



Decision

Matter of: The JAAW Group, LLC

File: B-424433.22

Date: July 31, 2026

Joel Ward, for the protester.

Wade L. Brown, Esq., and Jonathan A. Hardage, Esq., Department of the Army, for the agency.

Heather Self, Esq., and Peter H. Tran, Esq., Office of the General Counsel, GAO, participated in the preparation of the decision.

DIGEST

Protester's challenge of the rejection of its proposal due to allegedly conflicting file naming convention instructions between the solicitation and proposal submission portal is dismissed for failing to state factually sufficient grounds of protest where the record reflects the protest is premised on factually inaccurate assertions.

DECISION

The JAAW Group, LLC (JAAW), a small business of Ogden, Utah and the managing member of joint venture (JV) Paralaxx LLC, protests the rejection of Paralaxx's proposal under request for proposals (RFP) No. W15P7T-26-R-A006, issued by the Department of the Army for a variety of professional services. The protester claims the agency's proposal submission portal failed to function properly, resulting in the improper rejection of JAAW's attempts to submit its proposal.

We dismiss the protest.

BACKGROUND

On April 1, 2026 the Army issued the solicitation using the procedures of Revolutionary Federal Acquisition (FAR) Overhaul (RFO) part 15.¹ Req. for Dismissal at 3; Req. for Dismissal exh. 1, RFP at 4, 243; Req. for Dismissal exh. 14, Contracting Officer's Statement (COS) at 1.² The solicitation contemplates the award of multiple indefinite-delivery, indefinite-quantity (IDIQ) contracts to establish a marketplace for the acquisition of professional services (MAPS), which will combine the services currently procured under two different sets of IDIQ multiple-award task order contracts into a single procurement vehicle intended to provide "uncommon knowledge-based professional services and support [for] the Army enterprise infrastructure and infostructure goals with information technology (IT) services worldwide." RFP at 2-3.

The MAPS solicitation intends to award up to 70 IDIQ contracts in each of five "domains," for a potential total of 350 awards. RFP at 243. The five domains are: (1) engineering, logistics and operational services; (2) research, development, test and evaluation (RDT&E) services; (3) management and advisory services; (4) emerging IT services; and (5) foundational IT services. *Id.* at 3. The types of orders permitted under the awarded IDIQ contracts will include fixed price, time-and-materials, cost reimbursement, and hybrids "of all types." *Id.* at 5. The awarded IDIQ contracts will have a base ordering period of 5-years with one 5-year optional ordering period. *Id.* at 20. The maximum contract ceiling, including the optional ordering period, will be \$50 billion, and the minimum guarantee for each awarded contract will be \$100. *Id.* at 2, 29.

The solicitation establishes that awards will be made to the highest rated technical offerors proposing fair and reasonable prices in each domain without tradeoffs between price and non-price factors. RFP at 243. The agency will use a phased and rolling evaluation process that takes into consideration offerors' verified scorecards, past performance qualifying projects (QPs), price (assessed for reasonableness), and, for large business offerors, their small business subcontracting plans. *See id. generally* at 243-246, 256-257. The solicitation permitted offerors to submit proposals for multiple domains, and, relevant here, established a set of five "overarching NAICS [North

¹ The Department of Defense (DOD) issued a class deviation adopting RFO part 15 effective March 16, 2026. DOD-wide *Class Deviation-Revolutionary Federal Acquisition Regulation (FAR) Overhaul Part 15, Defense FAR Supplement (DFARS) Part 215* at 1.

² Our citations to the record use documents' PDF pagination. The agency filed its initial request for dismissal on July 10. Electronic Protest Docketing System (EPDS) at Docket (Dkt.) No. 5. Our Office required additional briefing related to the dismissal request. Dkt. No. 10. In response, the Army filed a consolidated initial and supplemental request for dismissal. Dkt. No. 11. Unless otherwise noted, our citations to the request for dismissal are to the later-filed consolidated version at Dkt. No. 11. Our citations to the solicitation are to the final version as issued by RFP amendment 10.

American Industry Classification System] codes” for each of the five domains.³ *Id.* at 202, 220-222, 252.

