



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

January 23, 2012

Via E-mail

Jes Black, President
Allied American Steel Corp.
600 Grant Street
Suite 660
Pittsburgh, PA 15219

**Re: Allied American Steel Corp. (f/k/a Royal Union Holding Corporation)
Form 10-K for the fiscal year ended December 31, 2010
Filed April 15, 2011
File No. 000-53485**

Dear Mr. Black:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Sonia Gupta Barros

Sonia Gupta Barros
Special Counsel

cc: Scott Rapfogel, Esq. (*via e-mail*)