



Jerrick Hernandez &lt;jhernandez@guamopa.com&gt;

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## Zoom Link for OPA-PA-20-008 Motion Hearing

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**Matthew E. Wolff** <mwolff@oagguam.org>

Fri, Jan 15, 2021 at 5:13 PM

To: Jerrick Hernandez &lt;jhernandez@guamopa.com&gt;

Cc: "Joshua D. Walsh" &lt;jdwalsh@rwtguam.com&gt;, "Edwin J. Torres" &lt;etorres@rwtguam.com&gt;, Robert Kono &lt;robert.kono@gsa.guam.gov&gt;, Lej Teodosio &lt;cgmanager@stguam.com&gt;

Jerrick and Others,

Attached is GSA's Opposition to Appellant ST Corporation's Motion to Compel. Attachments had to be separate.

regards,

Matt Wolff

[Quoted text hidden]

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### 2 attachments

**GSA's Opposition to ST Corp.'s Motion To Compel, 1-15-21.doc**

100K

**Attachments (Comm. Log) to GSA's Opposition To Motion To Compel, 1-15-21.pdf**

3988K



**Office of the Attorney General**  
**Leevin Taitano Camacho**  
 Attorney General of Guam  
**Solicitor Division**  
 590 S. Marine Corps Drive  
 ITC Bldg., Ste. 802  
 Tamuning, Guam 96913 • USA  
 Tel. (671) 475-3324 Fax. (671) 472-2493  
 www.guamag.org  
**Attorneys for the Government of Guam**

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

<b>IN THE APPEAL OF:</b>	)	<b>DOCKET NO. OPA-PA-20-008</b>
<b>ST CORPORATION, INC.,</b>	)	
Appellant,	)	
	)	
vs.	)	<b>GSA’S OPPOSITION TO</b>
	)	<b>MOTION TO COMPEL</b>
<b>GENERAL SERVICES AGENCY,</b>	)	
Purchasing Agency.	)	
	)	

Purchasing Agency, General Services Agency (“GSA”), hereby submits its Opposition to Appellant ST Corporation (“Appellant” or “ST”)’s Motion To Compel.

**I. COMMUNICATION LOG  
 A. GSA Is Agreeable**

Appellant points out that the Communication Log is missing from the Procurement Record. GSA is agreeable to amend the Procurement Record with the attached communications and Communication Log (roughly 20 pages).

## II. WRITTEN DETERMINATION

### A. No Need For Written Determination Because Specifications Are Not Restrictive

Appellant asks for an order requiring GSA to amend the record with a determination justifying restrictive container sizes. There is no need for such a written determination because the container size specifications are not restrictive for the four (4) following reasons.

#### 1. Healthy Competition Does Not Mean a 2<sup>nd</sup> and 3<sup>rd</sup> Bite

Appellant and various other vendors knew on May 1, 2020 that these were the sizes desired by using agencies and intended for the IFB. Appellant and various other vendors knew that comments and feedback were being requested. Appellant responded but made no mention of an objection to container sizes. Appellant then decided to change the specifications in a protest, but well beyond the fourteen (14) – day “knew or should have known” protest deadline.

The root of the restrictiveness rule comes in the protection of competition. Competition begins when feedback is first requested by GSA of the vendors because this information goes into the drafting and planning of an IFB. The reminder in the Procurement Code about healthy competition is not a mandate for a 2<sup>nd</sup> and 3<sup>rd</sup> bite.

#### 2. Statutory Standard for Competition Is Met

The statutory standard is maximum *practicable* competition, not maximum competition. 5 G.C.A. §5265; 2 GAR, Div. 4, §4102(a)(1). Maximum competition would be to include all sizes of containers, even if government agencies and departments have for years shown that they have no need for different sizes. Maximum practicable competition, however, would be to not have any blatantly or intentionally restrictive specifications<sup>1</sup>, and to have simultaneously offered *all*

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<sup>1</sup> intentionally restrictive specifications- In reviewing the record and communications, there was nothing intentionally restrictive or deceptive about GSA’s or notice and inquiry to vendors on May 1, 2020 about items and

vendors a chance to have altered such specifications. The latter fits the instant facts in that GSA gave such chance on May 1, 2020 and Appellant waived it by not raising container size.

