Dear Mr. President, Extortion? 12 Leads Re Patent Trolls for Your DOJ-FTC Investigation

Author: Tom Ewing

Dear Mr. President,

As a columnist here at aNewDomain.net — and as the intellectual property attorney who first published evidence in 2007 that mega mass patent aggregator Intellectual Ventures routinely buys, sells and litigates patents via thousands of oddly-named shell companies under veil — your Google+ February 14 State of the Union fireside comments on patent trolls intrigued me.

(Ed note: Find President Obama’s video — and many of the documents to which it refers — below the fold.)

In that February 14 hangout, you said patent “trolls don’t actually produce anything themselves … they just leverage and hijack somebody else’s idea and see if they can extort some money out of them.”

“Extort,” you said. “Hijack.” These are fighting words in my neck of the woods.

There are countless investors and inventors in Silicon Valley who are with you on those descriptions of so-called patent trolls. But, as GigaOm rightly asked: Exactly what do you plan to do about it?

It sounds like you mean business. But do your investigators at the Department of Justice (DOJ), the Federal Trade Commission (FTC), the Securities and Exchange Commission and the Internal Revenue Service have the time, patience and gusto to examine the murky and incestuous mire that patent trolls have created to obscure their activities in the tech world?

The whole of U.S. tech innovation and its future is at stake here. And your investigators are going to need a road map to figure it all out.

Here’s a 12-point plan for you and your agencies to jumpstart your patent troll investigation project.

1. Don’t stop at anti-competitive issues. Tech insiders are well aware that the DOJ, FTC and the United States Patent and Trademark Office are moving to investigate firms like IV and whether they’re violating antitrust and anti-competition laws. But that’s just a start. To truly figure out what’s going on here, you need to go further — a lot further — than just looking at antitrust and anti-competition. And you need all the subpoena firepower these agencies bring to the table to really figure out what’s going on here.

Only the feds have the tools to figure out whether patent “trolls” of such massive size are defrauding investors, slowing tech innovation, violating tax laws, and perhaps even extorting companies to invest their patents and dollars in exchange for IP litigation and injunction protection.

Sunshine is a good thing, as my co-author, UC Hastings professor Robin Feldman, likes to say. Our article for The Stanford Technology Law Review — The Giants Among Us — is a good place to start. When you read that, you’ll understand the enormous lengths mass aggregators have gone to in order to conceal their activities from the governments, universities, inventors and huge tech firms that either invest in or do business with them.

http://anewdomain.net/2013/03/29/dear-mr-president-obama-patent-trolls-extortion-12-leads... 4/4/2013
Consider whether patent assertion entities, as the FTC calls them, as a whole and individually are violating racketeering statutes under RICO — or if they are mischaracterizing their investment and litigation profits and the taxes they pay.

**Are they getting tech companies to back them willingly or coercing them to do so?** Getting to the truth of the matter has to be a multi-agency effort.

Demand that your U.S. agencies develop a full and complete picture of Intellectual Ventures at the very least. No private party could adequately conduct such an investigation. Only the federal government has the resources for this task. Every party who has ever dealt with IV is under the strictest, most-draconian non-disclosure agreement possible.

Your guys could plow through that and tell the world what’s really going on.

Tech has never needed more sunshine than it does now. Just look at IV. Led by former Microsoft CTO Nathan Myhrvold, ex Intel IP chief Peter Detkin, Seattle attorney Greg Gorder and ex MS exec Ed Jung, IV quietly grew over 10 years to assume now-massive proportions. It appears to be the nation’s single largest patent holder — and is involved directly or indirectly in hundreds of tech patent lawsuits that waste tech company money, which would otherwise funnel into R&D to develop new American products for the global marketplace.

There are suits where defendants often can’t even tell IV is involved. And tech buyers hear one thing and discover another.

For instance, it took a court order just to find out that tech companies like Microsoft, Nokia, Apple and Sony are among those who fund Intellectual Ventures in exchange for rights to its patents and other perks. As for Apple, this is a company that has testified before Congress about the damage patent trolls do. Yet it backs one. What is going on?

2. Think outside the box and examine how U.S. and foreign research labs have sold or exclusively licensed valuable intellectual property to IV and other patent mass aggregators. No one will know the extent of it until your investigators get the secret agreements.

