

Jerrick Hernandez <jhernandez@guamopa.com>

## Fwd: OPA-21-010; In the Appeal of Johndel International, Inc. dba. JMI-Edison

**Tracy Cantimbuhan** <tcantimbuhan@arriolafirm.com> To: jhernandez@guamopa.com Mon, Oct 25, 2021 at 9:27 AM

------ Forwarded message ------From: **Tracy Cantimbuhan** <tcantimbuhan@arriolafirm.com> Date: Fri, Oct 22, 2021 at 5:05 PM Subject: OPA-21-010; In the Appeal of Johndel International, Inc. dba. JMI-Edison To: <jhernandez@guamopa.org> Cc: <jdwalsh@rwtguam.com>, William Brennan <wbrennan@arriolafirm.com>

Hafa Adai Mr. Hernandez,

Please see the attached documents for e-filing in the above matter:

- Agency Statement

- Agency Report

Thank you.

Regards,

*Tracy A. Cantimbuhan* Legal Assistant to William B. Brennan, Esq. ARRIOLA LAW FIRM 259 Martyr Street, Suite 201 Calvo-Arriola Building Hagâtña, Guam 96910 Tel: 671.477.9730/33 Fax: 671.477.9734 Email: tcantimbuhan@arriolafirm.com

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#### 2 attachments

OPA-21-010 JMI v. GIAA OPA Appeal Draft Agency Statement jma edits (Final ALF 10.22.21).pdf 414K

OPA-21-010 JMI v. GIAA OPA Appeal Draft Agency Report\_10.22.21.pdf 737K ANITA P. ARRIOLA, ESQ. WILLIAM B. BRENNAN, ESQ. ARRIOLA LAW FIRM 259 MARTYR STREET, SUITE 201 HAGÅTÑA, GUAM 96910 TEL: (671) 477-9730/33 FAX: (671) 477-9734 attorneys@arriolafirm.com Counsel for Agency Guam International Airport Authority

#### BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY PROCUREMENT APPEAL

In the Appeal of Johndel International, Inc. dba. JMI, Appellant. APPEAL CASE NO.: OPA-21-010

AGENCY STATEMENT

**COMES NOW,** the A.B. Won Pat Guam International Airport Authority ("GIAA") which pursuant to 2 GAR Div. 4 §12105(g), and in response to the appeal of Johndel International, Inc. dba JMI ("JMI"), files this Agency Statement.

During the negotiation phase of this procurement for certain services, JMI submitted a request under the Sunshine Reform Act of 1999 to GIAA for documents related to the procurement. GIAA responded by disclosing certain documents, and withholding certain documents to protect the negotiation-phase of the RFP process, the competitive playing field between offerors, and as otherwise required by law. JMI admits that it has not seen the highest ranked offeror's proposal. However, JMI argues that the highest ranked offeror lacks a certain license it alleges is required to provide the services sought by the RFP. JMI also alleges the procurement record was incomplete, and seeks as an extraordinary remedy - award of the contract for services sought by the RFP, despite these alleged errors. As shown herein, the OPA does not have jurisdiction over most of JMI's appeal and those bases of the appeal should be denied on that basis. Additionally, and alternatively, to the extent the OPA reaches the merits of the Appeal, JMI's claims are baseless and the appeal must be denied.

#### FACTUAL BACKGROUND

On July 20, 2021, GIAA issued Request for Proposal number RFP 05-FY21 seeking offers/proposals from offerors for Management and Support Services to GIAA's Baggage Conveyance Systems. Procurement Record ("PR") at 195. GIAA received two proposals. See PR at 638-640. On August 26, 2021, GIAA presented the ranking of the two offerors by an evaluation panel to the GIAA Board of Directors during a virtual public meeting. See PR at 661-665.<sup>1</sup> A JMI representative was virtually present at the Board Meeting. See Ex. 1 (BOD Meeting Attendance Log, Aug. 26, 2021) attached hereto. GIAA management provided a summary of the procurement to Board Members and publicly announced the ranking (anonymously) of the two proposals submitted. See PR at 661-665; see also, n. 1. After the ranking was ratified and approved by the Board of Directors, the identities of the highest ranked offeror was made public –Aircraft Service International Group, Inc. dba Menzies Aviation ("Menzies"). PR at 666-667. The Board authorized GIAA management to enter into price negotiations with Menzies. See n. 1. The Board also authorized management to enter negotiations with the next highest ranked offeror should the negotiations with Menzies be unsuccessful. Id. GIAA gave written notice of the rankings to Menzies and JMI on or about August 30, 2021.

