

For Six Month Period Ending 8/31/2010
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration No.
DLA Piper LLP (US) 3712

(c) Business Address(es) of Registrant
500 8th Street NW
Washington, DC 20004

2. Has there been a change in the information previously furnished in connection with the following:

- (a) If an individual:
- | | | |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- (b) If an organization:
- | | | |
|--------------------------|---|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
- (c) Explain fully all changes, if any, indicated in items (a) and (b) above.
See attachment.

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IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4 AND 5(a).

3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

| Name | Position | Date connection ended |
|------|----------|-----------------------|
|------|----------|-----------------------|

See attachment.

(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? Yes No

If yes, furnish the following information:

| Name | Residence address | Citizenship | Position | Date assumed |
|------|-------------------|-------------|----------|--------------|
|------|-------------------|-------------|----------|--------------|

See attachment.

5. (a) Has any person named in item 4(b) rendered services directly in furtherance of the interests of any foreign principal? Yes No

If yes, identify each such person and describe his service.

(b) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

| Name | Position or connection | Date terminated |
|------|------------------------|-----------------|
|------|------------------------|-----------------|

See attachment.

(c) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes No

If yes, furnish the following information:

| Name | Residence address | Citizenship | Position | Date assumed |
|------|-------------------|-------------|----------|--------------|
|------|-------------------|-------------|----------|--------------|

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(c) of the supplemental statement? Yes No

If no, list names of persons who have not filed the required statement.

N/A

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name of foreign principal

Date of termination

8. Have you acquired any new foreign principal² during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name and address of foreign principal

Date acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principals² whom you continued to represent during the 6 month reporting period.

German State of Rheinland-Pfalz
Government of Afghanistan, Embassy
Government of Alberta
Embassy of the United Arab Emirates

10. EXHIBITS A AND B

(a) Have you filed for each of the newly acquired foreign principals in Item 8 the following:

Exhibit A³ Yes No
Exhibit B⁴ Yes No

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during the 6 month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9).) A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3 (Formerly CRM-157), sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4 (Formerly CRM-155), sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement? Yes No

If yes, identify each such foreign principal and describe in full detail your activities and services:

See attachment.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates and places of delivery, names of speakers and subject matter.

See attachment.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes No

If yes, describe fully.

⁵ The term "political activities" means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) **RECEIPTS - MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies⁶.

| Date | From whom | Purpose | Amount |
|------|-----------|---------|--------|
|------|-----------|---------|--------|

See attachment.

Total

(b) **RECEIPTS - FUND RAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fund raising campaign⁷, any money on behalf of any foreign principal named in items 7, 8, or 9 of this statement? Yes No

If yes, have you filed an Exhibit D⁸ to your registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date _____

(c) **RECEIPTS - THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes No

If yes, furnish the following information:

| Name of foreign principal | Date received | Description of thing of value | Purpose |
|------------------------------|------------------|----------------------------------|---------|
|------------------------------|------------------|----------------------------------|---------|

^{6, 7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. (See Rule 201(e).)

⁸ An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fund raising campaign and transmitted for a foreign principal.

⁹ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS – MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

| Date | To whom | Purpose | Amount |
|-----------------|---------|---------|--------|
| See attachment. | | | |

Total

(b) DISBURSEMENTS – THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes No

If yes, furnish the following information:

| Date disposed | Name of person to whom given | On behalf of what foreign principal | Description of thing of value | Purpose |
|---------------|------------------------------|-------------------------------------|-------------------------------|---------|
|---------------|------------------------------|-------------------------------------|-------------------------------|---------|

(c) DISBURSEMENTS – POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

| Date | Amount or thing of value | Name of political organization | Name of candidate |
|------|--------------------------|--------------------------------|-------------------|
|------|--------------------------|--------------------------------|-------------------|

See attachment.

^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks" and the like.

V - INFORMATIONAL MATERIALS

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials¹²?
Yes No

IF YES, RESPOND TO THE REMAINING ITEMS IN SECTION V.

17. Identify each such foreign principal.

Embassy of the United Arab Emirates

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

- Radio or TV broadcasts
- Magazine or newspaper articles
- Motion picture films
- Letters or telegrams
- Advertising campaigns
- Press releases
- Pamphlets or other publications
- Lectures or speeches
- Internet
- Other (specify) E-mail

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

- Public officials
- Newspapers
- Libraries
- Legislators
- Editors
- Educational institutions
- Government agencies
- Civic groups or associations
- Nationality groups
- Other (specify) _____

21. What language was used in the informational materials:

- English
- Other (specify) _____

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act? Yes No

See attachment.

¹² The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

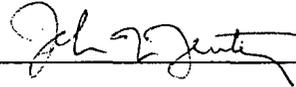
VI - EXECUTION

In accordance with 28 U.S.C. §1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Type or print name under each signature¹³)

October 14, 2010



John H. Zentay, Partner

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¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.



U.S. Department of Justice
National Security Division

Washington, DC 20530

THIS FORM IS TO BE AN OFFICIAL ATTACHMENT TO YOUR CURRENT SUPPLEMENTAL
STATEMENT - PLEASE EXECUTE IN TRIPPLICATE

SHORT-FORM REGISTRATION INFORMATION SHEET

SECTION A

The Department records list active short-form registration statements for the following persons of your organization filed on the date indicated by each name. If a person is not still functioning in the same capacity directly on behalf of the foreign principal, please show the date of termination.

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Short Form List for Registrant: DLA Piper US LLP

| Last Name | First Name and Other Names | Registration Date | Termination Date | Role |
|-------------|----------------------------|-------------------|------------------|----------------|
| Levinson | Lawrence E. | 11/16/1995 | | |
| Loud | Edward P. | 09/05/2000 | | |
| McPherson | Harry C. | 01/06/1998 | 3/1/10 | Senior Advisor |
| Meister | Brenda G. | 07/13/1998 | | |
| Merrigan | John A. | 06/02/1995 | | |
| Sanchez | Ignacio | 02/22/2001 | | |
| Salem | George Richard | 05/04/2006 | | |
| Bernstein | Matthew | 12/08/2006 | | |
| O'Scannlain | Kevin | 11/20/2006 | | |
| Phillips | Steven R. | 03/17/2009 | | |
| Shimberg | Steven | 04/14/2009 | | |
| Blanchard | James J. | 04/14/2009 | | |
| Minor | William | 04/14/2009 | | |
| Jones | Lisa L. | 03/29/2010 | 3/1/10 | Associate |
| Woolley | Jessica S. | 03/29/2010 | | |
| Weirs | David A. | 02/04/2002 | | |



U.S. Department of Justice

National Security Division

Washington, DC 20530

SECTION B

In addition to those persons listed in Section A, list below all current employees rendering services directly on behalf of the foreign principals(s) who have not filed short-form registration statements. (Do not list clerks, secretaries, typists or employees in a similar or related capacity). If there is some question as to whether an employee has an obligation to file a short-form, please address a letter to the Registration Unit describing the activities and connection with the foreign principal.

| Name | Function | Date Hired |
|------|----------|------------|
| N/A | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Signature: John P. [Signature]
Title: Partner

Date: October 14, 2010

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Question No. 2(c):

Explain fully all changes, if any, indicated in items (a) and (b) above.