### **3. These Specifications Are Standard**

A standard product, size, or specification is one that requires no changes, alterations, or additions from those that are customarily offered. GSA cannot carry every size. It can only offer sizes that sell the fastest. These sizes, on the lists shown to vendors in May 2020, have been customarily offered and not complained about by GovGuam agencies and departments since approximately 2012. If it's not broke, don't fix it. These using agencies have opportunities every year to complain about sizes, availability, and variety when they come in to GSA to purchase these items. As such, these sizes and specifications have been shown to meet the government's needs as standard and functional. 5 G.C.A. §5268; 2 GAR, Div. 4, §4102(a).

### **4. Research Renewal Mechanism Is In Place**

The market research was last conducted on or around 2012 and yielded the current list and sizes and specifications that were circulated among vendors in May 2020. Although the research is not recent and was destroyed pursuant to the Records Retention Schedule, this circulation and request for quotations and feedback is a renewal mechanism.

## **III. CONCLUSION**

For the foregoing reasons, GSA requests that Appellant's Motion be DENIED and that they take nothing by way of this Appeal and the underlying Protest.

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sizes needed and currently listed. All items and sizes intended to be solicited were listed with no slant toward any one or another, or towards any preferred alterations. Feedback was plainly and generally requested.

OFFICE OF THE ATTORNEY GENERAL  
**Leevin Taitano Camacho, Attorney General**

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**MATTHEW E. WOLFF**  
Attorney for GSA, Government of Guam

Dated: \_\_\_\_\_

Communication Log  
GSA-047-20  
Janitorial Supplies

Vendor	Date/Time Sent	Date/Time Response	Remarks:
Ambros	5/1/2020 11:25	7/6/2020 13:48	Emailed re: Market Research
		7/23/2020 16:30	sent email follow up
		7/24/2020 12:04	received attachment
Sunleader Gu	5/1/2020 11:26	5/11/2020 16:23	Emailed re: Market Research
		5/12/2020 11:27	resent market research
		7/6/2020 13:54	requesting to change specs to meet his change
		7/21/20 4:06 PM	sent email follow up received attachments
National Office Supply	5/1/2020 11:26	7/6/2020 13:48	Emailed re: Market Research
		7/23/2020 15:38	sent email follow up
		7/23/2020 15:56	received attachment Office
Standard Office Supplies	5/1/2020 11:27	5/1/2020 11:39	Emailed re: Market Research
		5/1/2020 11:39	Inquiry/ing if requesting for Quote
		5/1/2020 11:39	responded to Standard: Yes
		5/1/2020 14:51	received attachment Office
M.D. Wholesale	5/1/2020 11:27	5/12/2020 8:51	Emailed re: Market Research
		7/6/2020 13:49	informed that they were also done
		7/23/2020 15:38	sent email follow up
		9/4/2020 9:56	sent email follow up
		7/6/2020 13:50	Emailed re: Market Research
School Essentials	5/1/2020 11:28	7/23/2020 15:39	sent email follow up
		7/6/2020 16:43	Emailed re: Market Research
St Corp	5/1/2020 11:29	5/1/2020 16:43	noted and will provide feedback next week. Inq if we just need to know if they carry items
		5/1/2020 16:46	responded: to provide quote, if items in stock and how long to get stock in
		5/1/2020 16:49	noted: Estimated quantities to base on
		5/1/2020 16:56	responded: yes
		7/6/2020 13:50	sent email follow up
		7/23/2020 15:38	sent email follow up
		8/7/2020 12:10	received attachment Office
M.B.I Wholesale	5/1/2020 11:34	5/1/2020 11:59	Emailed re: Market Research
		5/1/2020 11:59	will fwd to marketing managers
		5/1/2020 12:28	responded to M.B.I: Thank you
		7/6/2020 13:50	sent email follow up
		7/23/2020 16:28	sent email follow up
		7/24/2020 8:14	will verify with managers
		7/24/2020 11:30	received attachment

