LARC OCC — Our Mission and Vision

The LaRC Office of Chief Counsel (OCC) provides legal support, advice, and representation in the areas of business law, intellectual property, employee ethics, standards of conduct, contracting, appropriation and authorization issues, personnel, Freedom of Information Act requests, environmental issues, and various other matters.

The LaRC OCC is divided into three teams: Business Law, Intellectual Property Law, and Human Relations & Ethics Law. Our OCC Vision is to be NASA’s premier team of legal professionals, widely known for innovative, effective, and professional representation and counsel, making valued contributions as essential members of the LaRC and NASA Teams.

Our OCC Vision OCC Mission Statement is as follows: As an integral part of LaRC, we provide high quality legal advice, legal representation, assistance, and counsel; thereby assisting the Center and the Agency to pioneer in space exploration, scientific discovery, and aeronautics research.

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In Loving Memory

Hanna Grace Polen

May 22, 1992 – August 3, 2018

It is with deep sorrow that Langley OCC shares the sad news that Hanna Polen, daughter of Charles “Pete” and Anita Polen, has passed away. Hanna was a bright and energetic person who enriched the lives of all who knew her. She was a 2017 graduate of the University of Virginia and a 2011 graduate of Norfolk Collegiate High School in Norfolk, VA. She will be terribly missed by her family, friends, and all of us here at Langley.

Pete, Anita, and their son Weston are in our thoughts and prayers during this difficult time. We celebrate Hanna’s spirit, and she will remain in the hearts of all who shared in her life.
As summer vacation plans are winding down and you are looking for your next getaway, you may find yourself wondering, can I accept an offer from a non-Federal source to pay for travel in my official capacity? In many cases you can; but you need to be sure that you are obtaining the appropriate approvals and complying with all applicable requirements. In some cases, you may even be able to accept payment of your spouse’s travel too!

Any acceptance of sponsored travel in your official capacity is on behalf of NASA and not in your individual capacity. You may only accept sponsored travel when:

- The offer of payment was unsolicited
- NASA determines that the travel is in the Agency’s interest
- The travel relates to the employee’s official duties
- The travel is for attending a meeting or similar function
- NASA has issued the employee a travel authorization approving acceptance of such payment in advance of the employee’s travel, and
- The non-Federal source is not disqualified due to a conflict of interest.

Who Can Sponsor My Travel

There are a variety of non-Federal entities that may sponsor a federal employee’s travel. Some common examples include:

- Individuals
- Private / commercial entities
- Non-profits
- Trade associations
- International or multinational organizations
- Foreign, state, or local governments

What Do I Need to Obtain Travel Authorization?

If you receive an offer from a non-Federal source to pay for travel expenses, you should discuss the offer with your supervisor and determine whether your organization would like to proceed with the acceptance process or decline the invitation. If the organization determines it would like to proceed with the acceptance process, you should promptly complete Langley Form 92 (or, in the case of foreign travel, Langley Form 93) and compile your travel packet. Your travel packet should include the applicable Langley Form, the sponsor’s invitation, whether he offer included travel expenses for your spouse, and any other pertinent information. The sponsor’s invitation should include:

- The employee’s requested role/reason for participation in the event,
- What the sponsor will pay for and the type of payment(s) the sponsor will provide,
- The meeting location and duration of the event, and
- Whether the sponsor has any contracts, grants or agreements with NASA and, if so, that no NASA funding will be used as part of the sponsor’s payment.

If the invitation does not include the above information, you should have the sponsor provide the information in writing to include in your travel packet. Other information that may be pertinent to the review process includes who the other event attendees are and the amount other attendees were charged for items covered by the sponsored travel.

The Process

Upon completing your travel packet, you should submit the packet to your immediate supervisor. Once your supervisor has approved the travel packet, the packet will require approval from the Office of Chief Counsel and the Director of the Financial Management Division. When dealing with sponsored travel, remember:

- You should never accept any payment from the non-Federal source for official travel expenses in your personal capacity
- You may only accept an actual payment from a non-Federal source for official travel expenses when you have been authorized to do so.
- Non-Federal sources may only use the following forms of payment when paying for a federal employee’s travel: direct payment in the form of a check or other monetary instrument payable to NASA (no cash); and in-kind payment (pay the bill directly).