Your agents will be able to find out under what conditions the fruits of government-owned and taxpayer-funded research went to aggregators who have no intention to ever make actual products. These are patent trolls, as you called them.

Suggestion: Examine the government’s transactions with limited liability companies having names such as: Vytral Systems Co. Ltd, LLC, Elemental Wireless, LLC and the Doar, Pekuin, Sall Limited Liability Company. These are quite possibly alter egos of patent trolls.

And consider alerting your counterparts in the Canadian, British, German and French governments about this. Their research agencies have likewise sold or exclusively licensed patents to patent aggregators operating in the U.S. either directly or indirectly via shell companies that don’t appear to be connected to big patent trolls — unless you do a deep dive.

These countries should know how the legal rights to publicly funded research ended up in private hands in the United States.

For example, here’s proof that the British government sold patents to Intellectual Ventures by way of its Intellectual Ventures Fund 20 LLC. I imagine Her Majesty the Queen, as listed in the transfer doc, would also not be pleased that patents went to another IV entity, a shell company with a comical German name. Here’s proof of that.

3. Make sure your investigators know that U.S. universities have sold or exclusively licensed patents on research funded by federal grants to Intellectual Ventures and other patent mass aggregators. Caltech, for instance, actually granted exclusive licenses of its IP to Intellectual Ventures Holding 59 LLC. That was in 2009.

Consider U.S. patent 7,023,435, which Caltech licensed to that IV-related LLC. Called “Object surface representation and related methods and systems.” The ’435 patent even includes a government interest statement that reads in part:

*The U.S. Government has certain rights in this invention pursuant to Grant Numbers ACI-9721349 and DMS-9874082 awarded by the National Science Foundation.*
IV has publicly admitted it does business with more than 300 universities worldwide, but most of these transactions aren’t publicly visible because they are exclusive licenses that don’t have to be publicly recorded.

Ask whether current federal regulations prohibit the sale of government-sponsored research to the companies you call “trolls.” When the results of government-funded research IP goes to patent aggregators who never will make actual products, I pause.

You should, too, Mr. President.

4. Have your investigators look into the extent under which it is acceptable under U.S. competition laws for companies to use a patent aggregator as an alter ego to compete against other companies. This is what I call privateering and it happens more frequently than you might know.

Apple is yet again a good example of this phenomenon. Patent records show that Apple sold 12 patents — via a company named Cliff Island — to Digitude Innovations, once a Virginia-based patent aggregator that had as its major stakeholder NYC venture firm Altitude Capital Partners. Two of the 12 patents that Apple transferred — patent Nos. 6,208,879 and 6,456,841 — formed half the basis of Digitude’s February 2012 lawsuit (PDF) against Motorola Mobility Holdings, a division of Google.

This lawsuit dried up when another patent aggregator, RPX, purchased Digitude and the Apple patents along with it. But you can find the background in the U.S. Patent and Trademark Office (USPTO) patent-assignment database.

Should companies rightly use their membership in patent aggregator funds as a means of accomplishing ends that would be impossible on their own?

Why didn’t Apple just sue Google directly, you might ask?

Google, once an investor in Intellectual Ventures, last year told my colleague Gina Smith here at aNewDomain.net that it wasn’t investing any more money in IV. Execs didn’t like paying the bill for its competitors to sue it and other Android vendors. The list of remaining investing tech partners in IV reads like a Who’s Who of Google competitors.

Here’s a list of tech companies that have sunk money into Intellectual Ventures, below. According to public docs, investments are in the cumulative billions. Verizon alone paid more than $350 million into IV, according to an SEC doc Verizon filed in 2008 that references the $350 million figure.

An excerpt from Verizon’s 2008 SEC filing:

> During 2008, we entered into an agreement to acquire a non-exclusive license [IP License] to a portfolio of intellectual property owned by an entity formed for the purpose of acquiring and licensing intellectual property. We paid an initial fee of over $100 million for the IP license, which is included in [other] intangible assets and is being amortized over the expected useful lives of the licensed IP.”

Additionally, the SEC filing said, Verizon invested $250 million “to become a member in a limited liability company” that gives Verizon rights to “certain intellectual property” in return for a license fee Verizon must pay annually.

