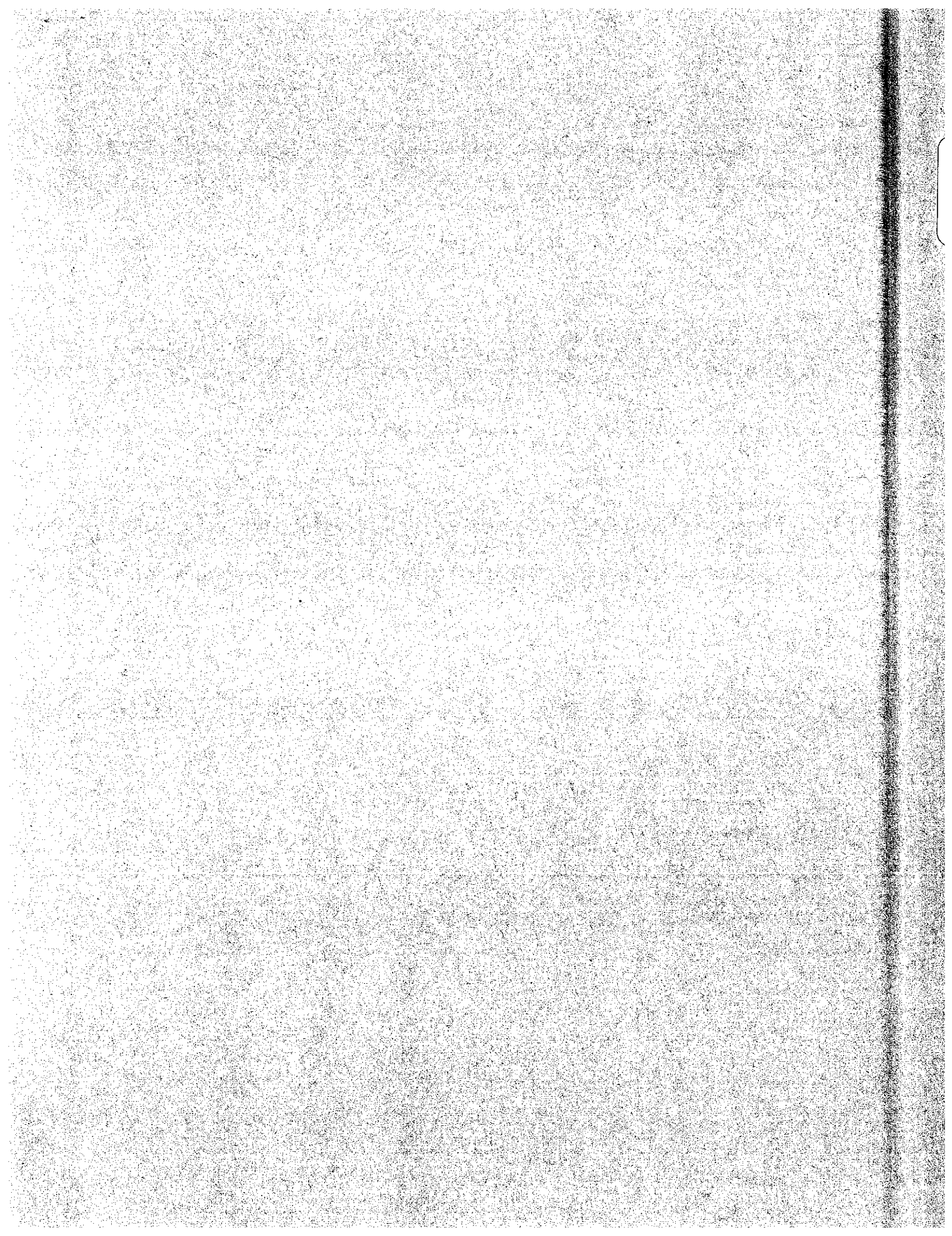
Based on the foregoing and any other irregularities to be submitted at a later date, Latte is asking for full remedy of all 5 RFPs pursuant to Guam Procurement Law. In accordance with Guam's Procurement Regulations, I trust that a copy of this protest will be provided to the Attorney General within three days from receipt of this letter.

I await your response in writing.

Regrettably,

Carlos Perez
Offerror
Latte Treatment Center, LLC

Luis Valdes, PhD
President
Latte Treatment Center, LLC



Dec 28, 2007

Senator Frank T. Ishizaki
29th Guam Legislature
155 Hessler Street
Hagatna, Guam 96910

Subject: Statement of Performance

Buenas Senator Ishizaki,

As requested DMHSA will make the following statements regarding the care provided at the Children's Residential Treatment Facility which is currently awarded to the vendor Latte Inc. The parent's responses to Latte have been favorable as noted in our most recent meetings. During these meetings concerns were raised regarding accessibility to the home by DMHSA to review records, cultural sensitivity, timeliness of quarterly reports, and the lack of participation in social activities by Latte consumers with other consumers of similar age.

The RTF is successful due to combined factors which include:

1) Strong family and local participation, 2) I'Famaguonta, a program of DMHSA which provides coordinated case management for the children at Latte, 3) DMHSA psychiatric services which works in tandem with Latte's contract psychiatrist Dr. Bellis who provides acute care and medication management, 4) the Guam Public School System which staffs and provides the education for the Latte consumers, 5) Latte Staff and counselors, and finally, 6) DMHSA maintenance which works to maintain the physical environment of the DMHSA owned home and assigned government vehicle.

Currently, the RTF under the current vendor Latte is running at three times the cost of local vendors who provide similar services. It is DMHSA's intent to bring the cost of service delivery in line with local rates. It is also noted that the RTF does not accept cases of the most severity as to do so would jeopardize other consumers in the residence. Services to address more acute children's cases is being planned for future residential homes.

Please do not hesitate to contact me at (671) 647-5330 or via email at drdreguam@yahoo.com if I can help to clarify any other concerns.

Dangkulo na Si Yu'ose Ma'ase,

Andrea M. Sablan Leitheiser, M.A., Ph.D.



department of
**MENTAL HEALTH &
SUBSTANCE ABUSE**
Dipartimento Salud Hinasso
Yon Abuson Amot

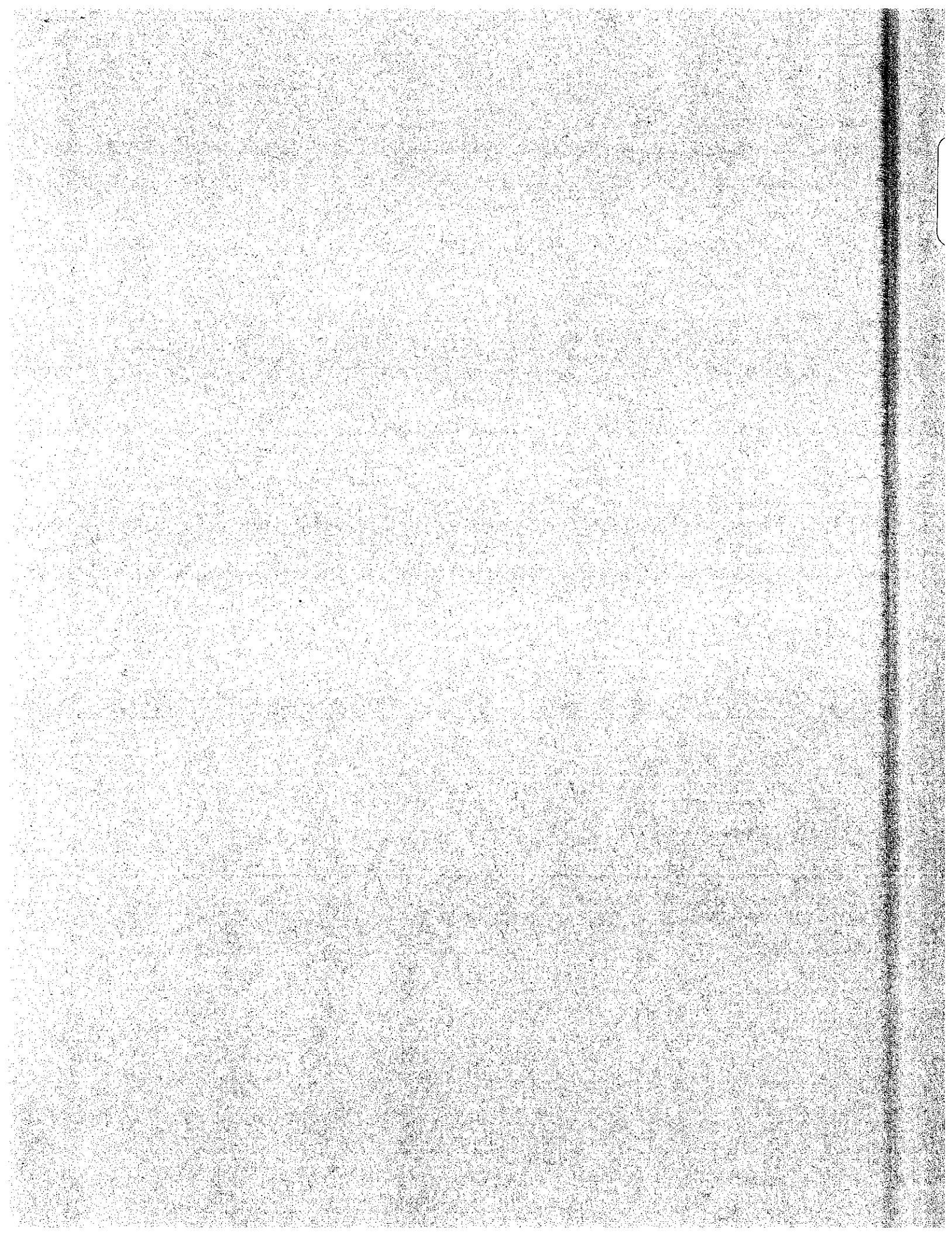
790 Gov. Carlos G. Camacho Rd.
Tamuning, Guam 96913

Phone: 671.647.5330
Fax: 671.649.6948

FELIX PEREZ CAMACHO
Governor

MICHAEL W. CRUZ, M.D.
Lieutenant Governor

ANDREA M. LEITHEISER, M.A., Ph.D.
Director, Acting





department of
**MENTAL HEALTH &
SUBSTANCE ABUSE**
Dipartimantan Solut Hinasse
Yon Abuson Amot

December 28, 2007

Senator Frank T. Ishizaki
29th Guam Legislature
155 Hessler Street
Hagatna, Guam 96910

790 Gov. Carlos G. Camacho Rd.
Tamuning, Guam 96913

Phone: 671.647.5330
Fax: 671.649.6948

Subject: Procurement for DMHSA Therapeutic Group Home for Children

FELIX PEREZ CAMACHO
Governor

Buenas Senator Ishizaki,

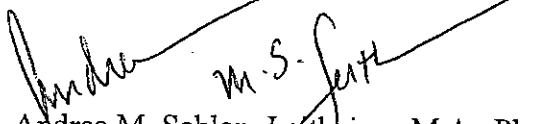
MICHAEL W. CRUZ, M.D.
Lieutenant Governor

Please accept my apologies for any misunderstandings regarding the timeliness of our response to your request of information. As a fellow public servant it is not my intention to disrespect you or our people. Rather, our decreased manning combined with increased patient care responsibilities and the permanent injunction deadlines have been demanding on myself and our dedicated staff.

ANDREA M. LEITHEISER, M.A., Ph.D.
Director, Acting

We are submitting the documents on time as requested in your second request. Submitted is the information regarding the procurement of services for the Therapeutic Group Home inclusive of the: requests for proposal log, invoice summary, payment summary to include amount owed to the vendor Latte, and Statement of Performance. Please do not hesitate to contact me at (671) 647-5330 or via email at drdreguam@yahoo.com if I can be of further service to you.

Dangkulo na Si Yu'ose Ma'ase,

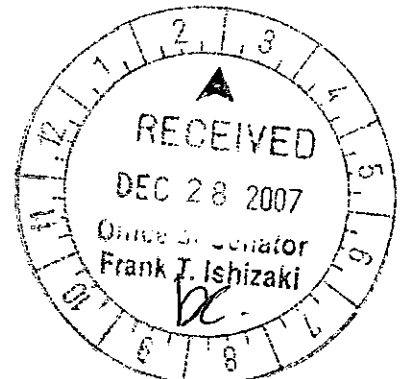

Andrea M. Sablan Leitheiser, M.A., Ph.D.

Attachments:

1. RFP Log Sheet
2. Invoice Summary
3. Payment Summary
4. Statement of Performance

CC:

Honorable Mike Cruz, M.D., Lt Governor
Honorable Frank Blaz, Jr., Senator, Chair, Health Committee



Dec 28, 2007

Senator Frank T. Ishizaki
29th Guam Legislature
155 Hessler Street
Hagatna, Guam 96910

Subject: Statement of Performance

Buenas Senator Ishizaki,

As requested DMHSA will make the following statements regarding the care provided at the Children's Residential Treatment Facility which is currently awarded to the vendor Latte Inc. The parent's responses to Latte have been favorable as noted in our most recent meetings. During these meetings concerns were raised regarding accessibility to the home by DMHSA to review records, cultural sensitivity, timeliness of quarterly reports, and the lack of participation in social activities by Latte consumers with other consumers of similar age.

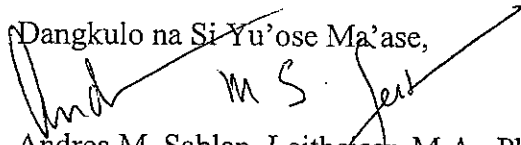
The RTF is successful due to combined factors which include:

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Currently, the RTF under the current vendor Latte is running at three times the cost of local vendors who provide similar services. It is DMHSA's intent to bring the cost of service delivery in line with local rates. It is also noted that the RTF does not accept cases of the most severity as to do so would jeopardize other consumers in the residence. Services to address more acute children's cases is being planned for future residential homes.

Please do not hesitate to contact me at (671) 647-5330 or via email at drdreguam@yahoo.com if I can help to clarify any other concerns.