On September 21, 2021, JMI filed a protest related to RFP 05-FY21. <u>See</u> Notice of Appeal Ex G (Oct. 8, 2021). JMI raised two issues as the bases for protest: (1) that Menzies lacked a specialty license from the Guam Contractor's License Board and (2) that the procurement record for RFP 05-

<sup>&</sup>lt;sup>1</sup> The Audio recording of the GIAA Board Meeting for August 26, 2021 is available at <u>https://www.guamairport.com/corporate/reports/board-meeting-minutes-audio</u>. The relevant discussion occurs at 55:22 minute mark.

FY21 was improperly maintained based on GIAA's response to a request by JMI under the Sunshine Reform Act of 1999. <u>Id.</u>, <u>see also</u>, n. 3 *infra*. GIAA denied JMI's protest in its entirety on September 30, 2021. Notice of Appeal Ex H, at 1-3 (Oct. 8, 2021). GIAA determined that Menzies proposal complied with the provisions of the RFP and that JMI's protest was also untimely on this basis. <u>Id.</u> GIAA also determined that JMI's allegations related to the procurement record were baseless and immaterial to the ranking of offerors. <u>Id.</u> JMI appealed the denial of its protest to the Office of Public Accountability ("OPA") on October 8, 2021. Notice of Appeal 1-9 (Oct. 8, 2021).

#### **<u>REPONSE TO APPEAL</u>**

#### The OPA Does Not Have Jurisdiction Over JMI's License-Related Claim.

JMI first argues that Menzies' alleged lack of an "appropriate contractor's license" renders it a non-responsive and non-responsible Offeror. Notice of Appeal 6 (Oct. 8, 2021). JMI then cites generally to portions of the RFP Packet that require that the selected offeror be duly authorized and licensed to conduct business in Guam. <u>Id.</u> at 6-7.

The OPA does not have subject matter jurisdiction over JMI's complaint related to a lack of license it alleges is required. Additionally, JMI did not raise this argument as a ground for protest in the time allowed by Guam law. Alternatively, even if the OPA reaches the merits of JMI's license-related argument, JMI's argument is speculative as JMI has not reviewed Menzies' proposal.

a. <u>The OPA does not have Jurisdiction Over Complaints re Contractor's Licensing Requirements</u>

Notably, JMI does not provide any evidence that a formal complaint was filed with or adjudicated by the Guam Contractor's License Board ("GCLB") related to the allegation that Menzies lacks a certain specialty license required to perform the services sought in the RFP. Additionally, JMI makes clear in its appeal that it has not reviewed Menzies' Proposal because the same was withheld

I.

in response to a JMI request under Guam's Sunshine Reform Act of 1999, as required by Guam law and as set out more fully below. <u>See</u>, *infra* Section III.

The GCLB is empowered to "investigate, *classify and qualify* applicants for contractor's licenses and *investigate for compliance with the rules and regulations of the Board and the provisions of the [Contractor's Licensing-related Chapter of the Guam Code].*" See 21 G.C.A. § 70109 *et seq* (*emphasis added*).

Without having reviewed Menzies' proposal, JMI implicitly admits it is shooting in the dark on this basis of appeal. If JMI believes that a certain license is required of the RFP and that Menzies lacks such license, JMI should complain to the GCLB. Menzies has not been found to have violated any law by the GCLB based on JMI's appeal. Therefore, this matter is not properly before the OPA. Finding otherwise would require the OPA to determine the applicability and enforceability of Contractor's licensing laws, and whether a violation has occurred. The OPA does not have that jurisdiction, nor does the OPA have the resources or expertise to conduct this inquiry and potentially make this finding.