The solicitation also set forth specific file naming conventions required to be used by offerors’ when submitting proposals, stating:

L.1 GENERAL INSTRUCTIONS & COMPLIANCE

* * * * *

2. The Offeror shall prepare proposal as follows:

Document	File Name*	Notes
Volume I--Cover Letter	xxxxCOVERDDMMYYYYY.pdf	Attachment 0001
Volume II--Scorecard	xxxxDOMAINSCORECARDMMYYYYY.pdf	Attachment 0002
Volume III--Past Performance	xxxxDOMAINQP1DDMMYYYYY.pdf xxxxDOMAINQP2DDMMYYYYY.pdf xxxxDOMAINQP3DDMMYYYYY.pdf	Attachment 0003
Volume IV--Small Business Subcontracting Plan	xxxxSBSPLANDMMYYYYY.doc or .pdf	Required only for Large Businesses

* Offerors shall replace “xxxx” with the Offeror’s name.

* Offers shall replace “DOMAIN” with the NAICS Code of the proposed Domain.

* If Offeror is utilizing a QP (Attachment 0003) across multiple Domains they shall replace “DOMAIN” with “MULTIDOMAIN”.

* Offerors shall replace “DDMMYYYYY” with date, month and year of submission. Example--“02APR2026”

** Offerors shall propose utilizing the latest version of the solicitation amendments.

³ The overarching NAICS codes assigned to the five domains were: (1) engineering, logistics and operational services--541330; (2) management and advisory services--541611; (3) RDT&E--541715; (4) emerging IT--541512; and (4) foundational IT--541519. RFP at 251-252.

RFP at 200-201.⁴ The attachments referenced in the table were forms provided with the solicitation, and offerors were required to use them as part of their proposal submissions. *Id.* at 205-206, 216-217.

Additionally, the solicitation required offerors to submit proposals “through the Digital Market Portal” (the “Portal”), and provided instructions for setting up Portal user accounts in appendix A of the solicitation.⁵ RFP at 200. With respect to file naming conventions, appendix A did not provide a separate set of file naming conventions for the Portal, appendix A instead instructed offerors to use the conventions set forth in the RFP, stating: “All documents shall be submitted in accordance with the naming conventions listed in RFP Section L.1 Paragraph 2 in order to be accepted as a full and complete package.” Req. for Dismissal exh. 8, RFP append. A at 3.

Of further relevance here, prior to issuance of the solicitation, the Army conducted “a MAPS Industry Day virtual listening session” on January 28, the same day the Portal went live and opened for offeror account registration. Req. for Dismissal at 3, 9; COS at 1. The agency’s industry day presentation included an overview of both the Portal account registration process and the proposal submission process; the slides from this presentation were subsequently posted to the System for Award Management. *Id.*; Req. for Dismissal exh. 3, Industry Day Slides at 1, 35-40. The industry day presentation advised offerors of the need to “[e]nsure all files are named in accordance with the RFP to be valid package submissions.” Req. for Dismissal exh. 3, Industry Day Slides at 38; see *also* RFP at 200-201 (“Offeror shall prepare proposal as follows . . .”; “Each volume shall be properly identified . . .”).

⁴ We note the “.pdf” in the “File Name” column of the table is the file extension denoting the file type or file format--a PDF file. It is commonly understood that the file extension is a suffix to the name of a computer file typically delimited from the rest of the filename with a period; the file extension is not part of the text of the actual file name rather it is a type of metadata about the file. See https://en.wikipedia.org/wiki/File:_extension (site last visited July 22, 2026). The file extension typically is added automatically by the software program used to create and save the file.

As an example, if company ABC used the Adobe Acrobat software to create its cover letter with RFP attachment 1 and intended to submit its cover letter in the Portal on June 22, the company would name the file “ABCCOVER22JUN2026” and the Adobe Acrobat software would automatically append the “.pdf” file extension to the file name when the file was created and saved, resulting in the file submitted in the Portal appearing as “ABCCOVER22JUN2026.pdf”. ABC would not need to add “.pdf” into the file name text because the resulting file name would then appear as “ABCCOVER22JUN2026.pdf.pdf” when ABC tried to submit the file into the Portal.

⁵ The solicitation set out separate file naming and submission requirements specific to any controlled unclassified information (CUI) included in an offeror’s proposal; CUI was required to be submitted through the DOD Secure Access File Exchange website, rather than through the Portal. RFP at 203.

Additionally, the presentation instructed that “[e]ach Volume being submitted shall be consolidated into one (1) PDF,” while “A full package” for an offeror’s proposal would consist of: (a) one cover letter volume (RFP attach. 1); (b) one self-scoring scorecard volume (RFP attach. 2); (c) up to three QP volumes (RFP attach. 3) per domain;⁶ and (d) for large business offerors, one small business subcontracting participation plan volume; these instructions comport with those included in the solicitation. Req. for Dismissal exh. 3, Industry Day Slides at 40; RFP at 202, 205-206, 216-217. The Portal opened for proposal submission on April 1, the same day the initial RFP was issued. COS at 1. Solicitation appendix A, providing the Portal instructions, was amended twice after issuance of the initial solicitation; the final version of appendix A was issued on April 22. *Id.*; Req. for Dismissal at 3-4, 10.