Dangkulo na Si Yu'ose Ma'ase,


Andrea M. Sablan Leithaiser, M.A., Ph.D.



department of
**MENTAL HEALTH &
SUBSTANCE ABUSE**
Dipartimento Sañu Hinossa
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790 Gov. Carlos G. Camacho Rd.
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FELIX PEREZ CAMACHO
Governor

MICHAEL W. CRUZ, M.D.
Lieutenant Governor

ANDREA M. LEITHEISER, M.A., Ph.D.
Director, Acting

FY2007 PAYMENT SUMMARY
 VENDOR: LATTE TREATMENT

Invoice Date	Invoice No	Invoice Amount
1-Jun-06	112 - Medication	\$ 3,218.42
1-Jul-06	112 - Medication A	\$ 5,321.33
1-Jul-06	112 - Medication B	\$ 1,032.70
1-Jun-06	112 C (Security Cameras)	\$ 10,443.73
1-Aug-06	113 - Medication A	\$ 2,876.37
1-Aug-06	113 - Medication B	\$ 2,860.36
1-Sep-06	114 - Medication	\$ 4,528.27
1-Oct-06	115 - Medication A	\$ 4,940.99
1-Oct-06	115 - Medication B	\$ 1,117.46
1-Oct-06	115 - Medication C	\$ 975.30
	115-Services	\$ 60,513.70
1-Nov-06	116 - Medication A	\$ 5,430.75
1-Nov-06	116 - Medication B	\$ 2,102.40
31-Oct-06	116 - Services	\$ 59,119.99
1-Dec-06	117 - Medication A	\$ 4,630.88
1-Dec-06	117 - Medication B	\$ 1,107.10
30-Nov-06	117 - Services	\$ 57,873.70
1-Jan-07	118 - Medication A	\$ 5,924.40
31-Dec-06	118 - Services	\$ 59,919.99
1-Feb-07	119 - Medication A	\$ 3,946.77
31-Jan-07	119 - Services	\$ 59,969.99
1-Mar-07	120 - Medication A	\$ 7,314.96
1-Mar-07	120 - Services	\$ 55,886.62
1-Apr-07	121 - Medication A	\$ 6,172.15
1-Apr-07	121 - Services	\$ 64,266.59
1-May-07	122 - Medication A	\$ 12,183.96
1-May-07	122 - Services	\$ 64,278.00
1-Jun-07	123 - Medication A	\$ 9,410.38
1-Jun-07	123 - Services	\$ 64,622.90
		\$ 641,990.16

FY2007 INVOICE SUMMARY
VENDOR: LATTE TREATMENT

<u>Invoice Date</u>	<u>Invoice No</u>		<u>Invoice Amount</u>
1-Jun-07	123 Medication B	\$	5,659.56
1-Jul-07	124 Services	\$	63,566.30
1-Jul-07	124 Medication A	\$	9,828.76
1-Aug-07	125 Services	\$	63,845.39
1-Aug-07	125 Medication A	\$	5,082.80
31-Aug-07	126 Services	\$	64,878.59
1-Sep-07	126 Medication	\$	3,927.41
30-Sep-07	127 Services	\$	65,735.10
	Total	\$	282,523.91

RECEIVED
DATE: 11/13/07

Latte Treatment Center LLC

308 Fr Duenas Drive
Tamuning, Guam 96913
671-647-5390 fax 671-647-5392

Invoice No. 128 Services

INVOICE

Customer

Name	Department of Mental Health		
Address	790 Gov Carlos G. Camacho Road		
City	Tamuning	State	GU ZIP 96913
Phone	671-647-5330		

Date	11/1/2007
Order No.	128 Services
Rep	October
FOB	

Qty	Description	Unit Price	TOTAL
	2 RTC; 6 TGH; 8 Day Tx; 5 Respite Clients, 1 Crisis		
31	RTC and TGH (recorded in days)	\$1,761.29	\$54,599.99
7	Day Treatment Services	\$1,130.00	\$7,910.00
123	Respite (recorded in hours)	\$10.00	\$1,230.00
15	Respite (recorded in days)	\$176.10	\$2,641.50
RTC- EA, JL TGH- MC, GC, ED, KK, SL, JF ROH- RA, AG, RL, TQ, JM, JT, MA, KN Respite- AO, KK, AG, ML, KN Crisis-CC			

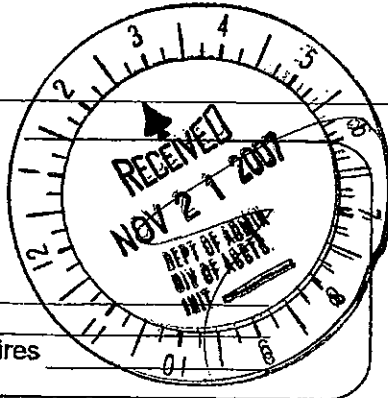
Payment Details

- Cash
- Check
- Credit Card

Name _____

CC # _____

Expires _____



SubTotal	\$66,381.49
Over Contract Rate	(\$481.49)
TOTAL	\$65,900.00

Office Use Only

Thank you for the opportunity to serve your clients.

LATTE TREATMENT CENTER LLC

RECEIVED
DATE: 11/13/07

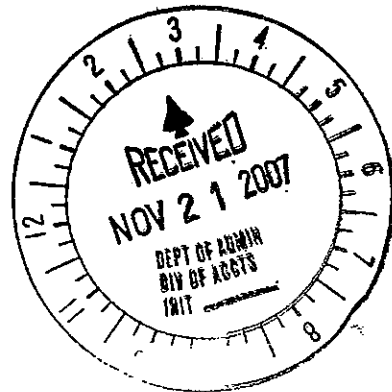
FACSIMILE TRANSMITTAL SHEET

TO: Rena Borja	FROM: Luis Valdes
COMPANY: DMH	DATE: 11/13/07
FAX NUMBER: 671-647-5402	TOTAL NO. OF PAGES INCLUDING COVER: * 9
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE: Latte Med Invoices	YOUR REFERENCE NUMBER:

- URGENT
 FOR REVIEW
 PLEASE COMMENT
 PLEASE REPLY
 PLEASE RECYCLE

NOTES/COMMENTS:

Attached are the Latte medication invoices for May (123 Meds B), September and October 2007 that are unpaid. Note that May 123 Meds A was already paid.





Latte Treatment Center LLC

308 Fr Duenas Drive
Tamuning, Guam 96913
671-647-5390 fax 671-647-5392

Invoice No. 129 Services

INVOICE

Customer

Name	Department of Mental Health	Date	12/1/2007
Address	790 Gov Carlos G. Camacho Road	Order No.	129 Services
City	Tamuning State GU ZIP 96913	Rep	November
Phone	671-647-5330	FOB	

Qty	Description	Unit Price	TOTAL
	2 RTC; 6 TGH; 8 Day Tx; 3 Respite Clients, 1 Crisis		
30	RTC and TGH (recorded in days)	\$1,761.29	
8	Day Treatment Services	\$1,130.00	
7	Respite (recorded in hours)	\$10.00	
7	Respite (recorded in days)	\$176.10	
	RTC- EA, JL TGH- MC, GC, ED, KK, SL, JF ROH- RA, AG, RL, TQ, JM, JT, MA, KN Respite- AO, AG, KN Crisis-KN		

Payment Details

Cash
 Check
 Credit Card

Name _____

CC # _____

Expires _____

SubTotal	
Over Contract Rate	
TOTAL	

Office Use Only

Thank you for the opportunity to serve your clients.

MEGA DRUG

#255 Farenholt Avenue

Tamuning, Guam 96913 USA

Tel. No. (671) 646-5355 Fax No. (671) 646-5333

October 08, 2007

LATTE TREATMENT CENTER

308 Father Duenas Drive

Tamuning, Guam 96915

Attn.: Daniel/Suzanne Cantu'

Dear Sir/Madam,

Below is a list of prescriptions authorized by your good office to be filled at Mega Drug-Tamuning for the following patients:

Rx # 576826 09/01/07 for: Megan Certeza Ambien 10mg #30	168.90
Rx # 576852 09/02/07 for: Charfauros, Gilven Geodon 20mg #60	396.60
Rx # 577197 09/04/07 for: Silina Lizama Seroquel 100mg #30	133.80
Rx # 572470 09/04/07 for: Amber Okada Cozaar 50mg #30	67.80
Rx # 572468 09/04/07 for: Amber Okada Trileptal 600mg #60	59.25
Rx # 572469 09/04/07 for: Amber Okada Benztropine 1mg #60	2.05
Rx # 570828 09/04/07 for: Emery Aguero Seroquel 25mg #30	20.00
Rx # 572300 09/04/07 for: Emery Aguero Geodon 80mg #60	20.00
Rx # 577351 09/05/07 for: Megan Certeza Depakote-EC 500mg #120	362.40
Rx # 577349 09/05/07 for: Jeremi Toves Tetracycline 500mg #60	15.00
Rx # 579437 09/17/07 for: Emery Aguero Lithium Carbonate 300mg # 90	5.00

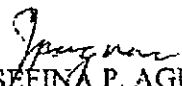
Cont'n. - Latte Treatment

Page 2 of 2 Pages

Rx # 579438 09/17/07 for: Jeremi Toves Clonazepam 0.5mg #90	18.00
Rx # 580768 09/24/07 for: Clinton Cellona Seroquel 100mg #30	133.80
Rx # 581173 09/26/07 for: Megan Certeza Seroquel 100mg # 150	20.00
Rx # 581174 09/26/07 for: Megan Certeza Fluoxetine 20mg #30	10.00
OTC Med. 09/28/07 for: Latte Treatment GNP lice treatment shampoo #1 bot.	7.60
Rx # 581420 09/28/07 for: Jeremi Toves Tetracycline 500mg #60	15.00
Rx # 581416 09/28/07 for: Megan Certeza Benztropine 0.5mg #60	10.00
Rx # 581417 09/28/07 for: Megan Certeza Zolpidem Tartrate 10mg #30	10.00
Rx # 581614 09/28/07 for: KN Niosy Amphetamine Salts 10mg #30	<u>40.50</u>
Total Amount Due	<u><u>\$ 1,515.70</u></u>

Kindly remit payment at the above address. Please see enclosures for details.

Thank you,


JOSEFINA P. AGUAS
Clerk-Billing Dept.

Latte Treatment Center LLC

308 Fr Duenas Drive
 Tamuning, Guam 96913
 671-647-5390 fax 671-647-5392

Invoice No. 124 Services

INVOICE

Customer

Name Department of Mental Health
 Address 790 Gov Carlos G. Camacho Road
 City Tamuning State GU ZIP 96913
 Phone 671-647-5330

Date 7/1/2007
 Order No. 124 Services
 Rep June
 FOB _____

Qty	Description	Unit Price	TOTAL
	2 RTC; 6 TGH; 7 Day Tx; 4 Respite Clients		
30	RTC and TGH (recorded in days)	\$1,761.29	\$52,838.70
7	Day Treatment Services	\$1,130.00	\$7,910.00
0	Respite (recorded in hours)	\$10.00	\$0.00
16	Respite (recorded in days)	\$176.10	\$2,817.60
RTC- EA, JT TGH- MC, GC, ED, KN, CC, SL ROH- RA, AMO, RG, AG, RL, DG, JM Respite- AG, ML, KK, AO			

Payment Details

- Cash
- Check
- Credit Card

Name _____
 CC # _____
 Expires _____

SubTotal	\$63,566.30
Shipping & Handling	
Taxes State	
TOTAL	\$63,566.30

Office Use Only

Thank you for the opportunity to serve your clients.

Statement

Daystar Pharmacy
3928 Bahler
Manvel, TX 77578

LATTE TREATMENT CENTER

Bill To:

LATTE TREATMENT CENTER
c/o Luis Valdes, Ph.D.
3926 Bahler Ave
Manvel, TX 77578

Remit To Address:

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

Phone: (281)489-9409

Customer No.: GUA
Page: LATTER
Date: 1
05/31/07

Customer No.: GUA
Page: LATTER
Date: 1
05/31/07

Document No	Doc. Date	Ty.	Due	Reference			Amount	Document No	Amount	
				Rx No	Date/Qty	Patient/Drug				
IN000004423	05/31/07	IN	05/31/07	17257	05/14/07	Balance Forward	\$12,282.91		\$12,282.91	
					30	AGUERO, EMORY DIPHENHYDRAM CAP 50MG	\$9.09	17257	\$9.09	
					15925	05/21/07	AGUERO, EMORY GEODON CAP 80MG	\$395.91	15925	\$395.91
					17257	05/31/07	AGUERO, EMORY DIPHENHYDRAM CAP 50MG	\$9.09	17257	\$9.09
					16167	05/14/07	CERTEZA, MEGAN DEPAKOTE TAB 500MG DR	\$369.23	16167	\$369.23
					16806	05/14/07	CERTEZA, MEGAN ABILIFY TAB 5MG	\$414.36	16806	\$414.36
					17401	05/14/07	CERTEZA, MEGAN SEROQUEL TAB 100MG	\$121.23	17401	\$121.23
					17402	05/14/07	CERTEZA, MEGAN FLUOXETINE CAP 20MG	\$83.44	17402	\$83.44
					17514	05/21/07	CERTEZA, MEGAN ABILIFY TAB 10MG	\$414.36	17514	\$414.36
					17515	05/21/07	CERTEZA, MEGAN SEROQUEL TAB 200MG	\$443.53	17515	\$443.53
					16806	05/31/07	CERTEZA, MEGAN ABILIFY TAB 5MG	\$414.36	16806	\$414.36
					14884	05/14/07	CHARFAROUS, GILVEN DEPAKOTE TAB 500MG DR	\$187.12	14884	\$187.12
					16316	05/14/07	CHARFAROUS, GILVEN GEODON CAP 40MG	\$349.53	16316	\$349.53
					14884	05/31/07	CHARFAROUS, GILVEN DEPAKOTE TAB 500MG DR	\$187.12	14884	\$187.12
					16495	05/31/07	CHARFAROUS, GILVEN GEODON CAP 20MG	\$349.53	16495	\$349.53
					16244	05/21/07	DOMINGUEZ, ERIC SEROQUEL TAB 200MG	\$224.27	16244	\$224.27
					16494	05/14/07	LIZAMA, SILINA SERTRALINE TAB 50MG	\$86.46	16494	\$86.46
					16972	05/14/07	LIZAMA, SILINA SERTRALINE TAB 25MG	\$86.46	16972	\$86.46
					17196	05/21/07	LIZAMA, SILINA SEROQUEL TAB 100MG	\$121.23	17196	\$121.23

IN - Invoice DB - Debit Note AD - Adjustment ED - Earned Discount PI - Prepayment
CR - Credit Note PY - Payment Receipt UC - Unapplied Cash IT - Interest Payable

Statement

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

LATTE TREATMENT CENTER

Bill To:

LATTE TREATMENT CENTER
c/o Luis Valdes, Ph.D.
3926 Bahler Ave
Manvel, TX 77578

Remit To Address:

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

Phone: (281)489-9409

Customer No.: GUA
Page: 2
Date: 05/31/07

Customer No.: GUA
Page: 2
Date: 05/31/07

Document No	Doc. Date	Ty.	Due	Reference			Amount	Document No	Amount
				Rx No	Date/Qty	Patient/Drug			
				16245	05/21/07 60	NIOSY, KN SEROQUEL TAB 100MG	\$237.46	16245	\$237.46
				15164	05/14/07 180	TOVES, JERMI SEROQUEL TAB 25MG	\$411.40	15164	\$411.40
				14582	05/21/07 60	TOVES, JERMI TETRACYCLINE CAP 500MG	\$12.08	14582	\$12.08
Invoice Total							\$4,927.26		\$4,927.26

IN - Invoice DB - Debit Note AD - Adjustment ED - Earned Discount PI - Prepayment
CR - Credit Note PY - Payment Receipt UC - Unapplied Cash IT - Interest Payable

Total: \$17,210.17

Total: \$17,210.17

1 - 30 Days O/Due 31 - 60 Days O/Due 61 - 90 Days O/Due Over 90 Days O/Due
\$0.00 \$2,809.71 \$6,534.95 \$2,938.25

ACCOUNT OVERDUE. PLEASE PAY IMMEDIATELY.

Statement

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

LATTE TREATMENT CENTER

Bill To:

LATTE TREATMENT CENTER
c/o Luis Valdes, Ph.D.
3926 Bahler Ave
Manvel, TX 77578

Remit To Address:

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

Phone: (281)489-9409

Customer No.: GUA
Page: LATTER
Date: 06/30/07

Customer No.: GUA
Page: LATTER
Date: 06/30/07

Document No	Doc. Date	Ty.	Due	Reference			Amount	Document No	Amount
				Rx No	Date/Qty	Patient/Drug			
2015228062	06/14/07	PY				Balance Forward	\$17,210.17		\$17,210.17
IN000004423	06/30/07	AD					(\$3,551.97)	2015228062	(\$3,551.97)
IN000004522	06/30/07	IN	06/30/07	17197	06/12/07 30	CELLONA, CLINTON SEROQUEL TAB 100MG	\$121.23	IN000004423	\$121.23
				17198	06/21/07 30	CELLONA, CLINTON SEROQUEL TAB 300MG	\$292.49	17198	\$292.49
				16494	06/12/07 30	LIZAMA, SILINA SERTRALINE TAB 50MG	\$90.40	16494	\$90.40
				16972	06/12/07 30	LIZAMA, SILINA SERTRALINE TAB 25MG	\$86.46	16972	\$86.46
				17196	06/21/07 30	LIZAMA, SILINA SEROQUEL TAB 100MG	\$121.23	17196	\$121.23
				15163	06/12/07 30	TOVES, JERMI DOCUSATE SOD CAP 100MG	\$6.78	15163	\$6.78
				17922	06/21/07 60	TOVES, JERMI TETRACYCLINE CAP 500MG	\$12.08	17922	\$12.08
						Invoice Total	\$730.67		\$730.67
IN000004522	06/30/07	AD					(\$206.52)	IN000004522	(\$206.52)

IN - Invoice DB - Debit Note AD - Adjustment ED - Earned Discount PI - Prepayment
CR - Credit Note PY - Payment Receipt UC - Unapplied Cash IT - Interest Payable

Total: \$13,427.34

Total: \$13,427.34

1 - 30 Days O/Due 31 - 60 Days O/Due 61 - 90 Days O/Due Over 90 Days O/Due
\$620.28 \$0.00 \$2,809.71 \$9,473.20

ACCOUNT OVERDUE. PLEASE PAY IMMEDIATELY.

