

## ARAM A. GAVOOR

2000 H Street, NW, Stuart Hall 306, Washington, DC 20052 – agavoor@law.gwu.edu

### LEGAL EXPERIENCE

---

#### THE GEORGE WASHINGTON UNIVERSITY LAW SCHOOL, WASHINGTON, DC

*Associate Professor of Law* July 2025 – present  
*Faculty Director, Administrative Law Issues & Appeals Clinic* Aug. 2024 – present  
*Associate Dean for Faculty Affairs* Nov. 2022 – present  
*Visiting Associate Professor of Law* (full-time faculty) Aug. 2017 – July 2019  
*Professorial Lecturer in Law* (part-time faculty) Dec. 2008 – Aug. 2017; Aug. 2019 – Nov. 2021

- Current teaching: Administrative Law, Issues, and Appeals Clinic.
- Previous teaching: Constitutional Law II, Administrative Law, National Security Law, Federal Courts.
- Co-authored *Administrative Records and the Courts*, 67 KANSAS LAW REVIEW 1 (2018), which was cited 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).
- Relied upon by news-media as an expert on national security, AI policy, and administrative law issues.

#### U.S. DEPARTMENT OF JUSTICE, CIVIL DIVISION, WASHINGTON, DC

##### OFFICE OF IMMIGRATION LITIGATION

*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 7 of 12 of the geographic federal courts of appeals and 30 of 94 federal district court jurisdictions.
- Supervised the work-product of ten attorneys at all stages of litigation, including investigations, negotiations, discovery, expert-witness discovery, trial practice, and appeals.
- Led key budgetary and program planning functions by coordinating with stakeholders and building coalitions.
- Designed and produced the Department's 2021 federal court administrative law litigation training program at the request of political leadership and co-led the development of the 2021 edition of the Department of Justice Administrative Procedure Act Litigation Monograph.
- Selected Awards:
  - The National Law Journal 2021 Rising Stars (40 under 40) Award.
  - Civil Division Special Commendation Award (2020, 2019, 2018).
  - U.S. Department of Justice Gears of Government Award (2020).
  - The Attorney General's Award For Distinguished Service (2019).
  - Armenian Bar Association "20 Under 40" Award (2019).

#### 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.

**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

- Served in third-in-rank leadership role for the agency that is the central authority for the review of executive branch regulations, approval of government information collections, establishment of government statistical practices, and coordination of federal privacy policy.
- 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.
- Received a commendation from the U.S. Department of Justice, Criminal Division, Human Rights & Special Prosecutions Section for playing a “pivotal role” in the diplomatic and operational coordination components of the successful removal to Germany of Jakiw Palij, a Nazi Schutzstaffel (SS) war criminal.

**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

- Played a key role in managing the national Chief Counsel’s office of 275 attorneys.
- 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

- Led and supervised first impression Administrative Procedure Act and constitutional law litigation against federal agencies before federal trial and appellate courts, and the Supreme Court of the United States.
- Oversaw Freedom of Information Act and whistleblower investigations into federal and state executive branch waste, fraud, and abuse to aid congressional oversight committees, inspectors general, and ethics bodies.

**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, emphasis in International Law, *with distinction* 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, *with honors* May 2003

**SIGNIFICANT PUBLICATIONS**

---

**ARTICLES**

- *Governing AI Without Agencies, Self-Regulatory Organizations and the Federal Backstop*, 21 FIU LAW REVIEW (forthcoming 2026).
- *Agency Delay and the Courts*, 77 ADMINISTRATIVE LAW REVIEW 761 (2025) (co-authored).
- *A New Approach to Measuring AI Bias in Human Resources Functions: Model Risk Management*, 54 THE SETON HALL LAW REVIEW 965 (2024) (co-authored).

- *U.S. Department of Justice Executive Branch Engagement on Litigating the Administrative Procedure Act*, 75 ADMINISTRATIVE LAW REVIEW 429 (2023) (co-authored).
- *In Search of the Presumption of Regularity*, 74 FLORIDA LAW REVIEW 729 (2022) (co-authored).
- *Administrative Investigations*, 97 INDIANA LAW JOURNAL 421 (2022) (co-authored).
- *The Forgotten FISA Court: Exploring the Inactivity of the ATRC*, 81 OHIO STATE LAW JOURNAL 139 (2020) (co-authored).
- *Administrative Records and the Courts*, 67 UNIVERSITY OF KANSAS LAW REVIEW 1 (2018) (co-authored).
- *Oversight of Oversight: A Proposal for More Effective FOIA Reform*, 66 CATHOLIC UNIVERSITY LAW REVIEW 525 (2017) (co-authored).
- *Public Participation in Nonlegislative Rulemaking*, 61 VILLANOVA LAW REVIEW 759 (2016) (co-authored).
- *Snap: How the Moral Elasticity of the Denaturalization Statute Goes Too Far*, 23 WILLIAM & MARY BILL OF RIGHTS JOURNAL 637 (2015) (co-authored).

## 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 (2021) (co-authored).
- *Administrative Records After Department of Commerce v. New York*, 72 ADMINISTRATIVE LAW REVIEW 87 (2020) (co-authored).
- *Chaidez v. United States: You Can't Go Home Now*, 29 NOTRE DAME JOURNAL OF LAW, ETHICS & PUBLIC POLICY 231 (2015) (co-authored).

## SELECTED SPEAKING ENGAGEMENTS

---

- “AI Policy Roundup,” The Federalist Society, Washington, DC (June 6, 2024) (with Hon. Keith E. Sonderling, Johnathan Smith, and Adam Thierer).
- “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).
- “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 numerous U.S. District Courts, U.S. Courts of Appeals, and the Supreme Court of the United States.