

Venetian Casino Resort LLC Political Action Committee
3355 Las Vegas Boulevard South
Las Vegas, Nevada 89109
702.733.1670

Sent via Overnight Delivery

June 2, 2004

Ms. Abbie Hodgson
 Campaign Finance Analyst
 Federal Election Commission
 999 E Street, NW
 Washington, DC 20463

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Re: Venetian Casino Resort LLC Political Action Committee
 CD0399642, FEC Form 1, Statement of Organization

Dear Ms. Hodgson:

This letter responds to your request for additional information regarding the Venetian Casino Resort, LLC Political Action Committee's ("Committee") FEC Form 1, Statement of Organization. Your letter asks whether The Venetian Casino Resort, LLC is the connected organization of the Committee or whether Las Vegas Sands, Inc. should be listed as the connected organization and included in the name of the PAC.

As discussed with one of the Committee's attorneys, William McGinley of Patton Boggs LLP, on May 19, 2004, the Committee's structure and information disclosed on the FEC Form 1, Statement of Organization, complies with the Commission's guidance in Advisory Opinion 1997-13. In that Advisory Opinion, the Commission held that an LLC owned by corporations and affiliated with at least one of them may serve as the connected organization for a PAC, and that the name of the PAC may include the LLC's name. The PAC's FEC Form 1, Statement of Organization, however, must list the corporation as the connected organization. In this case, the Committee's FEC Form 1 complies with this guidance by including the Venetian Casino Resort, LLC in the name of the PAC and listing the affiliated corporation, Las Vegas Sands, Inc., as the connected organization.

During your May 19, 2004 conversation with Mr. McGinley, you also indicated that no amendment to the FEC Form 1 is necessary. However, please do not hesitate to contact us with any further questions or require additional information.


Very truly yours,


 Deanna L. Forbush
 Assistant Treasurer

C: Andy Abboud

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