MEGA DRUG

#255 Farenholt Avenue

Tamuning, Guam 96913 USA

Tel. No. (671) 646-5355 Fax No. (671) 646-5333

July 17, 2007

LATTE TREATMENT CENTER

308 Father Duenas Drive
Tamuning, Guam 96915

Attn.: Daniel/Suzanne Cantu'

Dear Sir/Madam,

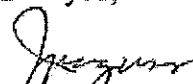
Below is a list of prescriptions authorized by your good office to be filled at Mega Drug-Tamuning for the following patients:

Rx # 556612 05/24/07 for: Emery Agüero Clonazepam 1mg #60	\$ 15.00
Rx # 559005 06/05/07 for: Jermi Todd Toves Clonazepam 0.5mg #90	18.00
Rx # 554655 06/11/07 for: Amber Okada Trileptal 600mg #60	356.40
Rx # 554654 06/11/07 for: Amber Okada Bentropine 1mg # 60	7.80
Rx # 556807 06/11/07 for: Amber Okada Geodon 80mg #90	652.50
Rx # 552403 06/12/07 for: Megan Certeza Fluoxetine 20mg #30	77.14
Rx # 554653 06/13/07 for: Amber Okada Cozaar 50mg #30	67.80
Rx # 564447 06/14/07 for: Eric Dominguez Adderall XR 20mg #60	301.20
Inv. # 696812 06/15/07 for: David Duenas Naputi OTC Medicines	44.30
Rx # 564585 06/15/07 for: KN Niosy Amphetamine Salts 10mg #30	40.50
Rx # 564583 06/15/07 for: Gilven Charfauros Methylphenidate 10mg # 30	22.50
Rx # 557330 06/26/07 for: KN Niosy Depakote EC 500mg #60	\$ 181.20

Rx # 557329 06/28/07 for: Gilven Charfauros Clonazepam 0.5mg #15	4.50
Rx # 566678 06/29/07 for: Megan Certeza Zolpidene 10mg #30	129.74
Rx # 559005 07/06/07 for: Jermi Todd Toves Clonazepam 0.5mg #90	18.00
Inv. #696821 07/06/07 for : Office Use Centrum (OTC) #1 bottle	13.95
Rx # 567762 07/06/07 for: Megan Certeza Seroquel 200mg #60	480.60
Rx # 567759 07/06/07 for: Emery Aguero Geodon 80mg #60	20.00
Rx # 567769 07/06/07 for: Emery Aguero Lithium Carbonate 300mg #120	5.00
Rx # 567758 07/06/07 for: Silina Lizama Seroquel 100mg #30	127.20
Rx # 567744 07/06/07 for: Jeremy Toves Tetracycline Hcl 500mg #60	15.00
Rx # 568508 07/11/07 for: Megan Certeza Depakote EC 500mg #120	362.40
Rx # 532997 07/12/07 for: Megan Certeza Seroquel 100mg #30	118.80
Inv. # 696823 07/11/07 for: Emery Aguero Vit. B2 100mg #1 btl.	6.80
Rx # 554655 07/13/07 for: Amber Okada Trileptal 600mg #60	356.40
Rx # 554653 07/13/07 for: Amber Okada Cozaar 50mg #30	67.80
Rx # 556807 07/13/07 for: Amber Okada Geodon 80mg #90	652.50
Rx # 554654 07/13/07 for: Amber Okada Benzotropine 1mg #60	<u>7.80</u>
Total Amount Due	<u>\$4,170.83</u>

Kindly remit payment at the above address. Please see enclosures for details.

Thank you,


JOSEFINA P. AGUAS
Clerk-Billing Dept.

MEGA DRUG 1
 255 FARENHOLT AVE.
 TAMUNING, GU. 96913 671646-5355
 RX NO: 554654 C 07/13/07 CD
 OKADA, AMBER M.
 POB 6016 MOM 479965 TAMUNING, GU. 96931

696828

MEGA DRUG
 TAMUNING, GUAM
 TEL: 671-637-1463

BENZTROPINE MESYLATE 1MG TAB (UPSHER) #60
 NDC: 00832108110
 Dr. BELLIS, KIRK
 Auth. #

\$7.80

Get NOPP Ack.

MEGA DRUG 1
 255 FARENHOLT AVE.
 TAMUNING, GU. 96913 671646-5355
 RX NO: 554653 C 07/13/07 CD
 OKADA, AMBER M.
 POB 6016 MOM 479965 TAMUNING, GU. 96931

\$67.80

Get NOPP Ack.

MEGA DRUG 1
 255 FARENHOLT AVE.
 TAMUNING, GU. 96913 671646-5355
 RX NO: 554655 C 07/13/07 CD
 OKADA, AMBER M.
 POB 6016 MOM 479965 TAMUNING, GU. 96931

\$356.40

Get NOPP Ack.

TRILEPTAL 600MG TAB (NOVARTIS) #60
 NDC: 00078045705
 Dr. BELLIS, KIRK
 Auth. #

CUSTOMER'S ORDER NO. DEPT. DATE: 7-13-07

NAME: Amber Okada

ADDRESS: 40 Lette Trea Street

CITY, STATE, ZIP

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	INDEX RTD.	PAID OUT

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	Rx # 554655 - Trileptal 600mg	356.40	356.40
2	554653 - Cozaar 50mg	67.80	67.80
3	554654 - Benztropine 1mg	7.80	7.80
4			
5			
6			

MEGA DRUG 1
 255 FARENHOLT AVE.
 TAMUNING, GU. 96913 671646-5355
 RX NO: 556807 C 07/13/07 CD
 OKADA, AMBER M.
 POB 6016 MOM 479965 TAMUNING, GU. 96931

\$652.50

Get NOPP Ack.

INSURANCE RECEIPT
 GEODON 80MG CAP (ROERIG) #90
 NDC: 00049399060
 Dr. BELLIS, KIRK
 Auth. #

84.50

696815

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 6-28-07

NAME: Gliven Chapoforos

ADDRESS: c/o LaHe Treatment Center

CITY, STATE, ZIP _____

SOLD BY: BR

CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
		<input checked="" type="checkbox"/>			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#16	Rx 557329 Clonazepam 0.5mg		\$ 4.50

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355
RX NO: 557329 C 06/28/07 GM (671)734-3911
CHARPAUROS, GILVEN
C/O DYA POB 23672 GME, GU. 96921

CLONAZEPAM 0.5MG TAB (SANDOZ) #15
NDC: 00185006305
DR. BELLIS, KIRK
Auth. #

INSURANCE RECEIPT

Get NOPP Ack.

RECEIVED BY: [Signature]

AMOUNT: 44.50

ORIGINAL
©2001 REDIFORM® 51320

696818

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7/6/07

NAME: SILVA WZAMA

ADDRESS: c/o LTC

CITY, STATE, ZIP _____

SOLD BY: _____

CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
		<input checked="" type="checkbox"/>			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#20	Rx # 57758 - <u>Seroquel</u> <u>100 mg.</u>		127.20

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355
RX NO: 57758 C 07/06/07 CD
LIZAMA, SILVINA
308 FR. DUENS DR. MANGILAO, GU. 96913

SEROQUEL 100MG TAB (ZENECA) #30
NDC: 00310027110
DR. BELLIS, KIRK
Auth. #

INSURANCE RECEIPT

Get NOPP Ack.

RECEIVED BY: [Signature]

AMOUNT: 127.20

ORIGINAL
©2001 REDIFORM® 51320

696978

MEGA DRUG
TAMUNING, GUAM
TEL: 670-5355

CUSTOMER'S ORDER NO.	DEPT. <i>L/T</i>	DATE <i>6/12/07</i>
NAME: <i>Megan Cer-teza</i>		
ADDRESS:		
CITY, STATE, ZIP		

SOLD BY: <i>Robby</i>	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	ON ACCT.	MDSE RTD.	PAID OUT
-----------------------	------	--------	--	----------	-----------	----------

QUANTITY	DESCRIPTION	PRICE	AMOUNT
<i>30</i>	<i>Fluoxetine 20MG fx</i>	<i>552403</i>	<i>\$ 77.14</i>

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

Rx No: 552403 U
CERTEZA, MEGAN
POB 704 TAMUNING, GU. 96931

INSURANCE
RECEIPT

671646-5355
06/12/07 AM
(671)472-5282

FLUOXETINE 20MG CAP (PLIVA) #30
NDC: 50111064801
Dr. BELLIS, KIRK
SELECT F Auth. #07118161416987

\$77.14

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	<i>\$77.14</i>
---------------------------------	----------------

696980

MEGA DRUG
TAMUNING, GUAM
TEL 610-5355

CUSTOMER'S ORDER NO.	DEPT. <u>L7</u>	DATE: <u>6/17/87</u>
NAME: <u>Amber Okada</u>		
ADDRESS:		
CITY, STATE, ZIP		

SOLD BY: <u>Robby</u>	CASH	C.O.D.	CHARGE	ON ACCT.	MISC RID.	PAID OUT
			<input checked="" type="checkbox"/>			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
<u>30</u>	<u>Cozaar 50 Mg Rx 554653</u>		<u>67.80</u>
<p>MEGA DRUG 1 255 FARENHOLT AVE. TAMUNING, GU. 96913 671646-5355 RECEIPT RX NO: 554653 C 06/13/07 AM OKADA, AMBER M. (671) 637-1463 POB#6016 MOM 4799065 TAMUNING, GU. 96931</p>			
	<u>CCZAAR UU 50MG TAB (MERCK) #30</u>	<u>867.80</u>	
	<u>NDC: 00006095254</u>		
	<u>Dr. BELLIS, KIRK</u>		
	<u>Auth. #</u>		
			<u>67.80</u>

Get NOPP Ack.

RECEIVED BY: SAW

ORIGINAL
FORM 51320

696810

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 6-5-07
NAME: Jermi Todd Toves		
ADDRESS: 40 Latte Treatment		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE RTD.	PAID OUT
			<input checked="" type="checkbox"/>			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#90	14 559005 Clonazepam 0.5		18-

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE
RECEIPT

Rx No: 559005 C 06/05/07 CD
TOVES, JERMI TODD S.
122 ADELFA CT. LIGUAN TER. DEDE, DO. 96912

671646-5355
(671) 637-4582

CLONAZEPAM 0.5MG TAB (STANDOZ) #90
NDC: 00185006305
Dr. BELLES, KIRK
Auth. #

\$18.00

Get NOPP Ack.

RECEIVED BY: 
--

696812

MEGA DF:JG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 8/15/07

NAME: (DAVID DUCHAS NAPU'I)

ADDRESS: C/o LATE TREATMENT

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE ON ACCT. _____ PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
4	Brite Life SPF 45	5.20	20.80
2	Sol Brn PF SPF 50	11.70	23.40
	OTC		44.20
CERTIFIED TRUE & CORRECT:			
AUTHORIZED SIGNATURE			
RECEIVED BY: [Signature]			44.20

ORIGINAL
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696821

MEGA DF:JG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7/6/07

NAME: _____

ADDRESS: LATE TREATMENT
(office use)

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE ON ACCT. _____ PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	CENTRUM (OTC)		13.95
CERTIFIED TRUE & CORRECT:			
AUTHORIZED SIGNATURE			
RECEIVED BY: [Signature]			13.95

ORIGINAL
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696777

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT. LT	DATE: 6/26/07
NAME: KN, Niosy		
ADDRESS:		
CITY, STATE, ZIP		

SOLD BY: pebbcy	CASH	C.O.D.	CHARGE	ON ACCT.	MISC RTD.	PAID OUT
------------------------	------	--------	--------	----------	-----------	----------

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	Rx 557330 Depakot EC 500mg		\$181.20
MEGA DRUG 1 255 FARNHOLT AVE. TAMUNING, GU. 96913 671646-5355 RECEIPT GM Rx NO: 557330 C 06/26/07 671-647-5390 NIOSY, KN 145 MARIETTA WAY STA. BARBARA YIGO, GU. 96929 DEPAKOTE-EC 500MG TAB (ABBOTT) #60 NDC: 00074621553 DR. BELLIS, KIRK Auth. #			
		\$181.20	
			\$181.20
RECEIVED BY: Edw O'Neil			

Get NOPP Ack.

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696811

MEGA DFJG
TAMUNING, GUAM
TEL: 671-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 6-19-07
NAME: Eric Dominguez		
ADDRESS: c/o latte treatment		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
			✓			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#60	Adderall XR		301.20
	PH 564447		
MEGA DRUG 1 255 FARENHOLT AVE. TAMUNING, GU. 96913 671646-5355 RECEIPT Ex. NO: 564447 C 06/14/07 AM DOMINGUEZ, ERIC 671-647-5390 308 FATHER DOENAS DRIVE TAMUNING, GU. 96913 ADDERALL XR 20MG CAP (SHIRE) #60 NDC: 54092038701 Dr. BELLIS, KIRK Auth. #			
		\$301.20	

Get NOPP Ack.

RECEIVED BY: *[Signature]*

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696823

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7/11/07


NAME: Agüero, Emery Treatment

ADDRESS: old Laité Treatment

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE ON ACCT. PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	100 mg.		6.50
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			6.50

RECEIVED BY: 

CERTIFIED TRUE & CORRECT
AUTHENTICATED SIGNATURE

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696805

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7/24/07


NAME: EMERY AGUERO

ADDRESS: CA LAITE TREATMENT

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE ON ACCT. PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
60	Rx # 556612		15.00
2	Cibonazepam 1mg		
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			15.00

RECEIVED BY: 

INSURANCE RECEIPT

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5353

RX NO: 556612 C 05/24/07 AM

AGUERO, EMERY

CONAITE TREATMENT 308 FATHER DUEÑAS TAMUNING, GU. 96913

CIBONAZEPAM 1MG TAB (STANDOZ) #60 \$15.00

NDC: 00185006410

Dr. BELLIS, KIRK
Auth. #

Get NOPP Ack.

ORIGINAL
©2001 MEDIFORM® 51320

696824

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. DEPT. DATE: 7/11/07

NAME: Certeza, Megan Treatment

ADDRESS: dr latte

CITY, STATE, ZIP

SOLD BY: CASH C.O.D. CHARGE ION ACCT. MDSE RTD. PAID OUT

QUANTITY	DESCRIPTION	PRICE	AMOUNT
120	Rx # 568508 - Depakote see rx.		362.40

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355 RECEIPT

RX NO: 568508 C 07/11/07 GM
CERTeza, MEGAN (671) 472-5282
POB 7704 TAMUNING, GU. 96931

DEPAKOTE-EC 500MG TAB (ABBOTT) #120
NDC: 00074621553
Dr. BELLIS, KIRK
Auth. #

\$362.40

Get NOPP Ack.

