# HEIDI MANDANIS SCHOONER

Visiting Professor of Law Antonin Scalia Law School, George Mason University 3301 Fairfax Drive Arlington, VA 22201 hschoone@gmu.edu

## ACADEMIC EXPERIENCE

**Visiting Professor of Law, Antonin Scalia Law School, George Mason University,** Arlington, VA. 2025 – present. Courses: Contracts, Business Associations, and Bank Regulation.

*Professor of Law, Columbus School of Law, The Catholic University of America,* Washington, D.C., 2003 – 2025.

- Associate Professor, 1997 2003; Assistant Professor, 1993 1997.
- **Courses:** Contracts, Corporations, Financial Institutions Regulation, Applied Legal Studies (MBE prep), and Commercial Transactions.
- Service: university and law school hiring, promotion, and dean search committees; chaired admissions, curriculum, and budget committees.

*Visiting Professor of Law, George Washington University Law School,* Washington, D.C., 2003-2005. Courses: Contracts and Corporations.

*Visiting Assistant Professor, Suffolk University Law School,* Boston, Massachusetts, 1992 - 1993. Courses: Banking Law and Commercial Law.

*Lecturer, Marymount University,* Arlington, Virginia, 1985 - 1992. Courses: Business Law and Paralegal Studies.

# LEGAL EXPERIENCE

Acting General Counsel, First American Metro Corp., McLean, Virginia, 1991 - 1992; Associate General Counsel, 1988 - 1991. Provided legal advice to, and managed litigation involving, Washington, D.C.-area First American Banks on commercial law, contracts, commercial and real estate loans, loan workouts, bankruptcy, creditor's rights, regulatory compliance, and general corporate matters. Supervised Legal Division.

*Staff Attorney, Office of the General Counsel, Securities and Exchange Commission,* Washington, D.C., 1986 - 1988. Advised the Commission in legal and policy matters involving registration and reporting requirements, regulation of securities markets, financial institutions, underwriters, broker-dealers, and other professionals.

Associate, Wickwire, Gavin & Gibbs, P.C., Vienna, Virginia, 1985 - 1986. Corporate and commercial law practice.

## **EDUCATION**

J.D. Georgetown University Law Center, 1985 Article & Notes Editor, AMERICAN CRIMINAL LAW REVIEW

A.B. Duke University, 1982, cum laude, Economics

### **PUBLICATIONS**

#### **BOOK, BOOK CHAPTERS, AND JOURNAL ARTICLES**

Deference and Discretion in Bank Regulation, 55 SETON HALL LAW REVIEW 1669 (2025)

*LGBTQ*+ *Banks and Banking*, 24 MARYLAND LAW JOURNAL OF RACE, RELIGION, GENDER AND CLASS 74 (2024)

*The Role of Rival Litigation in Wilmarth's New Glass-Steagall*, 93 UNIVERSITY OF COLORADO LAW REVIEW 961 (2022)

U.S. Financial Regulatory Structure: Beneath the Surface of Twin Peaks, in THE CAMBRIDGE HANDBOOK OF TWIN PEAKS FINANCIAL REGULATION, Cambridge University Press (Andrew Godwin & Andrew Schmulow, eds) (2021)

*Fintech: New Battle Lines in the Patent Wars?*, 42 CARDOZO LAW REVIEW 277 (2020) (with Megan La Belle)

*Big Bank Boards: The Case for Heightened Administrative Enforcement*, 68 ALABAMA LAW REVIEW 1011 (2017)

Top-Down Bank Capital Regulation, 55 WASHBURN LAW REVIEW 328 (2016)

*Regulating Angels*, 50 UNIVERSITY OF GEORGIA LAW REVIEW 143 (2015)

The Dogma of Capital Regulation as a Response to the Financial Crisis, in THE CHANGING LANDSCAPE OF GLOBAL FINANCIAL GOVERNANCE AND THE ROLE OF SOFT LAW, BRILL Martinus Nijhoff Publishers (Friedl Weiss & Armin Kammel, eds., 2015)

*Big Banks and Business Methods Patents*, 16 UNIVERSITY OF PENNSYLVANIA JOURNAL OF BUSINESS LAW 431 (2014) (with Megan La Belle)

U.S. Bank Resolution Reform: Then and Again, in CROSS BORDER INSOLVENCY, Oxford University Press (Rosa Lastra, ed.) (2011)