During the period, there were changes to various firm offices. Below is a complete, updated list:

Atlanta

One Atlantic Center
1201 West Peachtree Street, Suite 2800
Atlanta, Georgia 30309-3450
T: (404) 736-7800
F: (404) 682-7800

Austin

401 Congress Avenue, Suite 2500
Austin, Texas 78701-3799
T: (512) 457-7000
F: (512) 457-7001

Baltimore (Downtown)

111 South Calvert Street, Suite 1950
Baltimore, Maryland 21202-6193
T: (410) 580-3000
F: (410) 580-3665

Baltimore (Mount Washington)

The Marbury Building
6225 Smith Avenue
Baltimore, Maryland 21209-3600
T: (410) 580-3000
F: (410) 580-3001

Boston

33 Arch Street, 26th Floor
Boston, Massachusetts 02110-1447
T: (617) 406-6000
F: (617) 406-6100

Chicago

203 North LaSalle Street, Suite 1900
Chicago, Illinois 60601-1293
T: (312) 368-4000
F: (312) 236-7516

Dallas

1717 Main Street, Suite 4600
Dallas, Texas 75201-4629
T: (214) 743-4500
F: (214) 743-4545

Houston

1000 Louisiana Street, Suite 2800
Houston, Texas 77002-5005
T: (713) 425-8400
F: (713) 425-8401

La Jolla

1200 Prospect Street, Suite 575
La Jolla, California 92037-3654
T: (858) 638-6806
F: (858) 456-3075

Las Vegas

3960 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169-5982
T: (702) 737-3433
F: (702) 737-1612

Los Angeles (Century City)

1999 Avenue of the Stars, Suite 400
Los Angeles, California 90067-6023
T: (310) 595-3000
F: (310) 595-3300

Los Angeles (Downtown)

550 South Hope Street, Suite 2300
Los Angeles, California 90071-2678
T: (213) 330-7700
F: (213) 330-7701

Minneapolis

90 South Seventh Street, Suite 5100
Minneapolis, Minnesota 55402-4168
T: (612) 524-3000
F: (612) 524-3001

New Jersey (Atlantic City)

17 Gordon's Alley, Suite 100
Atlantic City, New Jersey 08401
T: (609) 449 7000
F: (609) 449 7001

New Jersey (Florham Park)

300 Campus Drive
Suite 100
Florham Park, New Jersey 07932-1039
T: (973) 520 2550
F: (973) 520 2551

New York

1251 Avenue of the Americas
New York, New York 10020-1104
T: (212) 335-4500
F: (212) 335-4501

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Northern Virginia (Reston)
1775 Wiehle Avenue, Suite 400
Reston, Virginia 20190-5159
T: (703) 773-4000
F: (703) 773-5000

Philadelphia
One Liberty Place
1650 Market Street, Suite 4900
Philadelphia, Pennsylvania 19103-7300
T: (215) 656-3300
F: (215) 656-3301

Phoenix
2525 East Camelback Road, Suite 1000
Phoenix, Arizona 85016-4232
T: (480) 606-5100
F: (480) 606-5101

Raleigh
4141 Parklake Avenue, Suite 300
Raleigh, North Carolina 27612-2350
T: (919) 786-2000
F: (919) 786-2200

Sacramento
400 Capitol Mall, Suite 2400
Sacramento, California 95814-4428
T: (916) 930-3200
F: (916) 930-3201

San Diego (Downtown)
401 B Street, Suite 1700
San Diego, California 92101-4297
T: (619) 699-2700
F: (619) 699-2701

San Diego (Golden Triangle)
4365 Executive Drive, Suite 1100
San Diego, California 92121-2133
T: (858) 677-1400
F: (858) 677-1401

San Francisco
555 Mission Street, Suite 2400
San Francisco, California 94105-2933
T: (415) 836-2500
F: (415) 836-2501

Seattle
701 Fifth Avenue, Suite 7000
Seattle, Washington 98104-7044
T: (206) 839-4800
F: (206) 839-4801

Silicon Valley (East Palo Alto)
2000 University Avenue
East Palo Alto, California 94303-2214
T: (650) 833-2000
F: (650) 833-2001

Tampa
100 North Tampa, Suite 2200
Tampa, Florida 33602-5809
T: (813) 229-2111
F: (813) 229-1447

Washington, D.C.
500 8th Street, NW
Washington, DC 20004
T: (202) 799-4000
F: (202) 799-5000

Question 4(a): Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

| Name | Position | Date connection ended |
|---------------------|----------|-----------------------|
| Ellen Ray | Partner | 3/16/2010 |
| Anthony Rosso | Partner | 3/20/2010 |
| Gregg Zucker | Partner | 3/27/2010 |
| Philip Martino | Partner | 3/27/2010 |
| David Beyer | Partner | 3/27/2010 |
| Christian Burden | Partner | 3/27/2010 |
| Ralph Dudziak | Partner | 4/15/2010 |
| Drew Chapman | Partner | 4/17/2010 |
| Palmina Fava | Partner | 4/23/2010 |
| Andrew Scott | Partner | 5/22/2010 |
| William Goldman | Partner | 6/2/2010 |
| Mary Kay Dreyfus | Partner | 6/8/2010 |
| Jon Atzen | Partner | 6/8/2010 |
| Dean Colucci | Partner | 7/1/2010 |
| Karol Denniston | Partner | 7/1/2010 |
| Khoa Do | Partner | 7/16/2010 |
| Micheal Reagan | Partner | 7/16/2010 |
| William Russell | Partner | 7/22/2010 |
| James Nelson | Partner | 7/22/2010 |
| Melquiades Martinez | Partner | 7/24/2010 |
| Michael Rubinger | Partner | 7/28/2010 |
| Douglas Spear | Partner | 7/28/2010 |
| James Seery | Partner | 8/18/2010 |

Question 4(b): Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes No

If yes, furnish the following information:

| <u>Name</u> | <u>Residence Address</u> | <u>Citizenship</u> | <u>Position</u> | <u>Date Assumed</u> |
|------------------------|---|----------------------------|-----------------|---------------------|
| Shale Stiller | 807 St. George's Road Baltimore, MD 21210 | U.S.A. | Partner | 3/1/2010 |
| Curtis Luke Mo | 6 William Court Menlo Park, CA 94205 | U.S.A. | Partner | 3/1/2010 |
| Frank Thomas Pepler | 1318 Page Street San Francisco, CA 94117 | U.S.A. | Partner | 3/1/2010 |
| Roger Rosendahl | 1225 Lachman Lane Pacific Palisades, CA 90272 | U.S.A. | Partner | 3/5/2010 |
| Daniela Almeida | 1218 Deodara Street Davis, CA 95618 | U.S.A./ Brazil | Partner | 4/1/2010 |
| Marcia Louise Augsburg | 1560 12th Avenue Sacramento, CA 95818 | U.S.A. | Partner | 4/1/2010 |
| John Barnes | 10 Shearwater Court Sacramento, CA 95833 | U.S.A. | Partner | 4/1/2010 |
| Stephen Goff | 1560 12th Avenue Sacramento, CA 95818 | U.S.A. | Partner | 4/1/2010 |
| Brian Taylor | 3921 Oliveglen Court Rocklin, CA 95677 | U.S. | Partner | 4/1/2010 |
| Peter Darrow | 565 Park Avenue New York, NY 10065 | U.S.A. | Partner | 4/12/2010 |
| Mark Whitaker | 1603 Fremont Lane Vienna, VA 22182 | U.S.A. | Partner | 5/1/2010 |
| Charles Baker | 211 East 70 Street Apt 25H New York, NY 10021 | U.S.A. | Partner | 5/1/2010 |
| Katherine Baynes | 210 Dartmouth Street Rochester, NY 14607 | U.S.A. | Partner | 5/1/2010 |
| Peter White | 101 Lynbrook Avenue Point Lookout, NY 11569 | U.S.A. | Partner | 5/1/2010 |
| Louis Ramos | 1833 Elgin Drive Vienna, VA 22182 | U.S.A. | Partner | 5/17/2010 |
| Hong Liu | 530 East 76 Street #7H New York, NY 10021 | China (U.S. Green Card) | Partner | 5/26/2010 |
| Francis Ryan | 141 Sunset Drive Chatham, NJ 07928 | U.S.A. | Partner | 6/1/2010 |
| Nicholas Papastavros | 56 Norfolk Road Arlington, MA 02476 | U.S.A. | Partner | 6/1/2010 |
| Michael Murphy | 4980 Shadow Rock Lane Clarence, NY 14031 | U.S.A. | Partner | 6/19/2010 |
| Aidan McCormack | 2 Summit Road Port Washington, NY 11050 | U.S.A. | Partner | 6/19/2010 |

| Name | Residence/Address | Citizenship | Position | Date Assumed |
|--------------------------|---|-------------|----------|--------------|
| Gianluca Bacchiocchi | 1224 Ridge Road Westmont, IL 60559 | U.S.A. | Partner | 7/6/2010 |
| Michael Patton | 808 Gatos Place Palos Verdes Estates, CA 90274 | U.S.A. | Partner | 7/6/2010 |
| Michael Helmer | 197 Blackburn Road Summit, NJ 07901 | U.S.A. | Partner | 7/12/2010 |
| Andrew Gilbert | 15 Homestead Road Basking Ridge, NJ 07920 | U.S.A. | Partner | 7/19/2010 |
| Carolyn Fitzhugh McNiven | 1440 Hawthorne Terrace Berkeley, CA 94708 | U.S.A. | Partner | 8/30/2010 |
| John Hillebrecht | 129 Columbia Heights Apt. 33 Brooklyn, NY 11201 | U.S.A. | Partner | 8/30/2010 |

Question No. 5(b): Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

| Name | Position or Connection | Date terminated |
|------------------|------------------------|-----------------|
| Harry McPherson* | Senior Counsel | 3/1/10 |
| Lisa Jones* | Associate | 3/1/10 |

* Harry McPherson and Lisa Jones, while still affiliated with DLA Piper, no longer expect to engage in activities on behalf of DLA Piper requiring registration under FARA, and therefore terminated their short-form registrations filed under DLA Piper's primary registration.

