

**DONNELLY CLARK** attorneys at law

Donnelly & Clark, a professional LLC

**JOHN M. DONNELLY**  
jdonnelly@donnellyclark.com  
609-347-1199

April 22, 2016

Catherine Blue  
Massachusetts Gaming Commission  
101 Federal Street, 23<sup>rd</sup> Floor  
Boston, MA 02110

RE: Mass Gaming & Entertainment, LLC ("MG&E")

Dear Ms. Blue:

As a follow up to our conversation on Tuesday, MG&E would like to reiterate its commitment to and enthusiasm for its proposed casino resort in Brockton. MG&E strongly believes that this project not only will be financially successful but will bring significant economic benefits to the City of Brockton, the surrounding region and the Commonwealth.

Further, MG&E already has spent millions of dollars and thousands of hours in pursuit of the Region C license. It is fully prepared to continue to spend significant resources to bring this exciting project to fruition.

In light of the Mashpees' public assertion that it will bring a legal challenge to the Commission's authority to issue the Region C license if the Commission elects to award the license to MG&E, and if the Commission is prepared to award the license to MG&E, then we respectfully request that the Commission enter into an agreement to award the license to MG&E as explained herein. As you know, MG&E otherwise would be required to pay the \$85 million license fee within 30 days of award. Although we agree with the Commission that it has the authority to issue the Region C license, in the unlikely event that a court overturns that authority, MG&E does not want to risk losing its \$85 million payment and not have a valid license to proceed with its project. After all, MG&E would have paid \$85 million for the license for the specific purpose of building and operating its proposed casino resort in Brockton.


The grounds for this request are similar to those present in the MGM matter, which we believe is strong precedent for our request. That decision was based upon the uncertainty created by the pending referendum which would, if successful, render a gaming license of no value coupled with the further uncertainty as to any remedy to obtain reimbursement of the license fee if the license proves worthless.

In the MG&E matter, the Mashpee's stated intention is to sue on the theory that the Commission lacks the statutory authority to issue the Region C license. That suit would create the same unfair situation. MG&E would have to pay an \$85 million license fee which may not be recoverable even if the Mashpee suit successfully negates the validity of the license. Success on that claim is, we believe, highly unlikely, however the consequences of a negative decision on the Commission's authority are incredibly significant to MG&E.

We therefore request that if the Commission determines that MG&E shall be awarded a license, the Commission enter into an agreement to award the license upon the earlier of i) a final judicial determination that the Commission has the statutory authority to issue a license in Region C or ii) MG&E beginning construction on its proposed facility. This proposal contemplates an agreement structurally similar to that entered into between the Commission and MGM.

This remedy, we believe, would be both equitable and in the best interest of the Commonwealth.

Respectfully Submitted,



John Donnelly  
JMD/lat

## **Blue, Catherine (MGC)**

---

**From:** Ryne Tennant <tenant@rushstreetgaming.com>  
**Sent:** Wednesday, April 27, 2016 9:27 AM  
**To:** Reilly, Janice (MGC); Ziemba, John S (MGC); Blue, Catherine (MGC)  
**Cc:** Scott Strusiner; 'jdonnelly@donnellyclark.com'  
**Subject:** MG&E Response  
**Attachments:** MG&E Material E&O 4-27-2016-2.docx

Attached is our response to yesterday's presentation. We will e-mail the Innovation Group memo cited in the attached in a few moments.

**Ryne Tennant**  
Rush Street Gaming  
900 N. Michigan Ave, 16<sup>th</sup> Floor  
Chicago, IL 60611  
[tenant@rushstreetgaming.com](mailto:tenant@rushstreetgaming.com)  
O: 312-229-7647  
C: 217-369-6789

---

# **Response to HLT Analysis:**

## **Region C, Massachusetts**

Prepared for:  
Mass Gaming & Entertainment, LLC

**April 26, 2016**



Prepared by:  
**THE INNOVATION GROUP**  
400 N. Peters St., Suite 206  
New Orleans, LA 70130

---

Dear Massachusetts Gaming Commission,

HLT's market assessment of the impact of a casino in Brockton is fundamentally flawed in many ways, yielding an erroneous conclusion that the Commonwealth would generate less tax revenue with a casino in Brockton than without. In general, far too little revenue is ascribed to Brockton because of inconsistent and arbitrary market shares awarded to Brockton in many key markets, and the impacts of Taunton's marketing advantage are borne almost wholly by Brockton, with very minor to no impacts to other facilities. No decision maker should rely on this erroneous conclusion due to the serious flaws in the HLT analysis as described further herein.