Vendor	Date/Time Sent	Date/Time Response	Remarks:
Cosmos Distributing	5/1/2020 11:39	5/7/2020 15:56 7/6/2020 13:51	Emailed re: Market Research received attachment sent email follow up
Horizon Pacific	5/1/2020 11:39	5/4/2020 11:04 5/4/2020 14:49 5/5/2020 11:38	Emailed re: Market Research inquiring what PD stands for and if looking for individual or bulk prices responded: Pad received attachment Office
Benson Guam	5/1/2020 11:43	7/6/2020 13:51 7/23/2020 16:28	Emailed re: Market Research sent email follow up sent email follow up
National Trading Corp	5/1/2020 11:44	7/6/2020 13:52	Emailed re: Market Research sent email follow up
Guam Home Center	5/1/2020 11:49	7/6/2020 13:53	Emailed re: Market Research sent email follow up
Haskell NY Inc (Office Sales USA)	5/6/2020 10:44	7/6/2020 13:52 9/3/2020 11:04 9/4/2020 8:49	Emailed re: Market Research sent email follow up sent email follow up response: inquiring on one quote or different quotes
Global Data Products	5/12/2020 8:14	7/6/2020 13:53 9/11/2020 8:35	Emailed re: Market Research sent email follow up sent email follow up
Nopco Distributor	9/3/2020 10:29		Emailed re: Market Research
JC Marketing	9/9/2020 9:58	9/9/2020 10:44 9/9/2020 10:56	Emailed re: Market Research response: inquiring on due date response: asap
USA Contractors	9/9/2020 10:04		Emailed re: Market Research
JMI - Edison	9/9/2020 10:11		Emailed re: Market Research
ERC Trading	9/9/2020 10:13		Emailed re: Market Research
Payless Markets, Inc	9/9/2020 10:21		Emailed re: Market Research
Payless Distributors	9/9/2020 10:27		Emailed re: Market Research
Fastenal	9/9/2020 10:30		Emailed re: Market Research

## Charleen Evangelista

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**From:** Charleen Evangelista  
**Sent:** Friday, May 1, 2020 11:39 AM  
**To:** sales@sosguam.com  
**Subject:** Re: Market Research

yes ma'am

Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 472-4217/475-1727

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**From:** sales@sosguam.com <sales@sosguam.com>  
**Sent:** Friday, May 1, 2020 11:35 AM  
**To:** Charleen Evangelista  
**Subject:** RE: Market Research

So what you are requesting is a quote?

----- Original Message -----

**Subject:** Market Research  
**From:** Charleen Evangelista <[Charleen.Evangelista@gsadoa.guam.gov](mailto:Charleen.Evangelista@gsadoa.guam.gov)>  
**Date:** Fri, May 01, 2020 11:26 am  
**To:** Standard Office Supplies <[sales@sosguam.com](mailto:sales@sosguam.com)>

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**From:** Charleen Evangelista  
**Sent:** Friday, May 1, 2020 11:25 AM  
**To:** [sunleadergu@gmail.com](mailto:sunleadergu@gmail.com)  
**Subject:** Market Research

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback.

Thank you,  
Charleen Evangelista  
671-475-1707/08

## Charleen Evangelista

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**From:** Charleen Evangelista  
**Sent:** Friday, May 1, 2020 12:28 PM  
**To:** Noel Metra  
**Subject:** Re: Market Research

Thank you,

Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 472-4217/475-1727

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**From:** Noel Metra <noel@mbiguam.com>  
**Sent:** Friday, May 1, 2020 11:58:47 AM  
**To:** Charleen Evangelista  
**Cc:** johntuba1970@gmail.com; Riza Ejercito-Raymundo; Glen Carlo Kadusale  
**Subject:** RE: Market Research

Hi Charleen,

I have forwarded to our Marketing managers Riza and Glen for their input and they will send to you shortly. They are cc'd on this e-mail. Thanks.

Regards,  
Noel

-----Original Message-----

**From:** "Charleen Evangelista" <Charleen.Evangelista@gsadoa.guam.gov>  
**Sent:** Friday, May 1, 2020 11:33am  
**To:** "Noel Metra" <noel@mbiguam.com>  
**Cc:** "johntuba1970@gmail.com" <johntuba1970@gmail.com>  
**Subject:** Market Research

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback.

Thank you,

Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 472-4217/475-1727

## Charleen Evangelista

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**From:** Charleen Evangelista  
**Sent:** Friday, May 1, 2020 4:56 PM  
**To:** Lej Teodosio  
**Subject:** Re: Market Research

yes ma'am

Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 472-4217/475-1727

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**From:** Lej Teodosio <[cgmanager@stguam.com](mailto:cgmanager@stguam.com)>  
**Sent:** Friday, May 1, 2020 4:48 PM  
**To:** Charleen Evangelista  
**Subject:** Re: Market Research

Okay noted. Any estimated quantities I can base my quotation on?