The solicitation established an initial due date for receipt of proposals of May 1. Req. for Dismissal at 3. Solicitation amendment 3 extended the due date to May 8. *Id.* at 4. On May 8, JAAW filed a protest with our Office in which the firm contended, among other things, that the Portal failed to function properly on both May 7 and May 8, preventing JAAW from submitting a proposal, and that the agency failed to provide adequate time for offerors to prepare proposals as multiple required proposal templates were not finalized until just a handful of days before proposals were due. *The JAAW Group LLC*, B-424433.9, June 1, 2026, at 1 (unpublished decision). In response to JAAW’s May 8 protest, the Army notified our Office it had taken corrective action by correcting the problems with the Portal and by amending the RFP to extend the due date for receipt of proposals until June 22. *Id.* As a result, we dismissed JAAW’s May 8 protest as academic. *Id.* at 2.

The final amended solicitation required proposals to be submitted in the Portal no later than “1200 Eastern Time on 22 June 2026.” RFP at 200. On June 22, JAAW attempted to submit the JV Paralaxx’s proposal in the Portal, but the firm’s submission attempts were rejected. Protest at 1-2; Resp. to Req. for Dismissal at 8. Also on June 22, JAAW sought assistance “through the Agency’s designated help-desk channel,” but did not receive a response. Protest at 2. At 5:55 p.m. on June 25, JAAW filed an agency-level protest with the Army. *Id.* On July 2, having received no acknowledgment of its agency-level protest, JAAW filed this protest with our Office. *Id.* On July 6, the Army issued a decision dismissing JAAW’s agency-level protest. Req. for Dismissal exh. 13, Agency-Level Protest Decision at 1. The Army’s decision dismissed JAAW’s agency-level protest as an untimely challenge to the terms of the solicitation, which was required to be filed prior to the time set for receipt of proposals. *Id.* Additionally, the Army’s decision stated that, in accordance with agency procedure, JAAW’s agency-level protest also was being dismissed because other potential offerors had filed protests that were still pending with in our bid protest forum. *Id.* at 1-2.

⁶ An offeror could potentially submit up to 15 QP volumes if they were submitting proposal packages for each of the five domains and were including with each of their five proposal packages the maximum number of 3 QPs permitted per domain. Req. for Dismissal exh. 3, Industry Day Slides at 40; see *also* RFP at 202, 216-217.

For the reasons discussed below, we dismiss JAAW's July 2 protest to our Office.

DISCUSSION

The protester alleges it attempted to submit proposal files that followed the file naming convention set out in the RFP's instructions to offerors, but the Portal set out a different file naming convention. According to JAAW, its proposal was improperly rejected because of these conflicting naming convention requirements. In this context, JAAW asserts:

This time, the failure arose because the file-naming conventions expressly mandated by the written solicitation (RFP Section L.1, Paragraph 2, and Appendix A--Portal Instructions for Submission of MAPS Proposals) directly conflicted with the naming conventions the portal's own upload interface would actually accept, and because the portal's on-screen prompts were internally inconsistent as to the required naming format. An offeror who followed the written solicitation's instructions produced a proposal the portal rejected; an offeror who followed the portal's prompts produced a proposal that did not conform to the solicitation's written terms. No offeror could comply with both. As a direct result, Protester was again unable to submit a complete, compliant proposal package by the extended June 22, 2026 deadline.

Protest at 1-2. JAAW argues this alleged conflict between the solicitation and the Portal regarding file naming conventions constitutes "a patent, uncorrected ambiguity requiring solicitation and/or system correction." *Id.* at 2. The protester further contends "the portal's own submission prompts were internally inconsistent" and that "[t]his defect undermines the integrity and transparency of the competition." *Id.* at 3. The protester raises other collateral arguments that we do not discuss; we have fully considered all of JAAW's arguments, however, and find none provides a valid basis of protest.

