ARAM A. GAVOOR
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ACADEMIC EXPERIENCE

THE GEORGE WASHINGTON UNIVERSITY LAW SCHOOL, WASHINGTON, DC

Associate Professor of Law   July 2025 – present
Faculty Director, Administrative Law, Issues, and Appeals Clinic   Aug. 2024 – present
Associate Dean for Academic Affairs   Nov. 2021 – present
Visiting Associate Professor of Law   Aug. 2017 – July 2019
Professorial Lecturer in Law   Dec. 2008 – Aug. 2017; Aug. 2019 – Nov. 2021

- Current teaching: Administrative Law, Issues, and Appeals Clinic.
- Previous teaching: Administrative Law, Constitutional Law II, Federal Courts, National Security Law, Selected Topics in Constitutional Law.
- Co-delivered U.S. General Services Administration 2025 AI Training to entire federal executive branch with Princeton University and Stanford University.
- News-media appearances as an expert on administrative law, AI policy, and national security issues: New York Times, Wall Street Journal, BBC World News, CNN, LA Times, NBC News, CBS News, others.
- Recipient of Distinguished Adjunct Faculty Teaching Award from 2017 and 2020 graduating JD classes.

GEORGETOWN UNIVERSITY LAW CENTER, WASHINGTON, DC

Teaching Fellow   Jan. 2007 – Feb. 2007

- Taught a one-credit seminar course, Law in a Global Context, with a U.S. Deputy Solicitor General.

EDUCATION

GEORGETOWN UNIVERSITY LAW CENTER, WASHINGTON, DC
Master of Laws   May 2007

THE GEORGE WASHINGTON UNIVERSITY LAW SCHOOL, WASHINGTON, DC
Juris Doctor   May 2006

THE UNIVERSITY OF MICHIGAN, ANN ARBOR, MI
Bachelor of Arts in Arabic, Armenian, Persian, Turkish, and Islamic Studies   May 2003

SIGNIFICANT PUBLICATIONS

ARTICLES

- *Agency Delay and the Courts*, 77 ADMINISTRATIVE LAW REVIEW (with Steven A. Platt) (forthcoming Dec. 2025).
  - Received "highly recommended" notation from Legal Theory Blog (Mar. 2025).
- *A New Approach to Measuring AI Bias in Human Resources Functions: Model Risk Management*, 54 THE SETON HALL LAW REVIEW 965 (with Keith E. Sonderling) (2024).
- *U.S. Department of Justice Executive Branch Engagement on Litigating the Administrative Procedure Act*, 75 ADMINISTRATIVE LAW REVIEW 429 (2023) (with Steven A. Platt).
- *In Search of the Presumption of Regularity*, 74 FLORIDA LAW REVIEW 729 (with Steven A. Platt) (2022).
  - Received "highly recommended" notation from Legal Theory Blog (Aug. 2021).
  - Recommended in JOTWELL post by Prof. Richard Pierce, *A Timely, Thorough and Provocative Evaluation of the Presumption of Regularity*, (Feb. 2, 2022).
- *Administrative Investigations*, 97 INDIANA LAW JOURNAL 421 (with Steven A. Platt) (2022).
- *The Forgotten FISA Court: Exploring the Inactivity of the ATRC*, 81 OHIO STATE LAW JOURNAL 139 (2020) (with Timothy M. Belsan).
- *Administrative Records and the Courts*, 67 UNIVERSITY OF KANSAS LAW REVIEW 1 (2018) (with Steven A. Platt).

- o Cited twice in *Department of Commerce v. New York*, 139 S. Ct. 2551, 2579 n.5 (2019) (Thomas, J., concurring in part and dissenting in part, with whom Gorsuch, J. and Kavanaugh, J., joined).
- *Oversight of Oversight: A Proposal for More Effective FOIA Reform*, 66 CATHOLIC UNIVERSITY LAW REVIEW 525 (2017) (with Daniel Miktus).
- *Public Participation in Nonlegislative Rulemaking*, 61 VILLANOVA LAW REVIEW 759 (2016) (with Daniel Miktus).
- *Snap: How the Moral Elasticity of the Denaturalization Statute Goes Too Far*, 23 WILLIAM & MARY BILL OF RIGHTS JOURNAL 637 (2015) (with Daniel Miktus).

ESSAYS
- *The Unintended Consequences of International Trade Law Adjudicatory Exceptionalism*, 57 VANDERBILT JOURNAL OF TRANSNATIONAL LAW 995 (2023).
- *The Impending Judicial Regulation of Artificial Intelligence In the Administrative State*, 97 NOTRE DAME LAW REVIEW REFLECTION 180 (2022).
- *A Structural Solution to Mitigating Artificial Intelligence Bias In Administrative Agencies*, 89 GEORGE WASHINGTON LAW REVIEW ARGUENDO 101 (with Raffi Teperdjian) (2021).
- *Administrative Records After Department of Commerce v. New York*, 72 ADMINISTRATIVE LAW REVIEW 87 (2020) (with Steven A. Platt).
- *Chaidez v. United States: You Can't Go Home Now*, 29 NOTRE DAME JOURNAL OF LAW, ETHICS & PUBLIC POLICY 231 (2015) (with Justin Orlosky).