RECEIVED BY: *SAC*

362.40

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696826

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. DEPT. DATE: 7/12/07

NAME: Megan Certeza

ADDRESS: c/o latte tx

CITY, STATE, ZIP

SOLD BY: CASH C.O.D. CHARGE ION ACCT. MDSE RTD. PAID OUT

QUANTITY	DESCRIPTION	PRICE	AMOUNT
90	Rx # 532997 Seroquel 100mg # 90		\$118.80

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355 RECEIPT

RX NO: 532997 C 07/12/07 GM
CERTeza, MEGAN (671) 472-5282
POB 7704 TAMUNING, GU. 96931

SEROQUEL 100MG TAB (ZENECA) #30
NDC: 00310027110
Dr. BELLIS, KIRK
Auth. #

\$118.80

Get NOPP Ack.

RECEIVED BY: *SAC*

\$118.80

ORIGINAL
©2001 REDIFORM® 51320

696817

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7/6/07

NAME: JERRY TOVES

ADDRESS: c/o LTC

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE ON ACCT. PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	RX # 567744 - Tetracycline		15.00
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

RECEIVED BY: *[Signature]*

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671-646-5355 RECEIPT

Rx NO: 567744 C 07/06/07 CD
TOVES, JEREMY
308 FATHERY DUENAS DR. TAMUNING, GU. 96913

TETRACYCLINE HCL 500MG CAP (IVAXPHAR) #60
NDC: 00172240780
Dr. BELLIS, KIRK
Auth. #

\$15.00

Get NOPP Ack.

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©2001 REFORM # 51320

696822

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7/06/07

NAME: Toves, Jeremi Todd S.

ADDRESS: c/o Lante Prudent

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE ON ACCT. PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	RX # 559005 - Clonazepam		18.00
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

RECEIVED BY: *[Signature]*

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671-646-5355 RECEIPT

Rx NO: 559005 C 07/06/07 CD
TOVES, JEREMI TODD S.
128 ADELFA CT. LIGUAN TER. DEDE. DO. 96912

CLONAZEPAM 0.5MG TAB (SANDOZ) #90
NDC: 00185006305
Dr. BELLIS, KIRK
Auth. #

\$18.00

Get NOPP Ack.

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696820

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7/6/07

NAME: MEGAN CERTEZA

ADDRESS: c/o LTC

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE ON ACCT. _____ MISD. RTD. _____ PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	RX# 567762 - Surgical Zonyl		480.60
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355
RX NO: 567762 C 07/06/07 CD (671) 472-5282

SEROQUEL 200MG TAB (ZENECA) #80
NDC: 00310027210
Dr. BELLIS, KIRK
Auth. #

Get NOPP Ack.

INSURANCE RECEIPT
\$480.60

RECEIVED BY: *[Signature]* 480.60

ORIGINAL
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696816

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO. _____ DEPT. _____ DATE: 7-29-07

NAME: Megan Certeza

ADDRESS: c/o La Tera Treatment Center

CITY, STATE, ZIP _____

SOLD BY: _____ CASH _____ C.O.D. _____ CHARGE _____ ON ACCT. _____ MISD. RTD. _____ PAID OUT _____

QUANTITY	DESCRIPTION	PRICE	AMOUNT
1	Zolpidem 10mg Rx # 566678		129.74
2			
3			
4			
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8			
9			
10			
11			
12			
13			
14			
15			

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355
RX NO: 566678 U 06/29/07 CD (671) 472-5282

ZOLPIDEM TART 10MG TAB (CARACO) #30
NDC: 57664051688
Dr. BELLIS, KIRK
SELECT F Auth. # 07118308189531

Get NOPP Ack.

INSURANCE RECEIPT
\$129.74

RECEIVED BY: _____

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LATTE TREATMENT CENTER

FACSIMILE TRANSMITTAL SHEET

TO: Andrea Leithieser, PhD

FROM: Luis Valdes

COMPANY:

DATE: 8/24/2007

FAX NUMBER:

TOTAL NO. OF PAGES INCLUDING COVER:

PHONE NUMBER:

SENDER'S REFERENCE NUMBER:

RE: Med Invoices

URGENT FOR REVIEW

PLEASE RECYCLE

NOTES/COMMENTS:



RECEIVED
DATE: 11/13/07

Latte Treatment Center LLC

308 Fr Duenas Drive
Tamuning, Guam 96913
671-647-5390 fax 671-647-5392

Invoice No. 125 Services

INVOICE

Customer

Name Department of Mental Health
Address 790 Gov Carlos G. Camacho Road
City Tamuning State GU ZIP 96913
Phone 671-647-5330

Date 8/1/2007
Order No. 125 Services
Rep July
FOB

Qty	Description	Unit Price	TOTAL
	3 RTC; 6 TGH; 6 Day Tx; 2 Respite Clients		
31	RTC and TGH (recorded in days)	\$1,761.29	\$54,599.99
6	Day Treatment Services	\$1,130.00	\$6,780.00
0	Respite (recorded in hours)	\$10.00	\$0.00
14	Respite (recorded in days)	\$176.10	\$2,465.40
	RTC- EA, JT, ML TGH- MC, GC, ED, KN, CC, SL ROH- RA, AMO, RG, AG, RL, JM Respite- AG, KK		

Payment Details

- Cash
- Check
- Credit Card

Name _____
CC # _____
Expires _____

SubTotal	\$63,845.39
Shipping & Handling	
Taxes State	
TOTAL	\$63,845.39

Office Use Only

Thank you for the opportunity to serve your clients.

Statement

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

LATTE TREATMENT CENTER

Bill To:

LATTE TREATMENT CENTER
c/o Luis Valdes, Ph.D.
3926 Bahler Ave
Manvel, TX 77578

Remit To Address:

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

Phone: (281)489-9409

Customer No.: GUA
Page: 1
Date: 07/31/07

Customer No.: GUA
Page: 1
Date: 07/31/07

Document No	Doc. Date	Ty.	Due	Reference			Amount	Document No	Amount				
				Rx No	Date/Qty	Patient/Drug							
IN000004623	07/31/07	IN	07/31/07	18349	07/23/07 90	Balance Forward AGUERO, EMORY LITHIUM CARB CAP 300MG	\$13,427.34		\$13,427.34				
							\$19.44	18349	\$19.44				
				18477	07/31/07 30	AGUERO, EMORY SEROQUEL TAB 25MG	\$72.73	18477	\$72.73				
				17197	07/10/07 30	CELLONA, CLINTON SEROQUEL TAB 100MG	\$121.23	17197	\$121.23				
				15103	07/03/07 30	CHARFAROUS, GILVEN DEPAKOTE TAB 250MG DR	\$54.38	15103	\$54.38				
				16316	07/03/07 60	CHARFAROUS, GILVEN GEODON CAP 40MG	\$349.53	16316	\$349.53				
				16495	07/03/07 60	CHARFAROUS, GILVEN GEODON CAP 20MG	\$349.53	16495	\$349.53				
				18097	07/03/07 60	CHARFAROUS, GILVEN DEPAKOTE TAB 500MG DR	\$187.12	18097	\$187.12				
				16244	07/03/07 30	DOMINGUEZ, ERIC SEROQUEL TAB 200MG	\$224.27	16244	\$224.27				
				16494	07/10/07 30	LIZAMA, SILINA SERTRALINE TAB 50MG	\$90.40	16494	\$90.40				
				16972	07/10/07 30	LIZAMA, SILINA SERTRALINE TAB 25MG	\$86.46	16972	\$86.46				
				16245	07/23/07 60	NIOSY, KN SEROQUEL TAB 100MG	\$237.46	16245	\$237.46				
				18348	07/23/07 60	NIOSY, KN DEPAKOTE TAB 500MG DR	\$187.12	18348	\$187.12				
				15163	07/03/07 30	TOVES, JERMI DOCUSATE SOD CAP 100MG	\$6.78	15163	\$6.78				
				15164	07/03/07 180	TOVES, JERMI SEROQUEL TAB 25MG	\$411.40	15164	\$411.40				
				Invoice Total							\$2,397.85		\$2,397.85

IN - Invoice DB - Debit Note AD - Adjustment ED - Earned Discount PI - Prepayment
CR - Credit Note PY - Payment Receipt UC - Unapplied Cash IT - Interest Payable

Total: \$15,825.19

Total: \$15,825.19

1 - 30 Days O/Due 31 - 60 Days O/Due 61 - 90 Days O/Due Over 90 Days O/Due
\$0.00 \$524.15 \$620.28 \$12,282.91

ACCOUNT OVERDUE. PLEASE PAY IMMEDIATELY.

MEGA DRUG

#255 Farenholt Avenue

Tamuning, Guam 96913 USA

Tel. No. (671) 646-5355 Fax No. (671) 646-5333

August 8, 2007

LATTE TREATMENT CENTER

308 Father Duenas Drive

Tamuning, Guam 96915

Attn.: Daniel/Suzanne Cantu'

Dear Sir/Madam,

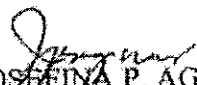
Below is a list of prescriptions authorized by your good office to be filled at Mega Drug-Tamuning for the following patients:

Rx # 568835 07/13/07 for: Dominguez, Eric Adderall XR 20mg caps. #60	\$ 301.20
Rx # 569582 for: Niosy KN Amphetamine Salts 10mg tab. #30	40.50
Rx # 569581 07/18/07 for: Charfauros, Gilven Methylphenidate 10mg tabs. #30	22.50
Rx # 570224 07/23/07 for: Aguero, Emery Clonazepam 1mg tab. #60	5.00
Rx # 557329 07/24/07 for: Charfauros, Gilven Clonazepam 0.5mg tabs. #15	4.50
Rx # 569879 07/20/07 for: Aguero, Emery Diphenhydramine 25mg #60	6.00
Rx # 557110 07/20/07 for: Cantu, Suzanne Tri-Sprintec 180/215/250-35mcg tab. #28	5.00
Rx # 570828 07/27/07 for: Aguero, Emery Seroquel 25mg tabs. #30	20.00
Rx # 570830 07/27/07 for: Niosy KN Depakote-EC 500mg tabs. #60	181.20
Rx # 570829 07/27/07 for: Niosy, KN Seroquel 100mg tabs. #60	254.40

Rx # 571284 07/30/07 for: Certeza, Megan Benzotropine Mesylate 0.5mg tabs. #60	9.00
Rx # 571774 08/02/07 for: Certeza, Megan Zolpidem Tart 10mg tabs. #30	18.00
Rx # 559005 08/04/07 Clonazepam 0.5mg tabs. #90	18.00
Rx # 572468 08/06/07 Trileptal 600mg tab. #60	356.40
Rx # 572470 08/06/07 Cozaar 50mg tabs. #30	67.80
Rx # 572469 08/06/07 Benzotropine Mesylate 1mg tabs. #60	7.80
Rx # 556807 08/06/07 Geodon 80mg caps. #30	217.50
Rx # 568508 08/07/07 Depakote-EC 500mg tabs. #120	362.40
Rx # 532997 08/07/07 Seroquel 100mg tabs. #30	<u>118.80</u>
Total Amount Due	<u><u>\$2,016.00</u></u>

Kindly remit payment at the above address. Please see enclosures for details.

Thank you,


JOSEFINA P. AGUAS
Clerk-Billing Dept.

696797

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT. E/T	DATE: 7/23/07
NAME: Emery Agvero		
ADDRESS: c/o Latic Treatment		
CITY, STATE, ZIP		

SOLD BY: Robby	CASH	C.O.D.	CHARGE /	ON ACCT.	MOSE STD.	PAID OUT
----------------	------	--------	----------	----------	-----------	----------

QUANTITY	DESCRIPTION	PRICE	AMOUNT
60	1 570224 Clonazepam 1mg		5.00
2			
3			

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355
Rx. No: 570224 U 07/23/07 GM
AGVERO, EMERY
C/O LATICE TREATMENT 308 FATHER DUENAS TAMUNING GU. 96913

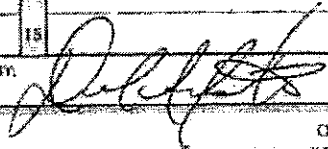
INSURANCE
RECEIPT

CLONAZEPAM 1MG TAB (SANDOZ) #60
NDC: 00185006410
Dr. BELLIS, KIRK
PCAP Auth. # 07203753100701

\$5.00

Get NOPP Ack.

\$5.00

RECEIVED BY: 
--

696831

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 7/20/07
NAME: EMERY AGUERO		
ADDRESS: c/o LATTE TREATMENT		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT	MPSE RTD.	PAID OUT
			✓			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#60	RX# 569879 DIPHENHYDRAMINE 25MG		6 00
1			
2			

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE
671646-5355
RECEIPT

Rx No: 569879 C 07/20/07 CD
AGUERO, EMERY
C/O LATTE TREATMENT 308 FATHER DIJENAS TAMUNING, GU 96913

DIPHENHYDRAMINE 25MG CAP (QUALITEST) #60
NDC: 00603333732

\$6.00

Dr. BELLIS, KIRK
Auth. #

Get NOPP Ack.

14			
15			6 00
RECEIVED BY: MARY BONE <i>Mary Bone</i>			

696833

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 7-27-07
NAME: Emery Agnero		
ADDRESS: 40 Latte Treatment		
CITY, STATE, ZIP		

SOLD BY: <i>de</i>	CASH	C.O.D.	CHEQUE <input checked="" type="checkbox"/>	IGN ACCT.	EMOSE RTD.	PAID CUIT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
#30	Seroquel 25mg		\$ 20.00
#100	Seroquel 100mg		\$254.00
	2000		\$181.20

MEGA DRUG 1
 255 FARENHOLT AVE.
 TAMUNING, GU. 96913 671646-5333
 INSURANCE RECEIPT
 Rx No: 570828 U 07/27/07 CD
 AGUERO, EMERY
 40 LATTE TREATMENT 308 PATHER DUENAS TAMUNING, GU 96913

SEROQUEL 25MG TAB (ZENECA) #30
 NDC: 00310027510 \$20.00
 DR. BELLIS, KIRK
 PCAP Auth. # 07207618015401

Get NOPP Ack.

RECEIVED BY:	<i>[Signature]</i>	AMOUNT: \$ 20.00
--------------	--------------------	------------------

696841

MEGA DRUG
TAMUNING, GUAM
TEL - 546-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE 8/7/07
NAME: Megan Certera		
ADDRESS: C/o Lathety		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MISSE RTD.	PAID OUT
			/			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
120	Rx# 568508 Depakote		362.40
	EC 500 mg		
30	Rx# 532997		118.80
	Seroquel 100 mg		

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE
RECEIPT

481.20

Rx No: 568508 C 08/07/07 AM
CERTEZA, MEGAN (671) 472-5282
POB 704 TAMUNING, GU. 96931

DEPAKOTE-EC 500MG TAB (ABBOTT) #120
NDC: 00074621553
Dr. BELLIS, KIRK
Auth. #

\$362.40

Get NQPP Ack.

RECEIVED BY: 	481.20
--	--------

696837

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/2/07
NAME: Megan Cerchez		
ADDRESS:		
CITY, STATE, ZIP: C/o Little Ty		

PAID BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE REL.	PAID OUT
			/			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
20	Rx # 571774		\$18.00
	Zolpidem 10mg		

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913
RX NO: 571774 C
CERTEZA, MEGAN
POB 704 TAMUNING, GU 96911

INSURANCE RECEIPT

671646-53
08/02/07 GM
(671) 472-5282

ZOLPIDEM TART 10MG TAB (CARACO) #30
NDC: 57664051688
Dr. BELLIS, KIRK
Auth. #

\$18.00

Get NOPP Ack.

