

REPUBLIC OF KENYA
PUBLIC PROCUREMENT ADMINISTRATIVE REVIEW BOARD
APPLICATION NO. 28/2022 OF 30TH MARCH 2022

BETWEEN

PEESAM LTD APPLICANT

AND

THE ACCOUNTING OFFICER,

CENTRAL BANK OF KENYA 1ST RESPONDENT

CENTRAL BANK OF KENYA 2ND RESPONDENT

KAMTIX CLEANERS CO. LIMITED INTERESTED PARTY

Review against the decision of the Accounting Officer of the Central Bank of Kenya in respect to Tender No. CBK/061/2021-2022 for Provision of cleaning and related services for Central Bank of Kenya Eldoret Branch for a period of two years.

BOARD MEMBERS

- | | |
|---------------------------|---------------|
| 1. Ms. Faith Waigwa | - Chairperson |
| 2. Mr. Nicholas Mruttu | - Member |
| 3. Ms. Rahab Robi | - Member |
| 4. Mr. Ambrose Ogeto | - Member |
| 5. Ms. Phyllis Chepkemboi | - Member |

IN ATTENDANCE

Mr. Philemon Kiprop - Holding brief for Acting Board Secretary

BACKGROUND TO THE DECISION

The Tendering Process

Central Bank of Kenya (hereinafter referred to as the 'Procuring Entity'), the 2nd Respondent herein, invited sealed tenders from eligible tenderers for Tender No. **CBK/061/2021-2022** for Provision of cleaning and related services for Central Bank of Kenya Eldoret Branch for a period of two years (hereinafter referred to as the 'subject tender') by way of National Open Tendering method through advertisement in the Public Procurement Information Portal (www.tenders.go.ke) and the 2nd Respondent's website (www.centralbank.go.ke) on 27th January 2022.

Tender Submission Deadline and Opening

The 2nd Respondent received a total of twenty-four (24) tenders by the tender submission deadline of 17th February 2022 at 10.30am. The tenders were opened shortly thereafter by a Tender Opening Committee in the presence of tenderers' representatives present. The following tenderers were recorded as having submitted their respective tenders and the corresponding tender sum amount in the minutes of the tender opening committee meeting held on 17th February 2022: -

No	Tenderer Name	Tenderer sum amount (Kes)
1.	One Way Cleaning Services Ltd	8,418,816.00
2.	Garbage Hero Limited	3,980,117.76
3.	Peesam Ltd	4,451,616.00
4.	Winner Cleaning Services	2,888,000.00 (This is in words)

		2,880,000.00 (This is in figures)
5.	Nadiah Investment Ltd	6,681,600.00
6.	Quickshine Ventures Ltd	1,800,000.00
7.	Petals Hygiene & Sanitation Services Ltd	5,294,388.48
8.	Jepco Services & Renovators Ltd	5,640,000.00
9.	Robu Cleaning Services Ltd	6,770,688.00
10.	Brooklyn Cleaning Services Ltd	3,120,000.00
11.	Simpson Lane Services Ltd	3,814,080.00
12.	Dechrip East Africa Ltd	3,897,600.00
13.	Limah East Africa Ltd	5,228,352.00
14.	Ice Clean Care Group Co. Ltd	4,155,913.44
15.	Kenma Homecare Services	3,028,073.28
16.	Jubilant Cleaning Services Ltd	7,999,200.00
17.	Swiftmax Services Ltd	4,267,872.00
18.	Glacier East Africa Ltd	6,592,320.00
19.	Aimat Company Ltd	5,428,800.00
20.	Spic 'N' Span Cleaning Services	5,011,200.00
21.	Maice Enterprises	5,545,808.00
22.	Supper Broom Services Ltd	5,091,156.48
23.	Kamtix Cleaners Co. Ltd	2,939,904.00
24.	Golden Years Suppliers	4,114,800.00

Evaluation of Tenders

An Evaluation Committee appointed by the 1st Respondent adopted the evaluation criteria provided in the Tender Document to evaluate the

tenders as follows and as captured in an Evaluation Report signed by members of the Evaluation Committee on 4th March 2022 (hereinafter referred to as the 'Evaluation Report'):

Stage1: Compliance with the Mandatory Requirements;

Stage 2: Technical Evaluation on capacity to deliver the contract;

Stage 3: The Financial Evaluation;

Compliance with the Mandatory Requirements

The first stage of evaluation involved determination of responsiveness to the mandatory requirements criteria outlined in Preliminary examination parameters - Stage 1 of the evaluation of Section III – Evaluation and Qualification Criteria at page 28 of 104 of the blank tender document issued to prospective tenderers by the Respondents (hereinafter referred to as the 'Tender Document').