GLOBAL BANK REGULATION: PRINCIPLES AND POLICIES, Elsevier (with Michael W. Taylor) (2010)

*Gringott's: The Role of Banks in Harry Potter's Wizarding World, in* THE LAW AND HARRY POTTER, Carolina Press (Jeffrey E. Thomas and Franklin G. Snyder eds., 2010)

Banks and Internet Payment Systems, in COMPARATIVE LAW PORTUGUESE-AMERICAN PERSPECTIVES Vol II (Dario Moura Vicente and Marshal Breger, eds., 2010)

Private Enforcement of Systemic Risk Regulation, 43 CREIGHTON LAW REVIEW 993 (2010)

Consuming Debt: Structuring the Federal Response to Abuses in Consumer Credit, 18 LOYOLA CONSUMER LAW REVIEW 43 (2005), reprinted in CONSUMER PROTECTION: DISPUTES AND RESOLUTION (K. Padmaja, ed., 2008)

Bank Insolvency Regimes in the United States and the United Kingdom, 18 THE TRANSNATIONAL LAWYER 385 (2005)

The Secrets of Bank Regulation: A Reply to Professor Cohen, 6 THE GREEN BAG 2d 389 (2003)

Central Banks' Role in Bank Supervision in the United States and United Kingdom, 28 BROOKLYN JOURNAL OF INTERNATIONAL LAW 411 (2003)

United Kingdom and United States Responses to the Regulatory Challenges of Modern Financial Markets, 38 TEXAS INTERNATIONAL LAW JOURNAL 317 (2003) (with Michael W. Taylor)

*Functional Regulation: The Securitization of Banking Law,* in FINANCIAL MODERNIZATION AFTER GRAMM-LEACH-BLILEY 189 (Patricia A. McCoy ed., 2002)

Popular Images of Bankers Reflected in Regulation, 5 THE GREEN BAG 2d 27 (2001)

Convergence and Competition: The Case of Bank Regulation in Britain and the United States, 20 MICHIGAN JOURNAL OF INTERNATIONAL LAW 595 (1999) (with Michael W. Taylor)

*Regulating Risk Not Function*, 66 UNIVERSITY OF CINCINNATI LAW REVIEW 441 (1998)

Registration and Regulatory Requirements of the Securities Exchange Act of 1934 and Other Securities Statutes, chapter in BANKING LAW (1998 Rel.) (the original version of this chapter was authored by Vincent Di Lorenzo)

Depository Institution Regulators, in GARY L. EDLES AND JEROME NELSON, FEDERAL REGULATORY PROCESS: AGENCY PRACTICES AND PROCEDURES (2d ed., 1995 & 1997 Supp.)

*Refocusing Regulatory Limitations on Banks' Compensation Practices*, 37 BOSTON COLLEGE LAW REVIEW 861 (1996)

Recent Challenges to the Persistent Dual Banking System, 41 ST. LOUIS UNIVERSITY LAW JOURNAL 263 (1996)

Fiduciary Duties' Demanding Cousin: Bank Director Liability for Unsafe or Unsound Banking Practices, 63 GEORGE WASHINGTON LAW REVIEW 175 (1995)

Look Before You Lend: A Lender's Guide to Financing Government Contracts Pursuant to the Assignment of Claims Act, 48 BUSINESS LAWYER 535 (1993) (with Steve Schooner)

*False Claims: Third Annual Survey of White Collar Crime*, 22 AMERICAN CRIMINAL LAW REVIEW 367 (1985)

#### ESSAYS, OPINIONS, AND TESTIMONY

Testimony, Hearing on Holding Executives Accountable After Recent Bank Failures, U.S. Senate Committee on Banking, Housing and Urban Affairs (May 4, 2023)

Personnel is Policy, Captured Economy (Nov. 10, 2021)

Testimony, Hearing on Bank Capital and Liquidity Regulation, U.S. Senate Committee on Banking, Housing and Urban Affairs (June 7, 2016)

A Lashing for the Bankers: New federal ownership plan for large banks may herald more punishing regulation, Vol. XXXI, No. 42 LEGAL TIMES (Oct. 20, 2008)

Testimony, Hearing on the Bank Charter Modernization Amendment Act of 2007, Committee on Public Services and Consumer Affairs, Council of District of Columbia (June 18, 2007)