14			
15			
RECEIVED BY:	<i>[Signature]</i>		\$18.00

696836

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE 7/30/07
NAME: <i>Certeza, Megan</i>		
ADDRESS: <i>Ch Little Treatment Center</i>		
CITY, STATE, ZIP		

PAID BY:	CASH	C.O.D.	CHARGE	ON ACCT	MOSE RID.	PAID OUT
				✓		

QUANTITY	DESCRIPTION	PRICE	AMOUNT
60	Rx # 571284 Benzotropine 0.5 mg		9.00

MEGA DRUG 1
255 PARENHOLT AVE.
TAMUNING, GU. 96913
Rx No: 571284 C 07/30/07 GM
CERTEZA, MEGAN
POB 704 TAMUNING, GU. 96911

INSURANCE
RECEIPT

(671) 472-5282

BENZTROPINE MESYL 0.5MG TAB (UPSHER) #60
NDC: 00832108000
Dr. BELLIS, KIRK
Auth. #

\$9.00

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	DATE 7/30/07	AMOUNT 9.00
------------------------------------	-----------------	----------------

696798

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT. L/T	DATE: 7/24/07
NAME: Gilven Charfauros		
ADDRESS: Uo Lalle Treatment		
CITY, STATE, ZIP		

SOLD BY: Robby	CASH	C.O.D.	CHARGE	ON ACCT	ADST RTD	PAID OUT
----------------	------	--------	--------	---------	----------	----------

QUANTITY	DESCRIPTION	PRICE	AMOUNT
15	557329 clonazepam 0.5mg		4.50

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE
RECEIPT

R# No: 557329 C 07/24/07 GM
CHARFAUROS, GILVEN
PO DYA POB 21672 GMF, GU. 96921

671646-5355
(671) 734-3911

CLONAZEPAM 0.5MG TAB (SANDOZ) #15
NDC: 00185006305
Dr. HELLIS, KIRK
Auth. #

\$4.50

Get NOPP Ack.

14					
15					4.50
RECEIVED BY: 					

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©2001 REDIFORM® 51320

696830

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 07/18/07
NAME: Charfauros, Gilven		
ADDRESS: do Lute Tamuning		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT	MDSE RTD.	PAID OUT
			/			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
# 30	Ritalin 10mg		22.50
	Rx 569581		

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE RECEIPT
671646-5355
07/18/07 GM
(671)734-3911

Rx No: 569581 C
CHARFAUROS, GILVEN
C/O DVA POB 23672 CNF. GIL 96921

METHYLPHENIDATE 10MG TAB (MALLINKRDT) #30
NDC: 00406112201
Dr. BELLIS, KIRK
Auth. #

\$22.50

Get NOPP Ack.

RECEIVED BY: *[Signature]*

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©2001 REDIFORM 51320

696827

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 7/13/07
NAME: ERIC DOMINGUEZ		
ADDRESS: c/o LATTE TX.		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE /	DN ACCT.	ADJSE RD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
60	1 RX # 568835		\$ 301.20
	2 Adderall XR 20 mg		
	3		

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE RECEIPT

Rx No: 568835 C 07/13/07 CD
DOMINGUEZ, ERIC
368 FATHER DUENAS DRIVE TAMUNING, GU. 96913

671646-5355
671-647-5390

ADDERALL XR 20MG CAP (SHIRE) #60
NDC / 54092038701
Dr. BELLIS, KIRK
Auth #

\$301.20

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	15	\$301.20
---------------------------------	----	----------

696834

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 7-27-07
NAME: KN, Niosy		
ADDRESS: c/o Latic Treatment		
CITY, STATE, ZIP		

SOLD BY: <i>ae</i>	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	CON ACCT.	MISC RTD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
#60	1 Depakote 500mg		157.81 20
#60	3 Serquel 100mg		254.40 40

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

Rx No: 570829 C
NIOSEY, KN
115 MAZIEITA WAY STA. BARBARA VIGO, GU 96929

SERQUEL 100MG TAB (ZENECA) #60
NDC: 00310027110
Dr. BELLIS, KIRK
Auth. #

INSURANCE
RECEIPT

671646-53
07/27/07 CD
671-647-5390

\$254.40

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	<i>As 438.00</i>
---------------------------------	------------------

696829

MEGA DRUG
TAMUNING, GUA*1
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 7/18/07
NAME: Noisy, KN		
ADDRESS: Ylo Lath Treatment		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	DN ACCT.	MOSE RTD.	PAID OUT
----------	------	--------	--------	----------	-----------	----------

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#30	Amphetamine Salts		40.50
	10 mg		
	Rx 569582		

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE
RECEIPT

Rx No: 569582 C 07/18/07 GM
NOSY, KN 671-647-5390
11 MARIETTA WAY STA. BARBARA YIGO, GU 96929

AMPHETAMINE SALTS 10MG TAB (SANDOZ) #30
NDC: 00185011101 \$40.50
Dr. BELLIS, KIRK
Auth. #

Get NOPP Ack.

[Handwritten Signature]

554255

MEGA DRUG
TAMUNING, GUAM
TEL - 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8-6-07
NAME: Amber Okada		
ADDRESS: c/o Latte Treatment		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACC	INSURED	PAID C/D
			/			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#30	Rx 572468		
1	Cozaar 50mg		67.80
2			

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913 671646-5355
INSURANCE 356.40
RECEIPT

Rx No: 572468 C 08/06/07 AM
OKADA, AMBER M. (671)637-1463
POB 6/16 MOM 4799063 TAMUNING, GU. 96931
F.80

TRILEPTAL 600MG TAB (NOVARTIS) #60 \$356.40 432.00
NDC: 00078045705
Dr. BELLIS, KIRK
Auth. #

Get NOPP Ack.

14			
15			
RECEIVED BY:	<i>[Signature]</i>		

696838

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 2/10/07
NAME: <i>PHYSICIAN</i>		
ADDRESS: <i>Old Latta Treatment Center</i>		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ROW ACCT.	MDST RTD.	PAYD DLT.
			/			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
190	Rx 559005		18.00
2	(<i>originals for patient 1/1/06</i>)		

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

**INSURANCE
RECEIPT**

Rx No: 559005 C 08/04/07 CD
 TOVES, JERMI TODD S. (671) 637-4582
 123 DELFA CT. LIQUAN TER. DEDE. DO. 96912

CLONAZEPAM 0.5MG TAB (SANDOZ) #90
 ND#: 00185006305 \$18.00
 DR. BELLIS, KIRK
 Auth. #

Get NOPP Ack.

14	AVT		
15			
RECEIVED BY: <i>[Signature]</i> // 10-10			

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Latte Treatment Center LLC

308 Fr Duenas Drive
 Tamuning, Guam 96913
 671-647-5390 fax 671-647-5392

Invoice No. 126 Services

INVOICE

Customer

Name Department of Mental Health
 Address 790 Gov Carlos G. Camacho Road
 City Tamuning State GU ZIP 96913
 Phone 671-647-5330

Date 8/31/2007
 Order No. 126 Services
 Rep August
 FOB _____

Qty	Description	Unit Price	TOTAL
	2 RTC; 6 TGH; 5 Day Tx; 4 Respite Clients		
31	RTC and TGH (recorded in days)	\$1,761.29	\$54,599.99
5	Day Treatment Servcies	\$1,130.00	\$5,650.00
5	Respite (recorded in hours)	\$10.00	\$50.00
26	Respite (recorded in days)	\$176.10	\$4,578.60
	RTC- EA, JT TGH- MC, GC, ED, KN, CC, SL ROH- RA, RG, AG, RL, JM Respite- AG, KK, AO, JT		

Payment Details

- Cash
- Check
- Credit Card

Name _____
 CC # _____
 Expires _____

SubTotal	\$64,878.59
Shipping & Handling	
Taxes State	
TOTAL	\$64,878.59

Office Use Only

Thank you for the opportunity to serve your clients.

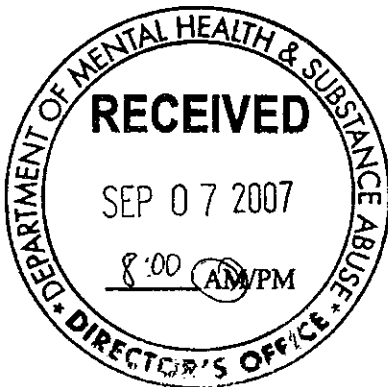
LATTE TREATMENT CENTER LLC

FACSIMILE TRANSMITTAL SHEET

TO: Andrea Leitheiser, PhD	FROM: Luis Valdes
COMPANY: DMH	DATE: 9/4/07
FAX NUMBER: 671-649-6948	TOTAL NO. OF PAGES INCLUDING COVER: 2
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE: August 2007 Latte Services Invoice	YOUR REFERENCE NUMBER:

- URGENT
 FOR REVIEW
 PLEASE COMMENT
 PLEASE REPLY
 PLEASE RECYCLE

NOTES/COMMENTS:



Statement

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

LATTE TREATMENT CENTER

Remit To Address:

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

Phone: (281)489-9409

Bill To:

LATTE TREATMENT CENTER
c/o Luis Valdes, Ph.D.
3926 Bahler Ave
Manvel, TX 77578

Customer No.:	GUA	GUA
Page:	LATTER	LATTER
Date:	1	1
	08/31/07	08/31/07

INVOICE NO.	DATE	TYPE	INVOICE NO.	DATE	DESCRIPTION	AMOUNT	INVOICE NO.	AMOUNT
53843175	08/01/07	PY			Balance Forward	\$15,825.19		\$15,825.19
000004623	08/09/07	AD				(\$16,455.16)	2053843175	(\$16,455.16)
000004710	08/31/07	IN	08/31/07	18621	08/09/07 AGUERO, EMORY 90 SEROQUEL TAB 25MG	\$208.20	IN000004623	(\$401.78)
				18927	08/30/07 AGUERO, EMORY 30 SEROQUEL TAB 100MG	\$127.04	18621	\$208.20
				17197	08/08/07 CELLONA, CLINTON 30 SEROQUEL TAB 100MG	\$121.23	18927	\$127.04
				18575	08/08/07 CERTEZA, MEGAN 60 BENZTROPINE TAB 0.5MG	\$16.36	17197	\$121.23
				15103	08/08/07 CHARFAROUS, GILVEN 30 DEPAKOTE TAB 250MG DR	\$54.38	18575	\$16.36
				16316	08/14/07 CHARFAROUS, GILVEN 60 GEODON CAP 40MG	\$366.75	15103	\$54.38
				18817	08/21/07 CHARFAROUS, GILVEN 60 DEPAKOTE TAB 500MG DR	\$192.40	16316	\$366.75
				16244	08/08/07 DOMINGUEZ, ERIC 30 SEROQUEL TAB 200MG	\$224.27	18817	\$192.40
				16494	08/21/07 LIZAMA, SILINA 30 SERTRALINE TAB 50MG	\$90.40	16244	\$224.27
				16972	08/21/07 LIZAMA, SILINA 30 SERTRALINE TAB 25MG	\$86.46	16494	\$90.40
				17196	08/21/07 LIZAMA, SILINA 30 SEROQUEL TAB 100MG	\$127.04	16972	\$86.46
				18577	08/08/07 TOVES, JERMI 30 DOCUSATE SOD CAP 100MG	\$6.78	17196	\$127.04
				15164	08/21/07 TOVES, JERMI 180 SEROQUEL TAB 25MG	\$431.71	18577	\$6.78
							15164	\$431.71
000004710	08/31/07	AD			Invoice Total	\$2,053.02		\$2,053.02
						(\$432.13)	IN000004710	(\$432.13)

IN - Invoice DB - Debit Note AD - Adjustment ED - Earned Discount PI - Prepayment
CR - Credit Note PY - Payment Receipt UC - Unapplied Cash IT - Interest Payable

Total: \$589.14

Total: \$589.14

• 30 Days O/Due 31 - 60 Days O/Due 61 - 90 Days O/Due Over 90 Days O/Due
\$0.00 \$0.00 \$0.00 \$294.78

ACCOUNT OVERDUE. PLEASE PAY IMMEDIATELY.

E-MAILED
8/12/07
TO DR. Uatades

MEGA DRUG

#255 Farenholt Avenue

Tamuning, Guam 96913 USA

Tel. No. (671) 646-5355 Fax No. (671) 646-5333

September 19, 2007

LATTE TREATMENT CENTER

308 Father Duenas Drive
Tamuning, Guam 96915

Attn.: Daniel/Suzanne Cantu'

Dear Sir/Madam,

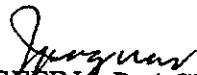
Below is a list of prescriptions authorized by your good office to be filled at Mega Drug-Tamuning for the following patients:

Rx # 573629 08/13/07 for: KN Niosy Amphetamine Salts 10mg tab. #30	40.50
Rx # 573628 08/13/07 for: Dominguez, Eric Adderall XR 20mg caps. #60	301.20
Rx # 573626 08/13/07 for: Charfauros, Gilven Methylphenidate 10mg tabs. #30	22.50
Rx # 573627 08/13/07 for: Charfauros, Gilven Clonazepam 0.5mg tabs. #30	6.00
OTC Medicine 08/13/07 for: Charfauros, Gilven Centrum #1 bottle	13.45
Rx # 574283 08/17/07 for: Charfauros, Gilven Geodon 20mg caps. #30	188.70
Rx # 574282 08/17/07 for: Charfauros, Gilven Geodon 40mg #30	189.00
Rx # 574389 08/18/07 for: Jeremi Toves Seroquel 25mg tabs. #180	446.20
Rx # 574390 08/18/07 for: Jeremi Toves Docusate 100mg # 30	4.50
Rx # 574635 08/20/07 for: Megan Certeza Seroquel 100mg tabs. #150	669.00

Rx # 556807 08/26/07 for: Okada, Amber Geodon 80mg #60	79.72
Rx # 574608 08/26/07 for: Charfauros, Gilven Depakote EC 250mg #30	52.80
Rx # 574607 08/26/07 for: Charfauros, Gilven Depakote 500mg #30	181.20
Rx # 552403 08/27/07 for: Certeza, Megan Fluoxetine 20mg # 30	10.00
Rx # 575943 08/27/07 for: Lizama, Silina Sertraline 25mg #90	72.00
Rx # 577355 09/05/07 for: Toves, Jeremi Clonazepam 0.5mg tabs. #60	12.00
Rx # 577380 09/05/07 for: Okada, Amber Geodon 80mg caps. #90	721.80
Rx # 577366 09/05/07 for: Okada, Amber Clonazepam 0.5mg tabs. #10	1.00
Rx # 578499 09/12/07 for: Charfauros, Gilven Clonazepam 0.5mg. #30	6.00
Rx # 578498 09/12/07 for: Charfauros, Gilven Methylphenidate 5mg #30	19.50
Rx # 578497 09/12/07 for: Dominguez, Eric Adderall XR 20mg #60	<u>301.20</u>
Total Amount Due	<u><u>\$3,338.27</u></u>

Kindly remit payment at the above address. Please see enclosures for details.

Thank you,


JOSEFINA P. AGUAS
Clerk-Billing Dept.

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

554459

CUSTOMER'S ORDER NO.	DEPT. <i>L/T</i>	DATE: <i>8/13/07</i>				
NAME: <i>KN Niosy</i>						
ADDRESS:						
CITY, STATE, ZIP	<i>Latta Treatment</i>					
SOLD BY: <i>Robby</i>	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	ON ACCT.	ADSE RTD.	PAID OUT

QUANTITY	DESCRIPTION	PRICE	AMOUNT
<i>30</i>	<i>RX 573629 Adderal comp (generic)</i>		<i>40.50</i>
1			
2			
3			

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

Rx No: 573629 C

NIOSY, KN

115 MARIETTA WAY STA. BARBARA YIGO, GU. 96929

AMPHETAMINE SALTS 10MG TAB (SANDOZ) #30
NDC: 00185011101

Dr. BELLIS, KIRK

Auth. #

INSURANCE
RECEIPT

671646-5355 AM
08/13/07
671-647-5390

\$40.50

Get NOPP Ack.