The OPA recently found in a separate appeal matter, that an appellant cannot manufacture jurisdiction in a procurement appeal where another administrative body is empowered to determine compliance with the law the appellant alleges a violation of. <u>See</u> OPA-PA-21-004, In Re Appeal of Pacific Data Systems, Inc., (PDS), Order (Oct. 5, 2021) (dismissing appeal without prejudice for lack of subject matter jurisdiction where PDS alleged violation of Guam Telecommunications (Telecom) Act, and instructing PDS to seek relief from the Guam Public Utilities Commission as the proper forum before the OPA can act on the violations of the Guam Telecom Act as a basis of a procurement appeal).<sup>2</sup> This is consistent with OPA precedent. <u>See</u> OPA-PA-10-008, In re Appeal of JRN Air Conditioning & Refrigeration, Inc., Decision 8-10 (Feb. 17, 2011) (finding OPA lacks subject matter

<sup>&</sup>lt;sup>2</sup> Notably, JMI's Counsel is aware of this precedential decision, since the same Counsel represented the Appellant, Pacific Data Systems in the consolidated OPA Appeals under case numbers PA-21-004 and PA-21-005.

jurisdiction to determine whether bidder's bid violated Guam Law related to wage and labor determinations submitted in response to an IFB because the enforcement of the various laws governing the wage and hour issues were not properly done "through the procurement protest and appeal process but an entirely separate administrative adjudicative process . . . entrusted to the Department of Labor.").

Here, as directed in the PDS and JRN cases, JMI should seek relief from the GCLB which has the jurisdiction and expertise to address alleged violations of contractor's licensing related laws. Until the GCLB takes that action such speculative allegations by JMI only serve to delay this matter in an effort to manufacture a basis for protest and appeal. Therefore, the OPA should find it lacks jurisdiction to consider JMI's appeal related to the argument that Menzies lacks a certain license that JMI believes is required under the RFP. As of now, that is all the OPA has before it, <u>JMI's belief</u>. Such belief is insufficient to further delay this procurement or for the OPA to find a violation. This basis for appeal must be denied for lack of subject matter jurisdiction.

#### b. JMI's Contractor's License Argument was Untimely made to GIAA.

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The individual who executed the JMI proposal in response to the RFP, and the individual who executed the JMI letter of protest dated September 21, 2021 was virtually present at the GIAA Board Meeting on August 26, 2021, where Menzies was announced as the highest ranked, qualified offeror who submitted a proposal in response to the RFP. <u>See</u> Notice of Appeal Ex G; <u>see also</u>, Ex. 1. Additionally, GIAA delivered to JMI a notice that it was not the highest ranked offeror on August 30, 2021. Despite this, JMI waited until September 13, 2021 to investigate the highest ranked offeror's compliance with what JMI viewed as a license requirement of the RFP. <u>See</u> Notice of Appeal Ex G.

Under Guam law, an aggrieved individual must submit a protest within fourteen (14) days after the individual knows or should know the facts giving rise thereto. 5 G.C.A. § 5425. JMI received notice that Menzies was the highest ranked offeror on August 26, 2021. Therefore, JMI had until September 10, 2021 to raise the issue of the highest ranked offeror's lack of a license JMI believes is required to perform the services sought by the RFP. Thus, JMI's protest on this basis was untimely as GIAA found at the agency-level. For that reason, the appeal on this basis should be summarily dismissed as untimely.

#### II. Menzies is Responsible and its Proposal is Responsive to the RFP.

Alternatively, the responsiveness of an offeror who submits a proposal is based on the offeror's satisfaction of the requirements in the RFP, not on JMI's interpretation and resulting conclusion that a specific license related to the services the RFP seeks, is required. <u>See</u> 5 G.C.A. § 5201(g). Here, GIAA determined Menzies' proposal satisfied the requirements of the RFP. Thus, GIAA properly determined Menzies' proposal was responsive.

JMI argues in this appeal that Sections 11 and 14 of the RFP General Terms and Conditions requires a specific license issued by the Guam Contractor's License Board. However, JMI's Notice of Appeal cites to one of those provisions in part.

