

# WILSON SONSINI

## Maneesha Mithal

PARTNER

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

mmithal@wsgr.com  
202-973-8834

### FOCUS AREAS

Advertising, Promotions,  
and Marketing

Artificial Intelligence and  
Machine Learning

Data, Privacy, and  
Cybersecurity

Federal Trade Commission  
Government Investigations  
Internet Strategy and  
Litigation

State Attorneys General

Strategic Risk and Crisis  
Management

### HIGHLIGHTS

#### ■ FTC Veteran

Maneesha led the Federal Trade Commission's Division of Privacy and Identity Protection for over a decade.

#### ■ Investigations Experience

Maneesha spearheaded over 150 investigations while at the FTC, and currently represents clients in high-profile investigations by the Commission.

#### ■ AI, Consumer Protection, and Privacy Expertise

Maneesha is one of the founding members of the firm's AI group and has extensive experience counseling clients on data regulatory issues of first impression.

#### ■ Maneesha is a frequent contributor to **The WSGR Data Advisor**



Wilson Sonsini's Data Advisor is your source for privacy news and insights—brought to you by our global privacy and cybersecurity team. Visit [wsgrdataadvisor.com](https://www.wsgrdataadvisor.com) and subscribe to stay connected.

### EXPERIENCE

Maneesha Mithal is a partner in the Washington, D.C., office of Wilson Sonsini and co-chair of the firm's data, privacy, and cybersecurity practice. Maneesha advises clients on privacy, cybersecurity, and consumer protection matters and represents companies in regulatory investigations. She is also one of the founding members of Wilson Sonsini's AI group.

Maneesha is an internationally recognized expert on privacy and data security, having led the Federal Trade Commission's (FTC's) Division of Privacy and Identity Protection prior to joining the firm. In this capacity, Maneesha oversaw a team of 40 lawyers responsible for the enforcement of privacy and security laws and the development of policy positions in areas such as artificial intelligence, facial recognition, biometrics, and connected cars, as well as health privacy, children's privacy,

ransomware, and the intersection of privacy and competition. She was also responsible for enforcing the Fair Credit Reporting and Gramm-Leach-Bliley Act Safeguards Rule. She led the negotiation of numerous privacy and data security settlements and managed the first litigated FTC decisions on cybersecurity issues. Maneesha also worked with congressional staff on federal privacy legislation, with state attorney general offices on joint investigations, and with other federal and international agencies on a variety of initiatives. She also held other roles in the Bureau of Consumer Protection.

Named to the 2024 “Incident Response 50” list by *Cybersecurity Docket* and recognized in the 2024 edition of *Chambers USA* for her privacy work, sources remark Maneesha “cuts to the heart of complex questions quickly” and “offers highly practical and thoughtful advice.”

Earlier in her career, as a manager with the FTC’s International Consumer Protection Division, Maneesha worked on European privacy issues and served as a U.S. delegate to the privacy committees of the OECD and APEC.

Maneesha previously served as Chief of Staff and Senior Counsel in the Bureau of Consumer Protection (BCP), where she reviewed advertising cases and financial consumer protection matters, and held various positions in BCP’s International Division, including as Acting Associate Director. She began her legal career as a litigator at Covington & Burling.

Maneesha is a frequent speaker at industry events, including IAPP- and ABA-led panels.

## CREDENTIALS

---

### Education

- J.D., Georgetown University Law Center, 1995  
*Cum Laude*
- B.A., Georgetown University, 1992  
*Magna Cum Laude*

### Honors

- Recognized in the 2025 and 2026 editions of the *Lawdragon 100 Leading AI & Legal Tech Advisors* guide
- Recognized for privacy and data security in the 2024-2026 editions of *Chambers Global*
- Recognized in the 2024-2026 editions of *Chambers USA: America’s Leading Lawyers for Business*
- Selected for inclusion in the 2024-2026 editions of the *Lawdragon 500 Leading Global Cyber Lawyers* guide
- Recipient, [Future of Privacy Forum Distinguished Public Service Award](#), 2023
- Recognized in “[Top Women in Data 2022](#)” by *GDR*
- Named to the 2024 and 2025 “Incident Response 50” and 2026 “Incident Response Elite” by *Cybersecurity Docket*

### Admissions

- Bar of the District of Columbia

## MATTERS

---

### Select Representations

- Successfully represented AI company in the employment space in an FTC investigation. Case closed with no enforcement action.
- Represented DoNotPay in FTC AI investigation.
- Successfully represented major generative AI company in non-public FTC investigations. Case closed with no enforcement action.
- Successfully represented companies in AI actions in non-public FTC investigations. Case closed with no enforcement action.
- Represented organization in FTC sweep of its Rule on the Use of Consumer Reviews and Testimonials.
- Represented Paddle, a fintech company, in non-public FTC investigation.
- Representing TikTok in FTC study of platform oversight of advertising.
- Representing global platform in non-public FTC investigation on minor safety.
- Representing ecommerce company in FTC investigation into fee disclosure issues.
- Drafted comments for FTC rulemaking proceedings on behalf of Google, ElevenLabs, and trade association Chamber of Progress.
- Drafted comments for CFPB rulemaking proceedings on behalf of fintech company Argyle.

