

JULY 17, 2025

# Government Grant Recipients & the False Claims Act

# Agenda

- False Claims Act Refresher
- Recent False Claims Act Causes of Action
- False Claims Act in the New Administration
- Reducing Your False Claims Act Risk



# False Claims Act Refresher

# What type of federal funding is subject to the FCA?

- Grants
- Contracts
- Cooperative agreements
- Non-cash contributions or donations of property (including donated surplus property)
- Direct appropriations
- Food commodities
- Loans
- Loan guarantees
- Interest subsidies
- Insurance
- Other financial assistance



# Elements for FCA Claim

A plaintiff alleging violation of the **False Claims Act** must demonstrate four elements:

- (1) A false record or false statement
- (2) Made to the Government
- (3) For the purpose of
- (4) Getting a false or fraudulent claim paid or approved by the Government.

*Allison Engine Co. v. U.S. ex rel. Sanders*, 553 U.S. 662, 671-672 (2008).





# False Claim or Statement

# What is a False Claim?

- Directly false information
- A misrepresentation
- An omission

Can take the form of:

- An invoice
- A certification
- A request for reimbursement
- Falsified data





# Scienter



# Scienter

- [A] any person who –
  - **knowingly** presents, or causes to be presented, a false or fraudulent claim for payment or approval. 31 U.S.C.A. § 3729(a)(1)(A)
- The FCA statute and the Supreme Court have interpreted knowingly to mean either:
  - a. The person knew their claim was false (actual knowledge);
  - b. The person was aware of the substantial risk that their claim was false but intentionally avoided learning about the falsity (deliberate ignorance); or
  - c. Aware of such a substantial and unjustifiable risk of a false claim but submitted the claims regardless (reckless disregard). , 31 U.S.C.A. § 3729(b)(1); *United States ex rel. Schutte v. Supervalu Inc.*, 598 U.S. 739, 751.
- Requisite mental state depends on whether a defendant subjectively believed its claims were false when submitting, not whether or not the defendant can offer an objectively reasonable basis for its claims.
  - *United States ex rel. Schutte v. Supervalu Inc.*, 598 U.S. 739 (2023).





# Materiality

# Materiality

- Material means “having a natural tendency to influence, or be capable of influencing, the payment or receipt of money or property.” § 3729(b)(4)
- What the Supreme Court has said about materiality:
  - A demanding standard.
  - Not automatically material if the requirement is statutory, regulatory, or contractual.
  - Not automatically material if the Government says something is material.
  - But not automatically immaterial if the Government does not call it material.
  - Cannot be a minor or insubstantial noncompliance.
  - Not dispositive if the Government declines payment because of the noncompliance.





# Caused the Government to Forfeit Money

# Made for the Purpose of Causing the Government to Pay or Approve a Claim

“What § 3729(a)(2) demands is not proof that the defendant caused a false record or statement to be presented or submitted to the Government but that the defendant made a false record or statement **for the purpose of getting “a false or fraudulent claim paid or approved by the Government.”** *Allison Engine Co. v. U.S. ex rel. Sanders*, 553 U.S. 662, 671 (2008)

- Claims need not be paid out by the Government to be actionable.
- Claims do not need to be submitted directly to the Government.
  - Can be submitted by subcontractors to prime federal contractors;
  - By subrecipients to prime federal grant recipients; and
  - To state, local, or tribal pass-through entities receiving federal funds.





# Reverse False Claims Act

## 31 U.S.C. §3729(a)(1)(G)

- Under the FCA, the government, or a party acting on its behalf, typically seeks recovery for false claims submitted by a defendant in order to obtain payment from the government.
- In contrast, a reverse false claim action arises when the defendant's conduct prevents payment to the government that is otherwise due, rather than causing the government to make an improper payment to the defendant.
- FCA liability may attach where a person or organization knowingly conceals or knowingly and improperly avoids or decreases an obligation to pay or transmit money or property to the government.
- Surplus funds and costs saved do not need to be returned.