What's Wrong With Wal-Bank?, THE FINANCIAL REGULATOR, Vo. 11, No. 2 at 41 (2006)

OCC Fumbles Over "Bank of Presidents," THE FINANCIAL REGULATOR, Vol. 9, No. 2 (2004)

Spitzer's Main Street Beat, THE FINANCIAL REGULATOR, Vol. 8, No. 4, at 21 (2004)

Why didn't Enron's board and watchdog howl?, HOUSTON CHRONICLE, February 4, 2002, at 25A

*Will Citigroup Deliver Bad Law or Real Reform?*, THE FINANCIAL REGULATOR, Vol. 3, No. 1, at 33 (1998)

### SELECTED PRESENTATIONS

Moderator, Wharton Conference on Financial Regulation (April 25, 2025)

Panelist, The End of Chevron Deference: Navigating Federal Administrative Law in the Wake of Loper Bright, Seton Hall Law Review Symposium (Feb. 14, 2025)

Panelist, Catholic Law on the Hill: The Future of Banking (November 14, 2024)

Presenter, LGBTQ+ Banks and Banking, 3<sup>rd</sup> Annual Women in Law and Finance Conference, Wharton Initiative on Financial Policy & Regulation and the Institute for Law and Economics Women in Business Law Initiative (September 27, 2024)

Panelist, Bank Corporate Governance Guidelines and Enforcement Risk, Business Law Section, ABA Spring Meeting (April 4, 2024)

Panelist, Lessons of Silicon Valley Bank and the Banking Turmoil of March 2023, 6<sup>th</sup> Conference on Law and Macroeconomics, Tulane Law School (November 2, 2023)

Witness, Hearing on Holding Executives Accountable After Recent Bank Failures, U.S. Senate Committee on Banking, Housing and Urban Affairs (May 4, 2023)

Panel Chair, Influencing Financial Regulation, Wharton Financial Regulation Conference (April 14, 2023)

Presenter, LGBTQ Banking, AALS Fall Conference, Section on Financial Institutions and Consumer Financial Services, Antonin Scalia Law School, George Mason University (November 4, 2022)

Speaker, The New Normal in Legal Education: What We Learned from Part-Time Programs During the Pandemic, AALS Annual Meeting, Section on Part-Time Division Program (January 7, 2022)

Speaker, Standing in Financial Regulation, Wall Street Weekly, Americans for Financial Reform (December 8, 2021)

Presenter, Standing in Financial Regulation, CUA Law Faculty Research Series (October 22, 2021)

Moderator, Regulating Megabanks: A Conference in Honor of Arthur Wilmarth, University of Colorado Law Review (May 24, 2021)

Speaker, How Well Did the Post-2008 Financial Crisis Regime Prepare the World for the COVID-19 Pandemic?, Contemporary Challenges in American and Global Law, American Law Program Lecture Series, Jagiellonian University & Catholic Law (February 24, 2021)

Presenter, U.S. Financial Regulatory Structure: Beneath the Surface of Twin Peaks, CUA Law Faculty Research Series (November 20, 2020)

Speaker, COVID Impact on Minority Business & Anti-Asian Hate, Catholic Law APALSA, BLSA & WLC (November 6, 2020)

Panelist, Financial Technology: The Future of Fintech, Catholic Law and the Journal of Law and Technology 2020 Spring Symposium (February 14, 2020)

Participant, Fintech Innovations, AALS Discussion Group, AALS Annual Meeting (January 5, 2020)

Panelist, Regulating Technology to Facilitate Innovation, Presented by the Administrative Law Review, American University Washington College of Law (October 18, 2019)

Discussant, 9<sup>th</sup> Annual Manne Faculty Forum, Law & Economics Center, George Mason University School of Law (September 20, 2019)

Panelist, Big Bank Regulation Under the Trump Administration, Americans for Financial Reform (May 21, 2019)

Presenter, Fintech Patent Wars, Work-in-Progress Workshop, Catholic University Law School (April 26, 2019)

Panelist, The Next Financial Crisis, AALS Annual Meeting, Section on Financial Institutions and Consumer Financial Services (January 5, 2019)

Commentator, Financial Regulation Workshop, ByWater Institute, Tulane Law School (January 4, 2019)