The entirety Section 14 provides "[o]fferors are cautioned that GIAA will not consider for award any proposal submitted by an Offeror who has not complied with the Guam Licensing Law. Offerors shall, at their own expense, procure all permits, certificates and licenses and shall give all notices and necessary reports required by law for the execution of the work. *Specific information on licenses may be obtained from the Director of the Department of Revenue and Taxation*." PR at 204, § 14 (*emphasis added*). Section 11 provides in full that "[i]t is the policy of GIAA to award proposals to Offerors duly authorized and licensed to conduct business in Guam."

GIAA determined that Menzies' proposal complied with Section 14. Additionally, a review of Menzies' proposal and qualifications also demonstrates its compliance with Section 11. JMI admittedly has not had access to Menzies' proposal submitted in response to the RFP, as laid out below in Section III. JMI simply alleges that based on JMI's attorney's research, Menzies does not hold a contractor license issued by the GCLB. Noticeably, JMI's letter of protest at the agency level specifically alleged a lack of a specialty contractor's license. JMI's Notice of Appeal expands the lack of license to a general allegation of "operating as a contractor without a contractor's license is a violation of law applicable to the work, and Menzies' attempt to obtain such work was improper, and should have been rejected by GIAA." Notice of Appeal 5-6 (Oct. 8, 2021). The Guam Contractor's license-related laws distinguish between a general building contractor and a specialty contractor. <u>See</u> 21 G.C.A. § 70106. JMI's lack of specificity and the expansion of their argument demonstrates they are grasping at straws.

GIAA is currently in negotiations with the highest ranked offeror – Menzies - in accordance with applicable law and regulations. JMI is not entitled to amend the RFP based on its interpretation of the services to be offered, and the licensure JMI believes is required of the same. The actual requirements of the RFP, and not JMI's interpretation, control. Menzies was deemed qualified due to their capacity, based on their proposal and qualifications, to provide the services sought. This renders Menzies a responsible offeror.

Because JMI issued a FOIA and protested while negotiations were ongoing, GIAA was unable to provide the proposal submitted by Menzies to JMI. Under Guam law, only the proposal of the offeror *awarded the contract* becomes public. See 2 GARR 3114(h)(1) ("[p]roposals of offerors who are not awarded the contract shall not be opened to public inspection"). No award has been made here. However, under Guam law the OPA has access to the Menzies' proposal which was part of the record submitted to the OPA, with certain portions designated as confidential, on October 15, 2021. Should the Public Auditor reach the merits of this basis for JMI's appeal, GIAA posits that a review of

Menzies' proposal demonstrates that the proposal was responsive to the requirements of the RFP, and that Menzies was appropriately deemed a responsible offeror based on the services sought in the RFP and Menzies' qualifications.

Therefore, for the reasons set out herein, JMI's appeal of the denial of its agency-level protest, on the basis that Menzies lacks a certain license JMI believes is necessary for the services sought in the RFP, should be denied.

# III. JMI's Procurement Record-Related Allegation is Baseless, and it is also Immaterial to Menzies being deemed the Highest Ranked Responsible Offeror.

JMI next alleges that in its view the procurement record related to GIAA RFP 005-FY21 was "not kept as mandated by law, and instead created after the fact." Notice of Appeal at 7-8 (Oct. 8, 2021). However, again JMI admits it has not had the opportunity to review certain documents related to this procurement. This is critical since JMI also fails to offer that any part of its allegation related to the procurement record was material to procurement or to the ranking of offerors. Materiality is a requirement for seeking relief under the procurement law protest and appeal procedure for record related defect allegations. See e.g., Teleguam Holdings LLC v. Guam, 2018 Guam 5, ¶¶ 39-40.