**Tech investors in Intellectual Ventures**

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<th>Investor name</th>
<th>Which IV fund</th>
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<tr>
<td>Adobe Systems Inc.</td>
<td>Invention Investment Fund II</td>
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<td>Amazon.com NV Investment Holdings Inc.</td>
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<td>Apple Inc.</td>
<td>Invention Investment Fund I, II</td>
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**CATEGORIES**

Android anewdomain.net anewdomain
weekend Ant Pruitt Apple Apple iPhone App Picks Around the Web Art & Design Cameras Commentary Freeware Gaming Gina Smith Google How To Infographics iPhone John C. Dvorak John C. Dvorak X3 Larry Pressi Leo Laporte Microsoft Mobile Music & News
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**TAGS**

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5. To what extent are the patent aggregators separate entities at all? Most do business with one another — they only compete for patent assets, and that nobody can deny.

Consider the extent to which Mosaid, Wi-Lan, Transpacific IP, the Rockstar Consortium, and Round Rock Research are genuinely independent parties. Might they possibly be different faces of the same overall entity? This matters for a lot of reasons. Check out a letter penned by a group of antitrust lawyers who claim that Rockstar (Microsoft, Apple and other firms) promised the government one thing before purchasing 4,000 Nortel patents for $1B but then delivered quite another. That letter is embedded below.

6. Have the fundraising activities of the patent mass aggregators satisfied the legal requirements for the SEC and the various states in which the patent trolls operate?

Consider: A guy named Andre Lee was listed in Intellectual Venture’s fund raising documents filed with the SEC in 2007 as a “promoter” for its Invention Development Fund I — a billion-dollar fund he later apparently ran as an Intellectual Ventures employee. Yes, that’s the same Andre Lee who is widely reviled for almost single-handedly bringing down one of Asia’s most prominent investment banks, Peregrine, in 1998.

According to a judgment, a Hong Kong Judge in 2009 disqualified Lee from being a director of a Hong Kong company for four and a half years. That disqualification order was made as part of proceedings that started way before he joined IV — circa 2002 by Peregrine’s official receiver.
What sort of disclosures did IV make to investors in the Invention Development Fund about Andre Lee and the then-pending investigation against Lee in Hong Kong?

7. How does a company like Intellectual Ventures handle its taxes? After all, the company comprises a web of at least 1200 limited liability shell companies. Some of these companies own patents. Some own exclusive licenses. Others control specific investments and some handle only licensing or litigation matters.

Does each entity file a tax return or does IV somehow homogenize profits and losses across all these companies? Is one set of companies responsible for the debts with another set of companies set up as responsible for the revenue? How does it work? It sounds complicated and makes for some tricky tax issues at the very least. Perhaps the IRS should look into that.

8. Here's another question for you: Have companies, governments and inventors — particularly sole inventors — received remuneration from IV after they sold or licensed patents to it?

Has IV ever assessed them with unforeseen charges? Has IV satisfied the expectations of The American Inventors Protection Act (AIPA)?

9. Should commitments made by one set of patent owners be binding — that is, operate as a covenant — for future owners of the patent?

As I mentioned above, it seems like the commitments made by Microsoft and Apple to the DOJ during the approval of the Nortel acquisition should be binding on the portfolio’s future owners, e.g., Rockstar IP.

10. How does the internal management structure work for complex and shadowy patent mass aggregators like IV? Do these companies disclose the management structure to their investors — and how do they make decisions?

After all, Intellectual Ventures sued its investor Xilinx and various Android smartphone manufacturers who were business partners with IV investor Google. What is up with that?

11. Does the patent licensing system in the U.S. favor a licensor’s aggression over the merits of the underlying patents? It sure looks that way.

12. Is the patent licensing market impaired by the tremendous growth in the number of patents during the past 20 years?

Look at my chart below. If the patent allowance rate of the 1963 to 1980 era had stayed in effect through the pro-patent era that began in 1980, there would be 2 million fewer issued patents today. That means we would have 6 million U.S. patents as opposed to the current 8 million plus.

The U.S. Patent Office issued its first patent in 1790. Patents issue sequentially. The most-recently issued patent was 8,407,811. The halfway point for US patents was 4,203,905 which was issued on May 20, 1980. So, half of all granted U.S. patents were issued after May 20, 1980 – 190 years of R&D on one side of the midpoint line and 33 years on the other.