Question No. 11: During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, and 9 of this statement? Yes No

If yes, identify each such foreign principal and describe in full detail your activities and services:

For the **Government of Afghanistan, Embassy**, the registrant acted as counsel in Washington, D.C. on legislative, trade, investment, and other matters. The registrant's political activities are set forth in Question No. 12.

For the **German State of Rheinland-Pfalz**, the registrant provided assistance in enhancing U.S.-Rheinland-Pfalz relations, including issues relating to the U.S. military facilities in the State. The registrant's political activities are set forth in Question No. 12.

For the **Embassy of the United Arab Emirates**, the registrant provided government affairs counsel and representation before the United States Congress and Executive Branch on a broad range of legislative, regulatory and government relations matters. The registrant's political activities are set forth in Question No. 12.

For the **Government of Alberta**, the registrant provided government affairs counsel in connection with the foreign principal's advocacy initiatives in the United States; provided strategic communications advice as it relates to the foreign

principal's development and implementation of a media and public relations campaign; and participated in meetings with government officials. The registrant's political activities are set forth in Question No. 12.

Question No. 12: During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

For the **Government of Afghanistan, Embassy**, the registrant contacted congressional staff and other individuals and organizations involved in legislative, regulatory, and public policy matters with respect to issues affecting Afghanistan and U.S.-Afghan relations. Details of such contacts are set forth in the attached log.

For the **German State of Rheinland-Pfalz**, the registrant made contacts with Members of Congress, congressional staff and Executive Branch officials with regard to issues affecting U.S. bases in Germany and visits by Rheinland-Pfalz officials. Details of such contacts are set forth in the attached log.

For the **Embassy of the United Arab Emirates**, the registrant contacted Members of Congress, congressional staff and other individuals and organizations involved in legislative, regulatory, and public policy matters with respect to issues affecting U.S.-U.A.E. relations. Details of such contacts are set forth in the attached log.

For the **Government of Alberta**, the registrant communicated with officials of and employees in the United States Congress and Executive Branch, state government officials, members of the media, and other individuals and organizations involved in legislative, regulatory, and public policy matters. Details of such contacts are set forth in the attached log.

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| Date | Mode of Communication | Name of Contact | Title of Contact | Contact Office | Topic of Exchange |
|--|-----------------------|-----------------------------------|---|--|--|
| Government of Afghanistan | | | | | |
| 6/29/10 | E-mail | Nisha Desai Biswal | Staff Assistant | House Appropriations Committee, Majority | Meeting request |
| 6/29/10 | E-mail | Kelly Heaton | Scheduler | Rep. Nita Lowey | Meeting request |
| 7/7/10 | Telephone | Kelly Heaton | Scheduler | Rep. Nita Lowey | Meeting request |
| 8/26/10 | Telephone | Juliann Andreen | Legislative Assistant | Sen. Orrin Hatch | Citizenship issue |
| German State of Rheinland-Pfalz | | | | | |
| 3/8/10 | Meeting | Bill Castle | Legislative Assistant | Sen. Orrin Hatch | F-35 basing criteria |
| 3/9/10 | E-mail | Bill Castle | Legislative Assistant | Sen. Orrin Hatch | F-35 basing criteria |
| 3/11/10 | Telephone | Lucian Niemeyer | Professional Staff Member | Senate Committee on Armed Services, Minority | US military bases in Rheinland-Pfalz |
| 3/12/10 | Telephone | Dave Sienicki | Professional Staff Member | House Committee on Armed Services | US military bases in Rheinland-Pfalz and Landstuhl Regional Medical Center |
| 3/24/10 | E-mail | Ryan Kaldahl | Legislative Director | Rep. Randy Forbes | Air Force restructuring |
| 4/20/10 | Meeting | Rep. Walter Jones | Representative | U.S. House of Representatives | Meeting request |
| 4/20/10 | E-mail | Sam Riser | Legislative Fellow | Rep. Randy Forbes | Meeting request |
| 4/20/10 | E-mail | Tracy Jacobson | Legislative Counsel | Rep. William Delahunt | Meeting request |
| 4/20/10 | E-mail | Erica Striebel | Legislative Director | Rep. Ander Crenshaw | Meeting request |
| 4/22/10 | Telephone | Evan Johnson | Intern | Rep. Randy Forbes | Meeting request |
| 4/27/10 | Telephone | Randy Zarate | Scheduler | Rep. Solomon Ortiz | Meeting request |
| 4/27/10 | E-mail | Molly Norton | Scheduler | Rep. Walter Jones | Meeting request |
| 4/27/10 | E-mail | Mary Hobbs | Scheduler | Rep. Jim Marshall | Meeting request |
| 4/27/10 | Telephone | Erica Striebel | Legislative Director | Rep. Ander Crenshaw | Meeting request |
| 4/28/10 | E-mail; Telephone | Martin Delgado | Minority Clerk | House Committee on Appropriations, Subcommittee on Military Construction, Veterans Affairs, and Related Agencies | Meeting request |
| 4/29/10 | E-mail; Telephone | Jennifer Griffith; Steve Petersen | Scheduler; Chief Counsel/Policy Advisor | Rep. Rob Bishop | Meeting request |

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| Date | Mode of Communication | Name of Contact | Title of Contact | Contact Office | Topic of Exchange |
|---------|-----------------------|--|--|---|--|
| 4/29/10 | Meeting | Bryan van Sweringen | Europe Liason Officer | U.S. Army | Upcoming visit of Rheinland-Pfalz official |
| 4/30/10 | E-mail | Katherine Hanes | Scheduler | Sen. Richard Burr | Meeting request |
| 5/3/10 | E-mail | LTC Stephen Wooldridge | Commander | U.S. Army Health Facility Planning Agency | Meeting request |
| 5/4/10 | E-mail | Maggie Piggott | Scheduler | Sen. Richard Burr | Meeting request |
| 5/4/10 | E-mail | Molly Norton | Scheduler | Rep. Walter Jones | Meeting request |
| 5/4/10 | Telephone | Jessica Sanford | Scheduler | Rep. Rob Bishop | Meeting request |
| 5/5/10 | E-mail | LTC Stephen Wooldridge | Commander | U.S. Army Health Facility Planning Agency | Meeting request |
| 5/5/10 | E-mail | Jessica Sanford | Scheduler | Rep. Rob Bishop | Meeting request |
| 5/5/10 | E-mail | Lynn Miller | Scheduler | Rep. Ander Crenshaw | Meeting request |
| 5/6/10 | E-mail | Katherine Hanes | Scheduler | Sen. Richard Burr | Meeting request |
| 5/7/10 | E-mail | Erica Striebel | Legislative Director | Rep. Ander Crenshaw | Meeting request |
| 5/7/10 | Telephone | Randy Zarate | Scheduler | Rep. Solomon Ortiz | Meeting request |
| 5/7/10 | Telephone | Jessica Sanford | Scheduler | Rep. Rob Bishop | Meeting request |
| 5/7/10 | Telephone | Lynn Miller | Scheduler | Rep. Ander Crenshaw | Meeting request |
| 5/10/10 | Meeting | James Townsend Jr.; Julianne Smith | Deputy Assistant Secretary of Defense for European and NATO Policy; Principal Director (Europe and NATO) | Office of the Under Secretary of Defense (Policy), Department of Defense | US military bases in Rheinland-Pfalz and Landstuhl Regional Medical Center |
| 5/10/10 | Meeting | Joseph Calcara | Deputy Assistant Secretary of the Army (Installations and Housing) | Office of the Assistant Secretary of the Army (Installations and Environment) | US military bases in Rheinland-Pfalz and Landstuhl Regional Medical Center |
| 5/10/10 | E-mail | Erica Striebel | Legislative Director | Rep. Ander Crenshaw | Background for upcoming meeting |
| 5/11/10 | Meeting | LTG Eric B. Schoemaker; LTC Stephen Wooldridge | Surgeon General/Commander; Commander | U.S. Army Medical Command; U.S. Army Health Facility Planning Agency | US military bases in Rheinland-Pfalz and Landstuhl Regional Medical Center |