At the end of evaluation at this stage, the Evaluation Committee determined three (3) tenders non-responsive while another twenty one (21) tenders were determined responsive. The Applicant's and the Interested Party's tenders were among the twenty-one (21) tenders determined responsive thus progressed to the next stage of evaluation.

Technical Evaluation on capacity to deliver the contract

The second stage of evaluation involved determination of responsiveness to the criteria outlined in Technical Qualification Evaluation – Stage 2 of the evaluation of Section III – Evaluation and Qualification Criteria at page

29 of 104 of the Tender Document. Tenders required to attain a minimum score of 75% to qualify for financial evaluation.

At the end of evaluation at this stage, the Evaluation Committee determined three (3) tenders non-responsive for failing to attain a minimum score of 75% while another eighteen (18) tenders were determined responsive for attaining a minimum score of 75%. The Applicant's and the Interested Party's tenders were among the eighteen (18) tenders determined responsive thus progressed to the next stage of evaluation.

Financial Evaluation

The third stage of evaluation involved determination of responsiveness to the criteria outlined in Financial Evaluation – Stage 3 of the evaluation of Section III – Evaluation and Qualification Criteria at page 30 of 104 of the Tender Document. Tenders were to be ranked to determine the lowest evaluated tenderer. The eighteen (18) tenders were ranked as follows at this stage:

Summary of Financial Tenders

Tenderers		Tender Amount (Kshs)	Rank
B1.	One Way Cleaning Services Ltd	8,418,816.00	18
B2.	Garbage Hero Limited	3,980,117.76	5
B3.	Peesam Ltd	4,451,616.00	9
B5.	Nadiyah Investment Ltd	6,681,600.00	16

Tenderers		Tender Amount (Kshs)	Rank
B7.	Petals Hygiene & Sanitation Services Ltd	5,294,388.48	12
B8.	Jepco Services & Renovators Ltd	5,640,000.00	14
B10.	Brooklyn Cleaning Services Ltd	3,120,000.00	3
B11.	Simpson Lane Services Ltd	3,814,080.00	4
B13.	Limah East Africa Ltd	5,228,352.00	11
B14.	Ice Clean Care Group Co. Ltd	4,155,913.44	7
B15.	Kenma Homecare Services	3,028,073.28	2
B16.	Jubilant Cleaning Services Ltd	7,999,200.00	17
B17.	Swiftmax Services Ltd	4,267,872.00	8
B18.	Glacier East Africa Ltd	6,592,320.00	15
B19.	Aimat Company Ltd	5,428,800.00	13
B22.	Super Broom Services Ltd	5,091,156.48	10
B23.	Kamtix Cleaners Co. Ltd	2,939,904.00	1
B24.	Golden Years Suppliers	4,114,800.00	6

The Evaluation Committee determined the Interested Party to be the lowest evaluated tenderer.

Due Diligence

The Evaluation Committee had discretion to conduct or not to conduct due diligence as provided at page 30 of the Tender Document. The Evaluation Committee opted not to conduct due diligence on the Interested Party because the Interested Party was a current service provider.

Recommendation

The Evaluation Committee recommended award of the subject tender to the Interested Party at a total cost of Kshs. 2,939,904.00 (Kenya Shillings Two Million Nine Hundred Thirty-Nine Thousand Nine Hundred and Four) only.

Professional Opinion

The Deputy Director, Head of Procurement Division of the 2nd Respondent, Z. N. Thambu and the Director, General Services Department of the 2nd Respondent, S. N. Muriu, in a Memo to the Governor, the 1st Respondent herein, signed on 9th March 2022, opined that they concur with the recommendation made by the Evaluation Committee to award the subject tender to the Interested Party being the lowest evaluated tenderer. They requested the 1st Respondent to consider and award the subject tender to the Interested Party at a total cost of Kshs. 2,939,904.00 (Kenya Shillings Two Million Nine Hundred Thirty-Nine Thousand Nine Hundred and Four) only.