PROFESSIONAL LEGAL EXPERIENCE

ADMINISTRATIVE CONFERENCE OF THE UNITED STATES, WASHINGTON, DC
Public Member (vote-bearing member, elected by peers)   July 1, 2025 – present
- The Administrative Conference of the United States is an independent, non-partisan federal agency within the executive branch dedicated to improving administrative law and federal regulatory processes. It conducts applied research, and provides expert recommendations to improve federal agency procedures.

U.S. DEPARTMENT OF JUSTICE, CIVIL DIVISION, WASHINGTON, DC
Senior Litigation Counsel/Senior Counsel for National Security (Top Secret/SCI clearance)   Apr. 2017 – Nov. 2021
Trial Attorney   Oct. 2006 – Mar. 2014; May 2016 – Apr. 2017
- Significant defensive and offensive trial and appellate court litigation experience in dozens of high visibility constitutional law, Administrative Procedure Act, and national security cases in federal courts of appeals and 30 of 94 federal district court jurisdictions.
- Co-edited the 2021 edition of the Department of Justice Administrative Procedure Act Litigation Monograph.
- Selected Awards:
  - o The National Law Journal 2021 Rising Stars (40 under 40) Award.
  - o Civil Division Special Commendation Award (2020, 2019, 2018).
  - o U.S. Department of Justice Gears of Government Award (2020).
  - o The Attorney General's Award For Distinguished Service (2019).
  - o Armenian Bar Association "20 Under 40" Award (2019).
  - o Criminal Division, Human Rights & Special Prosecutions Commendation (2018).

U.S. DEPARTMENT OF JUSTICE, CIVIL DIVISION, WASHINGTON, DC
OFFICE OF THE ASSISTANT ATTORNEY GENERAL
Senior Counsel to the Assistant Attorney General (on career-status detail)   Nov. 2020 – Apr. 2021
- Acted as the political front office's administrative law expert and coordinated complex litigations and issues with the Office of Immigration Litigation, Federal Programs Branch, Consumer Protection Branch, and Appellate Staff.
- Managed the policy and legislative portfolios of the Division, represented the Department in White House policy coordination meetings, and authored briefing materials for senior leadership nominees

EXECUTIVE OFFICE OF THE PRESIDENT, OFFICE OF MANAGEMENT AND BUDGET
OFFICE OF INFORMATION AND REGULATORY AFFAIRS, WASHINGTON, DC
Counselor to the Administrator (on career-status detail from the U.S. Department of Justice)   May 2020 – Nov. 2020
- Coordinated the implementation of regulatory reform initiatives with federal agency general counsels.

EXECUTIVE OFFICE OF THE PRESIDENT, DOMESTIC POLICY COUNCIL, WASHINGTON, DC
Senior Legal Policy Advisor (on career-status detail from the U.S. Department of Justice)   Apr. 2018 – Nov. 2018
- Advised on legal policy (regulatory, criminal, cyber, prison reform, human rights, immigration, intelligence, and national security) pertaining to the U.S. Department of Justice.

U.S. DEPARTMENT OF HOMELAND SECURITY
U.S. CITIZENSHIP AND IMMIGRATION SERVICES, **OFFICE OF THE CHIEF COUNSEL**, WASHINGTON, DC
Special Counsel to the Chief Counsel (on career-status detail from the U.S. Department of Justice)   July 2017 – Apr. 2018
- Advised on the litigation defense of Administrative Procedure Act and national security cases.

CAUSE OF ACTION INSTITUTE, WASHINGTON, DC
Senior Counsel   Mar. 2014 – May 2016
- Litigated first impression Administrative Procedure Act and constitutional law cases.
- Argued *Cause of Action v. Federal Trade Commission*, 799 F.3d 1108 (D.C. Cir. 2015), which then-Chief Judge Merrick Garland identified as one of his ten most significant opinions in the Senate Judiciary Committee questionnaire that he submitted in support of his presidential nomination to U.S. Attorney General.