GIAA denies any and all of JMI's allegations related to the alleged improper keeping of the procurement record in this matter. On September 17, 2021, GIAA responded to a request by JMI's attorneys Joshua Walsh and Joseph Razzano for documents under the Sunshine Reform Act of 1999 (the "FOIA Request").<sup>3</sup> GIAA provided digital copies of 252 pages of documents that may have fell

<sup>&</sup>lt;sup>3</sup> JMI also alleges that GIAA violated the Sunshine Reform Act of 1999 related to this Request. GIAA again categorically rejects this allegation. First, the OPA is not the proper forum to raise such an allegation. See 5 G.C.A. § 10111 (granting jurisdiction to the Superior Court to remedy violations of the Sunshine Reform Act of 1999). However, GIAA must respond to the allegation as it appears JMI is trying to bootstrap its procurement record related allegations to the baseless allegation of a violation the Sunshine Reform Act of 1999. GIAA had to review the entire file related to this procurement, which as evidenced by the submission of the record on October 15, 2021 to the OPA, exceeds 500 pages. Under the Sunshine Reform Act of 1999, an agency may request a 10-day extension to the initial 4-day period allowed to respond to a FOIA request where the request requires the Agency to review over 500 pages of documents. See 5 G.C.A. § 10103(e)(2). GIAA timely invoked that statutory extension provision and timely responded to JMI's FOIA with 252 pages of documents. The reservation that the request for extension due to the anticipated review of over 500 pages did not admit the existence of

within the items specifically enumerated in 5 G.C.A. Section 5249 and which may have been responsive to the FOIA request. GIAA requested an extension to respond to the FOIA request as JMI sent a FOIA in the midst of ongoing negotiations. This procurement is still pre-award, and thus the treatment of documents related to the procurement is specifically governed by Guam procurement law and regulations. 5 G.C.A. § 5249 *et seq*. Additionally, because no award had been made related to the procurement, GIAA also invoked the deliberative process privilege over certain documents. GIAA's response also considered the competitive playing field contemplated by the Guam procurement law and regulations in this pre award, negotiation phase.

Specifically, JMI's attorneys requested copies of "the proposals submitted by all bidders to the RFP, and the evaluation sheets from all GIAA Evaluators, and questions and answers submitted for the RFP." In response, GIAA relied on Guam Procurement regulations which specify that "[p]roposals shall not be opened publicly nor disclosed to unauthorized persons . . ." 2 GARR § 3114(h) (further mandating that "[a] Register of Proposals shall be established [which] shall be opened to public inspection only after award of the contract. *Proposals of offerors who are not awarded the contract shall not be opened to public inspection*" (*emphasis added*)). These regulatory provisions governing the handling of proposals are supported by statutory provisions in the Guam Procurement law. <u>See 5</u> G.C.A. § 5216(d) (stating while the head of a purchasing agency may have discussions with any offeror who submitted a proposal, such "[d]iscussions shall not disclose any information derived from proposals submitted by other offerors") 5 G.C.A. § 5216(d); see also, 5 G.C.A. § 5230(b) (mandating

public records in response to the FOIA request was made precisely because GIAA only disclosed those documents that were allowed by law to be disclosed at the time of the request – again because negotiations related to the procurement were still ongoing and no award had been made. Notably, the law contemplates that the timing of disclosures of portions of the procurement record should be addressed by the Regulations, but no such timing-related regulations have been promulgated. See 5 G.C.A. § 5252. Therefore, the documents withheld were not determined to be disclosable in response to the FOIA, but still had to be reviewed to the extent they were related to JMI's broad FOIA request related to the procurement.

that certain information related to responsibility determinations "shall not be disclosed" outside of the purchasing agency without the offeror's consent);

GIAA also made clear that the disclosure was made as of September 16, 2021 and was subject to change because the procurement process was ongoing. Thus, contrary to JMI's baseless assertion that procurement records were created in response to its FOIA, the record of this procurement was kept in accordance with law, and what was provided in response to the FOIA request was clearly described as a point in time disclosure of disclosable documents in response to the FOIA request.

Thus, JMI's appeal based on meritless allegations related to the procurement record should be denied in its entirety. JMI failed to allege materiality of their alleged record-related violations to the procurement or ranking of offerors. This is likely because JMI concedes that it has not reviewed the procurement record in its entirety. Simply put, JMI says because they have not been able to review the entire procurement record in this matter, something must be wrong. But rather than seek a remedy that is related to their issue with the record, JMI asks the OPA for extraordinary relief. They seek award of the RFP to JMI – notwithstanding their wholly speculative allegations related to how the procurement record was kept. Put another way, JMI is arguing - do not award the contract to Menzies because the record was not kept properly, instead make the award to JMI notwithstanding our allegations of error related to the handling of the procurement record. This demonstrates that the allegations are not meritorious. The allegations are not material to the procurement or the ranking, they are just generalized and speculative grievances. These are not basis to disturb the procurement or the ranking, the ranking of offerors by GIAA.

