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**OFFICE OF PUBLIC ACCOUNTABILITY
PROCUREMENT APPEALS**

IN THE APPEAL OF)	APPEAL NO. OPA-PA-18-003
)	
TAKECARE INSURANCE COMPANY,)	
INC.,)	TAKECARE'S EXHIBIT
)	LIST
Appellant)	
)	
)	
)	
)	
)	

TakeCare Insurance Company, Inc. ("TakeCare") hereby identifies the exhibits that it reserves the right to use during the hearing in this matter before the Office of Public Accountability. TakeCare also reserves its right to supplement this exhibit list should additional exhibits be discovered:

- Exhibit 1:** January to March 2017 - Legislative History Public Law 34-83;
- Exhibit 2:** February to March 2017 - Legislative History of Bill No. 21-34;
- Exhibit 3:** Negotiating Team Rules and Regulations;
- Exhibit 4:** FY19 Communications Log;
- Exhibit 5:** Log of Allegedly Privileged Documents per Public Law 32-083;
- Exhibit 6:** Log of Allegedly Privileged and Confidential Communications;

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Exhibit 7: DOA/HRC-RFP-GHI-19-001 (“RFP”) provision re Guam Regional Medical Center (“GRMC”) being part of provider network;

Exhibit 8: RFP provision with sole source provision;

Exhibit 9: RFP provision with provision re guaranteed renewability;

Exhibit 10: RFP provisions re written determination required for off island experience and performance;

Exhibit 11: 12/11/17 - AG’s Office appoints Shannon Taitano as its representative to serve on Negotiating Team;

Exhibit 12: Examples of tardy GRMC claims;

Exhibit 13: 1/31/18 - Suzanne Kohlmann from Aon sends an email to Leonora Candaso;

Exhibit 14: 1/31/18 - Leonora Candaso sends a draft of the RFP to Christine Baleto and Vince Arriola;

Exhibit 15: Letter from TakeCare to its Members;

Exhibit 16: 2/2/18 - Suzanne Kohlmann from Aon notifies Leonora Candaso from DOA via email that the new draft of the RFP is ready for review by DOA and Committee;

Exhibit 17: 2/7/18 - Governor Calvo appoints Roy S. Adonay as a Negotiating Team member for the General Public by the Calvo/Tenorio administration;

Exhibit 18: 2/13/18 - Leonora Candaso sends an email noting that “Roy Adonay was listed as the General Public member, but that there may be a conflict with his appointment;

Exhibit 19: 2/13/18 - Leonara Candaso requested that she be allowed to “send the team a draft RFP for their review.”;

Exhibit 20: 4/13/17 - TakeCare letter to GRMC;

Exhibit 21: 3/6/18 - Matthew Santos and Sylvia Calvo are notified of a meeting on 3/8/18 at 9 a.m.;

Exhibit 22: 3/15/18 - Matthew Santos and Sylvia Calvo are notified of a meeting on 3/22/18 at 9 a.m.;

Exhibit 23: 3/22/18 - Matt Santos sends an email to Shannon Taitano and BJ Cruz noting that the Speaker had told him that Tony Sgro had complained that he had recommended that the gym benefit be removed;

Exhibit 24: 3/28/18 - Chuck Tanner sent an email to Lester Carlson re confidentiality, but a portion of it is cut off at the bottom;

Exhibit 25: 4/3/18 - Leonora Candaso sends an email requesting that publication of the RFP take place on Friday;

Exhibit 26: 4/6/18 - TakeCare submits a registration of interest to provide health insurance to GovGuam;

Exhibit 27: 4/9/18 - SelectCare submits a registration of interest to provide health insurance to GovGuam;

Exhibit 28: 4/13/18 - SelectCare submits questions to DOA. In Question #7 SelectCare asks: “Please clarify that the requirement (Exhibit A, question #34) to have both hospitals (GRMC and GMH) for the Exclusive provided means that both facilities are duly or legally contracted with the provider.”;

Exhibit 29: 4/13/18 - TakeCare submits questions to DOA;

Exhibit 30: 4/18/18 - TakeCare protest of RFP;

Exhibit 31: 5/2/18 - Department of Administration denies TakeCare's protest;

Exhibit 32: 5/7/18 - DOA Director refuses to produce information to PDN because it is protected from disclosure;

Exhibit 33: 5/7/18 - DOA executes a tardy "Determination Regarding the Need to Procure Health Insurance Benefits Pursuant to 4 G.C.A. Section 4301(a).";

Exhibit 34: 5/7/18 - Someone from Personal Services Administration executes a Confidentiality Agreement;

Exhibit 35: 5/9/18 - James Moylan sends an email to DOA asking what happens if the RFP "rolls into the next contract period.";

Exhibit 36: 5/16/18 - DOA executes another tardy "Determination of Need to Use Competitive Selection Procedure" and says it was "made on March 30, 2018.";

Exhibit 37: 5/30/18 - TakeCare Supplemental Protest filed with DOA;

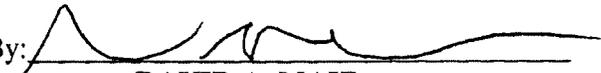
Exhibit 38: Undated GMH/GRMC Cost comparisons;

Exhibit 39: Complete copy of RFP. (Due to length of the RFP, three copies of it will be available at the hearing for the Hearing Officer, Attorney General's Office and TakeCare.); and

Exhibit 40: 7/9/18 - Declaration of Jerry Crisostomo.

Respectfully submitted this 13th day of July, 2018.

MAIR & MAIR, Attorneys at Law
Attorneys for TakeCare Insurance Company, Inc.

By: 

DAVID A. MAIR