Regards,  
Lej

On Fri, May 1, 2020 at 4:46 PM Charleen Evangelista <[Charleen.Evangelista@gsadoa.guam.gov](mailto:Charleen.Evangelista@gsadoa.guam.gov)> wrote:  
Good Afternoon Lej,

Please provide quote and if you do have items in stock. If not, how long will you get the stock in.

Thank you,

Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 472-4217/475-1727

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**From:** Lej Teodosio <[cgmanager@stguam.com](mailto:cgmanager@stguam.com)>  
**Sent:** Friday, May 1, 2020 4:42 PM  
**To:** Charleen Evangelista  
**Subject:** Re: Market Research

Hi Charl,

Noted on this and will provide feedback to you next week. Do you just need to know if we carry any of the items in the list?

Also, will these for any upcoming GSA bid?

Regards,  
Lej

On Fri, May 1, 2020 at 11:29 AM Charleen Evangelista <[Charleen.Evangelista@gsadoa.guam.gov](mailto:Charleen.Evangelista@gsadoa.guam.gov)> wrote:  
Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback.

Thank you,  
Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 475-4217/475-1727

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*Have a blessed day!*

*Best Regards,*

*Lej Teodosia*

**Sales & Marketing Manager  
Consumer Goods Division**

**ST CORPORATION GUAM**

**Mailing Address:** P.O. Box 12699

Tamuning, Guam USA 96931

**Location:** 147 Frank G. Benavente St.

South Barrigada, Guam USA 96913

**Phone: (671) 637-7101 ext. 220**

Fax: (671) 637-7175

Mobile: (671) 488-5337

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*Have a blessed day!*

*Best Regards,*

*Lej Teodosia*

**Sales & Marketing Manager  
Consumer Goods Division**

**ST CORPORATION GUAM**

**Mailing Address:** P.O. Box 12699

Tamuning, Guam USA 96931

**Location:** 147 Frank G. Benavente St.

South Barrigada, Guam USA 96913

**Phone: (671) 637-7101 ext. 220**

Fax: (671) 637-7175

Mobile: (671) 488-5337

## Charleen Evangelista

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**To:** Noel Metra  
**Cc:** johntuba1970@gmail.com; Riza Ejercito-Raymundo; Glen Carlo Kadusale  
**Subject:** RE: Market Research

**From:** Noel Metra [mailto:noel@mbiguam.com]  
**Sent:** Friday, July 24, 2020 8:14 AM  
**To:** Charleen Evangelista <Charleen.Evangelista@gsadoa.guam.gov>  
**Cc:** johntuba1970@gmail.com; Riza Ejercito-Raymundo <riza@mbiguam.com>; Glen Carlo Kadusale <gckadusale@mbiguam.com>  
**Subject:** RE: Market Research

Hi Charleen,

So sorry for the delay. I have notified our marketing managers to get back to you today who are cc'd on this e-mail. Thanks.

Regards,  
Noel

-----Original Message-----

**From:** "Charleen Evangelista" <Charleen.Evangelista@gsadoa.guam.gov>  
**Sent:** Thursday, July 23, 2020 4:28pm  
**To:** "Noel Metra" <noel@mbiguam.com>  
**Cc:** "johntuba1970@gmail.com" <johntuba1970@gmail.com>  
**Subject:** RE: Market Research

Good Afternoon,

May I please follow up on the above market research.

Please advise.

Thank you,

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**From:** Charleen Evangelista  
**Sent:** Monday, July 06, 2020 1:50 PM  
**To:** 'Noel Metra'  
**Cc:** johntuba1970@gmail.com  
**Subject:** FW: Market Research

Good Afternoon,

May I please follow up on the above market research.

Please advise.

Thank you,

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**From:** Charleen Evangelista  
**Sent:** Friday, May 01, 2020 11:34 AM  
**To:** Noel Metra  
**Cc:** [johntuba1970@gmail.com](mailto:johntuba1970@gmail.com)  
**Subject:** Market Research

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback.

