
Public Bid: An Analysis on the Transparency of the Bidding Process

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Abstract

The objective of the work is to talk about the transparency of Public Bids and the means to guarantee it during the process. To respond to the proposed objective, the theoretical framework from the Legal Doctrine was used, as well as the theoretical framework from articles, dissertations and doctoral theses. Transparency means that anyone can access certain information. According to the Advertising Principle, Public Administration must not commit obscure acts, and must always disclose their actions in an ethical manner. When applied in Public Bids, the Principle informs that there can't be no obscure acts and decisions. The greater visibility of the acts performed by the Administration during the bidding phases ensures that all interested parties have the possibility to inspect their legality and administrative probity.

Keywords: Bidding, process, transparency, Public Administration.

INTRODUCTION

Public Bid it's the public procurement process that searches the best and most advantageous contracting for the Public Administration. Bids, except in the cases provided for in the legislation, precede the contracts entered into by the Public Administration, that is, when it is necessary for the Administration to acquire a certain good or service, as a rule, there must be a bidding process with the objective of hiring

a subject capable of supplying the desired good or service, following all the steps and phases necessary to carry out the process.

Transparency, on the other hand, works as a way to assist the bodies and fiscal agents of the Public Administration in the search for irregularities and illegalities inside the bidding process, but transparency also exist to increase the bid's visibility in a way that each more and more people seek to follow the actions of the process and make it more difficult for anyone, supplier or public agent, to practice an act that makes the process irregular.

Currently, numerous large and small bids have already proved to be manipulated bids, rigging bids or addicted bids, which always causes great damage to the Public Administration and to society. It is possible to note that, currently, there is a lack of information about bids, this is due both to the lack of public interest and to the lack of disclosure by the Public Administration. This lack of information ends up creating a dangerous environment for public procurement. It can be said that the lower the population's knowledge about the subject, greater will be the number of "obscures" bids and, consequently, rigging bids. A better understanding of how bids and transparency work can enable greater control over the use of public funds and may even reduce the possibilities of fraud in public administration.

In troubled times of political and economic uncertainty, understanding how the public procurement process works is essential for every citizen. The purpose of the bid is to serve the public interest, so if the fiscalization is realized by the public itself makes it easier to determine whether the objective has been achieved or not.

The research will initially clarify the functioning of a Public Bid, its main rules and regulations, explaining the role of the Bidding Commission and its agents, the possibilities of secrecy during the process and how each of the stages of the process works. After the initial considerations, the role of transparency in the bidding process will be explained in a clear way and, shortly thereafter, an analysis will be made of the existing methods used by the Public Administration to ensure transparency. Finally, practical examples of transparency used by public administration bodies will be presented and analyzed.

METHODOLOGY

In order to respond to the objective proposed in this research, the methodological basis of the work is based on the theoretical framework that involves the field studied, as well as on the understandings from the Legal Doctrine, the articles, dissertations, master's theses and the existing legislative coverage.

RESULTS AND DISCUSSION

The bidding process according to the Brazilian law

Notorious doctrines of administrative law, such as Meirelles and Medauar, bring us the concept of bidding as follows:

The bidding is an administrative procedure in which the Administration selects the most advantageous proposal for the contract of their interest. It develops through an orderly succession of binding acts for the administration and for the bidders, providing equal opportunity to all interested parties and acting as a factor of efficiency and morality in administrative businesses. (MEIRELLES, 2004, page 266).

Based on these elements, we can conceptualize the bidding as *the linked administrative procedure through which the entities of the Public Administration and those controlled by it select the best proposal among those offered by the various interested parties, with two objectives - the realization of a contract, or the obtaining the best technical, artistic or scientific work.* (CARVALHO FILHO, 2016, pages 329 and 330, emphasis added).