The Army requests that we dismiss JAAW's protest as an untimely challenge to the terms of the solicitation. Req. for Dismissal at 5. In support of this request, the Army notes that JAAW's own protest filing characterizes the firm's argument as a challenge to "a **patent** uncorrected ambiguity" between the RFP's and Portal's instructions. *Id.* (citing Protest at 2, emphasis added). The protester responds that "[i]t was only during the final submission period under the extended deadline--when JAAW attempted to submit and encountered the same defects [it previously protested in May]--that a fresh basis for protest arose," and that the firm "filed its protest within 10 days of that discovery"--i.e., within 10 days of JAAW's June 22 attempt to submit Paralaxx's proposal. Resp. to Req. for Dismissal at 4, 8.

We need not discuss further the parties' disagreement about whether JAAW timely protested alleged inconsistencies between the RFP's and Portal's file naming convention instructions, because--as the agency asserts and the relevant portions of the solicitation discussed above demonstrate--the alleged inconsistencies do not exist.

Here, the Portal instructions *required offerors to comply with the file naming conventions set forth in section L of the solicitation*. Req. for Dismissal at 9-10; RFP at 200-201; Req. for Dismissal exh. 8, RFP append. A at 3; *see also e.g., comparison of RFP at 200 (requiring use of the file naming convention “xxxxCOVERDDMMYYYYY.pdf”) with Protest attach. 3, Agency-Level Protest Transmittal Email at 1 (showing screenshot of JAAW’s Portal submission attempt where Portal generated error message instructed protester to use the same file naming convention for its cover letter proposal volume as the RFP instructed--“xxxxCOVERDDMMYYYYY.doc or .pdf”)*⁷.

Further, as will be explained below, the record reflects the rejection of the protester’s proposal submission attempts was not due to any inconsistency between the Portal’s and the RFP’s file naming convention instructions, but was due to JAAW’s own failure to follow those instructions.⁸ Req. for Dismissal at 9 n.3; *see generally* Protest attach. 3, Agency-Level Protest Transmittal Email (showing multiple screenshots of JAAW’s attempts to submit Paralaxx’s proposal in the Portal).

Our Bid Protest Regulations require that protests include a detailed statement of the legal and factual grounds of protest and that the grounds be legally sufficient. 4 C.F.R. §§ 21.1(c)(4), (f). This requirement contemplates that protesters will provide, at a minimum, credible allegations that are supported by evidence and are sufficient, if uncontradicted, to establish the likelihood of the protester’s claim of improper agency action. *Warfighter Focused Logistics, Inc.*, B-423546, B-423546.2, Aug. 5, 2025, at 4. In this context, factually inaccurate representations by a protester do not constitute an adequate basis for protest. *Roku Mgmt. Consulting, LLC*, B-423683, July 29, 2025, at 3.

Here, the crux of JAAW’s protest--that inconsistencies between the RFP’s and Portal’s file naming convention instructions resulted in the improper rejection of the protester’s proposal--is based on factually inaccurate representations. JAAW included with its protest screenshots of its attempts to submit Paralaxx’s proposal into the Portal. Those screenshots show that JAAW repeatedly used file names that failed to comply with the solicitation requirements. As a representative example, we detail below the protester’s attempts to submit Paralaxx’s cover letter volume in the Portal.

⁷ As explained above, the “.doc” or “.pdf” file extensions denoting the file type or file format are not text in the file name but are suffixes added after the end of the file name by the software tool used to create and save the file. While the Portal apparently was capable of accepting both .doc and .pdf file types, the solicitation here required submission of proposal volumes using a PDF file format. RFP at 200-201, 205-206, 216-217.

⁸ The agency represents that over 1,300 offerors were able to submit proposals in the Portal by successfully complying with the solicitation’s required file naming conventions. Req. for Dismissal at 9 n.3.

As noted above, the solicitation required an offeror to submit its cover letter volume using the file naming convention, “xxxxCOVERDDMMYYYY” where the “xxxx” was replaced with the offeror’s name and the “DDMMYYYY” were replaced with the offer date in day, month, year format. RFP at 200; see *also* Protest attach. 3, Agency-Level Protest Transmittal Email at 1 (screenshot showing the Portal required the same “xxxxCOVERDDMMYYYY” file naming convention for the cover letter volume). Accordingly, to comply with the solicitation requirements, JAAW could have named its cover letter file in one of the following two ways: “PARALAXXLLCCOVER22JUN2026” or “PARALAXXCOVER22JUN2026”. It would have been at the protester’s discretion whether to use “ParalaxxLLC” or just “Paralaxx” as the name of the JV in the proposal file names.