| Date | Mode of Communication | Name of Contact | Title of Contact | Contact Office | Topic of Exchange |
|---------|-----------------------|---|--|--|--|
| 5/12/10 | Meeting | Rep. Jim Marshall; Michael Bindell | Representative; Military Legislative Assistant | U.S. House of Representatives; Rep. Jim Marshall | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center |
| 5/12/10 | Meeting | Rep. Ander Crenshaw; Erica Striebel | Representative; Legislative Director | U.S. House of Representatives; Rep. Ander Crenshaw | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center |
| 5/13/10 | Meeting | Kathleen Ferguson | Deputy Assistant Secretary of the Air Force for Installations | Office of the Assistant Secretary of the Air Force for Installations, Environment and Logistics | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center |
| 5/13/10 | Meeting | Sen. Richard Burr; Kevin Kane | Senator; Legislative Assistant | U.S. Senate; Sen. Richard Burr | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center |
| 6/18/10 | Meeting | Lucian Niemeyer | Professional Staff Member | Senate Committee on Armed Services, Minority | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center |
| 6/23/10 | Meeting | Brenda Hankins | Legislative Director | Rep. Randy Forbes | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center |
| 8/12/10 | Telephone | Martin Delgato | Minority Clerk | House Committee on Appropriations, Subcommittee on Military Construction, Veterans Affairs, and Related Agencies | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center; Meeting Request |
| 8/23/10 | Telephone | Bill Castle | Legislative Assistant | Sen. Orrin Hatch | F-35 basing criteria; bill/report language |
| 8/24/10 | Meeting | Martin Delgato | Minority Clerk | House Committee on Appropriations, Subcommittee on Military Construction, Veterans Affairs, and Related Agencies | US military bases in Rheinland- Pfalz and Landstuhl Regional Medical Center; Meeting Request |
| | | | | | |

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|--|-----------------------|--------------------------------------|---|--|-------------------------------------|
| Embassy of the United Arab Emirates | | | | | |
| 3/2/10 | Meeting | Frank Lowenstein | Staff Director | Senate Foreign Relations Committee | US-UAE bilateral relationship |
| 3/8/10 | E-mail | Richard Mereu | Professional Staff Member | House Committee on Foreign Relations, Subcommittee on Europe | David Ignatius column |
| 3/8/10 | E-mail | Frank Lowenstein | Staff Director | Senate Foreign Relations Committee | David Ignatius column |
| 3/8/10 | E-mail | Zahir Janmohamed | Legislative Assistant | Rep. Keith Ellison | David Ignatius column |
| 3/12/10 | Meeting | Frank Lowenstein | Staff Director | Senate Foreign Relations Committee | US-UAE bilateral relationship |
| 3/14/10 | E-mail; Telephone | Damian Murphy | Legislative Assistant | Sen. Bob Casey | Potential travel to the UAE |
| 3/17/10 | E-mail; Telephone | Damian Murphy | Legislative Assistant | Sen. Bob Casey | Pennsylvania-UAE trade relationship |
| 3/18/10 | E-mail | Damian Murphy | Legislative Assistant | Sen. Bob Casey | Meeting request |
| 4/13/10 | E-mail; Telephone | Rep. Keith Ellison; Zahir Janmohamed | Representative; Legislative Assistant | U.S. House of Representatives; Rep. Keith Ellison | Meeting request |
| 5/24/10 | E-mail | John Jones | Legislative Assistant | Sen. Charles Schumer | Meeting request |
| 5/25/10 | Meeting | John Jones | Legislative Assistant | Sen. Charles Schumer | Iran sanctions |
| 5/27/10 | Telephone | Zahir Janmohamed | Legislative Assistant | Rep. Keith Ellison | Meeting request |
| 6/3/10 | Telephone | Christopher Philbin | Chief of Staff | Rep. Jim McGovern | Legislation status |
| 6/10/10 | Telephone | Zahir Janmohamed | Legislative Assistant | Rep. Keith Ellison | Meeting request |
| 6/15/10 | Meeting | Rep. Keith Ellison; Zahir Janmohamed | Representative; Legislative Assistant | U.S. House of Representatives | Business delegation |
| 8/2/10 | E-mail | Damian Murphy | Legislative Assistant | Sen. Bob Casey | Meeting request |
| Government of Alberta | | | | | |
| 3/3/10 | Telephone | Scott Schloegel | Chief of Staff | Rep. Bart Stupak | Energy proposals |
| 3/9/10 | Telephone | Annie Paruccini | Director, State Federal Affairs | Governor Tim Pawlenty | Energy policies |
| 3/9/10 | Telephone | Kathy Deutsch | Senior Energy Advisor, Policy and International Affairs | Department of Energy | FutureGen |

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|---------|-----------------------|---------------------------------|---|-------------------------------|-------------------|
| 3/9/10 | Telephone | Jim Markowsky | Assistant Secretary for Fossil Energy | Department of Energy | FutureGen |
| 3/11/10 | Meeting | Sen. Lindsey Graham | Senator | U.S. Senate | Energy proposals |
| 3/11/10 | Meeting | Speaker Nancy Pelosi | Representative | U.S. House of Representatives | Energy proposals |
| 3/11/10 | Meeting | Rep. Ed Markey | Representative | U.S. House of Representatives | Energy proposals |
| 3/22/10 | Telephone | Scott Schloegel | Chief of Staff | Rep. Bart Stupak | Energy proposals |
| 3/23/10 | Meeting | Sen. Chuck Schumer | Senator | U.S. Senate | Energy proposals |
| 3/23/10 | Meeting | Speaker Nancy Pelosi | Representative | U.S. House of Representatives | Energy proposals |
| 4/10/10 | Telephone | Eric Feldman | Chief of Staff | Rep. Gary Peters | Energy proposals |
| 4/14/10 | Telephone | David Wade | Chief of Staff | Sen. John Kerry | Energy proposals |
| 4/16/10 | Meeting | Rep. Steny Hoyer | Representative | U.S. House of Representatives | Energy proposals |
| 4/20/10 | Telephone | David Lyles | Chief of Staff | Sen. Carl Levin | Energy proposals |
| 4/20/10 | Telephone | Amanda Renteria | Chief of Staff | Sen. Debbie Stabenow | Energy proposals |
| 4/22/10 | E-mail | Tony Blinken | National Security Advisor to the Vice President | Vice President Joe Biden | Energy policies |
| 4/26/10 | Telephone | Alison Warner | Executive Assistant | Sen. Carl Levin | Meeting request |
| 4/27/10 | Telephone | David Wade | Chief of Staff | Sen. John Kerry | Energy proposals |
| 5/3/10 | E-mail | Alice Yates; Mary Louise Wagner | Legislative Assistant | Sen. Carl Levin | Energy proposals |
| 5/5/10 | Meeting | Sen. Carl Levin | Senator | U.S. Senate | Energy proposals |
| 5/6/10 | Meeting | Sen. John Kerry | Senator | U.S. Senate | Energy proposals |
| 5/18/10 | Meeting | Rep. Ed Markey | Representative | U.S. House of Representatives | Energy proposals |
| 5/21/10 | Meeting | Rep. Gary Peters | Representative | U.S. House of Representatives | Energy proposals |
| 7/12/10 | Meeting | Sen. Debbie Stabenow | Senator | U.S. Senate | Energy proposals |

