



UNITED STATES
CIVILIAN BOARD OF CONTRACT APPEALS

APPELLANT DISMISSED FOR LACK OF STANDING:
February 9, 2026

CBCA 8362

GEOFFREY WATTIKER AND BRITTANI WATTIKER,

Appellants,

v.

GENERAL SERVICES ADMINISTRATION,

Respondent.

Geoffrey Wattiker and Brittani Wattiker, pro se, Dallas, TX.

Anne C. McDermott, Office of General Counsel, General Services Administration, Philadelphia, PA, counsel for Respondent.

Before Board Judges **LESTER**, **KULLBERG**, and **O'ROURKE**.

KULLBERG, Board Judge.

Although the respondent has not raised an objection, the Board raises sua sponte the issue of whether Geoffrey Wattiker has standing to appear before the Board as an appellant, alongside his wife, Brittani Wattiker, in this appeal. On February 26, 2025, the Board docketed this appeal as *Geoffrey Wattiker and Brittani Wattiker v. General Services Administration*, CBCA 8362, after the Wattikers jointly filed a notice of appeal challenging the contracting officer's "deemed denial" of claims involving alleged misrepresentations in three General Services Administration (GSA) auction notices, in response to which Brittani Wattiker had submitted winning bids. The three contracts at issue in this appeal were issued to and signed by only one of the appellants, Brittani Wattiker, and the contracting officer's

final decision, which was issued after this appeal was filed, was addressed only to Brittani Wattiker.

“[T]o invoke the Board’s jurisdiction in a contract appeal under the [Contract Disputes Act (CDA), 41 U.S.C. §§ 7101-7109 (2018)], [an] appellant must allege facts sufficient to show that, among other things, it is a ‘contractor’ as that term is defined in the CDA.” *Kristin Allred v. Department of Veterans Affairs*, CBCA 4952, 15-1 BCA ¶ 36,108, at 176,282; *see* 41 U.S.C. § 7104(a) (only a “contractor” may file an appeal of a contracting officer’s decision with a board of contract appeals). The CDA defines a contractor as “a party to a Federal Government contract other than the Federal Government.” 41 U.S.C. § 7101(7). Additionally, the CDA provides that “[e]ach claim by a contractor against the Federal Government relating to a contract shall be submitted to the contracting officer for a decision.” *Id.* § 7103(a)(1). The Board’s rules state that an “appellant” is the contractor filing an appeal.” Rule 1(b) (48 CFR 6101.1(b) (2024)). Based on the record, Geoffrey Wattiker is not a named party (i.e., not a contractor) on the contracts at issue and, therefore, cannot be an appellant. Accordingly, Brittani Wattiker is the only person who can be the appellant in this appeal.

Additionally, only Brittani Wattiker may appear as a pro se representative in this appeal. The Board’s rules provide, in pertinent part, that “[a]n appellant, petitioner, or applicant may appear before the Board through an attorney. An individual appellant, petitioner, or applicant may appear for himself or herself.” Rule 5(a)(1). The Board has recognized that, while a pro se appellant may represent himself or herself, no other non-lawyer, including family members, may represent a pro se appellant. *Sylvan B. Orr v. Department of Agriculture*, CBCA 5299, 16-1 BCA ¶ 36,479, at 177,744. In addition, a pro se appellant is responsible for signing all papers, pleadings, and motions filed with the Board. *Id.* at 177,745.

For the foregoing reasons, Gregory Wattiker is dismissed as an appellant in this appeal. The case caption will be revised to identify Brittani Wattiker as the sole appellant and representative in this appeal.

H. Chuck Kullberg
H. CHUCK KULLBERG
Board Judge

We concur:

Harold D. Lester, Jr.
HAROLD D. LESTER, JR.
Board Judge

Kathleen J. O'Rourke
KATHLEEN J. O'ROURKE
Board Judge