You are responsible for maintaining accurate records of any payments you receive from a non-Federal source and submitting a report of payments within 7 working days after completing official travel.
Special Requirements for Foreign Travel

When dealing with foreign travel, in addition to the materials described above, you must also complete the Office of International Interagency Relations (OIIR) preapproval form and NASA Form 1167. You should coordinate with Langley Counterintelligence on country clearance, passport, visa, and the OIIR preapproval. The travel packet should then be sent to your immediate supervisor for approval. Once your supervisor has approved the packet, the travel packet must be approved by the Office of Chief Counsel, the Office of International Interagency Relations, the Center Director, and the Director of the Financial Management Division.

Prior to traveling, you should also contact the local counterintelligence office and obtain TPSAS review of any presentation that you may give during your travel.

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HELPFUL HINT:

Disclosures of Invention (also referred to as “New Technology Reports” or “1679s”) are submitted at the invention.nasa.gov website – the electronic New Technology Reporting System (“e-NTR”). The e-NTR has been recently revamped to be more user-friendly. Of note, once the submitter submits the disclosure, then each of the named innovators will receive an email request to review the disclosure. The submitter will receive those comments and suggested edits and he/she can then incorporate those comments/edits as he/she sees appropriate. **Of importance, the submitter must then re-submit the disclosure so that it will reach the Office of Chief Counsel.** If you have any questions or concerns, please feel free to contact Elaine McMahon at 4-3226 or via email at elaine.c.mcmahon@nasa.gov.
LaRC relies heavily on its contractors to deliver quality work products that meet contractual requirements. Since LaRC is a research facility, work products often include technical data, reports, and software. Generally, contracts with technical data, reports, and software as deliverables include FAR clause 52.227-14 Rights in Data – General and NASA FAR Supplement 1852.227-14. These clauses require disclosure by the contractor and agreement by the Government of any data or software being delivered under the contract for which the Government will only have limited or restricted rights. Based on those clauses, contractors are prohibited from including proprietary data not previously agreed upon by the Contracting Officer, and any technical data, reports, and software developed in the performance of the contract are required to be delivered with unlimited rights and should not contain any restrictive markings.

However, technical data, reports, and software developed under contracts are sometimes delivered to the Government with unauthorized markings. Below are excerpts from samples of potentially unauthorized markings:

- “This document contains information proprietary and confidential to [Company Name]…”
- “Proprietary Statement – Information contained herein represents Proprietary Intellectual Property of [Company Name]”
- “This document is the exclusive property of [Company Name] and the contents herein shall not be disclosed....”
- “EXCEPT AS MAY BE OTHERWISE PROVIDED BY CONTRACT, THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY OF [COMPANY NAME]...”
- “CONFIDENTIAL DRAWING: THIS DRAWING CONTAINS CONFIDENTIAL DESIGN INFORMATION AND IS THE EXCLUSIVE PROPERTY OF [COMPANY NAME]...”
- “[Company Name]: Proprietary”

When the Government selects a contractor for award, it is often buying not only hardware, but also associated technical data (e.g., manuals or drawings). Contractors build the price of associated technical data into their proposals. The use of unauthorized markings purports to limit the Government’s ability to use the technical data, reports, and software it has purchased through the contract. Additionally, it creates a significant resource burden on the Government, as the Government has to address the unauthorized markings.²

