Dan Waltz

Associate

Chicago

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Dan helps clients navigate all aspects of highly regulated relationships between industry participants and federal, state and local governments. Whether engaging with regulators, negotiating transactions or representing clients in the courtroom, he delivers solutions that help his clients achieve their strategic goals.

OVERVIEW

Dan helps companies deploying cutting-edge technology navigate the increasingly complex landscape of government scrutiny and regulatory risk. He counsels clients across industries when their use of emerging technology draws the attention of state attorneys general and other regulators, particularly in matters where agencies allege that technology has been deployed in ways that harm consumers. Working closely with general counsel, compliance teams, and business leaders, Dan develops integrated legal and operational strategies to resolve investigations efficiently while positioning clients for sustainable, responsible innovation.

Dan maintains a focused practice in privacy, cybersecurity, and artificial intelligence, with an emphasis on regulatory enforcement and compliance. He keeps clients up to date on federal and state requirements governing data protection and AI deployment, helping organizations build proactive compliance frameworks that anticipate regulatory trends rather than simply reacting to them. His work spans the full arc of a regulatory matter — from pre-enforcement counseling and internal risk assessments to active investigation defense, litigation, and resolution — giving clients a trusted partner at every stage.

Before joining the firm, Dan served as assistant attorney general in the Illinois Attorney General's Office, where he represented government agencies in investigations, litigation, and government procurement. Dan's pro bono practice is focused on legal clinics in the Chicago area, where he represents the most vulnerable communities in a variety of legal matters. Additionally, Dan is an author and contributor to the firm's Regulatory Oversight blog and State Attorneys General Monitor.

REPRESENTATIVE MATTERS

Multistate State Attorneys General Investigations

- Representing an online platform in connection with state attorneys general strategy and investigations into the company's compliance with state privacy and consumer protection laws
- Representing a publicly traded health insurer in a multistate investigation arising from a vendor cyber incident, involving state privacy and breach-notification laws and HIPAA privacy and security rules.

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- Representing a health care provider in politically sensitive multistate attorney general investigations following a data breach under theories involving state privacy laws, breach-notification laws, and HIPAA.
- Defended a large publicly traded company and data processor in multiple state and federal regulatory enforcement actions following one of the largest cybersecurity attacks in the United States.
- Represented a tax preparation software company in coordinated enforcement actions by three states and the FTC, alleging violations of state data-breach notification laws.

Single-State Investigations

- Representing a health insurer in an investigation by the New York Attorney General into the company's use of artificial intelligence in the claims review process.
- Representing a coalition of lending institutions in litigation initiated by the New Mexico Attorney General.
- Representing a loan servicer in an enforcement action brought by the New Mexico Attorney General.
- Representing a publicly traded durable medical equipment manufacturer with more than $3 billion in annual revenue in multiple regulatory inquiries arising under state privacy laws and HIPAA.

Litigation

- Representing RealPage in antitrust litigation in the state courts of Illinois and Missouri.
- Represented a solar lender in litigation with the States of Kentucky and Tennessee involving alleged violations of the FTC Holder Rule, the Truth in Lending Act, and state analogs.
- Represented a data aggregator in State Attorney General False Claims Act litigation in Florida.
- Successfully defended a payment terminal manufacturer in product liability litigation involving PCI-DSS standards.
- Numerous local representations involving banking and lending clients with experience litigating in the U.S. Court of Appeals for the Seventh Circuit and the Illinois Supreme Court.

Compliance and Internal Investigations

- Assisted a client with a nationwide evaluation of disclosure requirements and developed an outreach and engagement strategy to avert potential adverse regulatory action.
- Assisted a sports memorabilia and trading card manufacturer in developing an artificial intelligence compliance program and related consumer disclosures.
- Represented a manufacturer in an internal investigation into promotional practices and claims regarding product quality and substantiation.

AWARDS

- *Best Lawyers in America® Ones to Watch*: Commercial Litigation (2023-2027), Insurance Law (2023-2027)

TOP AREAS OF FOCUS

- Better Business Bureau (BBB)
- Privacy + Cyber
- Regulatory Investigations, Strategy + Enforcement
- State Attorneys General
- Technology + Venture Lending

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ALL AREAS OF FOCUS

- Better Business Bureau (BBB)
- Emerging Companies + Venture Capital
- False Claims Act + Other Whistleblower Actions
- Government Contracts + National Security
- Privacy + Cyber
- Regulatory Investigations, Strategy + Enforcement
- State Attorneys General
- Technology + Venture Lending

PROFESSIONAL EXPERIENCE

- Assistant attorney general, Illinois Attorney General's Office, 2015-2017

EDUCATION AND CERTIFICATIONS

EDUCATION

- Loyola University Chicago School of Law, J.D.
- Indiana University Kelley School of Business, B.S.

BAR ADMISSIONS

- Illinois
- Wisconsin

COURT ADMISSIONS

- U.S. District Court, Northern District of Illinois
- U.S. District Court, Eastern District of Wisconsin
- U.S. District Court, Western District of Wisconsin

CLERKSHIPS

- Hon. Paul P. Biebel, Jr., Circuit Court of Cook County

SPEAKING ENGAGEMENTS

- Speaker, "State Privacy Law Evolution: New Legislative and Regulatory Enforcement Approaches," Troutman Pepper Locke and myLawCLE, July 23, 2025.
- Co-presenter, "Branching Out: Introduction to State and Local False Claims Act Practice," American Bar Association Webinar, June 12, 2024.
- Presenter, "Privacy: The Current Status of the CCPA and Compliance Challenges," Troutman Pepper Webinar, August 11, 2020.

