

# WILSON SONSINI

## Christopher N. Olsen

PARTNER

Data, Privacy, and  
Cybersecurity  
Washington, D.C.

colsen@wsgr.com  
202-973-8803

### FOCUS AREAS

Advertising, Promotions,  
and Marketing  
Communications  
Data, Privacy, and  
Cybersecurity  
Federal Trade Commission  
State Attorneys General

### HIGHLIGHTS

- Privacy and Data Security Expert with Track Record of Success**  
Chris advises clients on all aspects of privacy and cybersecurity matters, and represents companies under investigation by the FTC and state attorneys general. He has successfully resolved investigations without enforcement action, and clients regularly seek his guidance when faced with regulatory scrutiny.
- Former Agency Deputy Director with Extensive Government Background**  
Chris is a former deputy director of the Bureau of Consumer Protection at the FTC, and previously was the assistant director of the FTC's Division of Privacy and Identity Protection. He also served in a variety of roles at the FCC.
- A Leader in His Field**  
He is recognized among the nation's top privacy attorneys by *Chambers Global*, *Chambers USA*, and *the Global Data Review*. Clients remark he has "excellent work ethic" and "provides practical, sophisticated, and timely legal advice" and is a "brilliant leader and creative thinker."
- Chris is a frequent contributor to The WSGR Data Advisor**



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### EXPERIENCE

Christopher Olsen is a partner in the Washington, D.C., office of Wilson Sonsini and co-chair of the firm's privacy and cybersecurity practice. Chris advises clients on all aspects of privacy and cybersecurity matters and represents companies under investigation by the Federal Trade Commission and state attorneys general. He has an established track record of success in resolving investigations without enforcement action and clients regularly seek his guidance when facing high-stakes regulatory scrutiny.

Chris is a former deputy director of the Bureau of Consumer Protection (BCP) at the Federal Trade Commission (FTC), where he directed the international work of the Division of Privacy and Identity Protection and acted as the agency's co-lead negotiator in discussions with the European Commission regarding improvements to and renewal of the U.S.-EU Safe Harbor Framework.

Prior to joining the bureau director's office, Chris was the assistant director of the Division of Privacy and Identity Protection at the FTC. In this role, he managed a number of significant privacy and security enforcement actions, as well as several of the most important privacy initiatives in recent FTC history, including a seminal 2012 FTC report on consumer privacy that formulated important recommendations for businesses.

Previously, Chris served in a variety of roles at the Federal Communications Commission (FCC), including deputy chief of the FCC's Enforcement Bureau, where he directed several of the most significant enforcement matters in the commission's history, including the agency's first net neutrality order; its first actions enforcing the National Do-Not-Call requirements; and multimillion-dollar cases involving local competition and consumer protection rules.

Prior to joining the FCC, Chris was a partner at Howrey Simon Arnold & White, LLP, where he managed a variety of complex litigation matters.

## CREDENTIALS

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### Education

- J.D., University of Virginia School of Law, 1989
- A.B., English modified by Government, Dartmouth College, 1986  
*Cum Laude*

### Associations and Memberships

- Vice Chairman, Privacy and Information Security Committee, Section of Antitrust Law, American Bar Association, 2019-2022
- Member, Education Advisory Board, International Association of Privacy Professionals, 2017-2019

### Honors

- Named in the 2020-2026 editions of *Chambers Global*
- Named in the 2019-2026 editions of *Chambers USA: America's Leading Lawyers for Business*
- Selected for inclusion in the 2025-2026 editions of the Lawdragon's "500 Leading Global Cyber Lawyers" guide
- Named as a "Top Lawyer" in the cybersecurity category by *Washingtonian* magazine in December 2017
- Recipient, Award for Excellence in Supervision from the Federal Trade Commission for "an exceptional ability to guide, empower, and motivate staff . . . to protect consumer privacy through groundbreaking cases and innovative policy efforts" (September 2012)
- Recipient, Mary Gardiner Jones Award from the Federal Trade Commission for "active volunteer efforts that have benefited the FTC community, the employee's community or state, or the nation" (October 2010)
- Recipient, Silver Award from the Federal Communications Commission for "sustained exceptional accomplishments related to the mission and objectives of the Commission" (October 2006)

### Admissions

- Bar of the District of Columbia

## MATTERS

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### Representative Regulatory Matters

- Representing major companies in FTC investigations involving Artificial Intelligence.
- Lead counsel for Epic Games in two major FTC investigations into Fortnite, one involving COPPA and one involving purchasing; successfully negotiated consent agreements resolving both investigations.
- Lead counsel for Google and YouTube in COPPA enforcement action brought by FTC and New York Attorney General. Successfully negotiated consent agreement resolving allegations.
- Lead counsel for Lyft in FTC investigation involving earnings claims. Successfully negotiated consent agreement resolving investigation.
- Successfully represented major online commerce provider in FTC investigation. Case closed with no enforcement action.

- Successfully represented electronic products manufacturer in FTC privacy investigation. Case closed with no enforcement action.
- Successfully represented fitness device manufacturer in FTC investigation. Retained as counsel after FTC informed company it was proceeding with a complaint alleging privacy and security violations; convinced the agency to close the case with no enforcement action.
- Successfully represented internet security company in FTC data security investigation. Case closed with no enforcement action.
- Successfully represented media company in FTC advertising investigation. Case closed with no enforcement action.
- Successfully represented children's service in FTC COPPA investigation. Case closed with no enforcement action.
- Successfully represented ad tech company in FTC inquiry. Matter closed without formal investigation.
- Successfully represented communications company in FTC FCRA investigation. Case closed with no enforcement action.
- Successfully represented electronic products manufacturer in FTC advertising investigation. Case closed with no enforcement action.
- Represented maker of electronic learning devices in FTC COPPA investigation; successfully negotiated consent agreement resolving allegations.
- Currently representing electronic products manufacturer in state AG data security investigation.
- Currently representing makers of mobile health apps in state privacy inquiries.
- Currently representing AI technology provider in FCC privacy-related inquiry.
- Currently representing electronic entertainment company in FTC investigation.
- Currently representing ISP in FTC 6B study of ISP privacy practices.