Of course, some of this growth resulted from heightened R&D funding. But much of it traces to companies simply filing for patents more often. That means more opportunities for tech litigation and trolling. As you know, Mr. President, the United States has the world’s most-expensive and complicated infrastructure around patent litigation. That’s got to be changed. But to change it, you need to identify the heart of the problem.

![Chart]
Thank you for your continued interest in the U.S. innovation system and the legal rights and responsibilities related to it.

Sincerely yours,

Tom Ewing

Here's the video from President Barack Obama and his Google+ State of the Union Hangout, where he said, "patent trolls … extort" and "hijack" tech innovations. The comment is at 16:47.

Video of U.S. President Barack Obama on Google+ Hangout: Via TheDailyConversation Youtube Channel

Here's what the American Antitrust Association wrote to the government regarding antitrust issues and patent trolls. It names Intellectual Ventures and notes the issues with Rockstar and its failure to keep to government agreements.

American Antitrust Institute on IV; by Gina Smith
FORM D

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM D
NOTICE OF SALE OF SECURITIES
PURSUANT TO REGULATION D,
SECTION 4(6), AND/OR
UNIFORM LIMITED OFFERING EXEMPTION

Name of Offering (☐ check if this is an amendment and name has changed, and indicate change.)
Sale of Limited Liability Company Interests in INVENTION DEVELOPMENT FUND I, LLC
Filing Under (Check box(es) that apply): ☐ Rule 504 ☐ Rule 505 ☒ Rule 506 ☐ Section 4(6) ☐ ULOE
Type of Filing: ☐ New Filing ☒ Amendment

A. BASIC IDENTIFICATION DATA

1. Enter the information requested about the issuer
Name of Issuer (☐ check if this is an amendment and name has changed, and indicate change.)
INVENTION DEVELOPMENT FUND I, LLC
Address of Executive Offices (Number and Street, City, State, Zip Code) Telephone Number (Including Area Code)
1756 114th Avenue SE, Suite 110, Bellevue, WA 98004 (425) 467-2272
Address of Principal Business Operations (Number and Street, City, State, Zip Code) (if different from Executive Offices)
Same
Brief Description of Business Telephone Number (Including Area Code)
Intellectual Property Investment Fund
Type of Business Organization
☐ corporation ☐ limited partnership, already formed ☒ other (please specify): limited liability company
☐ business trust ☐ limited partnership, to be formed

Actual or Estimated Date of Incorporation or Organization: Month Year ☒ Actual ☐ Estimated
0 5 0 7
Jurisdiction of Incorporation or Organization: (Enter two-letter U.S. Postal Service Abbreviation for State:
CN for Canada. FN for other foreign jurisdiction) ☒ D ☐ E

GENERAL INSTRUCTIONS

Federal:
Who Must File: All issuers making an offering of securities in reliance on an exemption under Regulation D or Section 4(6), 17 CFR 230.501 et seq. or 15 U.S.C. 77d(6)
When To File: A notice must be filed no later than 15 days after the first sale of securities in the offering. A notice is deemed filed with the U.S. Securities and Exchange Commission (SEC) on the earlier of the date it is received by the SEC at the address given below or, if received at that address after the date on which it is due, on the date it was mailed by United States registered or certified mail to that address.
Copies Required: Five (5) copies of this notice must be filed with the SEC, one of which must be manually signed. Any copies not manually signed must be photocopies of the manually signed copy or bear typed or printed signatures.
Information Required: A new filing must contain all information requested. Amendments need only report the name of the issuer and offering, any changes thereto, the information requested in Part C, and any material changes from the information previously supplied in Parts A and B. Part D and the Appendix need not be filed with the SEC.
Filing Fee: There is no federal filing fee.

State:
This notice shall be used to indicate reliance on the Uniform Limited Offering Exemption (ULOE) for sales of securities in those states that have adopted ULOE and that have adopted this form. Issuers relying on ULOE must file a separate notice with the Securities Administrator in each state where sales are to be, or have been made. If a state requires the payment of a fee as a precondition to the claim for the exemption, a fee in the proper amount shall accompany this form. This notice shall be filed in the appropriate states in accordance with state law. The Appendix to the notice constitutes part of this notice and must be completed.

ATTENTION
Failure to file notice in the appropriate states will not result in a loss of the federal exemption. Conversely, failure to file the appropriate federal notice will not result in a loss of an available state exemption unless such exemption is predicated on the filing of a federal notice.