Panelist, Permits, Licensing and the Administrative State, Center for the Study of the Administrative State, George Mason University School of Law (October 24, 2018)

Panelist, Fintech: Implications for Consumers and Advocates, Consumer Federation of America 52<sup>nd</sup> Annual Consumer Assembly (May 10, 2018)

Panelist, Financial Regulation: Political, Administrative, and Constitutional Accountability, Center for the Study of the Administrative State, Antonin Scalia Law School, George Mason University (December 9, 2016)

Participant, Financial Regulation: Political, Administrative, and Constitutional Accountability Research Roundtable, Center for the Study of the Administrative State, George Mason University School of Law (September 29, 2016)

Participant, OFR Financial Stability Law Workshop, Office of Financial Research, Department of the Treasury (September 23, 2016)

Presenter, Bank Director and Officer Responsibilities Conference, Alabama Law Review, Alabama School of Law (August 26, 2016)

Witness, Hearing on Bank Capital and Liquidity Regulation, U.S. Senate Committee on Banking, Housing and Urban Affairs (June 7, 2016)

Panelist, Taking Stock: Financial Regulation since the Crisis, Law and Business Program, Vanderbilt Law School (March 25, 2016)

Panelist, 2016 Financial Regulation Roundtable, Columbia Law School (March 4-5, 2016)

Lecture, Managing Banks' Regulatory Capital, 39th Annual Foulston Siefkin Lecture, Washburn Law School (November 5, 2015)

Discussant, Rethinking the Public-Private Balance in Financial Markets and Regulation, Cornell BLI Conference (October 30-31, 2015)

Participant, Banking in a Free Society, The Federalist Society and the John Templeton Foundation (June 5-6, 2015)

Commentator, Wasting A Crisis: Why Securities Regulation Fails, Cato Institute (May 13, 2015)

Panelist, Attorney General Education Program Fifth Annual Public Policy Institute on Financial Services, Law and Economics Center, George Mason University Law School (April 30, 2015)

Panelist, Risk Management and Regulatory Oversight, 2015 Georgia Law Review Symposium (March 20, 2015)

Staff Briefing, Regulation of Large Regional Banks, Senate Banking Committee Staff (March 16, 2015)

Commentator, Fifth Annual Junior Faculty Business and Financial Law Workshop, Center for Law Economics and Finance, George Washington University Law School (February 27, 2015)

Panelist, Legal Perspectives on Consumer Credit and the American Economy, Journal of Law, Economics & Policy's Eleventh Annual Symposium, George Mason University Law School (November 14, 2014)

Commentator, Consumer Credit and the American Economy, Cato Institute and Federalist Society (September 30, 2014)

Moderator, The Effect of Government Policy on Community Bank Viability, 2014 Fed/CSBS Community Banking Research and Policy Conference, Federal Reserve Bank of Saint Louis (September 24, 2014)

Moderator, Critiquing Cost-Benefit Analysis of Financial Regulation, Association of Professors of Political Economy and the Law, Americans for Financial Reform, Better Markets, Center for Progressive Reform, George Washington University Law School (May 20, 2014)

Presenter, "The Dogma of Capital Regulation as a Response to the Financial Crisis," International Financial Regulation Roundtable, Tulane Law School (March 28, 2014)

Speaker, Financial Regulatory Structure in the United States, International Visitor Leadership Program, U.S. Department of State (March 4, 2014)

Commentator, Fourth Annual Junior Faculty Business and Financial Law Workshop, Center for Law Economics and Finance, George Washington University Law School, (February 7, 2014)

Commentator, Junior Scholars' Workshop, University of Connecticut School of Law (June 14, 2013)

Commentator, Third Annual Junior Faculty Business and Financial Law Workshop, Center for Law Economics and Finance, George Washington University Law School (April 5, 2013)

Speaker, Financial Regulatory Structure in the United States, Business Development Program (Syrian Delegation), U.S. Department of State (February 12, 2013)

Panelist, The Political Economy of Financial Regulation, George Washington University Center for Law, Economics & Finance, Insurance Law Center at the University of Connecticut School of Law, Center for Banking and Finance at the University of North Carolina School of Law, and the Institute for Law and Economic Policy (February 8, 2013)

Speaker, Recent Developments in International Financial Law, American Society of International Law, International Economic Law Interest Group, Biennial Meeting, George Washington University Law School (November 30, 2012)