# Enforcement



# Enforcement

- Any person found liable under Section 3729(a) of the False Claims Act is liable for a civil penalty between \$14,308 to \$28,619 per claim (adjusted for inflation).
- Plus, 3 times the amount of damages which the government sustained because of the action.
- Currently DOJ enforces these cases (and Qui Tam Relators) but a new enforcement mechanism, the Administrative False Claims Act (AFCA) allows federal agencies to directly pursue actions for claims with damages of \$1,000,000 or less. (This does not include the civil monetary penalties).





# Recent False Claims Act Causes of Action

# Focuses of Interest

- Cybersecurity
- Academic Fraud/Misrepresentation
- Domestic Preference
- Procurement Fraud
- Malign Foreign Talent Recruitment Programs
- Immigration
- Antisemitism and “Gender Ideology”
- Healthcare Related Fraud





# Cybersecurity

# Cybersecurity

## Overview

- DOJ launched its Civil Cyber-Fraud Initiative (CCFI) in 2021.
- Before the launch, there were only two known cybersecurity FCA cases.
- After the launch, the DOJ has settled ten cybersecurity FCA cases.



FY	NEW MATTERS°		SETTLEMENTS AND JUDGMENTS¹				
	NON QUI TAM	QUI TAM	NON <sup>a</sup> QUI TAM	QUI TAM			TOTAL QUI TAM AND NON QUI TAM
			TOTAL	WHERE U.S. INTERVENED OR OTHERWISE PURSUED	WHERE U.S. DECLINED	TOTAL	
2006	76	385	1,712,459,257	1,491,105,499	22,711,363	1,513,816,862	3,226,276,119
2007	146	365	564,826,844	1,251,726,955	160,246,894	1,411,973,849	1,976,800,693
2008	166	379	312,193,480	1,103,918,516	12,678,936	1,116,597,452	1,428,790,932
2009	134	433	470,685,686	1,964,005,251	33,776,480	1,997,781,730	2,468,467,417
2010	144	576	649,300,368	2,279,055,248	109,778,613	2,388,833,862	3,038,134,230
2011	136	634	241,365,995	2,656,802,414	173,888,703	2,830,691,117	3,072,057,112
2012	158	655	1,612,212,862	3,376,995,169	90,248,343	3,467,243,512	5,079,456,374
2013	117	757	188,376,772	2,818,607,362	203,992,659	3,022,600,021	3,210,976,794
2014	119	716	1,677,608,226	4,390,679,739	91,136,701	4,481,816,440	6,159,424,665
2015	129	639	738,442,487	1,898,041,298	516,875,695	2,414,916,993	3,153,359,480
2016	184	710	1,929,556,062	2,928,674,132	108,298,069	3,036,972,202	4,966,528,263
2017	176	681	283,626,021	2,555,280,735	602,682,052	3,157,962,787	3,441,588,807
2018	133	648	769,596,453	1,998,130,585	210,796,053	2,208,926,638	2,978,523,091
2019	150	637	852,782,697	1,912,589,545	305,554,613	2,218,144,158	3,070,926,855
2020	261	676	547,903,198	1,536,464,401	193,883,475	1,730,347,877	2,278,251,075
2021	212	598	3,993,418,820	1,210,916,864	482,504,272	1,693,421,136	5,686,839,956
2022	304	659	250,337,200	807,053,802	1,189,419,176	1,996,472,978	2,246,810,178
2023	505	713	363,694,220	1,956,813,447	466,884,196	2,423,697,644	2,787,391,864
2024	423	979	502,887,566	2,199,885,934	217,965,112	2,417,851,046	2,920,738,612



# Health Net Federal Services (HNFS)

- **Health Net Federal Services (HNFS)** recently paid **\$11.25 million** to resolve FCA allegations related to cybersecurity compliance failures in a DOD contract.

## Highlights:

- HNFS certified that it complied with cybersecurity requirements in its DOD contract to administer the TRICARE health benefits program for military service members and their families.
- DOJ alleged that:
  - HNFS failed to follow its own System Security Plan and the response time it established for finding and responding to security flaws;
  - HNFS ignored reports from third-party security auditors and its internal audit department of cybersecurity risks on its networks and systems; and
  - HNFS falsely attested to government that it was compliant with NIST 800-53 security controls.