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.
A. BASIC IDENTIFICATION DATA

2. Enter the information requested for the following:
   - Each promoter of the issuer, if the issuer has been organized within the past five years;
   - Each beneficial owner having the power to vote or dispose, or direct the vote or disposition of, 10% or more of a class of equity securities of the issuer;
   - Each executive officer and director of corporate issuers and of corporate general and managing partners of partnership issuers; and
   - Each general and managing partner of partnership issuers.

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Full Name (Last name first, if individual)

IDF Management, LLC

Business or Residence Address (Number and Street, City, State, Zip Code)

1756 114th Avenue SE, Suite 110, Bellevue, WA 98004

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Dekin, Peter N.

Business or Residence Address (Number and Street, City, State, Zip Code)

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Gerder, Gregory D.

Business or Residence Address (Number and Street, City, State, Zip Code)

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Jung, Edward K. Y.

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Full Name (Last name first, if individual)

Lee, Andre

Business or Residence Address (Number and Street, City, State, Zip Code)

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Myhrvold, Nathan P.

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Full Name (Last name first, if individual)

The William and Flora Hewlett Foundation

Business or Residence Address (Number and Street, City, State, Zip Code)

2121 Sand Hill Road, Menlo Park, CA 94025

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Full Name (Last name first, if individual)

The Board of Trustees of the Leland Stanford Junior University

Business or Residence Address (Number and Street, City, State, Zip Code)

c/o Stanford Management Company, 2770 Sand Hill Road, Menlo Park, CA 94025

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B. INFORMATION ABOUT OFFERING

1. Has the issuer sold, or does the issuer intend to sell, to non-accredited investors in this offering?  
   Answer also in Appendix, Column 2, if filing under ULOE.  
   Yes ☐ No ☒

2. What is the minimum investment that will be accepted from any individual?  
   $ ___________  N/A  

3. Does the offering permit joint ownership of a single unit?  
   Yes ☒ No ☐

4. Enter the information requested for each person who has been or will be paid or given, directly or indirectly, any commission or similar remuneration for solicitation of purchasers in connection with sales of securities in the offering. If a person to be listed is an associated person or agent of a broker or dealer registered with the SEC and/or with a state or states, list the name of the broker or dealer. If more than five (5) persons to be listed are associated persons of such a broker or dealer, you may set forth the information for that broker or dealer only.

Full Name (Last name first, if individual)

Business or Residence Address (Number and Street, City, State, Zip Code)

Name of Associated Broker or Dealer

States in Which Person Listed Has Solicited or Intends to Solicit Purchasers

(Use blank sheet, or copy and use additional copies of this sheet, as necessary)
C. OFFERING PRICE, NUMBER OF INVESTORS, EXPENSES AND USE OF PROCEEDS

1. Enter the aggregate offering price of securities included in this offering and the total amount already sold. Enter "0" if answer is "none" or "zero." If the transaction is an exchange offering, check this box □ and indicate in the columns below the amounts of the securities offered for exchange and already exchanged.

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<td>$</td>
<td>$</td>
</tr>
<tr>
<td>Partnership Interests</td>
<td>$1,000,000,000</td>
<td>$503,000,000</td>
</tr>
<tr>
<td>Other (Specify _)</td>
<td>$</td>
<td>$</td>
</tr>
<tr>
<td>Total</td>
<td>$1,000,000,000</td>
<td>$503,000,000</td>
</tr>
</tbody>
</table>

Answer also in Appendix, Column 3, if filing under ULOE.

2. Enter the number of accredited and non-accredited investors who have purchased securities in this offering and the aggregate dollar amounts of their purchases. For offerings under Rule 504, indicate the number of persons who have purchased securities and the aggregate dollar amount of their purchases on the total lines. Enter "0" if answer is "none" or "zero."

<table>
<thead>
<tr>
<th>Number of Investors</th>
<th>Aggregate Dollar Amount of Purchase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accredited Investors</td>
<td>25</td>
</tr>
<tr>
<td>Non-accredited Investors</td>
<td>0</td>
</tr>
<tr>
<td>Total (for filings under Rule 504 only)</td>
<td></td>
</tr>
</tbody>
</table>

Answer also in Appendix, Column 4, if filing under ULOE.