### Select Publications

- Co-author, “California Enacts Major AI Safety Legislation for Frontier AI Developers,” Wilson Sonsini Alert, October 2, 2025
- Co-author, “White House Releases America’s AI Action Plan,” Wilson Sonsini Alert, July 25, 2025
- Co-author, “New York Requires Disclosures for Personalized Pricing,” Wilson Sonsini Alert, July 14, 2025
- Co-author, “Nevada Passes Law Limiting AI Use for Mental and Behavioral Healthcare,” Wilson Sonsini Alert, June 25, 2025
- Co-author, “New York Passes Novel Law Requiring Safeguards for AI Companions,” Wilson Sonsini Alert, June 25, 2025
- Co-author, “HHS Announces New Director of Office for Civil Rights: What to Watch from the New Health Privacy Leader,” Wilson Sonsini Alert, June 11, 2025
- Co-author, “Regulators Target AI As Evolving Technology Threatens Fair Competition in Digital Economy,” GCR - Data & Antitrust Guide; Second Edition, May 30, 2025
- Co-author, “EU AI Office Clarifies Key Obligations for AI Models Becoming Applicable in August,” Wilson Sonsini Alert, April 29, 2025
- Co-author, “FTC Files Consumer Protection Complaint Against Uber for Deceptive Billing and Cancellation Practices,” Wilson Sonsini Alert, April 28, 2025
- Co-author, “The UK’s Online Child Safety Duties Are Coming into Force: Steps to Take Now,” Wilson Sonsini Alert, April 25, 2025
- Co-author, “FTC Appoints New Bureau Directors: What to Expect from Directors Christopher Mufarrige and Daniel Guarnera,” Wilson Sonsini Alert, February 13, 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, “CFPB Releases Final Open Banking Rules: Key Takeaways for Fintech Companies,” Wilson Sonsini Alert, November 4, 2024
- Co-author, “Subscription and Auto-Renew Offerings Face New Hurdles: FTC Issues Broad ‘Click-to-Cancel’ Rule Imposing Nationwide Requirements,” Wilson Sonsini Alert, October 17, 2024
- Co-author, “Governor Newsom Signs (and Vetoes) Major California AI Legislation,” Wilson Sonsini Alert, October 10, 2024
- Co-author, “Colorado Department of Law Proposes Amendments to the Colorado Privacy Act Regulations Regarding Biometric and Minors’ Data,” Wilson Sonsini Alert, October 3, 2024
- Co-author, “FTC Issues Final Rule Banning Fake and Misleading Consumer Reviews and Testimonials,” Wilson Sonsini Alert, August 22, 2024
- Co-author, “Seven New States Join Patchwork of U.S. Comprehensive Privacy Laws: Top 10 Trends from the First Half of 2024,” Wilson Sonsini Alert, July 12, 2024
- Co-author, “Chevron Is Overruled’: How Loper Bright Will Change the Regulatory Law Landscape,” Wilson Sonsini Alert, July 8, 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, “FTC Final Rule Officially Broadens Health Breach Notification Rule, Targets Health and Wellness Apps,” Wilson Sonsini Alert, May 14, 2024
- Co-author, “New Federal Data Broker Restrictions Signed into Law,” Wilson Sonsini Alert, April 25, 2024
- Co-author, “Congress Proposes New Comprehensive Privacy Legislation: The American Privacy Rights Act,” Wilson Sonsini Alert, April 16, 2024
- Co-author, “The EU AI Act Passes Another Hurdle Towards Becoming Law,” Wilson Sonsini Alert, March 13, 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, “California Appeals Court Moves Up Enforcement Date for Latest CCPA Regulations,” Wilson Sonsini Alert, February 13, 2024
- Co-author, “Fintech Marketing: Navigating the Complex Waters of Federal Regulation,” Wilson Sonsini Alert, January 30, 2024
- Co-author, “Cybersecurity: What to Watch for in 2024,” Wilson Sonsini Alert, January 3, 2024
- Co-author, “U.S. Privacy Predictions: What to Watch for in 2024,” Wilson Sonsini Alert, January 3, 2024