The bidding, in summary, is a formal administrative procedure in which the Public Administration convenes, under conditions established in its own act, companies interested in presenting proposals for the offer of goods and / or services, with the objective of providing the Public Administration with the possibility of acquire your respective good or service in the most advantageous way. Bids are governed by Law n°. 8.666, of June 21, 1993, which establishes the general rules for bidding, the principles that must be observed, the modalities, the judgment criteria, the possibilities of bidding waiver or unenforceability of bidding, etc.

The bidding procedure is divided into two phases: Internal phase and external phase. The internal phase is carried out exclusively by the Public Administration, in which the identification

of the need for demand, the definition of the bid's object, the price research, the choice of the bidding modality, the Term of Reference or Basic Project confection, authorization by the competent authority, indication of budgetary resources and, finally, the preparation of the public notice (Invitation to Bid). The external phase, on the other hand, is where the interaction between the public and the Public Administration agents occurs, it starts right after the publication of the public notice and the bidding notice, in this phase occurs the sent and judged of the proposals, the sent and analysis of the documents, the qualification, the homologation and the award.

The public notice is the maximum rule of the process, it is the instrument that contains all the requirements that will be necessary during the stages of the process, it contains the laws, decrees and normative instruments that govern the bidding, it defines the bid's object, its value and its technical specifications, it is through it that the Administration makes public the opening of a bidding process. The notice also includes the judgment criterion, which will define the method for analyzing proposals, which may be for: lower price, better technique, technique and price and higher bid or offer.

The bid is subdivided into six bidding modalities. Five of the modalities are provided for in article 22 of Law nº. 8.666, of June 21, 1993, are: Competition; Price Taking; Invitation; Contest and Auction. Subsequently, Law nº. 10.520, of July 17, 2002, introduced the reverse auction, which can be carried out in person or electronically.

Competition is a very wide bidding modality, because it is used in large contracts, under the terms of Decree nº. 9.412, of June 18, 2018, for the performance of: constructions, services, purchases, concessions and disposals. In the Competition procedure, unlike the other procedures, the bidders (the interested parties participating in the bidding) must prove their qualification in the preliminary qualification phase, continuing in the bidding only those qualified.

Price Taking seeks to enter into contracts for constructions, services and purchases, which are of a value lower than that of the Competition and higher than that of the Invitation, obeying the provisions of Decree nº. 9.412, of June 18, 2018. What differentiates the procedure for Price Taking is the existence of a qualification before the opening of the bidding procedure.

The Invitation is used in bids of lesser value, according to Decree no. 9,412, of June 18, 2018, because of this it has the simplest

of procedures. In this modality, the Public Administration chooses and invites at least three bidders, using an invitation-letter, to present their proposals.

The Contest is the bidding modality among any interested parties to choose technical, scientific or artistic work, through the institution of prizes or remuneration to the winners, according to the conditions established in the notice. The Contest differs from other modalities due to the fact that the winners of this modality receive a prize or a remuneration and, also, the winners do not contract with the Public Administration in any way. The Contest is the only modality that doesn't need a judgment criterion.

The Auction is the modality to carry out the sale of movable assets or to dispose of real estate to the highest bidder. In this procedure, as a rule, the qualification phase is waived, but wide dissemination must still be carried out before the opening of the event, as in the other modalities.

The Reverse Auction is the newest of the modalities, created by Law no. 10.520 / 2002, it aims at the acquisition of goods and services considered "common", that is, goods and services of little complexity that can be defined objectively and clearly in the notice, through market specifications. The Auction can be held in person or electronically. Currently the Electronic Auction is widely used, since it is held in a public digital room, which allows all interested parties to have access to the documents of the event.

There is also the possibility that the bid may be considered unenforceable or may be waived. The unenforceability of the bidding occurs when it is not feasible to hold a competitive event, according to the exemplary list of art. 25, of Law n^o. 8.666/1993. The bidding waiver occurs when it is possible to hold a competitive event, but the law authorizes direct hiring, as listed in art. 24, Law n^o. 8.666/1993.