15	RECEIVED BY: <i>[Signature]</i>	\$ 40.50
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554460

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT. <i>L/T</i>	DATE: <i>8/13/07</i>
NAME: <i>Eric Dominguez</i>		
ADDRESS:		
CITY, STATE, ZIP <i>Late Treatment</i>		

SOLD BY: <i>obby</i>	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	ON ACCT.	MDSE RTD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
<i>60</i>	<i>Rx 573628 Adderall XR 20MG</i>		<i>\$301.20</i>

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913
Rx No: 573628 C 08/13/07 AM
DOMINGUEZ, ERIC
308 FATHER DUENAS DRIVE TAMUNING, GU. 96913
Auth. #

INSURANCE RECEIPT

671646-5355
671-647-5390

ADDERALL XR 20MG CAP (SHIRE) #60
NDC: 54092038701
Dr. BELLIS, KIRK

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	<i>\$301.20</i>
---------------------------------	-----------------

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

554461

CUSTOMER'S ORDER NO.	DEPT. <i>C/T</i>	DATE: <i>8/13/07</i>
NAME: <i>Gilven Charfauros</i>		
ADDRESS:		
CITY, STATE, ZIP <i>Late Treatment</i>		

SOLD BY: <i>Robby</i>	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
<i>30</i>	<i>Rx 573626 Ritalin 10mg (generic)</i>		<i>\$22.50</i>
<i>30</i>	<i>Rx 573627 Clonazepam 0.5 mg</i>		<i>\$6.00</i>
<i>1</i>	<i>Centrum (OTC)</i>		<i>\$13.45</i>

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

INSURANCE
RECEIPT

Rx/No: *573626 C*
CHARFAUROS, GILVEN
C/O DYA POB 23672 GMF, GU. 96921

671646-5355
08/13/07 AM
(671) 734-3911

METHYLPHENIDATE 10MG TAB (MALLI) #30
NDC: 00406112201
Dr. BELLIS, KIRK
Auth. #

573626

Get NOPP Ack.

RECEIVED BY: *[Signature]*

41.95

696842

MEGA DRUG
Latta TAMUNING, GUAM
Treatment
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/17/07
NAME: Gilven Charfauros		
ADDRESS: c/o Latta Treatment		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
			<input checked="" type="checkbox"/>			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#30	Rx 574283 Geodon 20mg		188.70

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

Rx No: 574283 C
CHARFAUROS, GILVEN
C/O DYA POB 23672 GMF, GU. 96921

GEODON 20MG CAP (ROERIG) #30
NDC: 00049396060
Dr. BELLIS, KIRK
Auth. #

INSURANCE
RECEIPT

671646-5355
08/17/07 AM
(671)734-3911

189.00

5089.70

Get NOPP Ack.

RECEIVED BY:	<i>[Signature]</i>	\$ 377.70
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696843

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/18/07
NAME: JEREMY TOVES		
ADDRESS:		
CITY, STATE, ZIP: C/O LATTE TX.		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
			/			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
180	RX # 574389 SEROQUEL 25mg		446.20
30	RX # 574390 DOCUSATE 100mg		4.50
			450.70

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

671646-5355
CD

INSURANCE
RECEIPT

Rx No: 574389 C 08/18/07
TOVES, JEREMI
308 FATHERV-DUENAS DR. TAMUNING, GU. 96913

SEROQUEL 25MG TAB (ZENECA) #180
NDC: 00310027510
Dr. BELLIS, KIRK
Auth. #

5066.20

Get NOPP Ack.

RECEIVED BY: *[Signature]*

400.70

696844

MEGA DRUG
TAMUNING, GUA'1
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/20/07
NAME: MEGAN CERTEZA		
ADDRESS: c/o LTC		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	ON ACCT.	MDSE RTD.	PAID OUT
----------	------	--------	--	----------	-----------	----------

QTY	DESCRIPTION	PRICE	AMOUNT
# 150	RX# 574635 Seroquel 100mg.		669.00

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

Rx No: 574635 C
CERTEZA, MEGAN
POB 7704 TAMUNING., GU. 96931

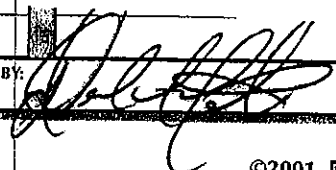
SEROQUEL 100MG TAB (ZENECA) #150
NDC: 400310027110
Dr. BELLIS, KIRK
Auth. #

INSURANCE
RECEIPT

671646-5355
08/20/07 GM
(671) 472-5282

6669.00

Get NOPP Ack.

RECEIVED BY: 	669.00
--	--------

696845

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/26/07
NAME: OKADA, AMBER		
ADDRESS: c/o LATTE TREATMENT		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
			<input checked="" type="checkbox"/>			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
#60	RE JTG807 - GEODON		79 72
<p>MEGA DRUG 1 255 FARENHOLT AVE. TAMUNING, GU. 96913 RX No: 556807 U OKADA, AMBER M. POB 6016 MOM 4799065 TAMUNING, GU. 96931</p> <p>GEODON 80MG CAP (ROERIG) #60 NDC: 00049399060 Dr. BELLIS, KIRK S BRONZE Auth. # 07238029810901</p> <p>Get NOPP Ack.</p>			
<p>INSURANCE RECEIPT 671646-53 ZL 08/24/07 (671) 637-1463</p>			
<p>RECEIVED BY: <i>[Signature]</i></p>			79 72

696846

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/26/07
NAME: CHARFAUROS, GILVEN		
ADDRESS: c/o LATTE TREATMENT		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
			<input checked="" type="checkbox"/>			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
# 30	Rx # 574608 - Depakote 250mg # 30		52 80
# 60	Rx # 574607 - Depakote 500mg # 30		181 20

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913

Rx No: 574608 C
CHARFAUROS, GILVEN
C/O DYA POB 23672 GMF, GU. 96921

INSURANCE RECEIPT
671646-535
08/20/07 GM
(671) 734-3911

DEPAKOTE-EC 250MG TAB (ABBOTT) #30
NDC: 00074621453
Dr. BELLIS, KIRK
Auth. #

552.80

Get NOPP Ack.

RECEIVED BY: 	\$ 234.00
--	-----------

696848

MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/27/07
NAME: Megan Cerfeza		
ADDRESS: 40 Latta Tr		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	ON ACCT.	MOSE RTD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
30	Pk # 552403 Fluoxetine 20mg		\$ 10 -

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913
Rx No: 552403 U
CERTEZA, MEGAN
POB 7704 TAMUNING, GU. 96931

INSURANCE
RECEIPT
671646-5355 GM
08/27/07
(671) 472-5282

FLUOXETINE 20MG CAP (PLIVA) #30
NDC: 50111064801
Dr. BELLIS, KIRK
SELECT F Auth. # 07118820515731

\$10.00

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	\$ 10 -
---------------------------------	---------

696849

MEGA DRUG
TAMUNING, GUA*1
TEL: 646-5355

CUSTOMER'S ORDER NO.	DEPT.	DATE: 8/29/07
NAME: Silina Lizama		
ADDRESS: C/o Lute Tx		
CITY, STATE, ZIP		

SOLD BY:	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
			✓			

QUANTITY	DESCRIPTION	PRICE	AMOUNT
90	PA# 575943 Sertraline 25mg		72-

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913
R_x No: 575943 C
LIZAMA, SILINA
30 FR. DUENS DR. MANGILAO, GU. 96913

INSURANCE
RECEIPT

671646-5355 GM
671-472-6709

SERTRALINE 25MG TAB (GREENSTONE) #90
NDC: 59762496001
Dr. BELLIS, KIRK
Auth. #

572.00

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	\$ 72-
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MEGA DRUG
TAMUNING, GUAM
TEL: 646-5355

554307

CUSTOMER'S ORDER NO.	DEPT.	DATE: 9/5/07
NAME: Amber Okada		
ADDRESS: Latte Treatment		
CITY, STATE, ZIP		

SOLD BY: Robby	CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RTD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
90	Rx 577390 Geddon 80mg		721.80
10	Rx 577364 Clonazepam 0.5		1.00

MEGA DRUG 1
255 FARENHOLT AVE.
TAMUNING, GU. 96913
Rx No: 577380 C 09/05/07 GM
OKADA, AMBER M.
POB 6016 MOM 4799065 TAMUNING, GU. 96931

INSURANCE
RECEIPT
671646-53
(671) 637-1463

GEDDON 80MG CAP (ROERIG) #90
NDC: 00049399060
Dr. BELLIS, KIRK
Auth. #

577390

Get NOPP Ack.

RECEIVED BY: 	722.80
--	--------

MEGA DRUG
 TAMUNING, GUA*1
 TEL: 671 7355

554308

CUSTOMER'S ORDER NO.	DEPT.	DATE: 9/14/07
NAME: Gilven Charfauros		
ADDRESS: c/o Lette Treatment		
CITY, STATE, ZIP		

SOLD BY: <i>REC</i>	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	ON ACCT.	MOSE RTD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
#30	Rx 578499 Clonazepam 0.5		\$6.00
	Rx 578498		
			\$19.50

MEGA DRUG 1
 255 FARENHOLT AVE.
 TAMUNING, GU. 96913
 Rx No: 578499 C
 CHARFAUROS, GILVEN
 C/O DYA POB 23672 GMF. GU. 96921
 CLONAZEPAM 0.5MG TAB (SANDOZ) #30
 NLC: 00185006305
 Dr. BELLIS, KIRK
 Auth. #

INSURANCE RECEIPT

671646-5355
 09/12/07 GM
 (671) 734-3911

\$6.00

Get NOPP Ack.

RECEIVED BY: <i>[Signature]</i>	\$25.50
---------------------------------	---------

MEGA DRUG
 TAMUNING, GUAM.
 TEL: 671-5355

554309

CUSTOMER'S ORDER NO.	DEPT.	DATE: 9-14-07
NAME: Eric Dominguez		
ADDRESS: % Lette [unclear]		
CITY, STATE, ZIP		

SOLD BY: [Signature]	CASH	C.O.D.	CHARGE <input checked="" type="checkbox"/>	ON ACCT.	MDSE RTD.	PAID OUT
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QUANTITY	DESCRIPTION	PRICE	AMOUNT
#60	Rx 578497 Adderall XR 20mg		\$301.20

MEGA DRUG 1
 255 FARENHOLT AVE.
 TAMUNING, GU. 96913
 Rx No: 578497 C 09/12/07 GM
 DOMINGUEZ, ERIC
 308 FATHER DUENAS DRIVE TAMUNING, GU. 96913
 ADDERALL XR 20MG CAP (SHIRE) #60
 NDC: 54092038701
 Dr. BELLIS, KIRK
 Auth. #

INSURANCE RECEIPT

671646-5355
 671-647-5390

Get NOPP Ack.

RECEIVED BY: [Signature]	#301 20
--------------------------	---------

Latte Treatment Center LLC

308 Fr Duenas Drive
 Tamuning, Guam 96913
 671-647-5390 fax 671-647-5392

Invoice No. 127 Services

INVOICE

Customer

Name Department of Mental Health
 Address 790 Gov Carlos G. Camacho Road
 City Tamuning State GU ZIP 96913
 Phone 671-647-5330

Date 9/30/2007
 Order No. 127 Services
 Rep September
 FOB _____

Qty	Description	Unit Price	TOTAL
	2 RTC; 6 TGH; 5 Day Tx; 6 Respite Clients		
30	RTC and TGH (recorded in days)	\$1,761.29	\$52,838.70
7	Day Treatment Services	\$1,130.00	\$7,910.00
76	Respite (recorded in hours)	\$10.00	\$760.00
24	Respite (recorded in days)	\$176.10	\$4,226.40
	RTC- EA TGH- MC, GC, ED, KN, CC, SL, ML ROH- RA, JF, AG, RL, KK, TQ, JM, JT, MA Respite- AO, KK, AG, JF, CC, ML		

Payment Details

- Cash
- Check
- Credit Card

Name _____
 CC # _____
 Expires _____

SubTotal	\$65,735.10
Shipping & Handling	
Taxes	
State	
TOTAL	\$65,735.10

Office Use Only

Thank you for the opportunity to serve your clients.

LATTE TREATMENT CENTER LLC

FACSIMILE TRANSMITTAL SHEET

TO: Andrea	FROM: Luis Valdes
COMPANY:	DATE: 10/01/07
FAX NUMBER: 671-649-948	TOTAL NO. OF PAGES INCLUDING COVER: 2
PHONE NUMBER:	SENDER'S REFERENCE NUMBER:
RE: Latte September '07 Services	YOUR REFERENCE NUMBER:

- URGENT
 FOR REVIEW
 PLEASE COMMENT
 PLEASE REPLY
 PLEASE RECYCLE

NOTES/COMMENTS:



RECEIVED
DATE: 11/13/07

Latte Treatment Center LLC

308 Fr Duenas Drive
Tamuning, Guam 96913
671-647-5390 fax 671-647-5392

Invoice No. 128 Services

INVOICE

Customer

Name Department of Mental Health
Address 790 Gov Carlos G. Camacho Road
City Tamuning State GU ZIP 96913
Phone 671-647-5330

Date 11/1/2007
Order No. 128 Services
Rep October
FOB _____

Qty	Description	Unit Price	TOTAL
	2 RTC; 6 TGH; 8 Day Tx; 5 Respite Clients, 1 Crisis		
31	RTC and TGH (recorded in days)	\$1,761.29	\$54,599.99
7	Day Treatment Services	\$1,130.00	\$7,910.00
123	Respite (recorded in hours)	\$10.00	\$1,230.00
15	Respite (recorded in days)	\$176.10	\$2,641.50
	RTC- EA, JL TGH- MC, GC, ED, KK, SL, JF ROH- RA, AG, RL, TQ, JM, JT, MA, KN Respite- AO, KK, AG, ML, KN Crisis-CC		

Payment Details

- Cash
- Check
- Credit Card

Name _____
CC # _____
Expires _____

SubTotal	\$66,381.49
Over Contract Rate	(\$481.49)
TOTAL	\$65,900.00

Office Use Only

Thank you for the opportunity to serve your clients.

Statement

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

LATTE TREATMENT CENTER

Bill To:

LATTE TREATMENT CENTER
c/o Luis Valdes, Ph.D.
3926 Bahler Ave
Manvel, TX 77578

Remit To Address:

Daystar Pharmacy
3926 Bahler
Manvel, TX 77578

Phone: (281)489-9409

Customer No.:	GUA	Customer No.:	GUA
Page:	LATTER	Page:	LATTER
Date:	09/30/07	Date:	09/30/07

Document No.	Doc. Date	Type	Due	Reference	Rx No.	Date/Qty	Patient/Drug	Amount	Document No.	Amount
IN000004804	09/30/07	IN	09/30/07	19029	09/04/07	90	Balance Forward AGUERO, EMORY SEROQUEL TAB 25MG	\$589.14		\$589.14
				16316	09/10/07	60	CHARFAROUS, GILVEN GEODON CAP 40MG	\$218.35	19029	\$218.35
				16495	09/10/07	60	CHARFAROUS, GILVEN GEODON CAP 20MG	\$366.75	16316	\$366.75
				16244	09/10/07	30	DOMINGUEZ, ERIC SEROQUEL TAB 200MG	\$366.75	16495	\$366.75
				16494	09/10/07	30	LIZAMA, SILINA SERTRALINE TAB 50MG	\$235.23	16244	\$235.23
				16972	09/10/07	30	LIZAMA, SILINA SERTRALINE TAB 25MG	\$90.40	16494	\$90.40
				17196	09/10/07	30	LIZAMA, SILINA SEROQUEL TAB 100MG	\$86.46	16972	\$86.46
								\$127.04	17196	\$127.04
							Invoice Total	=====		=====
								\$1,490.98		\$1,490.98
								(\$295.37)	IN000004804	(\$295.37)

IN - Invoice	DB - Debit Note	AD - Adjustment	ED - Earned Discount	PI - Prepayment	Total: \$1,784.75	Total: \$1,784.75
CR - Credit Note	PY - Payment Receipt	UC - Unapplied Cash	IT - Interest Payable			
- 30 Days O/Due	31 - 60 Days O/Due	61 - 90 Days O/Due	Over 90 Days O/Due			
\$294.36	\$0.00	\$0.00	\$294.78			

ACCOUNT OVERDUE. PLEASE PAY IMMEDIATELY.