Commentator, Scholars Roundtable, Brooklyn Law School (November 9, 2012)

Commentator, Second Annual Junior Faculty Business and Financial Law Workshop Center for Law Economics and Finance, George Washington University Law School (February 10, 2012)

Commentator, Soft Law and the Global Financial System Scholarship Roundtable, Georgetown University Law School (February 3, 2012)

Moderator, Rubber Hits Road: Implementing Dodd-Frank amid Reform Fatigue, AALS Annual Meeting, Section on Financial Institutions and Consumer Financial Services (January 8, 2012)

Participant, Banking on America: A Conversation about State Partnership Banks, Demos (November 18, 2011)

Presenter, "Patent Risk: Financial Innovation, Business Methods Patents, and the Regulation of Systemic Risk," American University Law School, Business Law Faculty Workshop (November 10, 2011)

Respondent, The Consumer Financial Protection Bureau: Independent Consumer Regulator or Unaccountable Agency?, Americans for Financial Reform, U.S. PIRG, and Consumer Federation of America (October 18, 2011)

Moderator, Secondary Mortgage Market Reform Symposium, Hamline University Law School (October 3, 2011)

Presenter, "Financial Innovation, Regulation, and Systemic Risk," Wharton International Financial Regulation Conference, The Wharton School, University of Pennsylvania (July 22, 2011)

Panelist, Law, Finance, and Accountability After Financial Reform, American University Law School (April 8, 2011)

Commenter, The Inaugural Junior Faculty Business and Financial Law Workshop, George Washington University Law School (April 2, 2011)

Presenter, "United Kingdom and United States Responses to the Financial Crisis," The European Union 20 Years After Maastrict – Transatlantic Perspectives, Tulane University Law School (March 25, 2011)

Speaker, U.S. Financial System and the Global Economy, International Visitor Leadership Program, U.S. Department of State (March 15, 2011)

Respondent, 2011 Student Scholar Series, Columbus School of Law, The Catholic University of America (February 17, 2011)

Moderator, AALS Annual Meeting, Section on Financial Institutions and Consumer Financial Services, Section Breakfast Panel (January 7, 2011)

Commentator, Conference on International Financial and Monetary Law, Benjamin N. Cardozo School of Law (June 3-4, 2010)

Panelist, The State of Reform in Financial Risk Regulation, Executive Compensation and Risk Regulation, George Washington University Center of Law, Economics, and Finance in New York (June 3, 2010)

Presenter, "A Twenty Year Perspective on U.S. Safety Net Reforms," Symposium on Managing Systemic Risk, U.S. Financial System Safety Net: Prospects for Reform, Warwick Law School, Warwick, U.K. (April 7 - 9, 2010)

Participant, Experts Group on Strengthening and Resolving Cross-Border Banks, International Monetary Fund, Washington, D.C. (January 28-29, 2010)

Moderator, The Future of Consumer Finance Regulation, Critical Insights in the Law and Law Practice Symposium, Catholic University of America, Columbus School of Law (December 3, 2009)

Panelist, Regulatory Reform at the Crossroads: What Is the Right Response to the Financial Crisis?, Banking Law Symposium, George Washington University Law School (October 24, 2009)

Presenter, "Public versus Private Enforcement of Systemic Risk Regulation," Lessons of the Financial Crisis: Implications for Regulatory Reform, Creighton University School of Law (September 25, 2009)

Presenter, "Public versus Private Enforcement Mechanisms: Checking the Balance of Financial Institution Regulatory Structure," Remaking Financial Services Regulation, Connecticut Insurance Law Journal Spring 2009 Symposium, University of Connecticut School of Law (April 17, 2009)

Commentator, The Panic of 2008, George Washington University (April 3, 2009)

Visiting Scholar, International Monetary Fund: Bank Regulation Workshop, Washington, D.C. (March 18, 2009)

Moderator, Does Modern Financial Institution Regulation Work? Reflections on Deregulation and Internationalization of Supervisory Standards, AALS Annual Meeting (January 9, 2009)

Panelist, Regulation of the Mortgage Lending Industry, Office of Thrift Supervision's National Housing Forum (December 8, 2008)

Faculty, International Monetary Fund: Banking Law Workshop, Tirana, Albania (November 17-19, 2008)