# Academic Fraud/Misrepresentation



# Academic Fraud/Misrepresentation

## Key Areas of Concern:

1. Fraudulent certifications for research grants (e.g. NSF, NIH grants).
2. Failure to disclose funding from or payments to foreign sources.

# Stanford University

- In late 2023, Stanford University paid \$1.9 million to resolve allegations it violated the False Claims Act.

## Highlights:

- DOJ alleged that Stanford failed to disclose support that 12 Stanford faculty members were receiving from foreign sources in research grant proposals to five federal agencies:
  - Army;
  - Navy;
  - Air Force;
  - NASA; and
  - NSF.
- No indication that this is a “qui tam” case.





# Domestic Preference

# Domestic Preference

## Overview

- Domestic preference rules generally include the Buy American Act (BAA) and Trade Agreements Act (TAA).
- Recently, additional domestic preference requirements, such as Build America, Buy America and the Buy America Act, have also been applied to projects funded through:
  - the Infrastructure Investment and Jobs Act; and
  - Inflation Reduction Act.
- Even without a written certification, the delivery or installation of products under these contracts or grants may be viewed as an implied certification of compliance with domestic preference rules.



# LED Lighting Solutions, LLC

- Two months ago, lighting company entered into a \$300,000 civil settlement agreement with the United States to resolve allegations that they failed to comply with domestic sourcing requirements.

## Highlights:

- Since 2013, LED Lighting Solutions had a GSA contract to supply various agencies with LED lights and lighting products.
- DOJ alleged that company sold foreign end products despite company's letter of supply attesting to its compliance with the TAA to several government procuring agencies including products shipped directly from China to the procuring agency.



# Procurement

# Procurement

## Overview

- All federal grant recipients must certify that they followed procurement requirements outlined in 2 C.F.R. Sections 200.318 – 200.327.
- These sections establish the baseline for fair, open, and competitive procurement processes for all non-Federal entities using Federal funds.
- The regulations emphasize transparency, competition, and documentation.



# Stantec Inc.

- Last week, a provider of environmental development and engineering services agreed to pay \$4 million to resolve allegations of violation of the FCA in its grant applications to the EPA for Brownfields Assessment Grants.

## Highlights:

- Part of the EPA's Brownfields Grant Program which "aims to help communities around the country transform contaminated sites into community assets."
- Applicants for EPA Brownfields grants must certify compliance with a requirement that "contractors that develop or draft specifications, requirements, statements of work, or invitations for bids must be excluded from competing on those procurements."
- DOJ alleged that, from 2014-2022, Stantec, through its subsidiary, drafted or assisted in the drafting of the requests for proposals and statements of work associated with applications for EPA Brownfields Assessment Grants, and then competed for and won the work for which they had drafted the specifications.







# Immigration

# Immigration – Undocumented Individuals

## **Executive Order 14218, Section 2 Preserving Federal Public Benefits:**

(a) Requires of each executive department or agency to:

- (i) identify all other sources of Federal funding for illegal aliens; and
  - (ii) recommend additional agency actions to align Federal spending with the purposes of this order, and, where relevant, enhance eligibility verification systems.
- (c) Agencies shall refer any improper receipt or use of Federal benefits to the Department of Justice and the Department of Homeland Security for appropriate action.

- 7. Programs that discourage collaboration with law enforcement or oppose or limit the role of police, prosecutors, or immigration enforcement in addressing violence against women.
- 9. Initiatives that prioritize illegal aliens over U.S. citizens and legal residents in receiving victim services and support.

### Certification Regarding Compliance with Federal Immigration Law

State or local government applicants seeking [priority consideration](#) for compliance with federal immigration law, including 8 U.S.C. § 1373, must submit a letter making this certification signed by the applicant's Authorized Representative.



# Immigration - Documented Individuals

## Overview

- The argument posited thus far has been that “visa petitions” could potentially be a “false claim” for purposes of the FCA.
- Relators have attempted to bring reverse FCA claims by alleging that employers improperly avoided paying higher government fees by using lower-cost options, such as B-1 or L-1 visas, over more expensive options such as H-1B visas.