Whether intentional or not, any such unauthorized markings need to be addressed and it is best to do so early on. What can you do to help? If you are a contractor employee responsible for delivering technical data under a contract, review any markings to ensure they are authorized under the contract and remove any unauthorized markings. If you are not sure, ask your employer or the Contracting Officer’s Representative. If you are a civil servant task monitor, Contracting Officer’s Representative, or similar designee responsible for accepting data deliverables, review technical data, reports, and software deliverables prior to acceptance to ensure they do not have proprietary markings. If they do, you can remind the contractor of its FAR 52.227-14 responsibility to deliver data with unlimited rights and without any restrictive markings. If the contractor does not remove the markings, contact the Contracting Officer to determine whether or not such markings are authorized. In some cases, contractors have appropriately identified background data in the contract, and the restrictive marking specified in FAR 52.227-14 would be authorized. If it is determined the markings are unauthorized, the Contracting Officer will take steps to provide the contractor with a notice challenging the markings and requesting the contractor remove any unauthorized markings, or justify portions of the deliverable that are properly marked as proprietary. If the contractor timely addresses the issues and provides revised deliverables at no cost to the Government, no additional action may be required. If not, the regulations provide a process for the Government to remove unauthorized markings and collect any associated costs from the contractor.

There are two additional points to remember: 1) Contractors are responsible for ensuring their subcontractors only apply authorized markings; and 2) During a dispute over markings, the Government honors the markings as if they are authorized. Of course, LaRC OCC’s Intellectual Property and Business Law Teams are available to assist, if any such issues arise.

1. Although this marking provides an exception under the terms of the contract, this exception is insufficient, since technical data is often retained by the Government after the records retention requirements for contracts, making it difficult to determine the applicable contract terms.

2. It should be noted that contractors are not necessarily intentionally applying unauthorized markings, but rather, the markings are often automatically applied based on templates used for work completed outside of Government contracts.
Civil Servant Seeks Private Sector Employment: Disqualification and Seeking Employment while at NASA

Sometimes civil servants decide that they want to leave the federal government and pursue private-sector employment. However, if you engage in employment discussions with outside employers, there are certain behaviors and practices that you should follow in order to be sure that you avoid a conflict of interest.

When Am I Considered To Be “Seeking Employment?”

An employee is “seeking employment” as soon as the employee:

- Engages in negotiations for employment with any person. A negotiation is any conversation or discussion “mutually conducted with a view toward reaching an agreement regarding possible employment with that person.” The conversation does not have to be specific or conclusive!
- Makes an unsolicited communication to any person regarding employment with that person. But, simply requesting a job application does not count!
- Makes any response—other than a “no”—to an unsolicited communication from any person, regarding possible employment with that person.

What Do I Have To Do If I Am Seeking Employment?

As soon as you know that you will be negotiating employment, you should tell your supervisor so that s/he can determine whether you have significant ongoing responsibilities involving your prospective employer that would be compromised by your disqualification during a job search. Your supervisor can then address any conflict concerns, or speak with OCC or the Office of Procurement to resolve them.

Seeking Employment with Employers Unrelated to NASA

If you are seeking employment with a business that does not have any existing relationship with NASA, there is nothing you must do as a federal employee prior to engaging in potential employment discussions. However, you must still follow NASA policies, and you will still be held to acceptable standards of performance and conduct in the federal workplace.

Seeking Employment with a NASA Contractor or Partner

Many NASA employees who leave the federal government end up seeking outside employment with one of NASA’s partners, like:

- Contractors
- Grantees
- Space Act Agreement partners
- Other companies that have a relationship with NASA.

If you are seeking employment with a NASA contractor or partner, you must disqualify yourself from all matters that might have a “direct and predictable effect” on the potential employer’s finances. If you have NASA duties involving a prospective employer, you must either (1) decline any offer, or (2) send a “disqualification notice” to your supervisor, OCC, and your immediate coworkers. This notifies them that you have a financial interest in the company, and that you cannot participate in official matters as part of your NASA duties. OCC can provide a standard disqualification notice to you, for you to share with your supervisor.

When you actually leave the federal government, you will receive some brief guidance from our office regarding “post-government” employment regulations and policies. Always feel free to contact OCC for any specific questions that you may have regarding seeking or accepting outside employment.

When Am I No Longer Seeking Employment?

If employment discussions with your prospective employer fall through, you will be free of any conflict of interest after:

- You or the prospective employer reject the possibility of employment and all discussions of possible employment have been terminated; or
- Two months have passed since you sent the employer an unsolicited resume or employment proposal, if the prospective employer hasn’t expressed any interest.