The responsible for the bids are the public agents that make up the Bidding Commission. Law n^o. 8.666/1993 brings in its art. 6th, item XVI, the concept of Bidding Commission, such as: "commission, permanent or special, created by the Administration with the function of receiving, examining and judging all documents and procedures related to bids and the registration of bidders". The commission is composed of at least three members, at least two of whom must be employees of the permanent staff of the body responsible for bidding.

All members of the bidding committee are jointly and severally liable for the acts performed by the commission.

After the homologation and the award of the bid the appeal phase is opened, where the bidders have the opportunity to appeal against possible irregularities that occurred in the process, after its conclusion, the bidding process ends. However, if the Administration is no longer interested in the bidding or if the existence of defects and/or irregularities in the process is discovered, even if the process has already been closed, the bidding may be canceled or revoked. Medauar (2018, p. 200) brings us the concept of these two institutes:

The annulment stems from the existence of illegality (see Chapter 8, item 8.11.3). Therefore, it can be carried out by a competent authority, superior to the bidding commission, by official letter or provocation (administrative appeal, press news, etc.). It may also result from a sentence or a judgment of the Judiciary.
[...]

The revocation undoes the bidding process for reasons of public interest related to a supervening fact, duly proven, relevant and sufficient to justify such conduct (art. 49). In view of this possibility of revocation, it has long been affirmed that the winning bidder is not entitled to conclude the contract, but has the right not to be passed over if the contract is concluded.

Transparency, ethics and access to information in Public Bids.

All public agents have an administrative duty to exercise their functions with ethics, impersonality and impartiality, but for the agent that works in the bidding process, the care with this duty needs to be much greater. After all, members of the Public Administration must be strictly legalists, following the parameters and procedures established by law and doctrine, the smallest infraction can result in an act of administrative improbity, for the public agent who works in the bids the smallest infraction can frustrate event, lead to unsatisfactory hiring, could manipulate the process, allow a rigging bid, incur any of the crimes described in articles 89 to 99, of Law nº. 8.666/1993, suspend the process, or cause damage to the Public Power and/or to the society.

However, the Bidding Law in bringing the duties and functions of those responsible for bidding also regulated the care that

bidders must take when participating in a bidding process. There are certain types of bidders There are certain types of bidders who use their cunning and the Administration's misunderstandings to benefit themselves. These bidders usually enter into bids even when they do not have the capacity to participate in it, just looking for some opportunity to deceive the Administration, when the bidding seems unfavorable to them they will try to turn insignificant details into bias in the process so that the bidding is suspended, they normally also seek to have direct contact with the Bidding Commission in order to facilitate if they wish to entice, disturb or even threaten their agents. All those involved in a bidding process, servers, suppliers and other interested parties, have an ethical and legal duty to obey all the rules of the bid and to always act with integrity, good faith and ethics. However, there will always be those who wish to obtain an undue advantage for themselves, so each participant in the event has the same ethical and legal duty to supervise the execution of the process and report any irregularities to the competent authority.

In this sense, it should be noted that the only effective way to prevent mistakes by the Public Administration, to avoid unsatisfactory contracts and to prevent malicious bidders from obtaining undue advantages is through a transparent bidding process.

The definition of the bid's object, together with the qualification rules and the execution requirements of the object, often ends up limiting the number of participants in the bidding, or even directing the result of the bidding. After all, depending on the object and taking into account the current market conditions, only with a mere reading of the notice will it be possible to discover which companies will be able to bear the costs of execution, which will have the necessary qualification to compete in the event and which will be prevented from participating.

For example, let's say that the government of city X holds a Bid for the construction of a new city hall and states in its notice that one of the necessary requirements for hiring is that the company has already built a city hall in city X previously. Therefore, the only company that could participate in the bidding process would be the one that built the old city hall. The example refers to a case of bidding direction, in other words, a restriction on the competitive nature of the event and a fraud in the bidding procedure.