3. If this filing is for an offering under Rule 504 or 505, enter the information requested for all securities sold by the issuer, to date, in offerings of the types indicated, in the twelve (12) months prior to the first sale of securities in this offering. Classify securities by type listed in Part C - Question 1.

<table>
<thead>
<tr>
<th>Type of Offering</th>
<th>Type of Security</th>
<th>Dollar Amount Sold</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rule 505</td>
<td></td>
<td>$</td>
</tr>
<tr>
<td>Regulation A</td>
<td></td>
<td>$</td>
</tr>
<tr>
<td>Rule 504</td>
<td></td>
<td>$</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>$</td>
</tr>
</tbody>
</table>

4. a. Furnish a statement of all expenses in connection with the issuance and distribution of the securities in this offering. Exclude amounts relating solely to organization expenses of the issuer. The information may be given as subject to future contingencies. If the amount of an expenditure is not known, furnish an estimate and check the box to the left of the estimate.

<table>
<thead>
<tr>
<th>Expense Type</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transfer Agent's Fees</td>
<td>$</td>
</tr>
<tr>
<td>Printing and Engraving Costs</td>
<td>$</td>
</tr>
<tr>
<td>Legal Fees</td>
<td>$400,000</td>
</tr>
<tr>
<td>Accounting Fees</td>
<td>$</td>
</tr>
<tr>
<td>Engineering Fees</td>
<td>$</td>
</tr>
<tr>
<td>Sales Commissions (specify finders' fees separately)</td>
<td>$</td>
</tr>
<tr>
<td>Other Expenses (identify)</td>
<td>$</td>
</tr>
<tr>
<td>Total</td>
<td>$400,000</td>
</tr>
</tbody>
</table>
**OFFERING PRICE, NUMBER OF INVESTORS, EXPENSES AND USE OF PROCEEDS**

b. Enter the difference between the aggregate offering price given in response to Part C - Question 1 and total expenses furnished in response to Part C - Question 4.a. This difference is the "adjusted gross proceeds to the issuer." $ 999,600,000

5. Indicate below the amount of the adjusted gross proceeds to the issuer used or proposed to be used for each of the purposes shown. If the amount for any purpose is not known, furnish an estimate and check the box to the left of the estimate. The total of the payments listed must equal the adjusted gross proceeds to the issuer set forth in response to Part C - Question 4.b above.

<table>
<thead>
<tr>
<th>Payments to Officers, Directors &amp; Affiliates</th>
<th>Payments To Others</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salaries and fees ................................</td>
<td>$300,150,000</td>
</tr>
<tr>
<td>Purchase of real estate .......................</td>
<td>$</td>
</tr>
<tr>
<td>Purchase, rental or leasing and installation of machinery and equipment</td>
<td>$</td>
</tr>
<tr>
<td>Construction or leasing of plant buildings and facilities</td>
<td>$</td>
</tr>
<tr>
<td>Acquisition of other businesses (including the value of securities involved in this offering that may be used in exchange for the assets or securities of another issuer pursuant to a merger)</td>
<td>$</td>
</tr>
<tr>
<td>Repayment of indebtedness ....................</td>
<td>$</td>
</tr>
<tr>
<td>Working capital ................................</td>
<td>$</td>
</tr>
<tr>
<td>Other (specify): __________________________</td>
<td>$</td>
</tr>
<tr>
<td><strong>Column Totals</strong> ................................</td>
<td>$300,150,000</td>
</tr>
<tr>
<td><strong>Total Payments Listed (column totals added)</strong></td>
<td>$999,600,000</td>
</tr>
</tbody>
</table>

**FEDERAL SIGNATURE**

The issuer has duly caused this notice to be signed by the undersigned duly authorized person. If this notice is filed under Rule 505, the following signature constitutes an undertaking by the issuer to furnish the U.S. Securities and Exchange Commission, upon written request of its staff, the information furnished by the issuer to any non-accredited investor pursuant to paragraph (b)(2) of Rule 502.