First, the HLT gaming revenue estimates are based on a methodology significantly inferior to accepted industry standards. It is standard practice in the gaming industry to utilize a gravity model to estimate the distribution of gaming visits and revenue in a competitive market area. HLT did not use a gravity model. The gravity model's granularity incorporates drive times to gaming facilities, propensity for the population to visit facilities, income levels, attractiveness of the gaming facilities and other defensible factors in determining win per adult and market share. The inconsistent and arbitrary market shares assigned in the HLT study should not be relied upon. This sub-standard methodology would not be acceptable to potential developers or investors, and it should not be acceptable to the Massachusetts Gaming Commission.

Core to HLT's assertion that the Commonwealth will have more revenue without a casino in Brockton is their comparison of the "Full Competition" scenario without Brockton to the "Full Competition" scenario with Brockton. However, the base case scenario without Brockton has not been updated in at least two years. The numbers are identical to the ones used in the February 2014 report by HLT regarding the selection of the slots only license. One would think the numbers would be updated in the base case to be in line with the actual performance of Plainridge. The result of using the stale estimates illogically attributes the estimated reduction in Plainridge's revenues almost all to the opening of a casino in Brockton whereas realistically, the Brockton opening would only have a marginal impact on Plainridge after the casinos are open in Taunton, Boston and Springfield.

In addition to HLT's errors (which are discussed in more detail below), HLT misrepresented the prior analysis of The Innovation Group by falsely indicating that The Innovation Group had not incorporated Taunton's competitive advantage of not paying gaming taxes if there is a commercial Region C casino. Michael Soll, the President of The Innovation Group, explained at the MGC Open Meeting held on March 24, 2016 that The Innovation Group had factored this tax differential into its analysis, and further his explanation was consistent with that of HLT's testimony today in that he explained that the Mashpees will have to balance spending more money on marketing against using that capital for other purposes, thus decreasing their competitive advantage:

**MR. SOLL:** And I'll hit it kind of formally, but the simple answer is that extra income they have, they're allowed different things they can do with it. The goal is always to bring as much as possible to profit so you're balancing that against potentially spending more marketing, potentially bring business which has no economic impact by the way per se. You can enhance your property and build

extra capital. You can make your financing package more attractive. But they're all nuances and noise compared to the big picture of getting people from a convenient location to a properly built attractive casino.

In addition, HLT compared its local market only projections against The Innovation Group's projections which included local market and out of market. While HLT footnoted this difference by writing "IG's estimates include inflow from outside market area", HLT compared its projections to The Innovation Group's projections in multiple tables as if they were apples to apples when clearly they were not.

There are so many errors and inconsistencies in the HLT analysis that it is impossible to catalog them all, but the discussion below highlights a few of the significant discrepancies.

- HLT incorrectly, and without justification, allocates too much market share to Taunton and too little to Brockton. For example, even in HLT's Scenario I (in which Taunton pays gaming taxes and therefore has a minimal tax advantage), HLT projects that Brockton would have gaming revenues of \$244.7M and Taunton would have gaming revenues of \$236.0M. This result seems unbelievable since Brockton is located 17 miles north of Taunton, much closer to the Boston population base. Further, the Mashpees and Genting have announced that its Phase I will only have approximately half of the originally planned gaming positions with fewer amenities. And even if Taunton had more gaming positions, it would not materially impact the market share allocation since the demand would not warrant the higher supply of gaming positions, and the outcome would be lower utilization with little revenue impact.
- The impacts asserted by HLT from Taunton's marketing advantage in Scenario 2 are also not credible; for example with respect to the Boston Suburbs – South submarket:
  - HLT projects that Taunton would cannibalize Brockton to the extent that Brockton and Plainridge have the same market share in the Boston Suburbs – South submarket. Given Brockton's proximity and robust amenity package, it is not credible that Taunton would cannibalize Brockton to the point that its revenues are the same as Plainridge in this key submarket.
  - It is not realistic that Taunton is assigned a 30% market share versus only a 15% market share for Brockton (1/2 of Taunton) even though Taunton is 42.8 minutes away and Brockton is only 19.5 minutes away.
  - The vast majority of the impact is concentrated on Brockton, which is estimated to decrease by 18.3%, but HLT forecasts zero impact on Connecticut.