Transparency International - TI, an international entity dedicated to fighting corruption, reports that some attitudes may suggest the presence of corruption: 1) lack of transparency in the process and in decision-making, preventing public control and monitoring; 2) inadequate access to information; 3) absence of opportunity for public discussions (FORTINI; MOTTA, 2016). In summary, a process without transparency is an irregular, obscure procedure, with little monitoring and strong evidence of corruption.

Transparency, in the scope of the bidding process, is not just about the dissemination of information. We can conceptualize transparency as making all relevant acts, documents and information available on an accessible platform, always using clear and understandable language, so that anyone interested in participating or supervising the event can easily understand the progress of the process.

Art. 5th, XIV, of the Federal Constitution of 1988, guarantees to all Brazilian citizens the right to information, the only caveat regarding confidentiality: "access to information is guaranteed to all and confidentiality of the source is guaranteed, when necessary for professional practice ". The hypothesis of secrecy does not apply to bids, because, according to the Advertising Principle, the Public Administration must not commit obscure acts, all acts of a bid must be public, and any type of confidentiality is prohibited.

Medauar (2018, p.181) conceptualizes the Advertising Principle as follows:

Advertising - translates into transparency, the right of access to elements of the bidding process, disclosure of notices, disclosure of decisions; for example, this principle translates to §3 of art. 3rd, according to which "The bidding will not be confidential, the acts of its procedure being public and accessible to the public, except for the content of the proposals, until the respective opening"; §6 of art. 15, art. 16 and § 1 of art. 43 also translates this principle.

The Advertising Principle concerns not only the disclosure of the procedure to the knowledge of all interested parties, but also to the acts of the Administration practiced in the various stages of the procedure, which can and must be open to interested parties, to ensure the possibility of inspecting their legality (DI PIETRO, 2019, p. 773).

Regarding the importance of the Advertising Principle, the indoctrinator Celso Antônio Bandeira de Mello (2009, p. 114) has to say that:

This is enshrined in the administrative duty to maintain full transparency in their behavior. There cannot be in a Democratic State of Law, in which the power resides in the people (art. 1st, sole paragraph, of the Constitution), concealment to the administered form the subjects that interest all, and much less in relation to the subjects individually affected by some measure.

The only admitted hypothesis of secrecy during the bidding process is regarding the proposal envelopes, they must be kept sealed and their contents confidential until the public session designated for their opening, according to art. 3rd, §3rd, of Law n°. 8.666/1993, however, once the contents of the envelopes are opened, they will also become publicly accessible.

The idea of using transparency as a tool for monitoring and combating corruption is not new, since the promulgation of the Federal Constitution of 1988, legislators have been tasked with creating laws and measures that supervise public accounts and administrative processes. It is worth mentioning here the Complementary Law n°. 131, of May 27, 2009, or simply, the Transparency Law, which innovated by inserting in the wording of the Fiscal Responsibility Law (Complementary Law n°. 101, of May 4, 2000) that information about the budgetary and financial execution of Union, States, Federal District and Municipalities can be made available in real time, and the Law also encourages popular participation in the entire budget execution process.

Another major advance in the area of transparency is Law n°. 12.527, of November 18, 2011, also known as the Access to Information Law. The Law brought legislative news regarding the availability of information and the creation of websites and mechanisms that provide transparent management. As for Public Administration, the Access to Information Law brought benefits to disciplining transparency, as can be seen in its art. 5th:

It is the duty of the State to guarantee the right of access to information, which will be franchised, through objective and agile procedures, in a *transparent, clear and easy-to-understand language*. (emphasis added).

Therefore, it can be seen that the requirement for transparency in a bidding procedure is not a legislative novelty, since such a requirement can be based on law, doctrine, constitutional and administrative principles, jurisprudence and even ethics.

Measures to ensure transparency during the bidding process.

In order to bring a more practical view to this research, some agents active in the bids were asked: What is the best way to ensure transparency in bids?