<table>
<thead>
<tr>
<th>Issuer (Print or Type)</th>
<th>Signature</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>INVENTION DEVELOPMENT FUND I, LLC</td>
<td>[Signature]</td>
<td>August 17, 2007</td>
</tr>
<tr>
<td>Name of Signer (Print or Type)</td>
<td>Title of Signer (Print or Type)</td>
<td></td>
</tr>
<tr>
<td>Gregory D. Gorder</td>
<td>Managing Member of the Managing Member, IDF MANAGEMENT I, LLC</td>
<td></td>
</tr>
</tbody>
</table>

**ATTENTION**

Intentional Misstatements or Omissions of Fact Constitute Federal Criminal Violations. (See 18. U.S.C. 1001.)
DEPARTMENT OF DEFENSE
Department of the Navy

Notice of Intent to Grant Exclusive Patent License; Vytral Systems Co. Ltd, LLC

AGENCY: Department of the Navy, DoD.

ACTION: Notice.

Dates: Anyone wishing to object to the grant of this license has fifteen (15) days from the date of this notice to file written objections along with supporting evidence, if any.

Addresses: Written objections are to be filed with the Naval Undersea Warfare Center Division, Newport, 1176 Howell St., Bldg 990, Code 07TP, Newport, RI 02841.

For further information contact: Dr. Theresa A. Baus, Head, Technology Partnership Enterprise Office, Naval Undersea Warfare Center Division, Newport, 1176 Howell St., Bldg 990, Code 07TP, Newport, RI 02841, telephone: 401-832-8728, or e-mail: bausta@npt.nuwc.navy.mil.


Dated: May 14, 2008.

T.M. Cruz,
Lieutenant, Judge Advocate General's Corps, U.S. Navy, Federal Register Liaison Officer.

[FR Doc. E8-11241 Filed 5-19-08; 8:45 am]
BILLING CODE 3810-FF-P
DEPARTMENT OF DEFENSE
Office of the Secretary

Notice of Intent To Grant an Exclusive License; Doar, Pekuin, Sall Limited Liability Company

AGENCY: National Security Agency, DoD.

ACTION: Notice.


The above-mentioned inventions are assigned to the United States Government as represented by the National Security Agency.

DATES: Anyone wishing to object to the grant of this license has fifteen (15) days from the date of this notice to file written objections along with any supporting evidence, if any.
ADDRESSES: Written objections are to be filed with the National Security Agency Technology Transfer Program, 9800 Savage Road, Suite 6541, Fort George G. Meade, MD 20755-6541.

FOR FURTHER INFORMATION CONTACT: Marian T. Roche, Director, Technology Transfer Program, 9800 Savage Road, Suite 6541, Fort George G. Meade, MD 20755-6541, telephone (443) 479-9569.

Mitchell S. Bryman,
Alternate OSD Federal Register Liaison Officer, Department of Defense.
[FR Doc. 2010-17967 Filed 7-21-10; 8:45 am]
BILLING CODE 5001-06-P
DEPARTMENT OF DEFENSE
Department of the Navy

Notice of Intent To Grant Partially Exclusive Patent License; Elemental Wireless, LLC

AGENCY: Department of the Navy, DoD.

ACTION: Notice.

5,805,635: SECURE COMMUNICATION SYSTEM, issue date September 8, 1998.//U.S. Patent No. 5,892,765: SYSTEM AND METHOD FOR EFFECTUATING COMMUNICATIONS BETWEEN NETWORKS OPERATING ASYNCHRONOUSLY WITH RESPECT

[[Page 38145]]

DATES: Anyone wishing to object to the grant of this license must file written objections along with supporting evidence, if any, not later than July 20, 2006.

ADDRESSES: Written objections are to be filed with the Office of Research and Technology Applications, Space and Naval Warfare Systems Center, Code 2112, 83570 Silvergate Ave., Room 2306, San Diego, CA 92152-5048.

FOR FURTHER INFORMATION CONTACT: Dr. Stephen H. Lieberman, Office of Research and Technology Applications, Space and Naval Warfare Systems Center, Code 2112, 83570 Silvergate Ave., Room 2306, San Diego, CA 92152-5048, telephone 619-553-2778 or E-Mail stephen.lieberman@navy.mil.

(Authority: 35 U.S.C. 207, 37 CFR part 404.)

Dated: June 22, 2006.
M. A. Harvison,
Lieutenant Commander, Judge Advocate General's Corps, U.S. Navy,
Federal Register Liaison Officer.

[FR Doc. E6-10431 Filed 7-3-06; 8:45 am]
BILLING CODE 3810-FF-P