PUBLICATIONS

- Co-author, "Compliance in the Wild West — How State AGs Are Using Traditional Legal Frameworks to Address AI Business Practices," *Reuters* and *Westlaw*, July 27, 2026.
- Podcast, "Regulatory Intelligence Platform: Using AI and Curated Data to Defend Clients and Support Proactive Compliance," *Regulatory Oversight* Podcast, July 16, 2026.
- Podcast, "AI State Regulatory Frontiers: Emerging Issues on AI, Privilege, and Work Product in Legal Practice," *Regulatory Oversight* Podcast, June 3, 2026.

- Co-author, "CCPA Cybersecurity Audit: Part 4 – Whose Name Is on the Line: Risks, Enforcement, and Responsibility," *Privacy + Cyber + AI*, April 22, 2026.
- Co-author, "Is Individualized Pricing the Next Big Privacy Enforcement Issue? California AG Announces Investigative Sweep Around 'Surveillance Pricing' Practices," *Privacy + Cyber + AI*, February 10, 2026.
- Co-author, "Colorado AG Fines Cannabis Company for Violating Prior Settlement," *Regulatory Oversight*, January 21, 2026.
- Co-author, "2025 State AG Year in Review," *Troutman Pepper Locke*, January 20, 2026.
- Co-author, "AG Watch: Illinois A Key Player In State-Level Enforcement," *Law360*, October 29, 2025.
- Podcast, "Understanding BBB Ratings: Strategic Approaches to Consumer Complaints," *Regulatory Oversight* Podcast, August 19, 2025.
- Podcast, "Understanding BBB Ratings: Building Trust and Mitigating Risks," *Regulatory Oversight* Podcast, July 29, 2025.
- Co-author, "2025 Mid-Year Review: State AGs in a New Era," *Troutman Pepper Locke*, July 25, 2025.
- Podcast, "Facial Recognition and Legal Boundaries: The Clearview AI Case Study," *Regulatory Oversight* Podcast, June 10, 2025.
- Co-author, "Emerging Trends: Federal Enforcement of Contract Cybersecurity Requirements," *Thomson Reuters Westlaw Today*, February 11, 2025.
- Co-author, "2024 State AG Year in Review," *Troutman Pepper Locke*, January 30, 2025.
- Co-author, "Consumer Protection: Understanding Enforcement Actions Brought by State Attorneys General," American Bar Association, 2024.
- Podcast, "12 Days of Regulatory Insights: Day 4 – A Focus on the FCA," *Regulatory Oversight Podcast*, December 10, 2024.
- Co-author, "2024 State AG Election Re-Cap: Where Things Stand the Day after Election Day," *Troutman Pepper*, November 6, 2024.
- Co-author, "Federal Cybersecurity Requirements Ought Not Be Ignored by Contractors," *Troutman Pepper*, October 8, 2024.
- Co-author, "2023 Privacy Year in Review," *Troutman Pepper*, February 1, 2024.
- Co-author, "2023 State AG Year in Review," *Troutman Pepper*, January 29, 2024.
- Co-author, "John Deere And Farmers Get Creative On 'Right To Repair'," *Law360*, March 2, 2023.
- Co-author, "2022 Regulatory Privacy Year in Review," *Troutman Pepper*, February 2, 2023.
- Co-author, "Preparing for an Era of Regulated Artificial Intelligence," *Law360*, January 25, 2023.
- Co-author, "Tractor Hacking Newest Trick for Right to Repair," *Thomson Reuters Westlaw Today*, September 9, 2022.
- Contributor, "Regulatory Investigation Red Flags That Signal Significant Risk for Companies," *Reuters*, August 19, 2022.
- Co-author, "Self-Regulation and Policymaking Guidance Regarding the Use of AI and ML," *RTInsights*, May 10, 2022.

- Co-author, “Federal Contractors on Notice After DOJ Announces First Civil Cyber Fraud Initiative Settlement ,” *Troutman Pepper*, April 21, 2022.
- Co-author, “Utah Becomes Fourth State to Adopt Privacy Legislation,” *Troutman Pepper*, March 24, 2022.
- Co-author, “States Attorneys General to Expand National Roles in 2022,” *Bloomberg BNA*, December 29, 2021.
- Co-author, “2021 NAAG Presidential Summit,” *Troutman Pepper*, October 11, 2021.
- Co-author, “Regulators Likely to Focus on Hybrid Transactions and IoT Devices,” *Intellectual Property & Technology Law Journal*, July–August 2021.
- Co-author, “Employers’ Top 7 Coronavirus Data Collection Questions,” *Law360*, June 15, 2020.
- Co-author, “Privacy Guidelines for COVID-19 Contact-Tracing App Makers,” *Law360*, April 17, 2020.
- Co-author, “Ill. Privacy Bill Is Not as Robust as Calif. Law,” *Law360*, December 17, 2019.
- Co-author, “Recent Breach Shows Importance of Securing Biometric Data,” *Law360*, August 21, 2019.
- Contributor, “D&O and Professional Liability Update 2018: A Year in Review,” *Troutman Sanders*, January 31, 2019.
- Co-author, “Data Privacy: The Current Legal Landscape 2018 Reviewed,” *Troutman Sanders News & Knowledge*, January 15, 2019.
- Contributor, “D&O and Professional Liability Update 2017: A Year in Review,” *Troutman Sanders*, February 8, 2018.

MEDIA COMMENTARY

- Quoted, “Clearview AI faces more legal uncertainty in UK and US,” *BiometricUpdate.com*, June 11, 2025.
- Mentioned, “Tax Prep Co. Gets Final OK for $3M Data Breach Settlement,” *Law360*, October 7, 2019.