



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-3561

October 14, 2010

George Boyer  
Executive Chairman of the Board  
Greektown Superholdings, Inc.  
555 East Lafayette  
Detroit, MI 48226

**Re: Greektown Superholdings, Inc.**  
**Form S-4**  
**Filed September 17, 2010**  
**File No. 333-169476**

Dear Mr. Boyer:

We have limited our review of your registration statement to those issues we have addressed in our comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. Where you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

General

1. We note that you are registering the Exchange Notes in reliance on our position enunciated in Exxon Capital Holdings Corp., SEC No-Action Letter (April 13, 1988). See also Morgan Stanley & Co. Inc., SEC No-Action Letter (June 5, 1991) and Shearman & Sterling, SEC No-Action Letter (July 2, 1993). Accordingly, with the next amendment, please provide us with a supplemental letter stating that you are registering the exchange offer in reliance on our position contained in these letters and include the representations contained in the Morgan Stanley and Shearman & Sterling no-action letters.

Signatures, page II-3

2. Please revise to provide the signatures required for each additional registrant.

Exhibit 5.1

3. The legality opinion must address the laws of the states of incorporation of all registrants, the states of incorporation of all guarantors, and the state governing the indenture. We note in the Table of Additional Registrants preceding the outside cover page of the prospectus that several guarantors are organized or incorporated in the state of Michigan. We also note from Section 13.08 of the indenture filed as exhibit 4.3 and incorporated by reference to the Form 8-K filed on July 2, 2010 that the governing law of the indenture is the State of New York. However the first sentence of the penultimate paragraph of the opinion limits the opinion to “the federal laws of the United States of America and the General Corporation Law of the State of Delaware (including the statutory provisions and reported judicial decisions interpreting such law).” Please revise the legality opinion to address the laws of the states of incorporation of all registrants, the states of incorporation of all guarantors, and the state governing the indenture.

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 Act of 1933 and all applicable Securities Act rules require. Since the company and its management are in possession of all facts relating to a company’s disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

Notwithstanding our comments, in the event you request acceleration of the effective date of the pending registration statement please provide a written statement from the company acknowledging that:

- should the Commission or the staff, acting pursuant to delegated authority, declare the filing effective, it does not foreclose the Commission from taking any action with respect to the filing;
- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing effective, does not relieve the company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the company may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Please refer to Rules 460 and 461 regarding requests for acceleration. We will consider a written request for acceleration of the effective date of the registration statement as confirmation of the fact that those requesting acceleration are aware of their respective responsibilities under the Securities Act of 1933 and the Securities Exchange Act of 1934 as they relate to the proposed public offering of the securities specified in the above registration statement. Please allow adequate time for us to review any amendment prior to the requested effective date of the registration statement.

George Boyer  
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October 14, 2010  
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You may contact John Dana Brown at (202) 551-3859 or the undersigned at (202) 551-3469 if you have questions regarding these comments.

Sincerely,

Justin Dobbie  
Special Counsel

cc: Richard A. Goldberg, Esq.  
Fax: (212) 698-3599