When you are no longer seeking employment, you should send a follow-up message to the recipients of your disqualification letter advising them that you are no longer disqualified. You should also have a “debriefing” meeting with your supervisor to wrap things up and make it clear that you have no plans for future employment negotiations with the employer.

HUMOR

More Murphy’s Laws:

- Whenever you set out to do something, something else must be done first
- Klipstein’s Law: After an instrument has been assembled, extra components will be found on the bench.

Universal Laws for Naïve Engineers:

- The most vital dimension on any plan or drawing stands the greatest chance of being omitted.
- Major changes in construction will always be requested after the fabrication is nearly completed.
- Any device requiring service or adjustment will be the least accessible.
Congratulations to Andrea Warmbier!

Andrea Warmbier received the HQ Office of General Counsel Award in August 2018 for her work in supporting the implementation of a single, enterprise-level legal operating system for the geographically dispersed NASA Legal Team. Thank you Andrea for all your hard work!

Guidance on Partnering with Industry

Several LaRC innovators have recently contacted OCC regarding partnering with industry in support of NASA’s mission. OCC has recommended various partnering mechanisms, based on the intended outcome of the endeavor. LaRC’s mission goals should determine the instrument used to partner industry; academia and nonprofits; government agencies at the federal, state, and local levels; and international entities. The following is a brief summary of some of the tools available for partnering.

CONTRACTS

The Federal Acquisition Regulation provides the regulatory framework for procurement of goods and services for the direct benefit of the Government. Use a contract if you need to fulfill an agency requirement, such as construction, lawn care, administrative support services, instrument calibration, or a satellite launch, or support for research activities.

GRANTS

A Grant transfers federal funding to a recipient (e.g., university, non-profit organization, and for-profit organization) to carry out a public purpose of support or stimulation of research and development and educational activities. With a Grant, the awarding Federal agency is not substantially involved in the activity after award. NASA awards research, education, training, and facilities grants, generally on a competitive basis. By policy, NASA does not award grants to commercial entities. Use a Grant if your goal is to accomplish a public purpose and provide a stable source of funding for research, development and educational activities, with little agency involvement.

SPACE ACT AGREEMENTS (SAAs)

Because SAAs are unique to NASA, more details are provided in this section. The National Aeronautics and Space Act, 51 U.S.C. § 20101, et seq. grants NASA authority to enter agreements with a wide variety of other entities, including businesses, universities, non-profit organizations, and state and local governments. Space Act agreements are often used for collaborative work, and address all aspects of the parties’ relationship, including intellectual property, funding, liability, and performance responsibilities.

There are three general types of SAAs: Reimbursable, Nonreimbursable, and Funded. A brief explanation of each follows:

- In a **Reimbursable SAA**, the Partner is permitted to use NASA goods, services, facilities, or equipment to advance the Partner’s own interests. NASA can provide reimbursable services if the proposed activity is consistent with NASA’s mission and involves goods, services, facilities or equipment not reasonably available on the U.S. commercial market (e.g., testing a company’s model in a NASA wind tunnel).

- NASA enters into **Nonreimbursable SAAs** for mutually beneficial activities that further NASA’s mission, and each party bears the cost of its participation. These instruments are useful in performing activities collaboratively for which each is particularly suited and for which the end results are of interest to both parties. For Nonreimbursable SAAs, the Signing Official must determine that the respective contributions of each Partner are fair and reasonable under the circumstances.

- In a **Funded SAA**, NASA transfers appropriated funds to a domestic Partner to fulfill one or more of the Agency’s statutory objectives. Funded SAAs can only be used when the Agency objective cannot be accomplished through the use of a procurement contract, grant, or cooperative agreement as determined by the Headquarters Office of General Counsel. LaRC does not currently have any Funded SAAs, and this instrument is generally reserved for agency-wide efforts such as the 2006 Commercial Orbital Transportation Services (COTS) program.