SELECTED SPEAKING ENGAGEMENTS

- "*Chevron* is Overruled": Analyzing Judicial Strategies and the Courts Following the October 2023 Term, Administrative Law Review's 2025 Symposium, Washington, DC (April 18, 2025) (with Prof. Elizabeth Earle Beske, Trent McCotter, Alan Morrison, and Michelle Kallan).
- "Data Flows and Privacy: Old Issues With New Tech?" GWU Competition & Innovation Lab, Washington, DC (Oct. 23, 2024) (with Professor Lorin Hitt, Kati Race Brin, and Kamay Lafalaise).
- "A Conversation With the Honorable Hester M. Peirce, Commissioner, U.S. Securities and Exchange Commission," George Washington University Regulatory Studies Center, Regulation by Enforcement: Blockchain and Crypto, Washington, DC (June 5, 2024) (with Hon. Hester M. Peirce).
- "In a World Without Deference?," New Civil Liberties Alliance Conference: Is Administrative Law Still Unlawful?, Washington, DC (April 10, 2024) (with Professor Don Elliott, Andrew Grossman, and Professor Philip Hamburger).
- "Federal Government Use of AI," American Bar Association Administrative Law Conference 2023, Washington, DC (Nov. 30, 2023) (with Steve Bunnell, Professor Michele Gilman, Svetlana Matt, and David Rubenstein).
- "AI's Constitutional Moment: Rights, Federalism and Separation of Powers: National and State Power," Washburn Law Journal Symposium, Topeka, KN (November 2, 2023) (with Professor Kevin Frazier, Professor Patricia Judd, Professor W. Keith Robinson, and Professor David Rubenstein).
- "Putting Legally Disruptive Technologies into Practice," The George Washington Law Review's Vol. 92 Annual Symposium: Legal Disruptive Emerging Technologies, Washington, DC (Oct. 13, 2023) (with Hon. Hester M. Peirce, Hon. Johnathan Smith, and Hon. Keith E. Sonderling)
- "An Overview of the U.S. Supreme Court and Its 2022 Term," University of Vienna Juridicum, Vienna, Austria (June 27, 2023).
- "Administrative Agency Structure Revisited: Congress in the Back Seat," C. Boyden Gray Center for the Study of the Administrative State, Antonin Scalia Law School, Cambridge, MD (May 30, 2023) (with Professor Jonathan H. Adler, Professor Joshua Kleinfeld, Amanda Neely, and Elizabeth Papez)
- "The Domain, Present and Future of Administrative Investigations," American Bar Association Administrative Law Conference 2022, Washington, DC (Dec. 1, 2022) (with Professor Richard J. Pierce, Megan L. Brown, Leon Fresco, and Alex Haas).

- "An Affront to the Administrative State," *Administrative Law Review* Fall 2022 Symposium, Washington, DC (Nov. 11, 2022) (with Professor William Buzbee, Daniel Cohen, and Professor Gillian Metzger).
- "Trade Administration Law and Separation of Powers," 21st Judicial Conference of the U.S. Court of International Trade, Washington, DC (Oct. 27, 2022) (with Professor Kathleen Claussen, Professor Kristin Hickman, Patricia M. McCarthy, Professor Aaron Nielson).
- "*West Virginia v. EPA*: What the Major Questions Doctrine Means for Environmental Protection, Energy Regulation, and Administrative Law," Energy Bar Association 2022 Mid-Year Energy Forum, Washington, DC (Oct. 12, 2022) (with Samuel G. Backfield, Elizabeth Boucher Dawson, Matthew Leopold, and Harvey Reiter).
- "Executive Orders in Theory and Practice," American Bar Association Administrative Law Conference 2021, Washington, DC (Nov. 19, 2021) (with Professor Andrew Rudalevige, Allison Zieve, Arpit Garg, and Professor Bridget C.E. Dooling).
- "What does *Arthrex* Mean for Administrative Adjudication?," American Bar Association Administrative Law Conference 2021, Washington, DC (Nov. 18, 2021) (with Professor Arti K. Rai, Professor Christopher J. Walker, Jeremy Graboyes, and Michelle Ankenbrand).
- "Administrative Investigations? How Agencies Initiate, Conduct, and Conclude Investigations," The Federalist Society 2021 National Lawyers Convention, Washington, DC (Nov. 11, 2021) (with The Honorable James C. Ho, Professor Richard J. Pierce, Jr., Tyler S. Clarkson, and Susan C. Rodriguez).
- "Standards of Review in Administrative Procedure Act Litigation," U.S. Department of Justice APA Litigation Training, Washington, DC (Oct. 13, 2021).
- "Administrative Procedure Act Standards of Review Germane to FDA Pharmaceutical Actions," Civil Division, Consumer Protection Branch Training, U.S. Department of Justice, Washington, DC (Jan. 8, 2021).
- "The Supreme Court and Administrative Law Trends," Fundamentals of Administrative Procedure Act Litigation Training, U.S. Department of Justice, Washington, DC (Feb. 5, 2020) (with Mark R. Freeman, Brinton Lucas, and Hashim M. Mooppan).
- "Is Immigration Law Special? National Security, Special Courts, and "For 'This Ride Only' Law," C. Boyden Gray Center for the Study of the Administrative State Roundtable Panel, George Mason University Antonin Scalia Law School, Arlington, VA (Oct. 25, 2019) (with Jesse Panuccio, Ilya Shapiro, and Brianne J. Gorod).
- "Introduction to the APA: Constitutional Overview and Types of Agency Action;" Fundamentals of Administrative Procedure Act Litigation Training, U.S. Department of Justice, Washington, DC (Nov. 2017).
- "Congressional Oversight of the Executive Branch," Villanova Law Review Norman J. Shachoy Symposium: Fifty Years Under the FOIA, 1967-2017, Villanova, PA (Oct. 2017) (with Katy Rother).

LICENSURE

- Bar admissions: District of Columbia; New York; Connecticut (inactive).
- Admitted, conditionally admitted, or admission waived to 34 U.S. District Courts, 12 U.S. Courts of Appeals, and the Supreme Court of the United States.