The 1st Respondent approved the professional opinion on 14th March 2022.

Notification to tenderers

Vide letters dated 15th March 2022, tenderers were notified of the outcome of evaluation of the subject tender.

REQUEST FOR REVIEW

Peesam Limited, the Applicant herein, lodged this Request for Review dated 29th March 2022 and filed on 30th March 2022 together with a Supporting Affidavit sworn on 29th March 2022 by Samuel Nganga, a director of the Applicant, through the firm of Karugu Mbugua & Co. Advocates seeking for the following orders: -

- a) The award be annulled;***
- b) The Procuring Entity does a fresh evaluation of all the bids in light of Clause 37 of the Tender Document and the Evaluation Criteria;***
- c) Costs of this application be awarded to the applicant; and***
- d) Any other orders that the Honorable Board may deem just and fit.***

In a Notification of Appeal and a letter dated 30th March 2022, the Acting Board Secretary of the Public Procurement Administrative Review Board (hereinafter referred to as the 'Board') notified the Respondents of the existence of the Request for Review and the suspension of procurement proceedings for the subject tender while forwarding to the Respondents a copy of the Request for Review together with the Board's Circular No.02/2020 dated 24th March 2020, detailing administrative and

contingency measures to mitigate the spread of Covid-19. Further, the Respondents were requested to submit a response to the Request for Review together with confidential documents concerning the subject tender within 5 days from 30th March 2022.

On 5th April 2022, the Respondents submitted to the Board confidential information and documents with respect to the subject tender pursuant to Section 67(3)(e) of the Act. Thereafter, on 6th April 2022, the Respondents filed a Memorandum of Response to the Request for Review and a Replying Affidavit sworn by Zipporah Thambu on 6th April 2022 through the firm of Tripleoklaw LLP Advocates.

Vide letters dated 7th April 2022, the Acting Board Secretary notified all tenderers in the subject tender, via their respective email addresses as provided by the Respondents, of the existence of the Request for Review while forwarding to tenderers a copy of the Request for Review together with the Board's Circular No.02/2020 dated 24th March 2020. Further, all tenderers were invited to submit to the Board any information and arguments on the subject tender within 3 days from 7th April 2022.

On 8th April 2022, the Interested Party filed a Replying Affidavit sworn by Mohamed Ali Ibrahim on 7th April 2022 through the firm of CK Advocates. However, no other tenderer in the subject tender other than the Applicant and the Interested Party, filed any pleadings or documents with respect to the subject tender in this review.

Pursuant to the Board's Circular No.2/2020 dated 24th March 2020, the Board dispensed with physical hearings and directed all requests for review applications be canvassed by way of written submissions. Clause 1 on page 2 of the said Circular directed that pleadings and documents would be deemed properly filed if they bore the Board's official stamp.

The Respondents filed their written submissions and list of authorities on 12th April 2022. The Applicant and the Interested Party did not file their submissions.

APPLICANT'S CASE

The Applicant avers that it participated in the subject tender by submitting its tender pursuant to an invitation to tender by the 2nd Respondent. According to the Applicant, it attached all the mandatory requirements as provided for in the tender evaluation criteria and technical evaluation documents. However, on 15th March 2022, the Applicant received a letter dated 15th March 2021 (we assume the Applicant meant 15th March 2022) informing it that it was not successful because it was not the lowest tenderer.

The Applicant avers that on the same day of 15th March 2022, it sought clarifications from the 2nd Respondent with respect to the winning tender which according to the Applicant contravened Clause 37 of the Tender Document and the evaluation criteria in so far as meeting the minimum wage requirements for the required staff par the Tender Document compared to the award made. The Applicant alleges that the 2nd

Respondent dismissed its queries as unfounded vide a letter dated 22nd March 2022.

Dissatisfied with the 2nd Respondent's decision and reply thereto, the Applicant lodged this review alleging that the 2nd Respondent breached Section 80(2) of the Act read with Clause 37 of the Tender Document and Evaluation criteria by awarding the subject tender to a procuring entity (we assume the Applicant meant tenderer and not procuring entity) with a tender which is totally unjustifiable and specifically with reference to minimum wage for all the employees required to perform the subject tasks.

