



Stewart Information Services Corporation
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August 8, 2023

Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, DC 20006-2803

RE: Proposing Release: Amendments to PCAOB Auditing Standards related to a Company's Noncompliance with Laws and Regulations and Other Related Amendments; PCAOB Rulemaking Docket Matter No. 051 ("Release")

Ladies and Gentlemen:

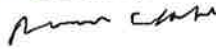
I am writing to comment on the Release referenced above. I am Chairman of the Audit Committee of Stewart Information Services Corporation ("Stewart").

On behalf of Stewart and the Audit Committee, I am strongly opposed to the Release for the following reasons:

1. The Release ignores the responsibility corporations have to comply with the numerous laws and regulations to which they are subject and the extent to which their managements, boards of directors, audit committees and counsel have developed controls to ensure such compliance.
2. Auditing firms do not have the legal expertise needed nor should they be expected to develop such expertise or to replace managements' responsibilities.
3. Imposing regulatory compliance responsibilities on auditing firms increases the possibility of reducing the quality of the audit as these firms take their focus away from verifying financial statements, which is their primary function.
4. Expanding the scope of auditors' responsibilities would materially increase the scope of an audit and would substantially increase the cost of the audit, all for the purpose of duplicating what the companies they audit are already expected to do.

The Release is a totally unnecessary expansion of auditor responsibilities, and I urge you to withdraw it in its entirety.

Yours very truly,

DocuSigned by:

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Robert L. Clarke