According to the Federal Audit Court :

In the case of bids promoted by the TCU administration, transparency is guaranteed through the publication of notices on the TCU portal on the internet and on the electronic platform where the reverse auctions are held. It should be noted that since 2018, the Court held only reverse auctions, so that in addition to making the notices available, all subsequent acts can be followed by any interested party through free access on Comprasnet. In addition, after the disclosure notice is released, anyone can request views of the bidding process, as it becomes public when the notice is released. (RAMOS, Evaldo Araújo. Auctioneer. Federal Audit Court. Electronic email. 10/27/2020).

According to the Jungle War Instruction Center - CIGS:

As we are a military unit that receives its resources through the Federal Government, we must use the reverse auction, and also in emergency cases the waiver of bidding (electronic quotation), the other types and modalities of bidding vary according to the complexity of the object and are rarely used, I will restrict the analysis to the most used ones. In these procedures, mainly the electronic auction already brings in its procedures mechanisms to guarantee the transparency of all phases of the bidding process in its internal and external phases. In the internal phase, a price survey is carried out by the Requesting Sector following Normative Instruction nº. 73, OF AUGUST 5, 2020, and subsequently the bidding process is launched in the system and submitted to legal analysis by the Legal Counsel of the Union - CJU. In the external phase, from the publication of the notice of opening of the public session in the system, all bidders have access to the process, and can question any situation presented in the notice, for example; then all phases are public and open, where all bidders have access to what is happening on the reverse auction, the auctioneer's actions, the documentation sent by the bidders, the disqualifications, the calls and conversations

through chat, the prices that were offered by all bidders, including the new Dec. 10.024/2019 it is mandatory to send the documentation ONLY through the Comprasnet system (reverse auction system), that is, any bidder has access to the other's documentation and can do their analysis as well. In the bidding waiver, in the past, the traditional way was adopted with the conduct of price research and the lowest value was made the acquisition, however with the Dec. 10.024/2019, it became mandatory to launch the waiver in the system for bids from any Company for at least 24 hours through electronic quotation, if there is a price according to the reference value and product quality the offer is accepted, if not the quotation it is canceled and the old method is adopted (commit to the lowest price), always prioritizing competition in the system. We can observe that in both forms we always use computerized systems that are disclosed to any company or interested person, with access anywhere in Brazil. I emphasize that this analysis is restricted to the two most used forms here in the quarter and are measures already provided for in the legislation and in the manuals of the systems that are used, also, the records of all the bidding processes carried out remain open to interested parties. Given the above, it is concluded that the more the system is computerized, the more it presents transparency in its acts, and the Federal Public Administration has been showing concern with the transparency mechanisms, as an example of this is the new reverse auction decree (Dec. 10.024/2019) which came with several changes and updates of methods that were very old, that worked at the time, but nowadays they are not so efficient. One of these methods is related to the obligation of Municipalities and States (most of which use the face-to-face reverse auction) which, when using federal resources, must adopt the reverse auction in its electronic form, requiring the adoption of the computerized system in their units. (SOBRINHO, Daniele Rocha. Auctioneer. Jungle War Instruction Center. Military Command of the Amazon. Electronic email. 10/30/2020).

According to the Amazonas State Court of Justice:

With regard to the procedures to ensure maximum transparency in the context of bidding processes, according to the current legislation, several elements are extremely accurate, and these were selected due to their importance in each phase of the bidding processes (instruction, analysis and execution) , these elements are part of the auctioneers' routine and are fully adopted by this Permanent Bidding Commission. Among these are the requirement of a document proving fiscal compliance and a certificate of technical capacity, which is extremely relevant in the bidding process. Another element

used is the participation of the requesting unit during the bidding process, since the requester is responsible for opening and signing the process according to art. 8th of the Decree nº 3.555/2000, and the specification of the object for decision making when choosing the acquisition or service provision to be acquired, art. 9th of the Decree nº 5.450/2005.

The standardization of public notices that are important to reduce possible failures and irregularities, in order to seek speed and efficiency in the internal procedures of bidding processes.