Thank you,

Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 472-4217/475-1727

## Charleen Evangelista

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**To:** Richard Luo  
**Subject:** RE: Market Research

**From:** Richard Luo [mailto:sunleadergu@gmail.com]  
**Sent:** Tuesday, May 12, 2020 11:27 AM  
**To:** Charleen Evangelista <Charleen.Evangelista@gsadoa.guam.gov>  
**Subject:** Re: Market Research

Hi, Charleen

I reviewed Janitorial supply list, below are some change request, thank you

1. item #11.1... Cuttingline. 130 3LB. Roll Diamo Sprayer 32 oz Bottle -----Please delete " Sprayer 32 oz Bottle "
2. item #16.1... Detergent Powder, Laundry original Scent 42 Loads per Box -----Please Add " or Equal "
3. item #17.1... Disinfectant Spray 15 oz/Can -----Please change " Disinfectant Spray 19 oz/Can "
4. item #27.1... Soap Bath 5.75 oz-----Please Add " or Equal "
5. item #34.1...Trash Cont w/Lid 32 GL H/D GI-----What is " GI " Standing for ???

Richard Luo

On Mon, May 11, 2020 at 4:33 PM Charleen Evangelista <[Charleen.Evangelista@gsadoa.guam.gov](mailto:Charleen.Evangelista@gsadoa.guam.gov)> wrote:

Good Afternoon,

Please see revised Janitorial. Please kindly review listing and provide feedback/quote.

Thank you

Charleen Evangelista  
Storekeeper I  
General Services Agency  
Department of Administration  
Government of Guam  
Telephone: (671) 475-1707/475-1720  
Fax: (671) 472-4217/475-1727

---

**From:** Charleen Evangelista  
**Sent:** Friday, May 1, 2020 11:25 AM  
**To:** [sunleadergu@gmail.com](mailto:sunleadergu@gmail.com)  
**Subject:** Market Research

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback.

Thank you,

Charleen Evangelista

671-475-1707/08

## Charleen Evangelista

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**To:** Joanne Sanchez  
**Subject:** RE: Market Research

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**From:** Charleen Evangelista  
**Sent:** Friday, September 4, 2020 8:49 AM  
**To:** Joanne Sanchez <joanne@officesalesusa.com>  
**Subject:** RE: Market Research

3 different quotes for Janitoria, Office and Copier paper.

Thank you,

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**From:** Joanne Sanchez [mailto:joanne@officesalesusa.com]  
**Sent:** Friday, September 04, 2020 5:29 AM  
**To:** Charleen Evangelista  
**Subject:** RE: Market Research

Hi Ms Charlene,

Is this request going to be in one quote? or 3 different quotes?

Regards,

**Joanne Sanchez**  
Account Manager  
**Haskell New York Inc.**  
823 E. 16th St Suite 103  
Brooklyn NY 11230  
P: 646 661 3832  
F: 212 343 0911  
email : [joanne@officesalesusa.com](mailto:joanne@officesalesusa.com)  
[www.officesalesusa.com](http://www.officesalesusa.com)  
FEIN:13-1990090  
GSA Contract : GS-02F-0108X  
FEDMALL Contract: GS-02F-0108X  
Duns: 001523745  
CAGE: 3FWRI

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**From:** Charleen Evangelista [Charleen.Evangelista@gsadoa.guam.gov]  
**Sent:** Wednesday, September 02, 2020 8:04 PM  
**To:** Joanne Sanchez  
**Subject:** Market Research

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback/quotation. Please advise as soon as possible.

Thank you,  
Charleen

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**From:** Joanne Sanchez [mailto:[joanne@officesalesusa.com](mailto:joanne@officesalesusa.com)]  
**Sent:** Tuesday, September 01, 2020 3:06 AM  
**To:** Joanne Sanchez  
**Subject:** GEL HAND SANITIZER AND ACRYLIC SHIELD

Good day!

Given this time of Covid 19 pandemic. We would like to help you be of your best health. We provide pandemic products that you might need-ready in stock and would fit your budget. Please see attached for the catalog and feel free to email/call me for your discounted quotes.