# Current State of Visa Fraud Cases under the FCA

## Highlights:

- *U.S. ex rel. Palmer v. Tata Consultancy Services, Ltd.*, 4:17-cv-72, ECF 81 at 13 (E.D. Tx. May 20, 2025)
  - Stated that a visa is not a claim/certification for purposes of FCA.
- May 12, 2025 DOJ released memo entitled “Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime” .
  - The memo expanded the previous initiative from last year to add areas of focus including “violations to federal immigration law.”
  - The DOJ’s whistleblower pilot program now expressly includes corporate misconduct involving immigration violations, such as the misuse of employment-based visa programs.





# Malign Foreign Talent Recruitment Programs

# Malign Foreign Talent Recruitment Programs

## Overview

- Applies to CHIPS and Science Act of 2022 grants.
- Two Elements:
  - Must be “compensated” or “sponsored” by a foreign country of concern (FCOC) (or any institution on two other specified lists); and
  - Is an enumerated “problematic activities”.
- These certifications shall not apply retroactively to proposals submitted prior to May 20, 2024.



# “Problematic Behavior”

- Unauthorized transfer of IP, materials, data products, or other nonpublic information;
- Recruitment of trainees or researchers to enroll in the program;
- Establishing a lab or company, or accepting a faculty position or other appointment, in the foreign country;
- Being unable to terminate the foreign talent recruitment program;
- Being limited in the capacity to carry out a research and development award, or requires engagement in work that overlaps or duplicates a federal award;
- Being required to apply for funding from the sponsoring foreign government;
- Being required to omit acknowledgement of the recipient institution (UH) or the federal agency sponsoring the research;
- Being required not to disclose participation in the program to the federal research agency or employing institution (UH); or
- Having a conflict of interest or commitment contrary to a federal award.



## **51. Malign Foreign Talent Recruitment Program Certification**

Pursuant to Section 10632 (42 U.S.C. § 19232) of the CHIPS and Science Act of 2022, each PI and co-PI identified on a proposal submitted or due on or after May 20, 2024, that results in an award, must certify annually in Research.gov, for the duration of the award that such individual is not a party to a malign foreign talent recruitment program.

These certifications shall not apply retroactively to proposals submitted prior to May 20, 2024. False representations may be subject to prosecution and liability pursuant to, but not limited to, 18 U.S.C. §§ 287, 1001, 1031 and 31 U.S.C. §§ 3729-3733 and 3802.







# Antisemitism and Gender Ideology

# Antisemitism and “Gender Ideology”

## Overview

- From the DOJ’s Civil Rights Fraud Initiative:

“[A] university that accepts federal funds could violate the False Claims Act when it encourages antisemitism, refuses to protect Jewish students, allows men to intrude into women’s bathrooms, or requires women to compete against men in athletic competitions. Colleges and universities cannot accept federal funds while discriminating against their students.”

- Grantees must certify that they will not use funds to promote “gender ideology.”





# Recent Developments: DEI & False Claims Act Enforcement

# Timeline

- **September 1965: President Lyndon Johnson Enacts Executive Order 11246, Affirmative Action Mandate**
- **January 21, 2025: President Donald Trump Enacts Executive Order 14173, Rescinding EO 11246**
  - Requires contractors and grant recipients to ***certify*** that they do not “operate any programs promoting DEI that violate any applicable Federal anti-discrimination laws,” and to agree in their federal contracts that their compliance “with all applicable Federal anti-discrimination laws ***is material*** to the government's payment decisions for purposes of” the False Claims Act (FCA).
- **February 5, 2025: AG Issues Memo Titled “Ending Illegal DEI and DEIA Discrimination and Preferences”**
- **May 13, 2025: DOJ Investigating Harvard for Affirmative Action-Related False Claims Act Violations**
- **May 19, 2025: U.S. Department of Justice Establishes Civil Rights Fraud Initiative**
  - Establishes an internal DOJ team that will coordinate with other federal and state agencies “to aggressively pursue” False Claims Act enforcement actions against federal contractors, federal grantees, and federally funded universities who falsely “certify compliance with civil rights laws.”
- **May 20, 2025 to Today: DOJ Investigating Title VII Violations**
  - DOJ began investigating multiple universities and government entities for potential Title VII violations.
  - DOJ did not connect those investigations to the False Claims Act.





