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OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEALS

DATE: 07-29-19

TIME: 3:55 AM PM BY: [Signature]

FILE NO OPA-PA: 19-005

5 Attorney for Appellant
6 TAKECARE INSURANCE COMPANY, INC.

7 **PROCUREMENT APPEAL**
8 **IN THE OFFICE OF PUBLIC ACCOUNTABILITY**

9 In the Appeal of
10 TAKECARE INSURANCE COMPANY,
11 INC.,
12 Appellant,
13 and
14 DEPARTMENT OF ADMINISTRATION,
15 Purchasing Agency.

APPEAL NO. OPA-PA-19-005

**APPELLANT TAKECARE INSURANCE
COMPANY, INC.'S PROPOSED LIST
OF ISSUES**

16
17 COMES NOW Appellant TakeCare Insurance Company, Inc. ("TakeCare"),
18 through counsel Louie J. Yanza, and hereby identifies the following issues:

- 19 1. Whether PL 35-2 and the RFP are in proper delegation of authority
20 to a private entity;
21 2. Whether PL 35-2 and the RFP violates Appellant's substantive and
22 procedural due process rights;
23 3. Whether PL 35-2 and the RFP deny equal protection; and
24

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ORIGINAL