Also, here are the summary of products that we also offer:

- 1) Imaging supplies ( ink, toners and cartridges for printers, copiers and fax machines)
  - 2) Back up media (back up tapes, CD's, hard drives, memory sticks, etc)
  - 3) Computer Hardware (computer, printer, fax, copier, monitors, key board, mouse, etc)
  - 4) IT materials (software, license, etc)
  - 5) Audio visual materials (TV, VCR, projectors, speakers, etc)
  - 6) Furniture (tables, chairs, cabinets, closets, etc)
  - 7) Communications equipment (two-way radio, telephones, etc)
  - 8) Shredders
  - 9) Office Supplies (binders, ball pens, papers, etc.) <http://officesalesusa.com/>
  - 10) Gloves (Medical-Non Medical)
  - 11) Hand Sanitizer (Purell, etc)
  - 12) Military Supplies (boots, shoes, socks, gloves, etc.)
  - 13) ROTC and JROTC Supplies ( uniforms, ranks, flags, boots, etc.)
  - 14) School supplies
  - 15) Promotional Items with logo (t-shirts, umbrella, flash drives, etc.) <http://www.yournameonitusa.com/> and <http://www.noworryprinting.com/>
  - 16) Sanitary Supplies
  - 17) Food Services Supplies (plates, cups, etc.)
  - 18) Uniforms
  - 19) Boxes
  - 20) Medical Supplies
  - 21) Industrial Supplies [www.biggestindustrialbook.com](http://www.biggestindustrialbook.com)
- and a lot more

If you have queries, request for quotes, orders or you need assistance, please feel free to contact me through e-mail or dial my direct line. All my contact information are listed below.

Thank you and I hope to hear from you soon! Have a Good day!

Respectfully,

**Joanne Sanchez**  
Account Manager  
**Haskell New York Inc.**  
823 E. 16th St Suite 103  
Brooklyn NY 11230  
P: 646 661 3832  
F: 212 343 0911

email : [joanne@officesalesusa.com](mailto:joanne@officesalesusa.com)

[www.officesalesusa.com](http://www.officesalesusa.com)

FEIN:13-1990090

GSA Contract : GS-02F-0108X

FEDMALL Contract: GS-02F-0108X

Duns: 001523745

CAGE: 3FWRI

## Charleen Evangelista

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**To:** reianne@jcmarketinginc.com  
**Subject:** RE: Market Research

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**From:** Charleen Evangelista  
**Sent:** Wednesday, September 9, 2020 10:56 AM  
**To:** reianne@jcmarketinginc.com  
**Subject:** RE: Market Research

Good Morning,

If you can as soon as possible.

Please advise.

Thank you,  
Char

---

**From:** reianne@jcmarketinginc.com [mailto:reianne@jcmarketinginc.com]  
**Sent:** Wednesday, September 09, 2020 10:44 AM  
**To:** Charleen Evangelista  
**Subject:** RE: Market Research  
**Importance:** High

Good Morning Ms. Charleen,

May we inquire when is the due date for the RFQ ma'am.

Thank you,

Rei Anne Bautista  
JC Marketing Inc.  
Tel: 671-633-6330  
Fax: 671-633-6333

----- Original Message -----

**Subject:** Market Research  
**From:** Charleen Evangelista <Charleen.Evangelista@gsadoa.guam.gov>  
**Date:** Wed, September 09, 2020 9:57 am  
**To:** Reianne Bautista <reianne@jcmarketinginc.com>

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback/quote.

Please advise.

Thank you,

Charleen Evangelista

Storekeeper I

General Services Agency

Phone: (671) 475-1707/8

Email: [charleen.evangelista@gsadoa.guam.gov](mailto:charleen.evangelista@gsadoa.guam.gov)

Website: [www.doa.guam.gov](http://www.doa.guam.gov)



## Charleen Evangelista

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**From:** Kamran Sabeti <kamran@horizonpacific.us>  
**Sent:** Tuesday, May 5, 2020 11:38 AM  
**To:** Charleen Evangelista  
**Subject:** Re: Market Research  
**Attachments:** Market Research Office Supplies.pdf

**Categories:** Orange category

Hafa Adai Charleen,

Please see the attached quote. I only quoted on these items:  
25.1, 52.1 ,53.1 ,54.1 ,55.1, 56.1, 57.1, 58.1, 59.1, 60.1

Thank you  
Kamran

On Mon, May 4, 2020 at 2:50 PM Charleen Evangelista <[Charleen.Evangelista@gsadoa.guam.gov](mailto:Charleen.Evangelista@gsadoa.guam.gov)> wrote:

pad

**From:** Kamran Sabeti <[kamran@horizonpacific.us](mailto:kamran@horizonpacific.us)>  
**Sent:** Monday, May 4, 2020 11:09 AM  
**To:** Charleen Evangelista <[Charleen.Evangelista@gsadoa.guam.gov](mailto:Charleen.Evangelista@gsadoa.guam.gov)>  
**Subject:** Re: Market Research

Good Morning Charleen,

what is PD stand for? Are you looking for an individual or bulk price?