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| Date | Mode of Communication | Name of Contact | Title of Contact | Contact Office | Topic of Exchange |
|---------|-----------------------|----------------------|-----------------------|-------------------------------|-------------------|
| 7/12/10 | Meeting | Rep. Henry Waxman | Representative | U.S. House of Representatives | Energy proposals |
| 7/14/10 | Meeting | Sen. Ron Wyden | Senator | U.S. Senate | Energy proposals |
| 7/14/10 | Telephone | David Jacobson | Ambassador to Canada | U.S. Embassy, Ottawa | Energy policies |
| 7/14/10 | Telephone | Amanda Renteria | Chief of Staff | Sen. Debbie Stabenow | Energy proposals |
| 7/14/10 | Meeting | Sen. Kent Conrad | Senator | U.S. Senate | Energy proposals |
| 7/14/10 | Meeting | Sen. Byron Dorgan | Senator | U.S. Senate | Energy proposals |
| 7/15/10 | E-mail | Jeff Michels | Chief of Staff | Sen. Ron Wyden | Energy proposals |
| 7/15/10 | Telephone | David Berick | Senior Advisor | Sen. Ron Wyden | Energy proposals |
| 7/15/10 | Telephone; E-mail | Chris Adamo | Legislative Assistant | Sen. Debbie Stabenow | Energy proposals |
| 7/20/10 | Telephone | Amanda Renteria | Chief of Staff | Sen. Debbie Stabenow | Energy proposals |
| 7/20/10 | Telephone | Chris Adamo | Legislative Assistant | Sen. Debbie Stabenow | Energy proposals |
| 7/20/10 | Telephone | Sen. Debbie Stabenow | Senator | U.S. Senate | Energy proposals |

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Question No. 14(a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, and 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

| Date | From Whom | Purpose | Amount |
|---|---------------------|-----------------------|------------------------|
| Government of Afghanistan, Embassy | | | |
| | | TOTAL | \$0¹ |
| German State of Rheinland-Pfalz | | | |
| | | TOTAL | \$0 |
| Embassy of the United Arab Emirates | | | |
| 3/15/10 | Embassy of the UAE | Fees & Expenses | \$80,000.00 |
| 5/17/10 | Embassy of the UAE | Fees & Expenses | \$40,000.00 |
| 5/24/10 | Embassy of the UAE | Fees & Expenses | \$40,000.00 |
| 6/29/10 | Embassy of the UAE | Fees & Expenses | \$40,000.00 |
| 8/17/10 | Embassy of the UAE | Fees & Expenses | \$80,000.00 |
| 8/26/10 | Embassy of the UAE | Fees & Expenses | <u>\$40,000.00</u> |
| | | TOTAL | \$320,000.00 |
| Government of Alberta | | | |
| 3/24/10 | Province of Alberta | Fees & Expenses | \$25,000.00 |
| 4/19/10 | Province of Alberta | Fees & Expenses | \$25,000.00 |
| 5/21/10 | Province of Alberta | Fees & Expenses | \$25,000.00 |
| 6/28/10 | Province of Alberta | Fees & Expenses | \$25,000.00 |
| 7/23/10 | Province of Alberta | Fees & Expenses | \$25,000.00 |
| 8/19/10 | Province of Alberta | Fees & Expenses | <u>\$25,000.00</u> |
| | | TOTAL | \$150,000.00 |
| | | TOTAL RECEIPTS | \$470,000.00 |
| ¹ The registrant received \$4,221 for non-registerable activities regarding separate and distinct legal matters. | | | |

Question No. 15(a) DISBURSEMENTS – MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, and 9 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

| Date | Purpose | Amount |
|--|--|--------------------|
| Government of Afghanistan, Embassy | | |
| Various | <u>Office Expenses</u> (e.g., delivery services, filing fees) | \$343.73 |
| Various | <u>Other Travel</u> (e.g., local transportation) (No travel expenses for U.S. Government officials or media) | \$222.00 |
| Various | <u>Meals</u> (No meal expenses for U.S. Government officials or media) | <u>\$378.89</u> |
| TOTAL | | \$944.62 |
| German State of Rheinland-Pfalz | | |
| Various | <u>Office Expenses</u> (e.g., delivery services, filing fees, Lexis, duplicating) | \$1,625.03 |
| Various | <u>Other Travel</u> (e.g., local transportation) (No travel expenses for U.S. Government officials or media) | \$284.80 |
| Various | <u>Meals</u> (No meal expenses for U.S. Government officials or media) | <u>\$1,562.25</u> |
| TOTAL | | \$3,472.08 |
| Embassy of the United Arab Emirates | | |
| Various | <u>Office Expenses</u> (filing fees, Westlaw) | \$317.72 |
| Various | <u>Other Travel</u> (local transportation) (No travel expenses for U.S. Government officials or media) | \$117.00 |
| Various | <u>Meals</u> (No meal expenses for U.S. Government officials or media) | \$215.37 |
| 4/7/10 – 4/8/10 | Travel expenses for J. Merrigan and J. Woolley to attend client meetings in Philadelphia | \$1,078.47 |
| <u>Consultant Fees</u> | | |
| 3/25/10 | Law Offices of George R. Salem, PLLC, 500 8th Street, NW, Washington, DC 20004 | \$10,000.00 |
| 6/4/10 | Law Offices of George R. Salem, PLLC, 500 8th Street, NW, Washington, DC 20004 | \$5,000.00 |
| 6/7/10 | Law Offices of George R. Salem, PLLC, 500 8th Street, NW, Washington, DC 20004 | \$5,000.00 |
| 7/19/10 | Law Offices of George R. Salem, PLLC, 500 8th Street, NW, Washington, DC 20004 | <u>\$5,000.00</u> |
| TOTAL | | \$26,728.56 |
| Government of Alberta | | |
| 3/11/10 | <u>Office Expenses</u> (filing fees) | \$305.00 |
| Various | <u>Other Travel</u> (e.g., local transportation) (No travel expenses for U.S. Government officials or media) | <u>\$33.00</u> |
| TOTAL | | \$338.00 |

Question No. 15(c): DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

Disbursements by DLA Piper PACs

| Date | Amount | Name of Political Organization | Candidate |
|---------|-------------|--|-----------------|
| 3/3/10 | \$500.00 | Citizen's Committee to Elect Timothy P. Murray | Timothy Murray |
| 3/8/10 | \$3,000.00 | Dan Lungren for Congress | Daniel Lungren |
| 3/8/10 | \$5,000.00 | Wyden for Senate | Ron Wyden |
| 3/10/10 | \$1,500.00 | Fund for America's Future | - |
| 3/10/10 | \$15,000.00 | Democratic Congressional Campaign Committee | - |
| 3/15/10 | \$1,000.00 | Castle Campaign Fund | Michael Castle |
| 3/15/10 | \$1,500.00 | Friends of Erik Paulsen | Erik Paulsen |
| 3/15/10 | \$3,500.00 | Friends of John McCain | John McCain |
| 3/15/10 | \$3,000.00 | Majority Committee PAC (MC PAC) | - |
| 3/15/10 | \$1,000.00 | Mike Michaud for Congress | Michael Michaud |
| 3/15/10 | \$5,000.00 | Scott Brown for U.S. Senate Committee | Scott Brown |
| 3/15/10 | \$500.00 | Issa for Congress | Darrell Issa |
| 3/22/10 | \$5,000.00 | GOPAC | - |
| 3/22/10 | \$300.00 | Committee for Kamenetz | Kevin Kamenetz |
| 3/22/10 | \$500.00 | Friends of Ken Ulman | Ken Ulman |
| 3/24/10 | \$500.00 | The Richard Burr Committee | Richard Burr |
| 3/24/10 | \$1,000.00 | Democratic State Committee (MA) | - |
| 3/24/10 | \$500.00 | Deval Patrick Committee | Deval Patrick |
| 3/24/10 | \$5,000.00 | Victory Now PAC | - |
| 3/24/10 | \$1,000.00 | Re-Elect McGovern Committee | James McGovern |
| 3/24/10 | \$5,000.00 | PAC to the Future | - |
| 3/24/10 | \$2,000.00 | Friends of Schumer | Charles Schumer |
| 3/24/10 | \$1,000.00 | Friends of Charlie Wilson | Charlie Wilson |
| 3/24/10 | \$2,500.00 | Massachusetts Democratic State Committee | - |
| 3/24/10 | \$15,000.00 | Democratic Senatorial Campaign Committee | - |
| 3/24/10 | \$3,750.00 | Bill Foster for Congress Committee | Bill Foster |
| 3/26/10 | \$3,000.00 | IMPACT | - |
| 3/29/10 | \$2,000.00 | IMPACT | - |
| 4/12/10 | \$3,000.00 | Republican Mainstreet Partnership PAC | - |
| 4/14/10 | \$1,000.00 | Castor for Congress | Kathy Castor |
| 4/14/10 | \$1,000.00 | Bass Victory Committee | Charles Bass |
| 4/19/10 | \$2,500.00 | Brown for Governor 2010 | Jerry Brown |
| 4/19/10 | \$1,000.00 | Kansans for Tiahrt | Todd Tiahrt |
| 4/19/10 | \$243.38 | Bass Victory Committee (inkind) | Charles Bass |
| 4/19/10 | \$5,000.00 | AmeriPAC | - |
| 4/21/10 | \$1,000.00 | Devin Nunes Campaign Committee | Devin Nunes |
| 4/23/10 | \$5,000.00 | People for Enterprise Trade and | - |