Depending on which of the versions of the JV’s company name JAAW chose to use (ParalaxxLLC or Paralaxx), the completed file name with the file extension for a PDF file type would have appeared in the Portal in one of the following two ways if JAAW had complied with the solicitation’s file naming convention instructions:

PARALAXXLLCCOVER22JUN2026.pdf
PARALAXXCOVER22JUN2026.pdf.

The screenshots submitted by JAAW, however, show none of the protester’s attempted submissions used one of these two compliant file names. Instead, the record shows that JAAW’s attempts to submit the cover letter volume used the following file names.

PARALAXXLLCVOLUME122JUN2026pdf.pdf
COVERLETTERVOLUME122JUN2026pdf.pdf
PARALLAXMULTICOVER122JUN2026.pdf
XXXXPARALLAXMULTICOVER22JUN2026.pdf

Protest attach. 3, Agency-Level Protest Transmittal Email at 1-5; see *also* Protest attach. 4, Portal Submission Attempt Screenshots at 1-4 (showing the same four attempted file names for submission of the cover letter proposal volume); Protest attach. 5, Additional Portal Submission Attempt Screenshots at 1-4 (same).

None of JAAW’s submission file names complies with the solicitation’s required file naming conventions. The first attempt uses the term “VOLUME1” instead of “COVER” as instructed by the solicitation, and includes the file extension as text in the file name itself. The second attempt uses the term “COVERLETTERVOLUME1” instead of “COVER”, does not include the offeror’s name as required by the solicitation, and includes the file extension as text in the file name itself. The third attempt uses the term “MULTICOVER1” instead of the term “COVER” as instructed by the solicitation, and, we note, spells the offeror’s name incorrectly as “PARALLAX” with two Ls and one X rather than correctly with one L and two Xs (Paralaxx). The fourth attempt uses the term “MULTICOVER” instead of the term “COVER” as instructed by the solicitation, spells the offeror’s name incorrectly, and leaves in the file name the “XXXX” placeholder text, which the solicitation required to be replaced by the offeror’s name.

The screenshots submitted by JAAW show the protester's attempts to submit proposal volumes II and III--scorecard and QPs, respectively--suffered from similar failures to comply with the solicitation's required file naming conventions. For example, JAAW repeatedly included the domain name, rather than the domain NAICS code, in its file name attempts for submission of the scorecard proposal volume. Protest attach. 3, Agency-Level Protest Transmittal Email at 2-3 (showing attempted file names of "MANAGEMENTADVISORYPARALAXXLLCVOLUMEII22JUN2026pdf.xlsx.pdf" and "XXXXPARALAXXMANAGEMENTADVISORYSCORECARD22JUNE2026.pdf"); RFP at 201 (instructing that "Offers shall replace 'DOMAIN' with the NAICS Code of the proposed Domain.").

In sum, JAAW's claim that the RFP's and Portal's file naming convention instructions were inconsistent is factually inaccurate; the record shows the instructions were consistent. Further, JAAW's insistence that the reason it was unable to submit Paralaxx's proposal in the Portal was because of these alleged inconsistencies also is factually inaccurate. The Portal submission screenshots submitted by the protester, itself, reveal the reason JAAW was unable to submit a proposal is because the protester repeatedly, and in a variety of ways, failed to comply with the RFP's and Portal's consistent file naming convention requirements. As JAAW's protest rests on a foundation of unsupported assertions, it fails to meet our threshold requirement that a protester provide a detailed statement of the legal and *factual* grounds of protest. 4 C.F.R. § 21.1(c)(4). Accordingly, we dismiss the protest. See e.g., *Roku Mgmt. Consulting, LLC*, *supra* at 4 (dismissing for failing to provide sufficient basis of protest where allegations were premised solely on factually inaccurate assertions of solicitation's requirements).

Inaccurate Legal Citations

In addition to the factual inaccuracies discussed above, JAAW offered, in support of its protest arguments, citations to five bid protest decisions--two decisions of our Office and three decisions of the U.S. Court of Appeals for the Federal Circuit.⁹ Protest at 2-3. In its dismissal request, the Army represented it was either unable to locate decisions cited by the protester or the cited decision did not stand for the proposition for which JAAW cited it. Initial Req. for Dismissal at 6. Based on these inaccurate legal citations, the Army posited that JAAW's protest "bears indicia consistent with the use of a large-language model or other artificial intelligence (AI)" tool. *Id.*

As a result, our Office directed the protester to address the Army's assertions regarding the legal citations in JAAW's response to the agency's request for dismissal, as well