25.1	COMPUTER MOUSE PADS WRIST ERGO 5704501011 Brand: _____ Date of Delivery: _____	PD	\$ _____	\$ _____
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On Fri, May 1, 2020 at 11:42 AM Charleen Evangelista <[Charleen.Evangelista@gsadoa.guam.gov](mailto:Charleen.Evangelista@gsadoa.guam.gov)> wrote:

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback/quote.

Thank you,

Charleen Evangelista

Storekeeper I

General Services Agency

Department of Administration

Government of Guam

Telephone: (671) 475-1707/475-1720

Fax: (671) 472-4217/475-1727

## Charleen Evangelista

---

**From:** mmalilay@mdwholesaleguam.com  
**Sent:** Tuesday, May 12, 2020 8:51 AM  
**To:** Charleen Evangelista  
**Cc:** Zach Tedtaotao  
**Subject:** RE: Market Research

Hi Ms. Charleen,

Good morning!

We're almost done working for pricing of this list please advise the deadline of submission.

Many thanks.

Warmest regards,

*Ms. Michel Malilay*  
*Sales Support*



*"Bridging the Supply Gap"*

442 Chalan San Antonio  
Tamuning , Guam 96913  
Tel: (671) 649-5833/36  
Fax: (671) 649-5830

[mmalilay@mdwholesaleguam.com](mailto:mmalilay@mdwholesaleguam.com)

[www.mdwholesaleguam.com](http://www.mdwholesaleguam.com)

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**From:** Zach Tedtaotao <ztedtaotao@mdwholesaleguam.com>  
**Sent:** Friday, May 1, 2020 1:11 PM  
**To:** 'Michel Malilay' <mmalilay@mdwholesaleguam.com>  
**Subject:** FW: Market Research

Sincerely,

**Zach Tedtaotao**  
Sales Executive

# MD Wholesale

442 Chalan San Antonio  
Tamuning Guam 96913

Tel: (671) 649-5833 / 36 Fax: (671) 649-5830

Cel: (671) 929-3004

Web: [www.mdwholesaleguam.com](http://www.mdwholesaleguam.com)

Email: [zteditaotao@mdwholesaleguam.com](mailto:zteditaotao@mdwholesaleguam.com)  
[zach.mdwholesale@gmail.com](mailto:zach.mdwholesale@gmail.com)

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**From:** Charleen Evangelista [<mailto:Charleen.Evangelista@gsadoa.guam.gov>]

**Sent:** Friday, May 1, 2020 11:27 AM

**To:** M D Wholesale <[mdwsupport@mdwholesaleguam.com](mailto:mdwsupport@mdwholesaleguam.com)>

**Cc:** Zachary Tedtaotao <[zach.mdwholesale@gmail.com](mailto:zach.mdwholesale@gmail.com)>

**Subject:** Market Research

Good Morning,

I am conducting a Market Research on the list above. Would you kindly view listing and provide feedback.

Thank you,

Charleen Evangelista

671-475-1707/08



Jerrick Hernandez <jhernandez@guamopa.com>

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## Zoom Link for OPA-PA-20-008 Motion Hearing

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**Matthew E. Wolff** <mwolff@oagguam.org>

Fri, Jan 15, 2021 at 5:24 PM

To: Jerrick Hernandez <jhernandez@guamopa.com>

Cc: "Joshua D. Walsh" <jdwalsh@rwtguam.com>, "Edwin J. Torres" <etorres@rwtguam.com>, Robert Kono <robert.kono@gsa.guam.gov>, Lej Teodosio <cgmanager@stguam.com>

Signature Page for Opposition to Motion to Compel.

[Quoted text hidden]



**Signature Page, GSA's Opposition To Motion To Compel, 1-15-21.jpg**  
35K



Leevin Taitano Camacho, Attorney General



A handwritten signature in blue ink, appearing to read "Matthew Wolff", is written over a horizontal line.

**MATTHEW E. WOLFF**  
Attorney for GSA, Government of Guam

Dated: Jan. 15, 2021