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| Date | Amount | Name of Political Organization | Candidate |
|---------|-------------|---|--------------------|
| | | Economic Growth (PETE PAC) | |
| 4/23/10 | \$750.00 | Robin Carnahan for Senate | Robin Carnahan |
| 4/26/10 | \$1,000.00 | Norm Dicks for Congress Committee | Norman Dicks |
| 4/30/10 | \$1,000.00 | Cardin for Senate | Benjamin Cardin |
| 4/30/10 | \$500.00 | Judge John Donovan Campaign | John Donovan |
| 4/30/10 | \$500.00 | Lawrence Rael for New Mexico | Lawrence Rael |
| 5/3/10 | \$2,000.00 | Barney Frank for Congress Committee | Barney Frank |
| 5/7/10 | \$1,000.00 | Friends of John McCain | John McCain |
| 5/7/10 | \$1,000.00 | Castle Campaign Fund | Michael Castle |
| 5/7/10 | \$2,500.00 | Minnick for Congress | Walter Minnick |
| 5/10/10 | \$10,000.00 | Sean Coffey for Attorney General | Sean Coffery |
| 5/10/10 | \$500.00 | Fisher for Ohio | Lee Fisher |
| 5/10/10 | \$5,000.00 | Dan Seals for Congress | Daniel Seals |
| 5/10/10 | \$500.00 | Mikulski for Senate | Barbara Mikulski |
| 5/12/10 | \$750.00 | Grassley Committee Inc. | Charles Grassley |
| 5/14/10 | \$1,000.00 | Chet Culver Committee | Chet Culver |
| 5/17/10 | \$1,000.00 | The Markey Committee | Edward Markey |
| 5/17/10 | \$15,000.00 | National Republican Campaign Committee | - |
| 5/19/10 | \$750.00 | Bob Ehrlich for Maryland Committee | Robert Ehrlich |
| 5/21/10 | \$5,000.00 | Gary Peters for Congress | Gary Peters |
| 5/21/10 | \$1,000.00 | Pallone for Congress | Frank Pallone |
| 5/24/10 | \$1,000.00 | Kildee for Congress | Dale Kildee |
| 5/24/10 | \$500.00 | Re-Elect McGovern Committee | James McGovern |
| 6/4/10 | \$500.00 | Judge Reece Rondon Campaign | Reece Rondon |
| 6/4/10 | \$500.00 | Judge Sylvia Matthews Campaign | Sylvia Matthews |
| 6/4/10 | \$3,000.00 | Rob Andrews U.S. House Committee | Robert Andrews |
| 6/7/10 | \$3,000.00 | Karen Bass for Congress | Karen Bass |
| 6/9/10 | \$1,000.00 | Marylanders for Miller | Thomas Miller |
| 6/11/10 | \$500.00 | Citizens for Maggie McIntosh | Maggie McIntosh |
| 6/11/10 | \$375.00 | Committee to Elect Michael J. Rodrigues to the Massachusetts Senate | Michael Rodrigues |
| 6/11/10 | \$1,500.00 | Kirk for Senate | Mark Kirk |
| 6/11/10 | \$4,000.00 | Hoeven for Senate | John Hoeven |
| 6/11/10 | \$1,000.00 | Forbes for Congress | Randy Forbes |
| 6/21/10 | \$5,000.00 | Friends of Roy Blunt | Roy Blunt |
| 6/21/10 | \$1,000.00 | The Richard Burr Committee | Richard Burr |
| 6/23/10 | \$500.00 | Geoff Davis for Congress | Geoffrey Davis |
| 6/23/10 | \$500.00 | Schock for Congress | Aaron Schock |
| 6/23/10 | \$7,500.00 | National Republican Senatorial Committee | - |
| 6/23/10 | \$1,000.00 | David Vitter for U.S. Senate | David Vitter |
| 6/28/10 | \$1,500.00 | Vern Buchanan for Congress | Vern Buchanan |
| 6/30/10 | \$750.00 | Friends of Anthony Brown | Anthony Brown |
| 6/30/10 | \$500.00 | The Connolly Committee | John Connolly |
| 6/30/10 | \$2,000.00 | Klein for Congress Inc. | Ronald Klein |
| 6/30/10 | \$137.50 | Hoeven for Senate (inkind) | John Hoeven |
| 6/30/10 | \$2,000.00 | Courtney for Congress | Joseph Courtney |
| 7/1/10 | \$3,000.00 | Gillibrand for Senate | Kirsten Gillibrand |
| 7/1/10 | \$1,000.00 | Campaign for Our Country | - |

| Date | Amount | Name of Political Organization | Candidate |
|---------|------------|--|-------------------|
| 7/12/10 | \$5,000.00 | Kathleen Rice 2010 | Kathleen Rice |
| 7/12/10 | \$1,000.00 | Schneiderman for Attorney General | Eric Schneiderman |
| 7/12/10 | \$250.00 | Keiffer Mitchell for the 44th | Keiffer Mitchell |
| 7/16/10 | \$7,500.00 | National Republican Senatorial Committee | - |
| 7/21/10 | \$5,000.00 | Stabenow for US Senate | Debbie Stabenow |
| 7/21/10 | \$500.00 | Tiberi for Congress | Patrick Tiberi |
| 7/21/10 | \$1,000.00 | Mike Michaud for Congress | Michael Michaud |
| 7/21/10 | \$5,000.00 | Sander Levin for Congress | Sander Levin |
| 7/21/10 | \$1,000.00 | Friends of Mike Lee, Inc. | Mike Lee |
| 7/21/10 | \$3,000.00 | Citizens for Harkin | Tom Harkin |
| 7/21/10 | \$3,000.00 | Citizens for Turner | Mike Turner |
| 7/21/10 | \$1,000.00 | De Jongh-Francis 2010 | John de Jongh |
| 7/26/10 | \$500.00 | John S. Fund | - |
| 8/9/10 | \$500.00 | Massachussetts Democratic Party | - |
| 8/9/10 | \$700.00 | Believe in Oakland – Perata for Mayor 2010 | Don Perata |
| 8/16/10 | \$1,000.00 | Roskam for Senate Committee | Peter Roskam |
| 8/18/10 | \$1,000.00 | Whitfield for Congress Committee | Edward Whitfield |
| 8/18/10 | \$4,500.00 | Dan Coats for Indiana | Daniel Coats |
| 8/18/10 | \$2,500.00 | Every Republican is Crucial (ERICPAC) | - |
| 8/18/10 | \$500.00 | Country First PAC | - |
| 8/18/10 | \$2,500.00 | Cantor for Congress | Eric Cantor |
| 8/20/10 | \$3,000.00 | Democratic State Central Committee of California | - |
| 8/25/10 | \$1,000.00 | Rich Gordon for Assembly 2010 | Rich Gordon |

Short-Form Registrants' Contributions

| Contributor Name | Date | Amount | Name of Political Organization | Name of Candidate |
|-------------------|---------|------------|--|-------------------|
| Charles Baker III | 3/4/10 | \$200.00 | Committee to Elect Terry Murray | Therese Murray |
| | 3/4/10 | \$2,500.00 | Martha Coakley for Senate Committee | Martha Coakley |
| | 3/4/10 | \$200.00 | Citizen's Committee to Elect Timothy P. Murray | Timothy Murray |
| | 3/4/10 | \$200.00 | The Flaherty Committee | Tim Flaherty |
| | 3/5/10 | \$2,500.00 | The Markey Committee | Edward Markey |
| | 3/8/10 | \$1,000.00 | The Niki Tsongas Committee | Niki Tsongas |
| | 3/9/10 | \$2,500.00 | Democratic Congressional Campaign Committee | - |
| | 3/15/10 | \$1,500.00 | The Markey Committee | Edward Markey |
| | 3/15/10 | \$1,500.00 | DLA Piper PAC | - |
| | 3/15/10 | \$500.00 | DLA Piper Massachusetts PAC | - |
| | 3/24/10 | \$200.00 | Friends of Mike Rush | Mike Rush |
| | 3/24/10 | \$1,000.00 | Robin Carnahan for Senate | Robin Carnahan |
| | 3/24/10 | \$200.00 | Deval Patrick Committee | Deval Patrick |

