

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 29, 2018

Mr. Robert L. Walker
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006

Dear Mr. Walker:

We have reviewed the draft agreement for the "Patriot Legal Expense Fund Trust, LLC". The Office of Government Ethics does not approve or disapprove of specific legal defense funds. However, if the fund is established and administered in accordance with the terms set out in the attached agreement, both the managers and the employee recipients will be in compliance with 18 U.S.C. § 209. Similarly, adherence to the terms of the agreement should ensure that the employee recipients do not violate any provision of 5 U.S.C. §§ 7351 and 7353, or of the Standards of Ethical Conduct for Employees of the Executive Branch at 5 C.F.R. part 2635, as a result of the planned activities of the managers on their behalf.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. Apok".

David J. Apok
Acting Director and General Counsel