LaRC’s Center Agreements Manager and team of SAA Specialists are available to assist in defining activity requirements and determining the most appropriate partnering mechanism.
INTERAGENCY AGREEMENTS

Federal agencies may acquire goods and services directly from another Federal agency when the acquisition cannot be accomplished as economically or conveniently by contracting with a private source. The requesting agency must reimburse the providing agency for the entire cost of the acquired goods or services. In the past, NASA has regularly cited the Space Act as authority for interagency agreements. However, new guidance requires that for funds being transferred to NASA from another agency, NASA will “mirror” that agency’s stated authority and cite the same authority, if NASA can do so. If not, NASA will consider whether the Economy Act is a proper authority, before considering the Space Act as an authority.

If LaRC is sending funds to another agency for an effort, LaRC’s Office of the Chief Financial Officer can assist in preparing the interagency agreement. If LaRC is receiving funds, the Center Agreements Manager can assist. If LaRC is using another agency’s contract for an assisted acquisition, LaRC’s Office of Procurement is responsible for processing the agreement.

COOPERATIVE AGREEMENTS

Like a Grant, a Cooperative Agreement transfers federal funding to a recipient (e.g., university, non-profit organization, and for-profit organization) to carry out a public purpose of support or stimulation of research and development and educational activities. However, unlike a Grant, in a Cooperative Agreement the awarding Federal agency is substantially involved in the activity. If, for example, NASA personnel, property, facilities or equipment will be used, a Cooperative Agreement is likely a more appropriate tool to use than a Grant. If it is difficult to determine the principle purpose of an activity, the NASA Grant and Cooperative Agreement Manual provides some threshold questions that may help.

COOPERATIVE RESEARCH AND DEVELOPMENT AGREEMENTS (CRADAS)

A CRADA is authorized by Stevenson-Wydler Act, 15 U.S.C. § 3710, et seq., which permits Government-operated federal laboratories (including LaRC’s) to conduct specified research consistent with the mission of the laboratory (Center) and to transfer federal technology and know-how to industry for commercialization. A CRADA is not subject to the laws and regulations applicable to procurement and assistance agreements and is generally used when both the Center and the non-Federal party intend to collaborate, through appropriate contributions to the effort, on specified research or development with the aim of commercializing the Government’s technology.

Because of the limitations of the Steveson-Wydler Act (e.g., cash contributions and intellectual property rights), a SAA may provide users with more flexibility. Not surprising, LaRC rarely uses CRADAs. LaRC currently only has once CRADA, with the Commonwealth Center for Advanced Manufacturing. Although an effective tool for collaboration, CRADAs often take months or years to execute due to the parties’ various goals and the laws applicable to the various entities.

KEY POINTS

- The applicable partnering mechanism will be dependent on the principle purpose of the activity. Don’t let the partnering mechanism be the primary driver.
- If we need to acquire intellectual property rights that are most advantageous to the Government, a contract if often the best option.
- If we need a CRADA, Funded SAA, or international agreement, we need a Headquarters champion early in the process. These instruments usually require HQ approval, which will likely only occur if there is a sponsoring program at the HQ level.
- If we are entering an agreement with another federal agency, NASA will “mirror” that agency’s stated authority and cite the same authority, if NASA can do so. If not, NASA will consider whether the Economy Act is a proper authority, before considering the Space Act as an authority.

What about International Space Act Agreements, Real Property Agreements, Intergovernmental Personnel Act Agreements, Patent License Agreements, and STTR contracts? Each of these instruments is governed by a separate legal and regulatory framework and could be the subject of later articles. Contact OCC’s Business Law Team for specific guidance on any of these partnering mechanisms.

ADDITIONAL RESOURCES

Articles on Property Loan Agreements, Software Usage Agreements, SBIR Contracts, and Economy Act Transactions are available on OCC’s website.

Image Credit: Pixabay
Many federal employees have activities or employment outside of their duty hours. Outside activities fall into three different categories:

- Jobs that cannot be performed while you work for NASA;
- Jobs that pose a potential conflict, and require prior approval from OCC and your supervisor, and;
- Jobs that pose no potential conflict and don’t require prior approval.