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| Contributor Name | Date | Amount | Name of Political Organization | Name of Candidate |
|-----------------------------|---------|------------|---|----------------------|
| | 3/25/10 | \$1,000.00 | Friends of Congressman George Miller | George Miller |
| | 3/29/10 | \$1,000.00 | Friends of Schumer | Charles Schumer |
| | 3/30/10 | \$1,000.00 | Friends of Schumer | Charles Schumer |
| | 4/30/10 | \$200.00 | Committee to Elect Martin Walsh | Martin Walsh |
| | 5/4/10 | \$200.00 | Committee To Elect Walter Timilty | Walter Timilty |
| | 5/10/10 | \$500.00 | Biden for Attorney General | Beau Biden |
| | 5/11/10 | \$1,000.00 | Barney Frank for Congress Committee | Barney Frank |
| | 5/20/10 | \$2,500.00 | Andrew Cuomo 2010 | Andrew Cuomo |
| | 5/21/10 | \$1,000.00 | AmeriPAC | - |
| | 6/14/10 | \$500.00 | Connolly for Congress | Gerry Connolly |
| | 6/22/10 | \$200.00 | Reinstein Committee | Kathi-Anne Reinstein |
| | 6/26/10 | \$200.00 | Committee to Elect Karen Spilka | Karen Spilka |
| | 8/4/10 | \$1,000.00 | Menendez for Senate | Robert Menendez |
| | 8/9/10 | \$1,000.00 | Democratic Senatorial Campaign Committee | - |
| | 8/22/10 | \$200.00 | Committee to Elect Michael J. Rodrigues to the Massachusetts Senate | Michael Rodrigues |
| | 8/22/10 | \$200.00 | The Mike Costello Committee | Michael Costello |
| | 8/31/10 | \$200.00 | The Canavan Committee | Christine Canavan |
| Matthew C. Bernstein | 3/24/10 | \$1,000.00 | Democratic Congressional Campaign Committee | - |
| | 3/30/10 | \$1,000.00 | Friends of Schumer | Charles Schumer |
| | 3/30/10 | \$1,000.00 | Democratic Senatorial Campaign Committee | - |
| | 4/15/10 | \$1,666.67 | DLA Piper PAC | - |
| | 4/22/10 | \$500.00 | Deval Patrick Committee | Deval Patrick |
| | 5/4/10 | \$1,000.00 | AmeriPAC | - |
| | 5/6/10 | \$1,000.00 | Barney Frank for Congress Committee | Barney Frank |
| | 5/15/10 | \$1,666.67 | DLA Piper PAC | - |
| | 6/15/10 | \$1,666.67 | DLA Piper PAC | - |
| | 6/25/10 | \$1,000.00 | De Jongh-Francis 2010 | John de Jongh |
| | 7/28/10 | \$1,000.00 | Menendez for Senate | Robert Menendez |
| | 7/28/10 | \$1,000.00 | Democratic Senatorial Campaign Committee | - |
| | 8/18/10 | \$1,000.00 | Stabenow for US Senate | Debbie Stabenow |
| James Blanchard | 3/6/10 | \$100.00 | David Leyton for Attorney General | David Leyton |
| | 3/6/10 | \$100.00 | Hickner for County Executive | Thomas Hickner |
| | 3/6/10 | \$250.00 | Paul Gielegam for State Senator | Paul Gielegam |
| | 3/6/10 | \$120.00 | Oakland County | - |

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| Contributor Name | Date | Amount | Name of Political Organization | Name of Candidate |
|------------------|---------|------------|--|---------------------|
| | | | Democratic Party | |
| | 3/10/10 | \$2,500.00 | Michigan Democratic State Central Committee | - |
| | 3/12/10 | \$250.00 | Committee to Elect Harvey Santana | Harvey Santana |
| | 3/15/10 | \$1,500.00 | DLA Piper PAC | - |
| | 3/20/10 | \$500.00 | The Committee To Elect Lee Gonzales | Lee Gonzales |
| | 3/30/10 | \$250.00 | Sander Levin for Congress | Sander Levin |
| | 3/31/10 | \$2,000.00 | Gary Peters for Congress | Gary Peters |
| | 4/7/10 | \$100.00 | Jeff Irwin for State Representative | Jeff Irwin |
| | 4/18/10 | \$100.00 | Nancy Quarles for Oakland County Commission Committee | Nancy Quarles |
| | 4/18/10 | \$250.00 | The Elect Vicki Barnett Committee | Vicki Barnett |
| | 4/18/10 | \$250.00 | Committee to Elect Pamela Pugh Smith | Pamela Pugh Smith |
| | 4/18/10 | \$50.00 | Michigan House Democratic Fund | - |
| | 4/19/10 | \$1,000.00 | Minnesotans for Matt (Entenza) | Matt Entenza |
| | 4/25/10 | \$125.00 | Michigan Democratic Party | - |
| | 4/29/10 | \$1,000.00 | Democratic Congressional Campaign Committee | - |
| | 5/18/10 | \$500.00 | Burt Leland for Detroit | Burt Leland |
| | 5/18/10 | \$100.00 | People for Eric Schertzing | Eric Schertzing |
| | 5/26/10 | \$1,000.00 | Gary Peters for Congress | Gary Peters |
| | 5/26/10 | \$500.00 | Friends of Ken Lampar | Ken Lampar |
| | 5/27/10 | \$500.00 | The Committee To Elect Lee Gonzales | Lee Gonzales |
| | 6/1/10 | \$250.00 | Committee to Elect Dan Scripps | Dan Scripps |
| | 6/21/10 | \$500.00 | The Committee to Elect Virgil Smith to Michigan State Senate | Virgil Smith |
| | 6/29/10 | \$1,000.00 | Schauer for Congress | Mark Schauer |
| | 6/29/10 | \$1,000.00 | Friends of Schumer | Charles Schumer |
| | 6/29/10 | \$1,000.00 | AmeriPAC | - |
| | 6/30/10 | \$1,000.00 | Democratic Congressional Campaign Committee | - |
| | 7/13/10 | \$500.00 | Friends of Rashida Tlaib | Rashida Tlaib |
| | 7/15/10 | \$1,000.00 | Michigan State Democratic Fund | - |
| | 7/16/10 | \$100.00 | Friends to Elect Lupe for SBE | Lupe Ramos-Montigny |
| | 7/17/10 | \$250.00 | Michael Lahti for State Senate Committee | Michael Lahti |
| | 7/25/10 | \$2,000.00 | Sander Levin for Congress | Sander Levin |
| | 8/1/10 | \$1,000.00 | Gary Peters for Congress | Gary Peters |

