

## REPRESENTATIONS

- Leading an investigation for a US publicly-traded China-headquartered issuer commissioned by the issuer's audit committee at the request of its external auditor to consider whether issuer funds had been provided to issuer directors and officers in violation of the Sarbanes-Oxley Act and the US FCPA.
- Acting as lead counsel in an internal investigation for a publicly-traded consumer-facing ecommerce company into potential irregularities by its sales team in three Chinese cities in the sales of gift cards to state-owned customers through improper delivery of benefits to customer employees.
- Leading an internal investigation into potentially improper conduct by a client's sales agent and senior executives in securing sales of the client company's products to state-owned and private customers in China and Korea and advising the company on contract restructuring and reformation for pending transactions in which the agent was supposed to be involved, but no wrongdoing was found.
- Representing various companies in responding to enforcement actions or threats of the same initiated by branches of China's State Administration of Industry and Commerce.
  
- Leading the China- and Hong Kong-based aspects of an investigation for a UK-headquartered US-publicly listed technology company into potential kickbacks allegedly taken and given by a China-based sales team member in connection with distribution to state-owned customers..
- Advising a leading US technology company on the conduct of anticorruption-focused diligence in connection with structuring an investment fund in partnership with a local fund management company to engage in urban infrastructure investment projects in China and development of compliance requirements to promote compliant conduct by the local partner of the project.
- Representing a publicly traded outdoor apparel company in the acquisition of a China-based distribution partner's assets and formation of a joint venture distribution business with a robust compliance program embedded in the resulting joint venture company.
- Developing and providing compliance training to the executives of a PRC food products company acquired by a US publicly traded confectionary company.
- Advising a US fast-food chain on the retention of qualified corporate filing agents to effect procedures associated with the acquisition of multi-store target in Shanghai in compliance with PRC and US anticorruption laws.
- Representing a US-headquartered relocation company on the conduct of an investigation into possible monopolistic distributor conduct in Thailand arising out of a whistleblower complaint.

## PRESENTATIONS

In terms of speaking engagements on **anti-corruption and FCPA** issues, examples include:

- Strategic RISK invited Ms. Sommers to participate in a panel "A practical picture of regulatory change in our region" at the Strategic RISK Forum in Singapore in July 2014.

- For the **FCPA & Anti-Corruption for the Life Sciences Industry Conference** held in New York in April 2014, Ms. Sommers co-presented on the topic of “*Using Chinese Travel Agencies in the Wake of GSK: Tailoring Your Outsourcing, Selection and Monitoring Practices in response to Heightened Enforcement Risks*”.
- At the “2nd Global Anti-Bribery In-House Network” held by TRACE International in Dubai in October 2013, Ms. Sommers Presented on “What Recent Landmarks Anti-Bribery Cases Reveal about Compliance Challenges in China”
- At the “**2012 Year-End SEC Conference: An Accounting and Reporting Update for US Listed Companies**” held in Beijing in December 2012, Ms. Sommers was a co-presenter on the topic of “*Conducting 10A Investigations*”.
- TRACE International invited Ms. Sommers to be a panelist on “**Successful Cross-Border Investigations**” for its **Global In-house Antibribery Network Conference** in Washington, D.C. in April 2012.
- At the World-Check & Ethisphere Symposium: “**Anti-Corruption in China,**” Ms. Sommers was a speaker in December 2011.
- Presenter at the **China Workshop** given as part of the “**26th Annual FCPA Conference**” in Washington, D.C. in November 2011.

## PUBLICATIONS

- Co-Author, “美国“反海外腐败法”为何与你有关” (What’s the U.S. Foreign Corrupt Practices Act Got to Do with You?), *Caijing*, June 25, 2014
- “Can You Sleep Well at Night?: Multinational Executives Detained in China Due to Bribery Concerns,” *K&L Gates Government Enforcement Alert*, July 22, 2013.
- Referenced in article, “Seven Lessons from China’s Bribery Investigation of GlaxoSmithKline,” *The FCPA Report*, August 7, 2013.
- Co-author, “FCPA and other Anti-Corruption Concerns Facing Sovereign Wealth Funds” *The Sovereign Wealth Fund Bulletin*, April 2012.
- *Getting the Deal Through Anti-Corruption Regulation 2014, 2013, and 2012* (Law Business Research Ltd, 2012), co-author China chapter.
- Co-author, “Anti-bribery Enforcement with Chinese Characteristics: Not All Official,” 25 No. 22 *Westlaw Journal Government Contract* 1, March 5, 2012.
- Co-author, “Anti-Corruption Compliance,” *Well Servicing Magazine*, May/June 2011.
- “企业如何面对美国海外反腐” (“How Companies Can Deal with America’s Anti-Corruption Efforts”), ” *China Reform (中国改革)*, August 2010
- "Managing Potential Corruption in China," *Counsel-to-Counsel*, January 2006

## ADMISSIONS

Washington State

## EDUCATION

J.D., University of Washington, 1991

Inter-University Program for Chinese Language Studies, 1989 - 90

B.A., University of Washington, 1986 (with distinction)

#### ACHIEVEMENTS

- In 2015, the last year Ms. Sommers was based full-time in the PRC, *Chambers Global 2015* ranked Ms. Sommers Band 1 (China, Dispute Resolution: Anti-Corruption (International Firms)). According to Chambers, her "opinions are professional and action plans feasible and practicable". In addition, Ms. Sommers was ranked Band 1 (China, Dispute Resolution Anti Corruption (International Firms)) in *Chambers Asia Pacific (China) 2015*. According to Chambers, Ms. Sommers "is terrific and clients really like her. She's knowledgeable and really understands PRC corruption issues". According to *Chambers Global 2014*. Ms. Sommers offers her clients "*to-the-point legal advice and a no-nonsense approach*". In addition, Ms. Sommers is ranked Band 1 (China, Dispute Resolution Anti Corruption (International Firms)) in *Chambers Asia Pacific (China) 2014*.
- From 2012-16, Ms. Sommers served on the board of directors of **TRACE International, Inc.** She currently serves on the board of directors of the **TRACE Foundation**.
- In 2016, she received the *Mayre Rasmussen Award for the Advancement of Women in International Law* from the ABA Section of International Law in recognition for her contributions.
- Ms. Sommers is a **fellow of American Bar Foundation** ("ABF"). Fellowship in the ABF is by invitation only. ABF is "an honorary organization of lawyers, judges, and legal scholars whose public and private careers have demonstrated outstanding dedication to the welfare of their communities and the highest principles of the legal profession."
- Ms. Sommers is a member of the National Committee of U.S.-China Relations.

#### LANGUAGES

- English - native
- Chinese (Mandarin) - fluent