

U.S. Department of Justice
Washington, DC 20530

Supplemental Statement
Pursuant to the Foreign Agents Registration Act of 1938, as amended

For Six Month Period Ending 06/30/2011
(Insert date)

I - REGISTRANT

1. (a) Name of Registrant (b) Registration No.

Blank Rome Government Relations LLC 6025

(c) Business Address(es) of Registrant
Watergate Office Building
600 New Hampshire Avenue N.W.
12th Floor
Washington, DC 20037

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 No
- (2) Citizenship Yes No
- (3) Occupation Yes No

(b) If an organization:

- (1) Name Yes No
- (2) Ownership or control Yes No
- (3) Branch offices Yes No

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

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 1		

(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 1				

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 the service rendered.

(b) During this six 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

Name	Residence Address	Citizenship	Position	Date Assumed

(c) 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
Weldon Rougeau	Principal/Of Counsel	6/30/11

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

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Weldon Rougeau	Principal/Of Counsel	Moroccan American Center for Policy ("MACP")	6/30/11

6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) 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:

Foreign Principal Date of Termination

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No
If yes, furnish th following information:

Name and Address of Foreign Principal(s) Date Acquired
Trust Company of the Marshall Islands ("TCMI") May 17, 2011

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

MACP

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

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 this six 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 fourth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

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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, or 9 of this statement? Yes No

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

See Attachment 1.

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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, places of delivery, names of speakers and subject matter.

Blank Rome Government Relations LLC ("Blank Rome") engaged in political activity on behalf of TCMI by developing a presentation and leave-behind materials for a meeting with Congressional staff which addressed the developments arising from the U.S. Coast Guard's release of "Volume 1" of the Joint Investigation Team's report of Investigation into the Deepwater Horizon oil spill.

Blank Rome engaged in political activity on behalf of MACP by (1) communicating with principals and staff of the federal government and (2) tapping extensive contacts among Washington foreign policy leaders and distributing information prepared by MACP to those contacts.

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes No

If yes, describe fully.

⁵ The term "political activity" 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 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 monies.⁶

Date	From Whom	Purpose	Amount
See Attachment 1			

\$125,000

Total

(b) RECEIPTS - FUNDRAISING CAMPAIGN

During this 6 month reporting period, have you received, as part of a fundraising 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 D 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:

Foreign Principal	Date Received	Thing of Value	Purpose
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^{6, 7} A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising 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 fundraising 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
FOR MACP:			
12/3/10		Reproduction of Documents	\$14.91
12/31/10	Washington Express	Express Delivery Service	\$15.90
01/17/11	Federal Express	Document Shipping	\$7.77
MACP TOTAL:			\$38.58

FOR TCM:			
05/17/11	FARA Registration Unit	Filing of Exhibits A and B for addition of TCM to Blank Rome's FARA registration with DOJ	\$305
TCMI TOTAL:			\$305

\$343.58

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	Recipient	Foreign Principal	Thing of Value	Purpose
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(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	Political Organization or Candidate	Location of Event
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See Attachment

2

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. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²
Yes No

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?
Yes No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.
TCMI and MACP

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 Motion picture films Letters or telegrams
- Advertising campaigns Press releases Pamphlets or other publications Lectures or speeches
- Other (specify) Leave-behind materials for Congressional Staff on behalf of TCMI

Electronic Communications

- Email
- Website URL(s): _____
- Social media websites URL(s): _____
- Other (specify) _____

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

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 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)

(Print or type name under each signature or provide electronic signature¹³)

5-22-12

SINGLETON McALLISTER
Singleton McAllister
Duncan C. Smith III
DUNCAN C. SMITH III

5-23-12

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.

ATTACHMENT 1

Registrant 6025**Supplemental Statement—6 month reporting period ending 06/30/11**

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

Name/Position	Date Connection Ended
Ralph Johnson/Partner	5/31/11
Lynn McKay/Partner	5/31/11
Weldon Rougeau/Principal/Of Counsel	6/30/11
Samuel Sterrett	12/31/10
Christine Tan/Partner	2/15/11

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

Name/Position	Address	Citizenship	Date Assumed
David Dempsey/ Partner	8509 White Post Ct. Potomac, MD 20854	US	1/1/11
Brian Higgins/ Partner	15005 High Forest Ct. Dayton, MD 21036	US	1/1/11
Thomas Poulin/ Partner	8930D Milford Haven Court Lorton, VA 22079	US	1/1/11

Question 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, or 9 of this statement.

- Blank Rome represented TCMI in connection with outreach and education efforts directed at Congress to address the developments arising from the U.S. Coast Guard's release of "Volume I" of the Joint Investigation Team's report of Investigation into the Deepwater Horizon oil spill. Blank Rome also created and distributed to Congressional staff informational materials on behalf of TCMI.
- Blank Rome worked in conjunction with MACP to communicate with principals and staff of the federal government and educate them on U.S.-Moroccan relations and Morocco's commitment to securing a permanent resolution of the Western Sahara issue, with the express purpose of encouraging U.S. actions that promote Moroccan sovereignty, security, and prosperity. Blank Rome also provided strategic advice to MACP on the dynamics of U.S. foreign policy decision making and distributed information provided by MACP to its contacts in the Washington foreign policy community.