Panelist, Town Hall Meeting on the Financial Meltdown, Columbus School of Law, The Catholic University of American (Oct. 27, 2008)

Speaker, Basel II's Capital Adequacy Requirements After the Subprime Crisis, The American Branch of the International Law Association, International Law Weekend (October 17, 2008)

Discussant, How Do Mutual Funds Vote Their Proxies?, American Enterprise Institute (July 10, 2008)

Faculty, Regulation of Financial Institutions, Federal Trade Commission, Division of Financial Practices Academy (June 25, 2008)

Commentator, Junior Scholars Workshop, University of Connecticut School of Law (May 28/29, 2008)

Discussant, The Second Report of the Committee on Capital Markets Regulation, American Enterprise Institute (February 14, 2008)

Faculty, International Monetary Fund: Banking Law Workshop for Central Asian Judges, Joint Vienna Institute (January 29 - 31, 2008)

Discussant, Fall 2007 Roundtable: Globalization and International Financial Regulation, Vanderbilt International Legal Studies Program, Vanderbilt University Law School (October 6, 2007)

Presenter, "The Fantasy of Money and Banking," Storytelling and the Law Conference, City University, London (July 20, 2007)

Testimony, Bill 17-166, Bank Charter Modernization Amendment Act of 2007, Committee on Public Services and Consumer Affairs, Council of the District of Columbia (June 18, 2007)

Discussant, The Role of the Corporation in America: How Are the Rules of Corporate Governance and Antitrust Law Evolving?, Hudson Institute (May 21, 2007)

Discussant, Is Excessive Regulation and Litigation Eroding U.S. Financial Competitiveness?, American Enterprise Institute and the Brookings Institution (April 20, 2007)

Presenter, "Banks and Internet Commerce," Sixth Conference on Portuguese and American Law: Information and Technology in Public and Private Law, Columbus School of Law, The Catholic University of America (April 12, 2007)

Discussant, How Does the United Kingdom's Financial Services Authority Work?, American Enterprise Institute (March 29, 2007)

Presenter, "Structural Comparison of Consumer Protection Regimes," Federal Preemption in the Financial Institutions Arena, Texas Tech University School of Law (April 20, 2006)

Presenter, "Gringotts: The Role of Banks in the Wizarding World," The Law and Harry Potter, Annual Meeting of the Association for the Study of Law, Culture and the Humanities, Syracuse University College of Law (March 18, 2006)

Presenter, "Bank Insolvency Regimes in the United States and the United Kingdom," International Financial Services: Diverse Approaches in a Globalized Environment, McGeorge School of Law, University of the Pacific (November 5, 2004)

Presenter, "Central Banks' Role in Bank Regulation in the United States and the United Kingdom," Do Financial Super Markets Need Super Regulators?, Brooklyn Law School (September 21, 2002)

Faculty, American Law Program, Jagiellonian University, Krakow, Poland (May, 2002)

Presenter, "Functional Regulation: The Securitization of Banking Law," Financial Modernization After Gramm-Leach-Bliley, Cleveland-Marshall College of Law (May 18, 2001)

Presenter, "Popular Images of Bankers Reflected in Regulation," Culture, Money, and Banking, 1999 Law and Society Annual Meeting (May 27, 1999)

### OTHER ACTIVITIES AND PROFESSIONAL AFFILIATIONS

- Fellow, George Washington University Law School's Center for Law, Economics, and Finance
- Advisory Board, LOYOLA CHICAGO CONSUMER LAW REVIEW
- International Advisory Board, JOURNAL OF BANKING REGULATION
- Contracts Instructor, BARBRI's Law Preview (2006 2019)
- AALS Section on Financial Institutions and Consumer Financial Services (2010 Chair; 2009 Program Chair; 2008 Executive Committee;1997 Chair; 1996 Program Chair; 1995 Executive Committee)
- Board of Trustees, Congressional Schools of Virginia (2006-2010)
- Member, Falls Church City Watershed Advisory Committee (2009-2010)
- Coach, Falls Church City, Livable Neighborhood Water Stewardship Program (2007-2008)
- Team Leader, Falls Church City, Livable Neighborhood Water Stewardship Program (2006-2007)
- Volunteer Instructor, Operation Hope (Summer 2003) (teaching financial literacy)
- Admitted to practice in Virginia and District of Columbia