1ST AND 2ND RESPONDENTS RESPONSE

In response to the Applicant's allegations, the Respondents contend that in a bid to efficiently perform its Constitutional and statutory mandate, the 2nd Respondent advertised a Tender Notice inviting tenderers to submit sealed tenders for the subject tender on both the Central Bank of Kenya and the Public Procurement Information Portal (PPIP) websites.

According to the Respondents, the 2nd Respondent received a total of twenty-four (24) tenders and depending with their level of compliance, the tenders were subjected to three evaluation processes, namely: a) Compliance with mandatory terms; b) Technical evaluation; and c) Financial evaluation. Upon evaluation, 3 tenderers failed the mandatory requirements evaluation and subsequently a further 3 tenderers failed the technical evaluation. Once the remaining tenders were subjected to

financial evaluation, the Interested Party emerged as the lowest evaluated tenderer at a cost of Kenya Shillings Two Million Nine Hundred and Thirty-Nine Thousand Nine Hundred and Four (Kshs. 2,939,904.00) only. The Respondents confirm that the Applicant was notified of its tender's unsuccessfulness vide a letter dated 15th March 2022

According to the Respondents the entire procurement process fully complied with the provisions of the Act and more so Section 80 (2) of the Act as the evaluation of tenders was premised upon the Tender Document and that the 2nd Respondent ascertained itself that the tender of the Interested Party was not an abnormally low tender that would raise concerns about the Interested Party's ability to perform a resultant contract of the subject tender. It is thus the Respondent contention that the Applicant has not demonstrated how the Respondents and/or Interested Party violated Clause 37 of the Tender Document.

The Respondents contend that under Section III of the Tender Document, tenderers were required to provide evidence proving adherence to minimum wages in accordance with government guidelines on payment of wages and that both the Applicant and the Interested Party submitted this evidence which the 2nd Respondent confirmed that the Interested Party had fully complied with the minimum wage requirements.

The Respondents contend that the Tender Document provided for prices quoted to be inclusive of taxes and delivery costs and the

amounts as quoted by the Interested Party were all inclusive and the Interested Party is bound by law to pay minimum wages to its employees as well as deliver services to the 2nd Respondent for the price quoted.

The 2nd Respondent denies that the alleged minimum cost for the resultant contract of the subject tender are as indicated by the Applicant which in any event are erroneous and not in accordance with the law.

The Respondents contend that the Applicant is not the lowest evaluated tenderer and is not entitled to award of the tender or grant of the orders it is seeking in this review and that the Interested Party was the lowest evaluated tenderer and the Applicant was among the highest in terms of cost in the evaluated tenders.

The Respondents contend that the procurement process and the award of the subject tender was carried out in accordance with Article 227 (1) of the Constitution as well as the Act and in a legal, fair, equitable, transparent, competitive and cost-effective method.

The Respondents also contend that the Applicant has neither pleaded nor proved breach of any duty by the 1st and 2nd Respondents under the Act or any regulations therein and is therefore not entitled to an order for review as stated or at all and that the Applicant has not laid any foundation in law or fact that the 1st and 2nd Respondents failed to

evaluate tenders in the subject tender in accordance with the law and or the criteria set out in the Tender Document.

In conclusion, the Respondents contend that the Request for Review application herein is an abuse of the Board's process, unsupported in law and is for dismissal.

INTERESTED PARTY'S RESPONSE

The Interested Party contends that it presented its tender in the subject tender pursuant to an advertisement for the same by the 2nd Respondent and that upon completion of evaluation of tenders by the 2nd Respondent, its tender was determined to be the most responsive tender thus awarded the subject tender vide a notification of award dated 15th March 2022.

The Interested Party further contends that the allegations by the Applicant that it did not meet certain minimum wage requirements are far-fetched and untruthful. According to the Interested Party, the Applicant cited an alleged breach of substantive law under the Labour Institutions Act (Act No. 12 of 2007) but failed to demonstrate clearly the manner in which those alleged breaches affected the tendering process or specify which provisions of the Act have been violated.

According to the Interested Party, it met all the mandatory requirements of the tendering process and went through all the stages of evaluation before the subject tender was awarded to it and it believes that the 2nd Respondent in awarding the subject tender to it,

complied with Clause 37 of the tender Document and constitutional provisions governing the process of procurement thus was not in breach of any duty imposed on the 2nd Respondent by the Act and the Public Procurement and Asset Disposal Regulations, 2020 (hereinafter referred to as the 'Regulations 2020').