MEGA DRUG

#255 Farenholt Avenue

Tamuning, Guam 96913 USA

Tel. No. (671) 646-5355 Fax No. (671) 646-5333

November 1, 2007

LATTE TREATMENT CENTER

308 Father Duenas Drive

Tamuning, Guam 96915

Attn.: Daniel/Suzanne Cantu

Dear Sir/Madam,

Below is a list of prescriptions authorized by your good office to be filled at Mega Drug-Tamuning for the following patients:

Rx # 582327 10/03/07 for: Jose Longa Seroquel 25mg #30	77.70
Rx # 582543 10/04/07 for: Megan Certeza Depakote 500mg #120	348.31
Rx # 577380 10/04/07 for: Amber Okada Geodon 80mg #90	721.80
Rx # 572469 10/04/07 for: Amber Okada Benzotropine 1mg #60	7.80
Rx # 572468 10/04/07 for: Amber Okada Trileptal 600mg #60	356.40
Rx # 572470 10/04/07 for: Amber Okada Cozaar 50mg #30	67.80
Rx # 82546 10/04/07 for: Amber Okada Clonazepam 0.5mg #30	6.00
Rx # 582540 10/04/07 for: Emery Agüero Geodon 80mg #60	20.00
Rx # 582653 10/05/07 for: Gilven Charfauros Ritalin 10mg #30	22.50
Rx # 582718 10/05/07 for: Jose Longa Concerta ER 27mg #60	292.20
Rx # 582953 10/07/07 for: Jose Longa Sertraline 100mg #30	27.00
Rx # 583408 10/09/07 for: Gilven Charfauros Clonazepam 0.5mg #30	6.00

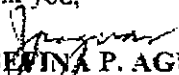
Cont'n. - Latte Treatment

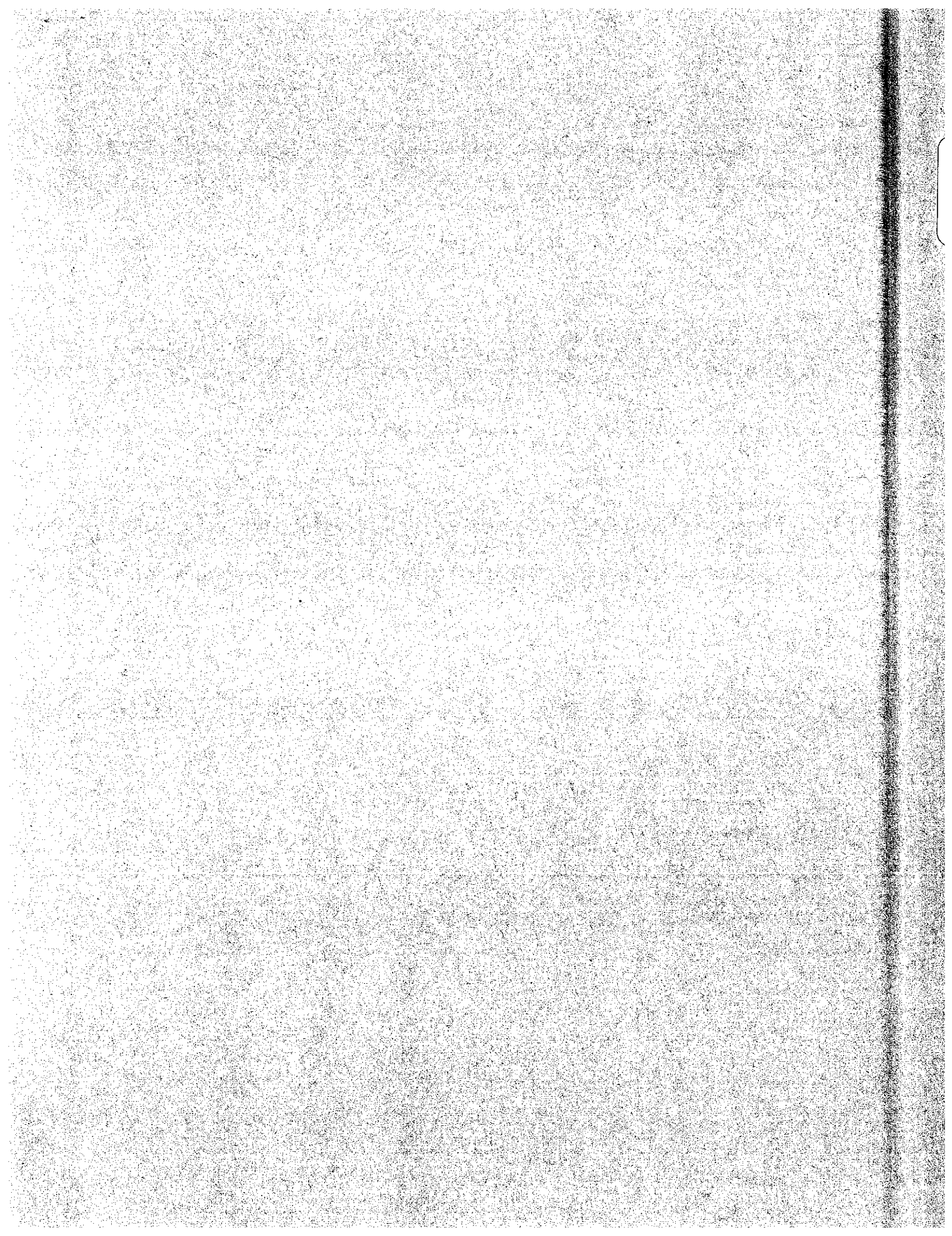
Page 2 of 2 Pages

Rx # 583407 10/09/07 for: John Flores Cheratussin AC #120ml	6.50
Rx # 583426 10/10/07 for: KN Niosy Seroquel 100mg #60	267.60
Rx # 583425 10/10/07 for: KN Niosy Depakote 500mg #60	181.20
Rx # 583756 10/11/07 for: KN Niosy Amphetamine Salts 10mg #30	40.50
Rx # 584372 10/15/07 for: Jeremi Toves Seroquel 25mg #180	466.20
Rx # 584373 10/15/07 for: Jeremi Toves Docusate Sodium 100mg #30	4.50
OTC Medicine 10/15/07 for: Jeremi Toves Vitamin B-2 #100	6.80
Rx # 584434 10/15/07 for: Eric Dominguez Adderall XR 20mg # 60	325.20
Rx # 584870 10/17/07 for: Emery Aguero Lithium Carbonate 300mg #90	5.00
Rx # 584677 10/17/07 for: John Flores Seroquel 25mg #30	77.70
Rx # 584873 10/17/07 for: Gilven Charfauros Doxycycline 100mg #14	8.40
OTC Medicine 10/17/07 for: Gilven Charfauros Centrum tabs. #130	13.95
Rx # 585383 10/21/07 for: Jose Longa Gentamicin Sulfate 0.3% sol. #5ml	7.50
Rx # 579438 10/23/07 for: Jeremi Toves Clonazepam 0.5mg #90	18.00
Rx # 581417 10/26/07 for: Megan Certeza Zolpidem Tart 10mg #30	18.00
Rx # 586961 10/29/07 for: Megan Certeza Fluoxetine 20mg #30	77.14
Rx # 581416 10/29/07 for: Megan Certeza Benztropine 0.5mg #60	13.67
Rx # 586962 10/29/07 for: Megan Certeza Seroquel 100mg #150	564.88
Total Amount Due	<u>\$ 4,056.25</u>

Kindly remit payment at the above address. Please see enclosures for details.

Thank you,


JOSEFINA P. AGUAS
Clerk-Billing Dept.



January 13, 2008

Dear Senator Frank Blas,

I just heard your interview to a KUAM reporter on the KUAM Sunday, January 13, 2008 News, about the Request for Proposal (RFP) for the Therapeutic Group Home and Rays of Hope. You mentioned my involvement with the RFP and my visit to Zackheim group homes. Since information is already leaking out to the public even before the oversight hearing, I feel I need to respond to you.

First, I want to remind you that there are two sides to every "story". It is disappointing to know that despite the fact that you know me, you also know about I Famagu'on-ta as you had gone on a federally funded trip with I Famagu'on-ta staff, and know my role as the Administrator of Children Mental Health Services, you did not give me or I Famagu'on-ta the courtesy to find out from us the other side of the "story". As a matter of fact, the other side of the "story" which you did not seek to get before speaking to KUAM was factual information rather than unfair, sensational journalism.

Let me say that it is common practice, in fact it is encouraged among our System of Care Communities to visit sites and see what they are doing that are best practices in children's mental health services. Someone in our system of care field had visited Dr. Zackheim's group homes and had highly recommended that I make the visit. As we, at I Famagu'on-ta had been exploring ways to help our youth, many who are of transition age and have lots of needs in the area of transitioning to adulthood, which are services desperately lacking on island, I decided to take up the invitation to visit Dr. Zackheim's transitional group homes. This was about 2 years ago and we were not anticipating any RFP at that time. In fact, Dr. Valdes was already into a year of running the therapeutic group home and the day treatment services. By the way, this side trip was paid out of my personal funds. For your information, I had also visited Dr. Valdes' Shiloh group homes in Manville, Texas during one of my business travels at the request of the former DMHSA Director back in 2005, prior to Dr. Valdes getting the sole source contract in June of the same year.

Now, with regards to the RFP, I do not think that there were 5 RFP's. I believe there were only 3 RFP's written, and one RFP had a repeated announcement due to problems with dates, making it appear as if there were more than 3 RFP's written. In October, I was tasked by the Acting Director to do the final (4th RFP) because the previous ones were not written appropriately for what was needed, and being the administrator for children services, I knew best what was needed. The RFP that I wrote was thoroughly reviewed and edited not only by the Acting Director but also an Attorney from the Governor's office.

Back in Sept. 20, 2007, I wrote the then Acting Director asking to be recused from the panel of reviewers. I was excused from reviewing the previous 2 proposals, but I was told I had to be part of the panel of reviewers in the last one, as I had written the RFP and was the most knowledgeable staff member on children's mental health services.

p.2

Now, if anyone is to review the proposals submitted by the 2 offerers, it is not difficult to see the vast difference between the two proposals as far as providing the organized and very comprehensive information requested in the RFP. This, in my opinion, was the deciding factor as to who had the highest score, and thus the recommended selection.

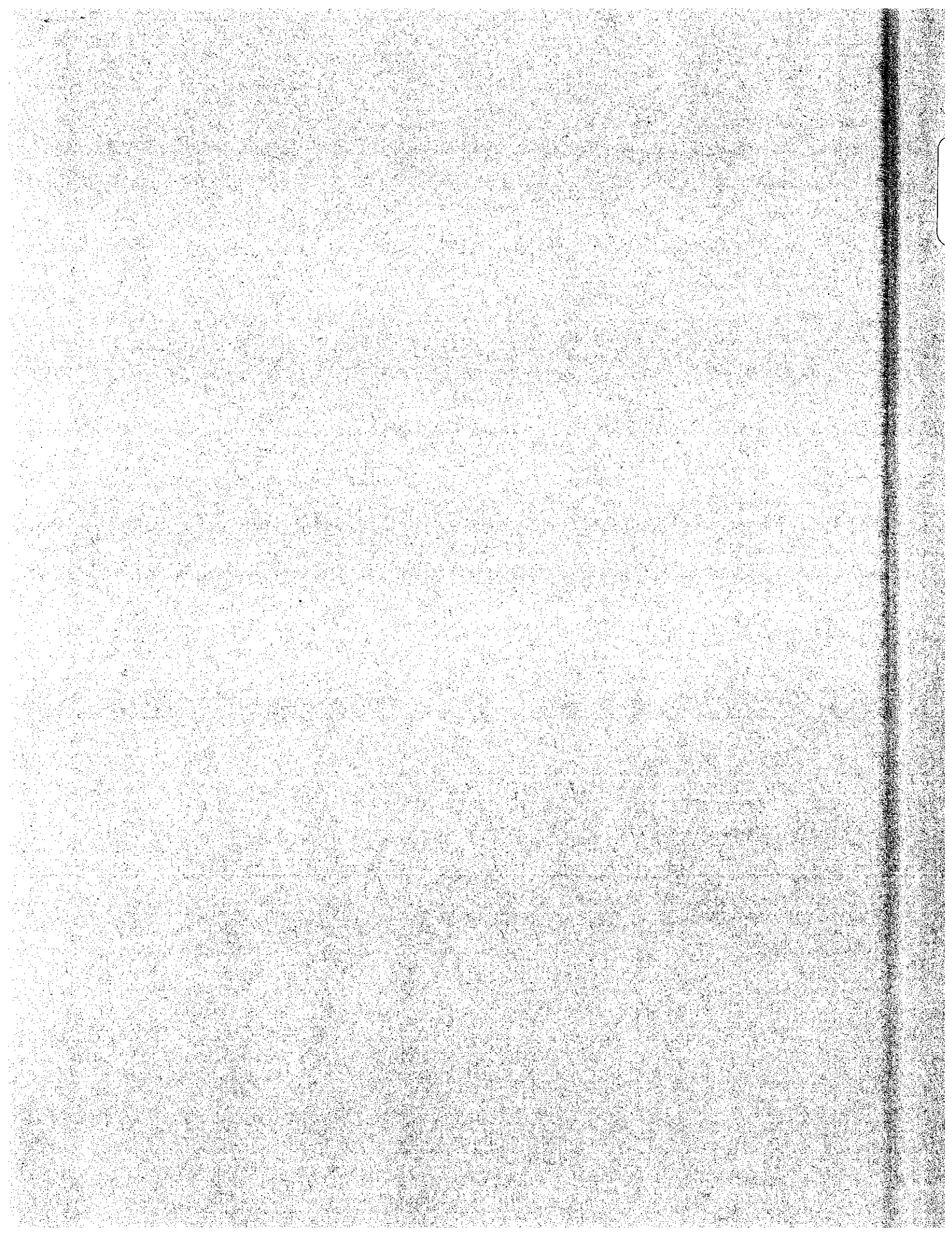
I shall be glad to provide additional information if needed to set the record straight.

Respectfully,

Annie F.B. Unpingco, LCSW
Administrator, Child-Adolescent Services Division and
Principal Investigator for I Famagu'on-ta

Attachment

Cc: Members of the Legislative Committee on Health, Human Services and Homeland
Security
DMHSA Acting Director prior to January 5, 2008
DMHSA Acting Director since January 5 2008.



Rena Borja

From: Annie Unpingco [annieunpingco@yahoo.com]
Sent: Wednesday, January 16, 2008 11:56 PM
To: andrea leitheiser
Cc: Linda Leon Guerrero
Subject: response to Valdes protest

Hi Andrea,

I am providing you my input in response to several questions in Valdes' RFP protest. The following are the only ones that I feel I am able to offer a response to. I hope it helps.

#8 and #9 on p. 2:

I visited Valdes' Shiloh Group Home in Manvel, Tx. (exact date is Nov. 2004) About 6 months prior to his "sole source" contract with DMHSA for the Group Home and Rays of Hope. I have also visited other group homes such as the Brown School Residential Home in Tulsa, Oklahoma, where some of Guam youth have been placed. It is not uncommon for manager/administrators to visit sites to see what services are there and what services/interventions that work. My visit to Zackheim's group home was to see what services and best practices are available for youth with complex mental health needs and who are transitioning into adulthood. These are services that are greatly needed and lacking on Guam. This took place over a year ago, Sept. 2006. There was no RFP anticipated during that time and Valdes was a year into his contract with DMHSA.

I paid for the trip to Zackheim's group home. The government paid for my side trip to Valdes' Shiloh group homes during a business travel. The trip to Brown School in Ok. was a site trip during a System of Care conference in Oklahoma.