Question 14(a): 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 principal, any contributions, income or money either as compensation or otherwise?

Date	Payment Type	Foreign Principal	From Whom	Amount
12/30/10	Wire	MACP	Ministere De L'interieur	\$50,000
4/13/11	Check 1548	MACP	MACP	\$25,000
4/29/11	Check 1553	MACP	MACP	\$25,000
6/9/11	Check 1555	MACP	MACP	\$25,000
			TOTAL	\$125,000

Questions 22 and 23: (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? (23) Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

- Blank Rome prepared a one-page briefing paper, or "leave-behind," and distributed it to Congressional staff members on behalf of TCMI. The briefing paper was labeled with the appropriate disclaimer, but Blank Rome cannot determine whether it was filed with DOJ. The briefing paper is appended to this Attachment 1.
- Blank Rome receives from MACP all informational materials disseminated on MACP's behalf. MACP labels the materials with the disclaimer required by Section 4(b) prior to providing them to Blank Rome. In addition, MACP files with DOJ copies of all materials provided to Blank Rome. Thus, Blank Rome answered yes to questions 22 and 23 even though Blank Rome did not actually file or label the materials itself.



Office of the

Maritime Administrator

U.S. COAST GUARD'S *DEEPWATER HORIZON* REPORT – INCOMPLETE AND SPECULATIVE

Issue: The manner in which the federal joint investigation of the *Deepwater Horizon* casualty ("Joint Investigation") has been conducted may lead to misimpressions as to the roles and responsibilities of those associated with the incident. No action should be taken before this investigation and other official inquiries are properly concluded, and final, comprehensive, and fully reviewed reports are issued.

Background: On April 20, 2010, a loss of well control and subsequent explosion occurred involving the Mobile Offshore Drilling Unit *Deepwater Horizon* that resulted in the loss of 11 lives, pollution, and the sinking of the unit. On April 27, 2010, the Departments of Homeland Security and Interior together issued a convening order (the "Convening Order") regarding the Joint Investigation of the *Deepwater Horizon* casualty. The Convening Order contained a statement of principles of how the Joint Investigation was to be conducted and called for the issuance of a single report by U.S. Coast Guard ("USCG") and the Bureau of Ocean Energy Management, Regulation and Enforcement ("BOEMRE") upon its completion. This Joint Investigation is separate and independent from the other reports and investigations relating to this incident, including the criminal investigation launched by the Department of Justice in June 2010, the ongoing investigations by the National Academy of Engineering/National Research Council, the U.S. Chemical Safety and Hazard Investigation Board, and Congressional committees in 2010, and the Report to the President by the National Commission on the BP *Deepwater Horizon* Oil Spill and Offshore Drilling issued January 12, 2011.

Republic of the Marshall Islands ("RMI"): The RMI, as the flag State of the *Deepwater Horizon*, has an obligation to conduct an investigation of the casualty and the RMI Maritime Administrator is in the process of finalizing its own report of the investigation, in accordance with the internationally accepted Code of the International Standards and Recommended Practices for a Safety Investigation into a Marine Casualty or Marine Incident ("Casualty Investigation Code"). Shortly after the casualty, the Maritime Administrator requested to participate in the Joint Investigation and provided its full cooperation as a Substantially Interested State. While there was nominal cooperation extended by the Joint Investigation team ("JIT") to the Maritime Administrator, it fell far short of a level of cooperation contemplated by the Casualty Investigation Code.

Investigation Report: Contrary to the Convening Order, on April 22, 2011, the USCG released the Report of Investigation into the Circumstances Surrounding the Explosion, Fire, Sinking and Loss of Eleven Crew Members Aboard the MOBILE OFFSHORE DRILLING UNIT DEEPWATER HORIZON in the Gulf of Mexico April 20-22, 2010, Volume I ("USCG Report"). The USCG Report was not issued jointly by the USCG and BOEMRE. The USCG Report focuses exclusively on the marine aspects of the casualty, which were not the proximate causes of this casualty. The Commandant of the USCG and his staff will review the USCG Report's findings, conclusions and recommendations, and will then decide to concur, partially concur, or not concur with the USCG Report. Pursuant to the USCG's own procedures, this report should not have been made public until the Commandant took final agency action. Another report, presumably Volume II, will be issued later by BOEMRE.

Report Concerns: The issuance of the USCG Report contravenes the requirements of the Convening Order, which directs the JIT to issue a single, comprehensive report, jointly drafted by the USCG and BOEMRE. Thus, it is important to note that the USCG Report is not "final" and will, in fact, be incorporated into the final JIT report, due by July 27, 2011. Further, a number of the key USCG investigative findings regarding the marine aspects of the casualty investigation are speculative in nature, and are couched in terms of "could have," "may have," or "it is possible." These findings are contradicted by the evidence in the investigative record or appear not to be based on the facts in the record. The advance release and nature of these findings create a misimpression as to the actual causes of the incident.