In conclusion, the interested Party prays that the Board finds the Request for Review vexatious and does not disclose reasonable cause of action meriting the same to be adjudicated upon by the Board.

BOARD'S DECISION

The Board has considered each of the parties' case, pleadings, documents, written submissions, list of authorities and confidential documents submitted by the Respondents to the Board pursuant to Section 67 (3) (e) of the Act and finds that the main issue for determination is as follows: -

Whether the 1st and 2nd Respondents breached Clause 37 of Section I – Instructions To Tenderers at page 21 of 104 of the Tender Document and Clause 80(2) of the Act in awarding the subject tender to the Interested Party.

We understand the Applicant's allegation to be that the Interested Party submitted a tender with a tender sum that was abnormally low and which tender sum could not meet the minimum wage for all employees required to perform the task in the subject tender. With this, the Applicant cites the Respondents to be in breach of Clause 37 of the Tender Document

and Section 80(2) of the Act in awarding the subject tender to the Interested Party on the basis of an allegation that the Interested Party's tender sum is abnormally low.

On the other hand we understand the Respondents contention to be that during evaluation, the 2nd Respondent was satisfied with the evidence tendered by Interested Party in its tender to adhere to minimum wages in compliance with government guidelines on payment of wages and that the tender sum quoted by the Interested Party in its tender was inclusive of taxes and delivery costs. Further, the Respondents contention is that the Interested Party in performing the tasks of the subject tender will be bound by its tender sum.

The Interested Party on its part supported the Respondents contention and in addition contended that the allegations by the Applicant were far-fetched and untruthful and that it met all the requirements for evaluation of the subject tender.

We have carefully studied the Tender Document and note Clause 37 of Section I - Instructions To Tenderers at page 21 of 104 thereof provides as follows:

37 *Abnormally Low Tenders and*

.....

Abnormally Low Tenders

37.1 An Abnormally Low Tender is one where the Tender price, in combination with other elements of the Tender, appears so low that it raises material concerns as to the capability of the Tenderer in regards to the Tenderer's ability to perform the Contract for the offered Tender Price.

37.2 In the event of identification of a potentially Abnormally Low Tender, the Procuring Entity shall seek written clarifications from the Tenderer, including detailed price analyses of its Tender price in relation to the subject matter of the contract, scope, proposed methodology, schedule, allocation of risks and responsibilities and any other requirements of the Tender document.

37.3 After evaluation of the price analyses, in the event that the Procuring Entity determines that the Tenderer has failed to demonstrate its capability to perform the Contract for the offered Tender Price, the Procuring Entity shall reject the Tender.

From the above provisions of the Tender Document, it is our interpretation that it is the responsibility of a procuring entity like the 2nd Respondent in this review, to identify a potentially low tender and not a tenderer like the Applicant in this review.

Section 80(1) and (2) of the Act provides as follows with respect to evaluation of tenders:

80. Evaluation of tenders

(1) The evaluation committee appointed by the accounting officer pursuant to section 46 of this Act, shall evaluate and compare the responsive tenders other than tenders rejected.

(2) The evaluation and comparison shall be done using the procedures and criteria set out in the tender documents and, in the tender for professional services, shall have regard to the provisions of this Act and statutory instruments issued by the relevant professional associations regarding regulation of fees chargeable for services rendered.

From the above provisions of the Act, it is our interpretation that the responsibility of evaluating tenders rests with an evaluation committee of a procuring entity appointed by an accounting officer of such a procuring entity. While evaluating tenders, such an evaluation committee is guided by the procedures and criteria set out in a tender document. In essence, tenders are only evaluated using the procedures and criteria set out in a tender document.

The Tender Document provided for the criteria for evaluation in Section III – Evaluation and Qualification Criteria at pages 28 to 30 of 104 of the

Tender Document. We say so because Clause 1.2 of Section III – Evaluation and Qualification Criteria at page 28 of 104 of the Tender Document provides as follows:-

1.2 This section contains the criteria that the Employer shall use to evaluate tender and qualify tenderers. No other factors, methods or criteria shall be used other than specified in this tender document.....