I had made a request (Sept. 20, 2007 e-mail) to recuse myself from sitting as a reviewer to allow other representatives from child-serving agencies to participate in the review and selection process. I did not participate in the first two review panels. DMHSA Administration required my participation in the last RFP review panel (Dec. 4, 2007). I have been to both Valdes' and Zackheim's group homes.

#11 and other questions relating to the differences in content/language between the first (Aug. 2007) and second/third RFP (Sept. 2007) from the 3rd RFP (Oct. 2007) are due mainly because of the following: The first 2 RFPs were written by DMHSA staff who were not very familiar with children mental health services as they work with adults. The last RFP was written by the Children Services Administrator who knows the services very well.

The revisions were influenced by the feedbacks and experiences from families, youth and children services staff such as Wrap Coordinators and other staff of I Famagu'on-ta as well as reviews and edits from the Acting Director and Attorney representative from the Governor's office. The language regarding sex offender is a requirement by the AG's office on all service providers.

Let me know if you have any question and good luck.

Sincerely,
Annie

1/17/2008



Print - Close Window

Date: Wed, 16 Jan 2008 05:55:43 -0800 (PST)
From: "Annie Unpingco" <annieunpingco@yahoo.com>
Subject: response to Valdes protest
To: "andrea leitheiser" <drdreguam@yahoo.com>
CC: "Linda Leon Guerrero" <Linda.LeonGuerrero@mail.dmhsa.guam.gov>

Hi Andrea,

I am providing you my input in response to several questions in Valdes' RFP protest. The following are the only ones that I feel I am able to offer a response to. I hope it helps.

#8 and #9 on p. 2:

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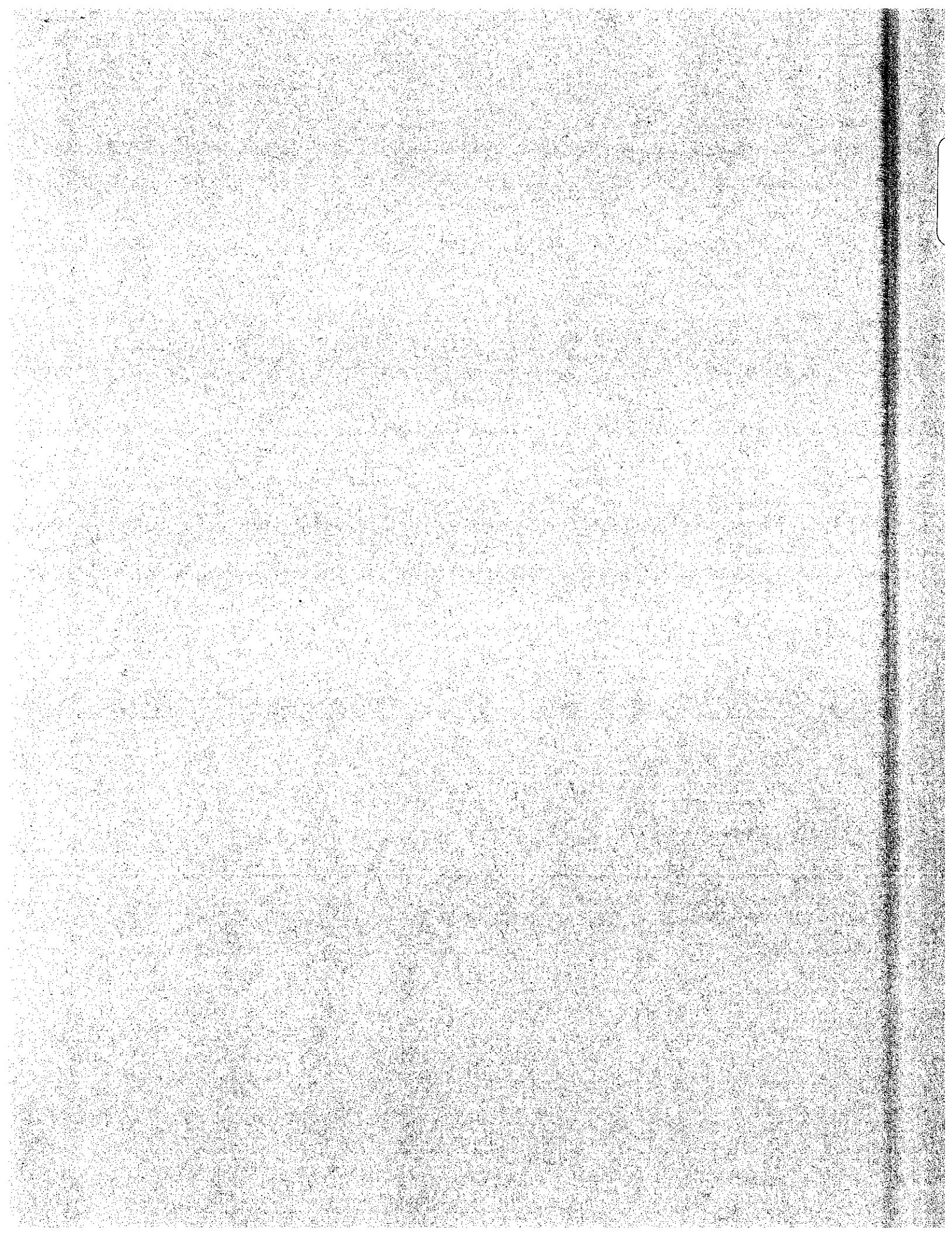
#11 and other questions relating to the differences in content/language between the first (Aug. 2007) and second/third RFP (Sept. 2007) from the 3rd RFP (Oct. 2007) are due mainly because of the following: The first 2 RFPs were written by DMHSA staff who were not very familiar with children mental health services as they work with adults. The last RFP was written by the Children Services Administrator who knows the services very well.

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Let me know if you have any question and good luck.

Sincerely,
Annie

Never miss a thing. [Make Yahoo your homepage.](#)



Alicia G. Limtiaco
Attorney General




Alberto E. Tolentino
Chief Deputy Attorney
General

Office of the Attorney General

May 15, 2008

Mr. Carlos Perez
Luis Valdes, Ph.D.
Latte Treatment Center
308 Father Duenas Drive
Tamuning, Guam 96932

*dropoff at the door
5/16/08 10:00 am
Nissan/Hu 1:00 pm*



RE: TGHRFP

Dear Mr. Perez and Dr. Valdes:

We are hereby responding to your letter of December 21, 2007. You request a thorough investigation of the procurement process by an entity other than DMHSA. You do not, however, suggest what that entity should be. There is a legal process for bid protests that will determine whether there have been irregularities. If you believe there has been criminal wrongdoing, please refer the matter to the appropriate authorities.

We will respond to your bullet points one by one.

1. The Procurement Law does not require us to provide this documentation. Since the matter is in a litigation posture, we believe it is better not to provide it.
2. We do not believe the law permits you to reserve rights at this point.
3. The question of renewal of an older contract is not part of a bid protest. DMHSA has already explained the decision not to renew, which is more than it is required to do. It believes that the new vendor will perform better. Latte did not meet the bid criteria.
4. See answer to No. 3.
5. See answers to No. 1 and No. 3.
6. See answers to No. 1 and No. 3.
7. See answers to No. 1 and No. 3.
8. Dr. Zackheim has been exonerated by a court and by the relevant licensing board regarding this allegation, which has no bearing on the bid.
9. See answer to No. 8.
10. This allegation is ill founded and malicious. We will not respond further.
11. Latte did not meet the criterion DMHSA determined were appropriate to making the award.
12. This is a question about the state of the law. Please consult your attorney.

13. Originally, there was no money available, but DMHSA eventually chose to use other money from its budget to fund the contract.
1. This point lacks details. Please provide the times, dates, means of enquiry and the identities of the persons asked for information.
2. This point has no bearing on a bid protest. If Dr. Valdes believes he was defamed, he may consult an attorney.
3. We disagree that no reason was given. Latte did not meet the bid criteria.
4. Your use of the phrase "restriction of trade" is unclear. Failure to process invoices, or any problem that occurred in the administration of a previous contract, is not grounds for a bid protest. As you know, the government is experiencing financial difficulty. Payments were made as promptly as possible.
5. See answer to No. 4.
6. See answer to No. 4.
7. See answer to No. 4.
8. Even if this allegation were true, it would not violate the procurement laws. It is not relevant to a bid protest.
9. See answer to No. 8.
10.
 - a. See answer to No. 8.
 - b. See answer to No. 8.
 - c. See answer to no. 3. We cannot respond because you fail to state why Latte was erroneously disqualified.
 - d. See answer to No. 8.
 - e. We cannot respond because we fail to see from the vagueness of the allegation how the sequence of RFPs was altered.
 - f. See previous answer.

Possible Violations, etc.

1. We do not believe this is a violation and you fail to cite a law that would make it so.
2. Assuming that this allegation is true, it is not a violation.
3. Assuming that this allegation is true, it is not a violation.
4. We do not believe this is factually correct.
5. See answer to No. 2.
6. We cannot respond because you do not identify the person making the disclosure or the information disclosed.
7. We do not understand this allegation.

Possible Violations of Chapter 5 Guam Procurement Law

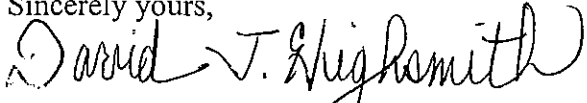
1. The bid winner will, as required by Guam law, acquire a Guam business license. It will also employ local residents in its program, as would seem inevitable. Local experience was not one of the bid criteria. We believe that the "local preference" in the law relates mainly to construction contracts and agreements to purchase items and much less to contracts to provide professional services.

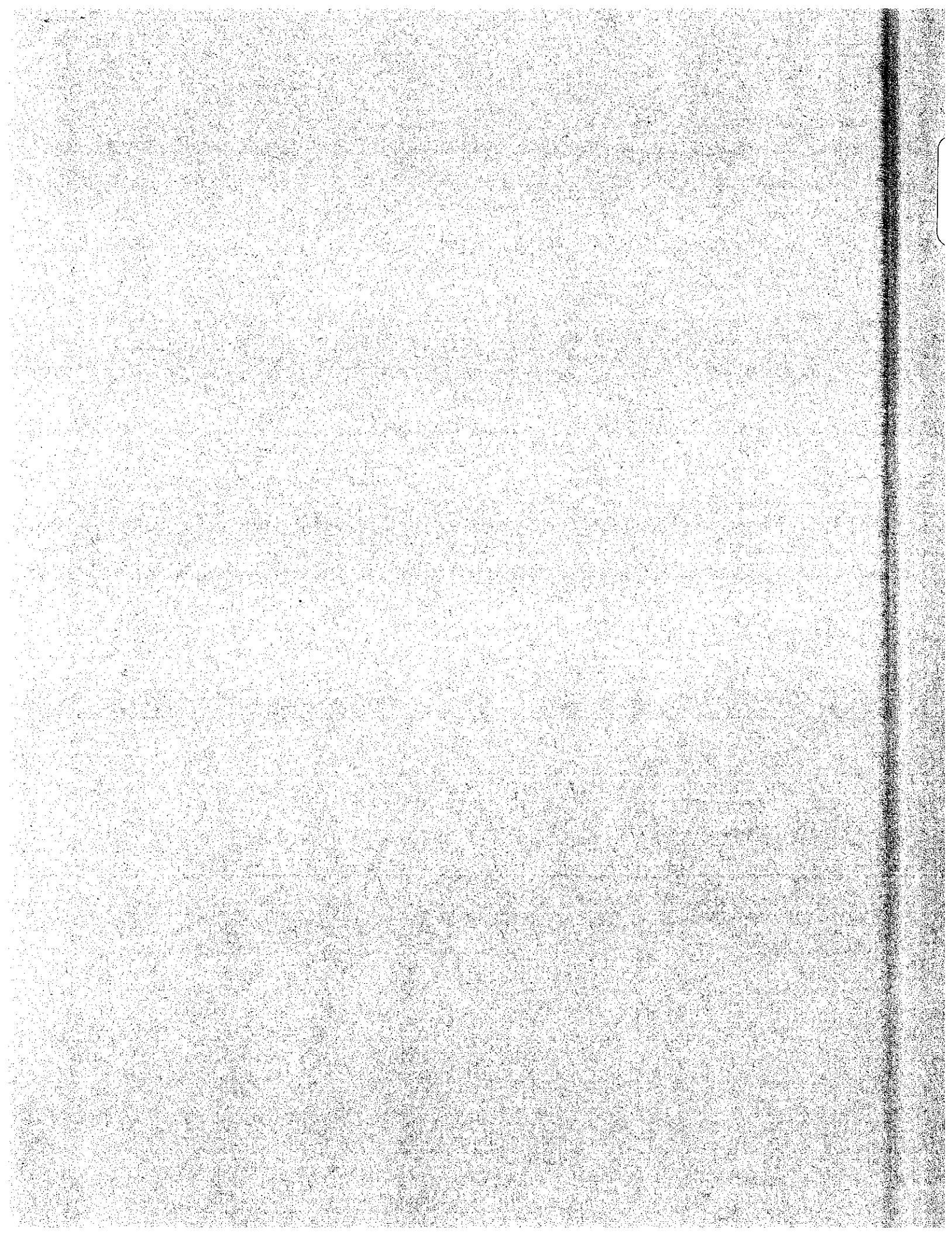
2. As stated above, the administration of a previous contract has no bearing on a bid process. DMHSA was free to renew or go through procurement as its choice.
3. We cannot respond because you do not state what information was requested or allegedly withheld.
4. This had no bearing on the award.

Your letter alleges undue influence, defamation, favoritism and possible criminal activity. If you have the slightest evidence to support these allegations please provide it to us and to the appropriate authorities. If you do not, please cease from making unfounded, malicious allegations against government employees who bear you no ill will and do not deserve this treatment.

We are grateful to Latte for its years of service to the community. However, it is in everyone's best interest if Latte accepts this decision.

Sincerely yours,


DAVID J. HIGHSMITH
Assistant Attorney General



Latte Treatment Center, LLC
308 Fr. Duenas Drive Tamuning, Guam 96913
Phone 671-475-5390 Fax 671-475-5392

28 May 2008

To: Alicia Limtiaco
Attorney General
Office of the Attorney General
287 West O'Brien Drive
Hagåtña, Guam 96910

Re: **TGH RFP**

Dear Madame Attorney General,

Please be advised that I am in receipt of Assistant Attorney General Highsmith's 15 May 2008 letter pertaining to my letter of protest on the subject RFP.

Foremost and regrettably, I must inform you that I take exception to the AAG's comments that my request for an explanation was "malicious", as I am only requesting an explanation as to why information in the RFP was changed to reflect specific information that was not included in prior, but related, RFPs. I do not understand and I take exception to the strong language "If you do not, please cease from making unfounded, malicious allegations against government employees who bear you no ill will and do not deserve this treatment". The Latte Treatment Center is only exercising its right to obtain clarification in accordance with Guam law. Further, I do not understand what he means by "litigation posture". I thought I was asking for a review.

As mentioned in the AAG's letter, please note that the Latte Treatment Center continues to follow 5 GCA pertaining to the bid protest process. To date, Latte continues to await a *prompt* Notice of Protest Decision from the DMHSA, as required by 5 GCA. Please provide written clarification if the AAG's response is being made on behalf of DMHSA. If the 15 May 2008 AAG letter is the formal Notice of Protest Decision from DMHSA, please be informed that Latte plans to file an appeal with the Office of the Public Auditor in accordance with 5 GCA.

For the record, Latte continues to exercise calm patience for everything the Latte Treatment Center has gone through under the current contract with DMHSA (e.g. non-payment for services rendered), to include the questionable RFP process, and is, therefore, seeking to ensure that fair and equitable treatment were exercised during the procurement process.

I look forward to mutual resolution of the subject matter.

Sincerely,



Luis A. Valdes, PhD
Executive Director

Cc: David J. Highsmith, Assistant Attorney General

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