Use of a Checklist by this Bidding Commission, which is important, as it serves as a checklist that constitutes a single and organized guideline, in order to make the hiring that is intended to be carried out efficiently.

Carrying out extensive market research, so that Administration can acquire a real market value in the price composition, through a minimum parameter, according to the Normative Instruction nº 05/2014.

The training of auctioneers, in turn, is another very important element due to the constant updating of legislation, with the purpose of contributing to institutional development.

Finally, Information Technology through electronic auction modernizes public contracts, providing competitiveness and transparency and lower costs for public administration.

This Permanent Bidding Commission, together with the other technical sectors of TJAM, uses all the mechanisms mentioned above, and, nevertheless, considering that all mechanisms are of fundamental importance in the development of the bidding process, the performance of the reverse auctions as a means of ensuring greater transparency to the entire process, from the analysis of price proposals, to the documentation of bidders, accessible not only to all participants, but also to any and all interested parties who want to inspect the activities developed by the agencies administrative authorities in the respective area. (ISRAEL, Elízia Mara. Chairman of the Permanent Bidding Commission. Court of Justice of the State of Amazonas. 10/30/2020).

From the analysis of the answers presented, it is possible to conclude that there are several ways to guarantee transparency, and it is up to each body, entity, manager, auctioneer, agent and server to decide which method to use. In addition, it was possible to identify two

common measures in all the answers: the computerization of the bidding process and the preference for holding Electronic Auctions.

Computerizing a bidding means two things: giving preference to bids that can be made electronically and implementing ways to guarantee access to the bidding information, even if it is done in person. In today's world, where access to the internet is practically universal and society increasingly encourages freedom of information, computerizing the bidding process is not an absurd requirement but a real need.

Following the logic of computerization, we have the Electronic Auction, the bidding modality that exists to guarantee the greatest transparency of the process. The Reverse Auction mode was created to use more modern means of bidding, but the Electronic Auction came to optimize the entire bidding system. The Electronic Auction is normally held in a virtual public access room where any interested party can view the documents of each classified company, the conversations between the auctioneer and the classifieds, requests for clarification and challenges to the bid, which company won the bidding and all other data pertinent to the process. In summary, the Electronic Auction is naturally a transparent procedure.

Currently, many bodies have given preference to the use of the Electronic Auction, since it not only facilitates the monitoring of the bidding, but also facilitates the execution and control of the bidding by the Public Administration. This growth in the use of the Electronic Auction led the government to create a new decree that regulated the Electronic Auction and, furthermore, that made its use mandatory by certain members of the Public Administration, Decree no. 10,024, of September 20, 2019.

Anyway, from the simple reading of the answers it is possible to understand that, there are several ways and measures to guarantee transparency in the bidding process, regardless of which one is used, the only thing that matters is if the main objective was achieved, if it was possible to implement transparency in bids.

CONCLUSION

Bids have a big impact on our society, whether positive or negative. Successful bids lead to the construction of squares, hospitals and schools, move our economy, renovate historic monuments and even

pay the wages of many workers. However, in the same way that a successful bid can lead to several positive effects, failed, frustrated, fraudulent, corrupt, deserted and obscure bids make reforms and constructions, that should be made immediately, to be suspended or canceled, cause great damage financial, and can even lead to arrests, layoffs, financial deficits, etc.

Throughout this research it was possible to verify the relationship between a transparent bidding and a successful and well-supervised bidding. It was possible to perceive that, in the scope of public biddings, there is no perfect formula that guarantees constant success in all bids, what exists is a transparent management system that, when used, can discourage attempts at corruption, can encourage public inspection and participation. and can stimulate the fairness of the event.

The world is constantly changing and updating, it is up to each of us to monitor progress and meet new social needs. If access to information has become public interest and Public Administration, in order to meet this interest, has started to seek more transparent management, then transparency has become a collective interest. Now, it is up to each one of us to pursue this interest, we must always ensure that our freedom of information is respected, because access to information is a right and a duty.

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