Specific to adherence to minimum wages, the Tender Document provided criterion T6 of Technical Qualification Evaluation – Stage 2 of the evaluation of Section III - Evaluation and Qualification Criteria at page 29 of 104 of the Tender Document as follows as a criterion for evaluation at the Technical Evaluation Stage:

“

No	Evaluation Criteria	Weighting Score	Max Score %
T1	5
T2	30
T3	5
T4	15
T5	25

T6	Evidence to adherence to minimum wages in compliance with government guidelines on payment of wages (Attach latest two months' pay slips for cleaners)	<ul style="list-style-type: none"> • Marks will be earned as follows • Wages between KShs 13,000-15,000- 10 marks • Wages between above KShs 15,000-17,000- 15 marks • Wages between above KShs 17,000- 20 marks • Below KShs 13,000- Zero 	20
Total Score			100

Tenderers that score 75% and above on the above Technical Evaluation will qualify for Financial Evaluation."

Clearly, the requirement for proof of evidence to adherence to minimum wages in compliance with government guidelines on payment of wages was not a mandatory requirement but a requirement at technical evaluation stage which attracted a maximum of 20 marks depending on the evidence provided in the tenders being evaluated. We remind

ourselves that for a tender to progress to the financial evaluation stage such a tender required to attain a minimum score of 75% at the technical evaluation stage. We therefore find that it was possible for a tender to progress to the financial evaluation stage without proof of evidence to adherence to minimum wages in compliance with government guidelines on payment of wages if such a tender attained a maximum score in each of the other 5 criteria of evaluation at the technical evaluation stage. Simply put, a tender that attained a score of 80% at the technical evaluation stage having lost all the 20 marks under criterion T6 of Technical Qualification Evaluation – Stage 2 of the evaluation of Section III - Evaluation and Qualification Criteria at page 29 of 104 of the Tender Document was still eligible to progress for financial evaluation.

Turning to the circumstances of this review and having carefully studied the Interested Party's original tender, we note at pages 335 to 343 of the Interested Party's original tender are copies of nine (9) payslips that cover a period of more than two months (from 05/11/2021 to 05/01/2022) with salaries ranging between Kshs. 15,500/= and Kshs.22,500/=.

We also note from the Evaluation Report submitted to the Board as part of confidential documents that the Interested Party attained a score of 15 out of 20 marks with respect to criterion T6 of Technical Qualification Evaluation – Stage 2 of the evaluation of Section III - Evaluation and Qualification Criteria at page 29 of 104 of the Tender Document which required proof of evidence to adherence to minimum wages in compliance with government guidelines on payment of wages.

From the foregoing, it is our considered opinion that the Evaluation Committee fairly awarded the Interested Party a score of 15 marks out of 20 marks with respect to criterion T6 of Technical Qualification Evaluation – Stage 2 of the evaluation of Section III - Evaluation and Qualification Criteria at page 29 of 104 of the Tender Document which required proof of evidence to adherence to minimum wages in compliance with government guidelines on payment of wages.

As documented in the Evaluation Report, the Interested Party's tender attained a total score of 95% at the technical evaluation stage thus progressed for financial evaluation. At the financial evaluation stage, the Evaluation Committee ranked tenders according to their quoted tender sums and the Interested Party who had the lowest evaluated tender was recommended for award in accordance with the criteria for evaluation at Financial Evaluation - Stage 3 of the evaluation of Section III - Evaluation and Qualification Criteria at page 30 of 104 of the Tender Document read with criteria for award at Recommendation of award - Stage 5 of the evaluation of Section III - Evaluation and Qualification Criteria at page 30 of 104 of the Tender Document and Clause 41 Award Criteria of Section I – Instructions To Tenderers at page 22 of 104 of the Tender Document.

In the circumstances, we find that the 1st and 2nd Respondents did not breach Clause 37 of Section I – Instructions To Tenderers at page 21 of 104 of the Tender Document and Clause 80(2) of the Act in awarding the subject tender to the Interested Party.

FINAL ORDERS

In exercise of the powers conferred upon it by Section 173 of the Public Procurement and Asset Disposal Act, 2015, the Board makes the following orders in the Request for Review dated 29th March 2022:

1. **The Applicant's Request for Review dated 29th March 2022 be and is hereby dismissed.**
2. **Each party shall bear its own costs of this Request for Review.**

Dated at Nairobi this 20th day of April 2022



.....
CHAIRPERSON
PPARB



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SECRETARY
PPARB

