

1 DANIEL J. BERMAN, ESQ.  
2 Suite 801, DNA Bldg.  
3 238 Archbishop Flores Street  
4 Hagåtña, Guam 96910  
5 Telephone No.: (671) 922-7570  
6 Email: djberman@pacificlawyers.law

RECEIVED  
GUAM PUBLIC AUDITOR  
PROCUREMENT APPEALS  
DATE: 5/10/2025

TIME: 3:12 DIAM BERMER: JM

ATTORNEY DOCKET NO. 25-002

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6 Attorneys for Appellant:  
7 *GLIMPSES OF GUAM, INC.*

8  
9 **BEFORE THE PUBLIC AUDITOR  
PROCUREMENT APPEALS  
TERRITORY OF GUAM**

10 IN THE APPEAL OF

Appeal No.: OPA-PA-25-002

11 GLIMPSES OF GUAM, INC.,

**APPELLANT GLIMPSES OF GUAM, INC.'S  
ADMISSIONS OF FACT AND LIST OF  
ISSUES**

12  
13 Appellant.

14 The Appellant GLIMPSES OF GUAM, INC. (herein "Glimpses") submits the  
15 following Admissions of Fact and List of Issues.

16 Glimpses admits to the documents that are the Record of Procurement on Appeal  
17 submitted by the Guam Visitors Bureau ("GVB"). Glimpses expects that GVB will  
18 likely admit to admissibility of the documents that are the record of procurement.

19 Glimpses submits that the issues that will require evidence or argument are set  
20 forth in Glimpses' Motion and Memorandum Brief in Support of Summary Judgment  
21 and Reply Memorandum filed on May 7 and May 14, 2025, respectively. These include  
22 among others:

23 1. No individual bid of RIMS was ever submitted in response to the RFP;  
24 2. GVB's purported Notice of a public state of emergency and necessity to  
25 protect substantial interests of Guam February 24, 2025 is void;  
26 3. Does RIMS have the sole and individual right to receive the contract from  
27 GVB without an individual bid;

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ORIGINAL

4. Is the contract between GVB and RIMS void as a result of the failures of GVB to offer the contract to the Manhita Team;

5. Is awarding a collaborative bid to only one non-bidder among several individual partners on a team bid is unlawful;

6. Is the exception to the automatic stay improperly invoked when no notice of the right to appeal was provided and distributed; and,

7. Is the enforcement of a two-day time bar without providing notice to Appellant arbitrary, capricious and contrary to constitutional procedural due process

## CONCLUSION

Glimpses submits the Admissions of Fact and Issues for briefing in the Trial Briefs as set out above.

DATED this 19 day of May, 2025.

Respectfully submitted,

Attorneys for Appellant  
*GLIMPSES OF GUAM, INC.*

By:

Daniel Berman  
DANIEL J. BERMAN, ESO.

## CERTIFICATE OF SERVICE

I, Christine Pangelinan, hereby certify that on the 19 day of May, 2025, I caused the foregoing *Appellant Glimpses of Guam, Inc.'s Admissions of Fact and List of Issues* to be served via hand delivery to the following:

Joseph B. McDonald, Esq.  
McDonald Law Office, LLC  
173 Aspinall Ave., Suite 207A  
Hagatna, Guam 96910

DATED this 19 day of May, 2025.

  
CHRISTINE PANGELINAN