Conclusion: Actions taken on the basis of these investigations should wait until all investigations are properly concluded, and final, comprehensive, and fully reviewed reports are issued. No action should be based on the incomplete and speculative findings contained in the USCG Report.

This material is distributed by Blank Rome Government Relations LLC on behalf of The Trust Company of the Marshall Islands, Inc., the Republic of the Marshall Islands Maritime Administrator. Foreign Registered Agent information is available at the Department of Justice, Washington, D.C.

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ATTACHMENT 2

Blank Rome PAC Contributions ~ 12/3/10 thru 06/30/11

Date	Amount	Committee	Last Name	First Name	State
1/19/2011	\$5,000	National Republican Congressional Committee			
1/19/2011	\$5,000	National Republican Senatorial Committee			
1/19/2011	\$5,000	Democratic Congressional Campaign Committee			
1/19/2011	\$5,000	Democratic Senatorial Campaign Committee			
3/1/2011	\$1,000	Jim Gerlach for Congress Committee	Gerlach	Jim	R-PA-6
3/1/2011	\$1,000	Pat Meehan for Congress	Meehan	Pat	R-PA-7
3/1/2011	\$1,000	Upton for All of Us	Upton	Fred	R-MI-6
3/9/2011	\$1,000	Friends of Joe Pitts	Pitts	Joe	R-PA-16
3/9/2011	\$1,000	Friends of Bennie Thompson	Thompson	Bennie	D-MS-2
3/14/2011	\$2,500	Carper for Senate	Carper	Tom	D-DE
3/14/2011	\$1,000	People for Ben	Lujan	Ben	D-NM-3
3/15/2011	\$1,000	LoBlondo for Congress	LoBlondo	Frank	R-NJ-2
3/15/2011	\$1,000	Alaskans for Don Young, Inc.	Young	Don	R-AK
3/28/2011	\$1,000	Lou Barletta for Congress	Barletta	Lou	R-PA-11
4/11/2011	\$1,000	Dan Coats for Indiana	Coats	Dan	R-IN
4/11/2011	\$1,000	McCaul for Congress Inc.	McCaul	Michael	R-TX-10
4/11/2011	\$1,000	Jon Runyan for Congress Inc.	Runyan	Jon	R-NJ-3
4/18/2011	\$2,500	Maloney for Congress	Maloney	Carolyn	D-NY-14
4/18/2011	\$5,000	National Republican Senatorial Committee			
4/27/2011	\$1,000	Charlie Dent for Congress	Dent	Charlie	R-PA-15
4/27/2011	\$1,000	Mike Kelly for Congress	Kelly	Mike	R-PA-3
4/27/2011	\$1,000	Nelson 2012	Nelson	Ben	D-NE
4/27/2011	\$1,000	Wicker for Senate	Wicker	Roger	R-MS
5/4/2011	\$1,000	Valley PAC	Peterson	Collin	D-MN-7
5/5/2011	\$1,000	Jeff Miller for Congress	Miller	Jeff	R-FL-1
5/16/2011	\$5,000	Democratic Congressional Campaign Committee			
5/16/2011	\$5,000	Democratic Senatorial Campaign Committee			
5/23/2011	\$500	Judy Biggert for Congress	Biggert	Judy	R-IL-13
5/23/2011	\$1,000	Tim Murphy for Congress	Murphy	Tim	R-PA-18
5/31/2011	\$1,000	Andrews For Senate	Andrews	Robert	D-NJ-10
6/1/2011	\$2,500	Gillibrand for Senate	Gillibrand	Kirsten	D-NY
6/7/2011	\$2,000	Friends of Pat Toomey	Toomey	Pat	R-PA
6/13/2011	\$1,000	Hawkeye PAC	Grassley	Chuck	R-IA
6/13/2011	\$1,000	Re-Elect Tim Griffin for Congress Comm	Griffin	Tim	R-AR-2
6/15/2011	\$1,000	George Allen for US Senate	Allen	George	R-VA
6/15/2011	\$1,000	Fitzpatrick for Congress	Fitzpatrick	Mike	R-PA-8
6/15/2011	\$1,000	Friends of Mazie Hirono	Hirono	Mazie	D-HI-2
6/27/2011	\$5,000	National Republican Congressional Committee			
6/27/2011	\$5,000	National Republican Senatorial Committee			
6/28/2011	\$5,000	National Republican Congressional Committee			

Individual Contributions of Short-Form Registrants to Blank Rome PAC

Between 12/3/10 and 6/30/11	Amount
Singleton McAllister	\$3,500
Weldon Rougeau	\$3,333
Duncan Smith	\$1,458
Kristi Remington	\$292