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|--------------------------|---------|------------|---|---------------------|
| | 8/11/10 | \$2,000.00 | Stabenow for US Senate | Debbie Stabenow |
| | 8/13/10 | \$1,000.00 | Oakland County Democratic Party | - |
| | 8/15/10 | \$2,000.00 | David Leyton for Attorney General | David Leyton |
| | 8/24/10 | \$250.00 | Friends of Bill Richards for State Representative | Bill Richards |
| Lisa Jones | 3/28/10 | \$33.34 | DLA Piper PAC | - |
| | 4/25/10 | \$33.34 | DLA Piper PAC | - |
| | 5/21/10 | \$33.34 | DLA Piper PAC | - |
| | 6/20/10 | \$33.34 | DLA Piper PAC | - |
| | 7/18/10 | \$33.34 | DLA Piper PAC | - |
| | 8/29/10 | \$33.34 | DLA Piper PAC | - |
| Larry Levinson | 4/12/10 | \$1,000.00 | Friends of Schumer | Charles Schumer |
| | 6/22/10 | \$1,000.00 | De Jongh-Francis 2010 | John de Jongh |
| | 7/30/10 | \$1,000.00 | Menendez for Senate | Robert Menendez |
| Brenda Meister | 3/11/10 | \$250.00 | Charlie Crist for U.S. Senate | Charlie Crist |
| | 3/15/10 | \$500.00 | DLA Piper PAC | - |
| John A. Merrigan | 3/15/10 | \$1,666.00 | DLA Piper PAC | - |
| | 3/30/10 | \$2,400.00 | Friends of Schumer | Charles Schumer |
| | 4/13/10 | \$1,000.00 | Democratic Congressional Campaign Committee | - |
| | 4/22/10 | \$500.00 | Deval Patrick Committee | Deval Patrick |
| | 5/26/10 | \$1,000.00 | AmeriPAC | - |
| | 5/27/10 | \$1,000.00 | Gary Peters for Congress | Gary Peters |
| | 6/4/10 | \$2,000.00 | Rob Andrews U.S. House Committee | Robert Andrews |
| | 6/21/10 | \$2,000.00 | Karen Bass for Congress | Karen Bass |
| | 6/22/10 | \$1,000.00 | De Jongh-Francis 2010 | John de Jongh |
| | 7/12/10 | \$1,000.00 | Stabenow for US Senate | Debbie Stabenow |
| | 7/29/10 | \$1,000.00 | Democratic Senatorial Campaign Committee | - |
| William Minor | 3/15/10 | \$500.00 | DLA Piper PAC | - |
| | 3/30/10 | \$500.00 | Democratic Congressional Campaign Committee | - |
| | 3/31/10 | \$500.00 | Friends of Schumer | Charles Schumer |
| | 5/21/10 | \$500.00 | Gary Peters for Congress | Gary Peters |
| | 8/19/10 | \$500.00 | Stabenow for US Senate | Debbie Stabenow |
| Kevin O'Scannlain | 3/28/10 | \$50.00 | DLA Piper PAC | - |
| | 4/25/10 | \$50.00 | DLA Piper PAC | - |
| | 5/10/10 | \$250.00 | Scott Bruun for Congress Committee | Lorentz Scott Bruun |
| | 5/21/10 | \$50.00 | DLA Piper PAC | - |
| | 6/20/10 | \$50.00 | DLA Piper PAC | - |
| | 6/23/10 | \$500.00 | National Republican Senatorial Committee | - |
| | 7/13/10 | \$500.00 | Friends of Mike Lee, Inc. | Mike Lee |
| | 7/18/10 | \$50.00 | DLA Piper PAC | - |

| Contributor Name | Date | Amount | Name of Political Organization | Name of Candidate |
|------------------------|---------|------------|--|-------------------|
| | 8/29/10 | \$50.00 | DLA Piper PAC | - |
| George Salem | 3/22/10 | \$1,000.00 | Friends of Schumer | Charles Schumer |
| | 3/23/10 | \$2,300.00 | Friends of Frank Wolf | Frank Wolf |
| | 4/14/10 | \$1,000.00 | Scott Brown for U.S. Senate Committee | Scott Brown |
| | 4/22/10 | \$1,000.00 | Friends of John McCain | John McCain |
| | 5/5/10 | \$1,000.00 | Ellison for Congress Committee | Keith Ellison |
| | 5/5/10 | \$1,000.00 | Keep Nick Rahall in Congress Committee | Nick Rahall |
| | 6/9/10 | \$1,400.00 | Friends of John McCain | John McCain |
| | 7/14/10 | \$1,000.00 | Moran for Congress | Jim Moran |
| | 7/19/10 | \$2,500.00 | DLA Piper PAC | - |
| Ignacio Sanchez | 3/15/10 | \$1,666.00 | DLA Piper PAC | - |
| | 7/7/10 | \$2,000.00 | Menendez for Senate | Robert Menendez |
| | 7/27/10 | \$2,000.00 | Cantor for Congress | Eric Cantor |
| | 7/28/10 | \$1,000.00 | Marco Rubio for US Senate | Marco Rubio |
| David Weiss | 3/28/10 | \$62.50 | DLA Piper PAC | - |
| | 4/25/10 | \$62.50 | DLA Piper PAC | - |
| | 5/21/10 | \$62.50 | DLA Piper PAC | - |
| | 5/26/10 | \$500.00 | Gary Peters for Congress | Gary Peters |
| | 6/20/10 | \$62.50 | DLA Piper PAC | - |
| | 7/18/10 | \$62.50 | DLA Piper PAC | - |
| | 8/29/10 | \$62.50 | DLA Piper PAC | - |

Questions No. 22 and No. 23:

Our review prior to filing this supplemental statement identified one set of informational materials not previously filed with the Department and/or labeled. We are filing this document with the Department today.

NSD/CES/REGISTRATION UNIT
 2010 OCT 14 PM 4: 02

The Washington Post

A sober approach to sanctioning Iran

By David Ignatius
Sunday, March 7, 2010; A17

The cynical (and usually correct) critique of economic sanctions was summed up this way by a retired U.S. diplomat named Douglas Paal: "Sanctions always accomplish their principal objective, which is to make those who impose them feel good." The Obama administration is struggling to craft a new round of U.N. sanctions against Iran that achieves more than this feel-good impact. The ambitious goal is "to cut off the revenues that fund Iran's nuclear and missile programs," says a senior administration official.

"We are going to put as tight a squeeze on Iran as we possibly can," adds a diplomat from one of the members of the U.S.-led coalition that is beginning to discuss a new sanctions resolution at the U.N Security Council. The resolution will target the Iranian Revolutionary Guard Corps (IRGC) and its vast network of companies, which the United States estimates may include up to one-third of Iran's total economy.

One focus of the proposed sanctions may be the Islamic Republic of Iran Shipping Lines, a 115-vessel fleet that analysts believe has carried cargo for the country's nuclear program. Another target might be the IRGC-owned construction company Khatam al-Anbiya, and its network of subsidiaries, which are said to build some of Iran's strategic infrastructure.

To provide economic muscle for the push against Iran, the Obama administration is working closely with Gulf oil exporters, such as Saudi Arabia and the United Arab Emirates. Secretary of State Hillary Clinton visited Saudi Arabia last month to enlist its help in the sanctions campaign - and, in particular, to lobby China to back the U.N. sanctions resolution.

China is vulnerable to Iranian oil pressure because it imports about 540,000 barrels per day from Iran. So the Saudis and Emiratis have been assuring Beijing that they would be prepared to offset any shortfall in Iranian crude shipments.

The UAE has already boosted its oil exports to China as part of this pressure campaign. Shipments have increased from about 50,000 barrels per day last year to 120,000 now, with a goal by year-end of up to 200,000 barrels. Over the next few years, the UAE is offering to increase that export volume to China to about 500,000 barrels per day, which would nearly equal the current Iranian total.

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Prince Saud al-Faisal, the Saudi foreign minister, traveled to China late last week to enlist its support against Iran. The Saudi message to Beijing, according to one U.S. official, is: "If you don't help us against Iran, you will see a less stable and dependable Middle East." Meanwhile, a high-level Israeli group also visited China last weekend, according to the Financial Times. The delegation included Stanley Fischer, the governor of Israel's central bank. Fischer, an eminent economist who is respected by Chinese officials, would be able to explain the impact of the planned sanctions regime.

The Israeli visit led one prominent energy expert to speculate privately that if sanctions fail to alter Iranian behavior, the Israelis might use military means to halt Iran's oil exports.

The campaign against Iran was the central topic during a recent visit to Washington by the UAE's foreign minister, Sheik Abdullah bin Zayed al-Nahyan. He urged administration officials to include Iran's vulnerable neighbors in the Gulf Cooperation Council -- Saudi Arabia, Qatar, Oman and others -- in their planning for dealing with Iran. "We will find ways to do more with them," said the senior administration official.

The trick for the Obama administration is to craft a sanctions plan that hurts the Iranian government without causing too much pain for the Iranian people. That's one reason the administration is wary of a congressional proposal for sanctions against Iran's imports of refined petroleum products -- a step that would probably harm the public more than the regime.

Officials talk about "targeted" sanctions that focus on the Revolutionary Guard Corps and its military-industrial complex of companies. But this effort is the diplomatic equivalent of "precision bombing" -- in practice, some collateral damage is inevitable, which could help President Mahmoud Ahmadinejad rally support for his hard-line government.

What's certain is that the Iranian nuclear issue is heading into a more intense phase of confrontation -- starting with the push for tougher U.N. sanctions. The Gulf countries have been asking what the administration plans to do if the sanctions don't work: That's the big foreign policy question of 2010, and Washington is beginning now to think about the answer.

davidignatius@washpost.com

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