# New Contract Provisions Introduced Because of EO 14173

# Example of Post-EO 14173 Contract Provision: DOJ, Office of Community Oriented Policing Services

## 2025 Notice of Funding Opportunity (NOFO) for *Law Enforcement Mental Health and Wellness Act (LEMHWA)* Implementation Projects – May 14, 2025

- \$8.85M in program funding in which funds are used to improve the delivery of and access to mental health and wellness services for law enforcement officers.

### XLIII. Federal Civil Rights and Nondiscrimination Laws (Certification)

The recipient agrees that its compliance with all applicable Federal civil rights and nondiscrimination laws is material to the government's decision to make this award and any payment thereunder, including for purposes of the False Claims Act (31 U.S.C. 3729-3730 and 3801-3812), and, by accepting this award, certifies that it does not operate any programs (including any such programs having components relating to diversity, equity, and inclusion) that violate any applicable Federal civil rights or nondiscrimination laws.

# Example of Post-EO 14173 Contract Provision: HHS Grants Policy Statement – April 16, 2025

**Effective April 2025, applications applying to the Health and Human Services discretionary grant programs must abide by new grant rules and regulations.**

The “Civil Rights Assurance” section requires each submission to file an *Assurance of Compliance* form certifying compliance with Title VII, Title IX, Rehabilitation Act, Age Discrimination Act, and Patient Protection and Affordable Care Act.

- By accepting a grant award recipients certify:
  - i. They will not operate any programs that advance or promote DEI; and
  - ii. They do not engage in a discriminatory prohibited boycott of Israeli companies, or with companies doing business in or with Israel.



# Example of Post-EO 141733 Contract Provision: National Science Foundation – May 19, 2025

**Effective for new NSF grants, and funding amendments to existing grants, made on or after 5/19/2025**

- Pp. 37-38:

Recipients must comply with all applicable Federal anti-discrimination laws material to the government's payment decisions for purposes of 31 U.S.C. § 3729(b)(4).

...

(2) Award certification.

(a) By accepting the award, recipients are certifying that:

(i) They do not, and will not during the term of this financial assistance award, operate any programs that advance or promote DEI, or discriminatory equity ideology in violation of Federal anti-discrimination laws; and

(ii) They do not engage in and will not during the term of this award engage in, a discriminatory prohibited boycott.





# Overview of Civil Rights Laws Whose Violation Can Trigger FCA Liability

# Key Federal Civil Rights Laws

## **Title VI of the Civil Rights Act of 1964**

- Prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.

## **Title VII** *(almost all of DOJ's investigations thus far have been based on potential Title VII violations)*

- Prohibits all employment discrimination based on race, color, religion, sex (including pregnancy and sexual orientation), and national origin (only applies to employers with >15 employees).

## **Title IX**

- Prohibits sex discrimination in education programs and activities receiving federal financial assistance.

## **Americans With Disabilities Act of 1990 (ADA)**

- Prohibits employment discrimination based on disability.

## **Age Discrimination in Employment Act of 1967 (ADEA)**

- Prohibits employment discrimination against individuals who are 40 years of age or older.

# New Title VII Guidance from EEOC

## EEOC Guidance Document – March 19, 2025:

- 42 U.S.C. § 2000e-2(m): An “unlawful employment practice is established” if “race, color, religion, sex, or national origin was a motivating factor for any employment practice, even though other factors also motivated the practice.”
- Title VII prohibits disparate treatment in hiring, firing, promotion, demotion, compensation, fringe benefits, training access, mentoring/sponsorship programs, internships, interview selection, and job assignments.
  - This includes placement or exclusion from candidate pools and access to leadership development programs.
- Employers cannot limit, segregate, or classify employees based on protected characteristics in ways that affect employment status or opportunities.
  - This prohibition applies to employer-sponsored activities and includes restricting Employee Resource Groups or affinity groups to certain protected groups.
- Separating workers into groups based on race, sex, or other protected characteristics for DEI trainings and programming violates Title VII, even when groups receive identical content or resources.
- Employees "of all backgrounds" must have equal access to all workplace networks.