As evidenced by the procurement record submitted on October 15, 2021, GIAA has complied with Guam law and a record of this procurement is intact and was properly maintained. However, the procurement is ongoing, and certain documents related to this procurement are not public at this time pursuant to Guam law and regulations. JMI is aware of the authorities GIAA relies on since they were cited specifically in response to JMI's protest. However, JMI offers only a conclusory notice of appeal and fails to offer a legal argument that GIAA was wrong to comply with applicable law and regulations. Thus, JMI's appeal is meritless related to the procurement record and must be denied.

### **CONCLUSION**

Based on the foregoing, JMI's appeal should be denied in its entirety. Specifically, GIAA requests that the OPA grant the following relief:

- Until such time as the GCLB finds that Menzies has violated contractor's license related laws, the 1. OPA should make clear that no allegation to the contrary is properly before the OPA and no finding of a violation or requirement of a license related to this procurement was ever made;
- The OPA should find that JMI's appeal is a frivolous abuse of the protest and appeal process and award fees to GIAA pursuant to 5 G.C.A. § 5425(h)(2);
- RRIOLA LAW FIRM HAGÅTÑA, GUAM 96910 The OPA should also admonish JMI's Counsel for bringing the license-requirement related portion 3. of this appeal three days after the appeal in PA-21-004 and PA-21-005 was dismissed on analogous legal grounds, where a similar argument by JMI's counsel was rejected in that matter, rendering this appeal contrary to OPA precedent; and
  - 4. Finally, GIAA requests that the OPA find that GIAA's actions related to the procurement record were in accordance with applicable law and regulations and expressly reject JMI's allegations to the contrary.

Dated: October 22, 2021, at Hagatna, Guam<sup>4</sup>

<sup>&</sup>lt;sup>4</sup> Caption corrected pursuant to Errata filed on October 25, 2021.