- Co-author, "FTC Proposes Significant Changes to COPPA Rule," Wilson Sonsini Alert, December 21, 2023
- Co-author, "FTC Amends Safeguard Rule with Requirement for Non-Banking Financial Institutions to Report Data Security Breaches," Wilson Sonsini Alert, November 6, 2023
- Co-author, "AI in the Biden Administration's Crosshairs—Summarizing the Sweeping New Executive Order and Ten Top Takeaways," Wilson Sonsini Alert, November 2, 2023
- Co-author, "Coalition of States Sues Meta for Alleged Harms to Children and Teens, and Alleged COPPA Violations," Wilson Sonsini Alert, October 27, 2023
- Co-author, "CFPB Announces Proposed Rules to Accelerate Open Banking," Wilson Sonsini Alert, October 24, 2023
- Co-author, "FTC Seeks Comments on Proposed Rule Requiring Disclosure of Fees in Consumer Goods and Services," Wilson Sonsini Alert, October 16, 2023
- Co-author, "UK-U.S. Data Bridge Commencement Date Announced," Wilson Sonsini Alert, September 22, 2023
- Co-author, "CPPA Posts Draft Rules on Cybersecurity Audits and Risk Assessments - Significant New CCPA Compliance Requirements Likely on the Way," Wilson Sonsini Alert, September 1, 2023
- Co-author, "SEC Adopts Cybersecurity Disclosure Rules for Public Companies," Wilson Sonsini Alert, August 1, 2023
- Co-author, "EU and U.S. Finalize Data Privacy Framework: Here's How to Get Certified," Wilson Sonsini Alert, July 10, 2023
- Co-author, "FTC Announces Proposed Settlement with IHealth.io Genetic Testing Firm for Privacy and Security Violations," Wilson Sonsini Alert, July 5, 2023
- Co-author, "FTC Alleges Amazon Prime Subscription and Cancellation Screens Violate Federal Law," Wilson Sonsini Alert, June 27, 2023
- Co-author, "UK and U.S. Commit to Establish a 'Data Bridge' to Facilitate the Free Flow of Personal Data," Wilson Sonsini Alert, June 22, 2023
- Co-author, "Considerations for M&A Transactions Involving Fintech Companies," Wilson Sonsini Alert, June 15, 2023
- Co-author, "Generative AI: Privacy and Consumer Protection Considerations," Wilson Sonsini Alert, May 26, 2023
- Co-author, "FTC Announces Proposed Settlement with Premom Fertility Tracking App for Privacy Practices," Wilson Sonsini Alert, May 24, 2023
- Co-author, "California's Privacy Regulatory Odyssey Continues: Formal CCPA Rulemaking on the Horizon Amidst Expanded Data Broker Requirements," *The WSGR Data Advisor*, November 18, 2024
- Co-author, "Do's and Don'ts for Developing, Extending, and Using Generative AI Models," *The Computer & Internet Lawyer*, May 2, 2023
- Co-author, "New Legal Requirements for Online Marketplaces: The INFORM Consumers Act," Wilson Sonsini Alert, February 6, 2023
- Co-author with D. Chase, "FYI on NFTs: Consumer Protection and Privacy Considerations," *The WSGR Data Advisor*, March 8, 2022
- Author, "Legal Requirements for Mitigating Bias in AI Systems," *The WSGR Data Advisor*, February 14, 2022
- "Privacy and Security Enforcement: State AGs Flex Their Muscles," Wilson Sonsini Alert, February 2, 2022
- Co-author with L. Ahmed and L. Weingarten, "Fintech and Financial Privacy: Regulatory Developments on the Use of Financial Data," Wilson Sonsini Alert, January 25, 2022
- "FTC Consumer Protection Remedies After the U.S. Supreme Court's AMG Decision," Wilson Sonsini Alert, January 19, 2022
- "2021 Privacy and Cybersecurity Year in Review," Wilson Sonsini Advisory, January 12, 2022

Maneesha is also a frequent contributor on the [Data Advisor](#).

## Select Speaking Engagements

- Roundtable Co-lead, "Navigating AI Driven Privacy and Security Risk," The L Suite 2026 Deputy GC Summit, May 4-5, 2026
- "AI, Regulatory, and Compliance Update and Discussion," Competition Law Seminar, Salt Lake City, April 2025
- Panelist, "Election 2024: Emerging Regulatory Trends in the Digital Health Sector," DHNY Summit, September 18, 2024
- Panelist, "What's the Harm in Digital Advertising? Developments in Perception of Consumer Privacy Harms and How Policymakers are Responding," NAI Summit, May 16, 2024
- Panelist, "Preparing and Educating the Board on Regulatory Developments," TechGC Virtual Forum, April 11, 2024
- Session Chair, "Privacy Models in a Surveillance Era," ABA Spring Meeting 2024, April 10, 2024

- Co-host, "The FTC, Privacy and AI," Teach Privacy, March 22, 2024
- Panelist, "Guarding Privacy: Using Personal Data in AI Models," Practising Law Institute (PLI), January 26, 2024
- Speaker, "Regs Risk & Opportunity: New Cyber Rules, AI's Impact, Evolving Your Career," Women Leaders in Cybersecurity, January 26, 2024
- Speaker, "Probing the FTC's Paradigm Shift," Privacy and Security Forum, November 8, 2023
- Speaker, National Association of Attorneys General 2023 Eastern Region Meeting, August 1, 2023
- Panelist, "ABA Privacy Game Changers: A New Wave of State Laws," ABA Webinar, July 26, 2023
- Speaker, "AI—The Challenge of the Intelligent Computer," National Association of Attorneys General, 2023 Eastern Regional Meeting, Uncasville, Connecticut, July 13, 2023
- Speaker, WSJ Pro Cybersecurity Forum, May 31, 2023
- Speaker, "Web3 Privacy and Security," TechGC, June 23, 2022