## INSIGHTS

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### Select Publications

- Co-author, "European Commission Publishes DSA Guidelines on the Protection of Minors Online," Wilson Sonsini Alert, July 23, 2025
- Co-author, "Nebraska and Vermont Pass Age-Appropriate Design Codes," Wilson Sonsini Alert, June 24, 2025
- Co-author, "EU Commission Issues Guidelines on Prohibited AI Practices Under EU AI Act," Wilson Sonsini Alert, February 11, 2025
- Co-author, "Consumer Protection Update: With Disruption at the Federal Level, State Attorneys General Are Likely to Loom Large," Wilson Sonsini Alert, February 5, 2025
- Co-author, "New Year, New Developments: 2025 U.S. Privacy, Cybersecurity, and Consumer Protection Predictions," Wilson Sonsini Alert, January 7, 2025
- Co-author, "Regulators in Europe Signal Increased Scrutiny of Online Platforms," Wilson Sonsini Alert, October 21, 2024
- Co-author, "Governor Newsom Signs (and Vetoes) Major California AI Legislation," Wilson Sonsini Alert, October 10, 2024
- Co-author, "Maryland Age-Appropriate Design Code Effective October 1, 2024," Wilson Sonsini Alert, October 7, 2024
- Co-author, "New York Legislature Passes a Pair of Bills to Protect Children's Privacy Online," Wilson Sonsini Alert, June 18, 2024
- Co-author, "Colorado Passes First-in-Nation Artificial Intelligence Act," Wilson Sonsini Alert, May 21, 2024
- Co-author, "Congress Proposes New Comprehensive Privacy Legislation: The American Privacy Rights Act," Wilson Sonsini Alert, April 16, 2024
- Co-author, "State Social Media Law Patchwork Emerging: Florida Passes Law to Restrict Minors' Use of Online Services," Wilson Sonsini Alert, April 2, 2024
- Co-author, "Utah Passes New Versions of Social Media Laws for Minors in Response to Challenges," Wilson Sonsini Alert, March 28, 2024
- Co-author, "New Executive Order Restricts Certain Cross-Border Transactions Involving Sensitive Personal Data of U.S. Citizens," Wilson Sonsini Alert, March 6, 2024
- Co-author, "The AI Act Just Got One Step Closer to Becoming Law," Wilson Sonsini Alert, February 2, 2024
- Co-author, "Cybersecurity: What to Watch for in 2024," Wilson Sonsini Alert, January 3, 2024
- Co-author, "SEC Adopts Cybersecurity Disclosure Rules for Public Companies," Wilson Sonsini Alert, August 1, 2023
- Co-author, "Texas Joins Other States in Enacting Social Media Law for Minors," Wilson Sonsini Alert, June 21, 2023
- Co-author, "Round Three: FTC Proposes Further Restrictions on Meta's Privacy Practices and a Complete Prohibition on Meta Monetizing Youth Data," Wilson Sonsini Alert, May 5, 2023

- Co-author, "New Legal Requirements for Online Marketplaces: The INFORM Consumers Act," Wilson Sonsini Alert, February 6, 2023
- Contributor, "Accountability to Data Subjects and Regulators," *The Guide to Data as a Critical Asset, Global Data Review, 2022*
- Co-author with J. Ferris, "Five Things to Know About Net Neutrality," WSGR Alert, December 10, 2015
- "Comcast Enters into Largest Privacy Settlement on Record with California Attorney General," *The WSGR Data Advisor*, November 2015

## Select Speaking Engagements

- Panelist, "The Modern Challenges of Protecting Children's Privacy Online," Soft Law Summit, September 24, 2024
- Speaker, "So You Just Got a CID: What's Next?" IAPP Practical Privacy Series, December 2016
- Speaker, "Privacy, Encryption, and Consumer Rights: A New Boardroom Challenge," Stanford Directors' College, June 2016
- Speaker, "History of Self-Regulatory Enforcement," Online Interest-Based Advertising Accountability Program's Consumer Privacy and Digital Advertising Innovation Conference, May 2016
- Keynote Speaker, Future of Privacy Forum Advisory Board Meeting, April 2015
- Co-moderator, "Privacy Implications Associated with Broadband Internet Access Services," Federal Communications Commission Workshop on Broadband Consumer Privacy, Washington, D.C., April 2015
- "Data, Lending, and Civil Rights," Georgetown Center on Privacy and Technology Symposium, Georgetown University Law Center, Washington, D.C., April 2015
- Panelist, "Big Data: Privacy and Data Security Issues for Media and Communications Companies," FCBA and ABA Symposium, Washington, D.C., March 2015
- Panelist, "Raising the Bar for Privacy and Data Security: The Role of Self-Regulation in the New Frontier," IAPP Global Privacy Summit, Washington, D.C., March 2015
- Panelist, "An Exposé on How the Internet of Things Impacts Individual Industries," International Consumer Product Health and Safety Organization Annual Meeting, Orlando, Florida, February 2015
- "Brand New Web: Privacy and Security Implications of Connected Consumer Devices and the 'Internet of Things,'" FCBA Privacy and Data Security Committee, February 2015