Respectfully submitted, ARRIOLA LAW FIRM By: WILLIAM B. BRENNAN

Meeting ID 86118846332	Start Time 8/26/2021 14:47	End Time 8/26/2021 17:44	User Email jeanarriola5@gmail.com	Duration (Minutes) 178	Participants 30
Name (Original Name)	Join Time	Leave Time	Duration (Minutes)	Guest	Recording Consent
GIAA (Jean Arriola)	8/26/2021 14:47	8/26/2021 17:44	178	No	
Amanda Rios	8/26/2021 14:48	8/26/2021 14:50	2	Yes	
Connie Garrido-SSFM	8/26/2021 14:50	8/26/2021 15:09	19	Yes	
William Brennan	8/26/2021 14:55	8/26/2021 15:09	14	Yes	
PNC Digital	8/26/2021 14:56	8/26/2021 15:09	13	Yes	
ED ILAO	8/26/2021 14:56	8/26/2021 15:09	13	Yes	
Morgan Legel	8/26/2021 14:56	8/26/2021 15:09	13	Yes	
Rolenda Lujan Faasuamalie	8/26/2021 14:58	8/26/2021 15:09	11	Yes	
Arriola Law Firm	8/26/2021 14:59	8/26/2021 15:09	10	Yes	
ttaitano	8/26/2021 15:01	8/26/2021 15:01	1	Yes	
ttaitano	8/26/2021 15:01	8/26/2021 15:09	8	Yes	
Lucy's iPhone	8/26/2021 15:02	8/26/2021 15:07	5	Yes	
Joe J.	8/26/2021 15:06	8/26/2021 15:09		Yes	
Morgan Legel	8/26/2021 15:07	8/26/2021 15:09		Yes	
Lucy's iPhone	8/26/2021 15:07	8/26/2021 15:08		Yes	
oyaol	8/26/2021 15:08	8/26/2021 15:09		Yes	
Director Alcorn (Lucy's iPhone)	8/26/2021 15:08	8/26/2021 17:44	156	Yes	Y
ED ILAO	8/26/2021 15:09	8/26/2021 16:14	66	Yes	Y
Connie Garrido-SSFM	8/26/2021 15:09	8/26/2021 16:18	69	Yes	
Oyaol N. Guam Daily Post					
(oyaol)	8/26/2021 15:09	8/26/2021 17:00	112	Yes	Y
Joe J.	8/26/2021 15:09	8/26/2021 17:00		Yes	Y
ttaitano	8/26/2021 15:09	8/26/2021 16:39		Yes	Y
Rolenda Lujan Faasuamalie	8/26/2021 15:09	8/26/2021 16:53		Yes	
William Brennan	8/26/2021 15:09	8/26/2021 17:41		Yes	Y
Arriola Law Firm	8/26/2021 15:09	8/26/2021 17:41		Yes	Y
Morgan Legel	8/26/2021 15:09	8/26/2021 15:47		Yes	Ŷ
Morgan Legel	8/26/2021 15:09	8/26/2021 15:11		Yes	
PNC Digital	8/26/2021 15:09	8/26/2021 17:41		Yes	Y
Elfrieda Koshiba	8/26/2021 15:11	8/26/2021 15:11		Yes	
Elfrieda Koshiba	8/26/2021 15:11	8/26/2021 17:05		Yes	Y
PNC Digital	8/26/2021 15:16	8/26/2021 15:17		Yes	
Steve Limtiaco	8/26/2021 15:16	8/26/2021 15:17		Yes	
Steve Limitaco	8/26/2021 15:17	8/26/2021 17:03		Yes	Y
PNC Digital	8/26/2021 15:17	8/26/2021 17:41		Yes	Y
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Morgan Legel	8/26/2021 15:47	8/26/2021 15:48		Yes	
Morgan Legel	8/26/2021 15:49	8/26/2021 15:48		Yes	
Janalynn Damian	8/26/2021 15:50	8/26/2021 15:50		Yes	
Janalynn Damian	8/26/2021 15:50	8/26/2021 15:56		Yes	
iPhone	8/26/2021 15:53	8/26/2021 15:53		Yes	EXHIBIT
iPhone	8/26/2021 15:53	8/26/2021 15:53		Yes	se 1
	8/26/2021 15:53	8/26/2021 15:58		Yes	
George Castro					
George Castro	8/26/2021 16:01	8/26/2021 17:41	101	Yes	

Danny Cepeda (GIAA-MIS)	8/26/2021 16:03	8/26/2021 16:03	1 Yes	
Danny Cepeda (GIAA-MIS)	8/26/2021 16:03	8/26/2021 17:00	58 Yes	Y
Morgan Legel	8/26/2021 16:09	8/26/2021 16:14	6 Yes	
Morgan Legel	8/26/2021 16:14	8/26/2021 16:56	43 Yes	Y
Artemio "Ricky" Hernandez	8/26/2021 16:27	8/26/2021 16:27	1 Yes	
Artemio "Ricky" Hernandez	8/26/2021 16:27	8/26/2021 16:29	2 Yes	Y
Janalynn Damian	8/26/2021 16:34	8/26/2021 16:34	1 Yes	
Janalynn Damian	8/26/2021 16:34	8/26/2021 17:44	70 Yes	
Eduardo Calvo	8/26/2021 16:46	8/26/2021 16:47	1 Yes	
Eduardo Calvo	8/26/2021 16:47	8/26/2021 17:41	55 Yes	Y
William Brennan	8/26/2021 17:41	8/26/2021 17:44	3 Yes	
Arriola Law Firm	8/26/2021 17:41	8/26/2021 17:44	3 Yes	
PNC Digital	8/26/2021 17:41	8/26/2021 17:43	2 Yes	
PNC Digital	8/26/2021 17:41	8/26/2021 17:44	3 Yes	
Morgan Legel	8/26/2021 15:48	8/26/2021 15:49	1 Yes	
Morgan Legel	8/26/2021 16:08	8/26/2021 16:46	38 Yes	
Morgan Legel	8/26/2021 16:46	8/26/2021 16:56	11 Yes	