# Current Actions Against and Investigations Into “DEI Practices”

# Ongoing DOJ Investigations Into “DEI Practices” : Harvard



EDUCATION

## DOJ investigating Harvard over admissions policy compliance

BY LEXI LONAS COCHRAN - 05/16/25 12:00 PM ET



**ED, HHS Launch Title VI Investigations of Harvard University and Harvard Law Review Amid Allegations of Discriminatory Practices**

## The New York Times

### *Trump Administration Escalates Harvard Feud With New Justice Dept. Investigation*

The Trump administration is targeting the Ivy League university under a law typically used to go after government contractors for swindling.

**May 2025: False Claims Act Investigation into Harvard, Focusing on its Admissions Process**

**June 2025: Harvard is also under investigation for two separate allegations of discrimination**



# Ongoing DOJ Investigations Into “DEI Practices”: Individual States

## CHICAGO SUN★TIMES

### Justice Department launches probe into City Hall's hiring practices, claims they're solely race-based

The Trump administration on Monday opened a civil rights investigation into Chicago's hiring practices one day after Mayor Brandon Johnson boasted about the record number of African Americans he has hired for top city jobs.

by Fran Spielman | May 19, 2025, 3:58pm PDT

*Rhode Island* **Current**

### DOJ launches Civil Rights Act investigation in R.I.

BY: **NANCY LAVIN** - JUNE 5, 2025 3:07 PM

PRESS RELEASE



## Justice Department Opens Investigation into the State of Minnesota for Race- and Sex-Based Hiring Practices



Thursday, July 10, 2025

For Immediate Release





# Reducing Your Risk under the FCA

# Check Your Grant Agreement

Determine Type of Funding



Identify Relevant Grant Terms





# Preemptively Discuss Certifications with Your Grant Officer

- While relying on the advice or interpretation of a grant officer in reference to these new certifications is not a complete defense, it could contribute towards a finding of good faith or lack of scienter.
- Get any information you receive from government personnel regarding these certifications in writing.
  - Do not rely on oral representations.



# Successful Defenses

- Any element of the FCA has not been met:
  - There is no false claim.
    - Was the claim true at the time of submission to the Government and became false later?
    - Not all submissions to the Government are claims for payment in terms of the FCA.
  - There is no requisite scienter.
    - A defendant who operates in good faith does not violate the FCA—even if its interpretation of the law is incorrect.
  - The alleged false claim is not material to payment.
  - The alleged false claim was not submitted to the Government for the purpose of payment.
    - Was the alleged false claim was submitted after payment was received?
- Government Knowledge.
- Public Information (in the case of a Qui Tam suit).
- Constitutional Challenge (discussed next slide).



# Current Legal Actions

- Rhode Island Coalition Against Domestic Violence v. Bondi (1:25-cv-00279-WES-AEM): Challenging the “gender ideology,” immigration, DEI, and “out of scope activity” certifications in Office on Violence Against Women Office (OVW) grants on the grounds of APA violations (arbitrary, unconstitutional, contrary to law), Separation of Powers violation, Spending Clause violation, ultra vires, violations of the First Amendment, and Due Process (vagueness).
- King County v. Turner, 2:25-cv-00814: challenging HUD, DOT, and FTA certifications involving DEI, immigration status, “gender ideology” and “elective abortion” on similar grounds as above.
- In addition to several suits challenging the certifications, it is also unclear if courts will consider these certifications as material.
- The Government has stated that these certifications are material to payment, but the Government’s decision to expressly identify a provision as a condition of payment is relevant, it is not automatically dispositive under *Universal Health Services, Inc. v. United States ex rel. Escobar et al.*, 579 U.S. 176, 194 (2016).
  - (“A misrepresentation cannot be deemed material merely because the Government designates compliance with a particular statutory, regulatory, or contractual requirement as a condition of payment.”)



# Other Steps Your Organization Can Take

- Evaluate whether your practices violate current interpretations of laws.
- Update existing internal controls and policies to mitigate risk areas for your organization.
- Do not lie on claims and certifications to the Government or tell them what you think they want to hear.
- Consider legal challenges.
- Find alternatives to federal funding.





# Questions?



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