⁹ Specifically, the protest includes the following citations: (1) *Tyco Electronics Corp.*, B-411937, Nov. 9, 2015; (2) *Pemco World Air Servs.*, B-310372, Dec. 27, 2007; (3) *Blue & Gold Fleet, L.P. v. U.S.*, 492 F.3d 1308 (Fed. Cir. 2007); (4) *Impresa Construzioni Geom. Domenico Garufi v. U.S.*, 238 F.3d 1324 (Fed. Cir. 2001); and (5) *Statistica, Inc. v. Christopher*, 102 F.3d 1577, 1581 (Fed. Cir. 1996). Protest at 2-3.

requiring the protester to provide copies of all cases cited in JAAW's protest. Dkt. No. 6. On July 13, JAAW submitted its response to the Army's dismissal request, and addressed the accuracy of the legal citations in the protest as follows:

The Army correctly notes that two citations in JAAW's July 2, 2026 GAO protest require correction. JAAW acknowledges these errors and takes full responsibility:

1. Tyco Electronics Corp., B-411937: The Army was unable to locate this decision. JAAW has independently verified that this citation as presented does not correspond to a published GAO decision. JAAW withdraws this citation. The substantive proposition it was offered to support--that a solicitation containing irreconcilable submission requirements constitutes a patent ambiguity warranting corrective action--is a well-established principle of GAO bid protest law. JAAW will provide verified, accurate citations supporting this proposition in its Comments on the Agency Report if GAO retains jurisdiction, and commits to independent verification of all legal authorities in all future filings.
2. Impresa Construzioni Geom. Domenico Garufi v. United States, 238 F.3d 1324 (Fed. Cir. 2001): The Army correctly notes that this case addresses a contractor responsibility determination, not solicitation ambiguity. JAAW withdraws the citation as applied to the ambiguity argument. The underlying principle--that ambiguous government requirements undermine the integrity of a competition--will be supported by properly verified GAO authorities in JAAW's Comments on the Agency Report.

JAAW takes seriously its obligation of accuracy before GAO. These errors resulted from inadequate verification prior to filing. JAAW commits to independent verification of all legal authorities in all future submissions and respectfully requests that GAO not dismiss the protest on this basis, as the substantive grounds remain legally sound and accurately supported when correct citations are substituted.

Resp. to Req. for Dismissal at 1-2.

The protester's response did not include copies of all the cases cited in its protest, as requested by our Office. Because additional development of the record was necessary to resolve the agency's request for dismissal, we required further briefings from the parties. In setting the deadline for the protester's briefing, we reminded JAAW of the requirement to provide copies of all cases cited in its protest. Notice of Additional Briefing Requirement at 3. The protester submitted a timely response, including the requested copies of the protest decisions cited in JAAW's protest that had not been withdrawn. Supp. Resp. to Req. for Dismissal at 1, 9-50.

As decisions of our Office have explained, while there is nothing inherently wrong with the proper and competent use of AI tools in the legal arena, this evolving technology has many glitches--including hallucinations--and must only be used with close, careful supervision, fact-checking, and citation-checking. *KE System Servs., Inc.*, B-423881 *et al.*, Dec. 22, 2025, at 6. In order to satisfy our statutory mandate to resolve protests and to maintain our role as a meaningful, efficient protest forum, we expect all parties to prepare and present their cases carefully and diligently. *Wolverton Prop. Mgmt., LLC--Recon.*, B-415295.4, June 6, 2018, at 3. This expectation applies to both protesters represented by counsel and *pro se* protesters proceeding without counsel. See *KE System Servs., Inc.*, *supra*. The use of AI tools to draft or assist in drafting legal filings can result in the citation of non-existent decisions, such that reliance on those tools without review for accuracy wastes the time of all parties and of GAO. *Raven Investigations & Sec. Consulting, LLC*, B-423447, May 7, 2025, at 4. As such, our Office necessarily reserves an inherent right to dismiss any protest and to impose sanctions against a protester, where a protester's actions undermine the integrity and effectiveness of our process. *Id.*

Here, because we dismiss the protest for failing to set forth a factually sufficient basis of protest, we do not exercise our right to impose sanctions for JAAW's submission of one non-existent citation and one wholly irrelevant citation. The protester, however, is advised that any future submissions of filings to our Office with citations to non-existent or wholly irrelevant authority may, after a review of the totality of the circumstances, result in the imposition of sanctions.

The protest is dismissed.

Edda Emmanuelli Perez
General Counsel