**The “No-Go’s”—Prohibited Outside Employment**

Federal civil servants cannot engage in any outside employment or activity that conflicts with their official duties. An activity poses a conflict of interest if:

- Your official NASA duties could have a “direct and predictable effect” on your outside financial interests, or
- A reasonable person would question your impartiality.

There are two types of prohibited employment, which a NASA employee (other than a special Government employee or a student intern) cannot hold:

1. Outside employment with a NASA contractor, subcontractor, or grantee in connection with work performed by that entity for NASA, or
2. Outside employment with a party to a Space Act Agreement (SAA), Commercial Launch Act Agreement, or other agreement to which NASA is a party, if the employment is in connection with work performed under that agreement.

If you are seeking outside employment but you aren’t sure whether your potential employer has a relationship with NASA, you should ask OCC just to be sure. We can confirm whether a given entity is a NASA contractor / Space Act Agreement party / etc. if you don’t know.

**The “Maybes”—Outside Employment that Requires Prior Approval**

Many forms of outside activity are not prohibited, but do require prior approval before you can participate. The approval process is designed to confirm that no conflict of interest exists. The following types of activities must be approved before you can engage in them:

- Teaching, speaking, writing, or editing pertaining to anything other than a private interest;
- The practice of a profession or performing professional consulting services;
- The management or conduct of a self-owned (or spouse-owned) business that “performed or may seek to perform work (other than routine consumer transactions) for the Federal Government or for a NASA contractor, grantee, or other party to an agreement with NASA;”
- Holding state or local public office;
- Employment with a NASA contractor, subcontractor, or grantee (on matters unrelated to work they perform for NASA);
- Employment with a party to a Space Act Agreement or other NASA agreement (on matters unrelated to your NASA work);
- Serving as an officer, trustee, or board member of a for-profit organization; or
- Employment which “involves the practice of a NASA-owned invention or the performance of an experimental, developmental, research, design, or engineering work that relates to the official duties of such employee.”

**The “Sure’s”—All Other Outside Employment**

Beyond the specific situations listed above, NASA employees are free to pursue outside employment without the need for prior approval. Of course, outside employment should not interfere with your ability to perform your NASA duties.

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Pathways students are held to slightly different standards regarding outside employment, but are still subject to the same basic ethics restrictions as other civil servants. Many Pathways students are employed with their universities while participating in the Pathways program. Because many universities are NASA contractors, Pathways students should report their positions as research assistants / teaching assistants / etc. to OCC, and must obtain prior approval before participating in the Pathways program. Pathways students should not work on any project with their university “in connection with” work done by the university for NASA.

Pathways students are still “NASA employees” under the ethics regulations, even when they are on LWOP during the school semester. Thus, Pathways students must report outside employment even if they are not currently working at a NASA Center. OCC is available to answer any questions about these requirements.
RECENTLY ISSUED U.S. PATENTS

APRIL 1, 2018       JULY 31, 2018


Narasimha S. Prasad, NASA LaRC. U.S. Patent 9,995,674 issued June 12, 2018 for “Photoacoustic Chemical Detector.”


Congratulations, Inventors!
A Successful OCC Picnic!

The OCC summer picnic was held on July 12, complete with food and games! “Giant Jenga” and “corn-hole” were big hits with the group. Former Langley OCC team member Shawn Gallagher and his wife Mary Pat also came in to celebrate with us! Thanks to everyone who brought food and participated!

Bridgette, Robin, Elaine, Diann, and Jenn relaxing in the shade.

A Special Thank-You!

The Langley OCC would like to extend a special “thank you!” to JSC Chief Counsel Donna Shafer. Donna came to stay at Langley for a few weeks so that our acting Chief Counsel, Pete Polen, could be with his family. Donna has provided wonderful guidance and support for both our office and for the Polen family during this difficult time, and we are grateful to have her! Donna will be going back to Houston at the beginning of September, but she will be missed by her friends at Langley!

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