**Boston Suburbs-South Drive Time Minutes and Scenario 2 Market Shares**

	ZIP CODE	Brockton	Plainridge	Everett	Taunton	Springfield
Canton	02021	17.45	22.35	29.90	40.40	123.82
Stoughton	02072	10.27	24.03	32.77	33.22	128.37
Braintree	02184	18.02	33.27	20.43	41.95	128.57
Weymouth	02188	20.07	36.80	23.97	42.98	132.10
East Weymouth	02189	22.88	39.48	26.53	45.80	134.67
South Weymouth	02190	17.98	39.18	26.35	40.90	134.48
Avon	02322	7.45	29.95	30.57	32.68	132.52
Holbrook	02343	10.17	35.33	27.63	34.10	132.88
Randolph	02368	13.38	30.40	24.00	37.72	125.95
Cohasset	02025	34.63	49.95	34.93	57.55	143.07
Hingham	02043	27.60	44.27	29.88	50.52	138.02
Hull	02045	35.83	48.62	31.92	58.75	141.73
Sharon	02067	18.20	16.42	37.47	39.65	123.93
<b>Average</b>		<b>19.53</b>	<b>34.62</b>	<b>28.95</b>	<b>42.79</b>	<b>132.32</b>
<b>Market Share by HLT</b>		<b>15%</b>	<b>15%</b>	<b>17.5%</b>	<b>30%</b>	<b>5%</b>

- Meanwhile, Wynn/Boston is awarded a higher share, 17.5%, despite the greater drive time.
  - Further, Wynn/Boston's 17.5% does not change between Scenario's 1 and 2 while Brockton's share drops from 27.5% to 15%.
  - Likewise, Springfield's 5% market share does not change between Scenario's 1 and 2. This means that in Scenario 2 Springfield's market share is one-third that of Brockton's.
- Given the unjustified market share allocations in Scenario I, and using those as a starting point, HLT proceeds in Scenario II to show that Taunton will generate \$305.5M in gaming revenues versus only \$199.9M by Brockton. This has the result of dramatically overestimating Taunton revenues, which will not be taxed if there is a commercial Region C casino, and underestimating Brockton's revenues, which would pay a 25% tax rate.
  - The impacts asserted by HLT from adding Brockton in Scenario 1 are not credible; for example:
    - The total GGR in the market does not change, which implies that the market is 100% inelastic. This is not credible, since the addition of a casino to the market would have some impact on total GGR.

- Rhode Island and Connecticut take a 50% hit in Central Boston but no hit in Central Boston – North (which is even further from Rhode Island and Connecticut), and Rhode Island takes no hit in Central Boston-South, all of which underestimate the new revenues which would be repatriated to Massachusetts due to the Brockton casino.
  - Plainridge declines by 29% and Taunton by 36%, while Rhode Island only declines by 6%.
  - Plainridge goes from \$6 million to \$0 in Central Boston – North. Brockton would not cannibalize Plainridge by 100%.
- Illogical assertions by HLT pertain to other submarkets as well. For example, in Central Boston – South, HLT again without justification assumes that Taunton will cannibalize Brockton to the point its projected market share of 10% matches that of Plainridge. It is simply not credible to believe that Brockton and Plainridge would have the same market share in this submarket.
  - HLT utilizes revenue assumptions for Plainridge which no longer are supported by actual performance. Plainridge today has revenues of approximately \$145M per year based on recent gaming revenues of \$11M-\$13M per month. Plainridge currently benefits from Wynn, MGM and Taunton not yet being open. However, HLT used its previous, and now stale, assumption for Plainridge of \$143.1M in its base scenario, when Plainridge would face competition from Boston, Springfield and Taunton. Based on actual performance, this assumption when competition opens is significantly too high, and therefore, there will be less Plainridge revenue to cannibalize, resulting in a smaller gaming tax impact to the Commonwealth if the Brockton casino also opens.
  - Further, once Taunton opens and takes its share of the southeastern Massachusetts market, the marginal impact on Plainridge from Brockton will be much smaller than what HLT has forecasted.
  - HLT makes very broad brush assumptions, and consequently, its projections are not accurate. For example, it does not take into account income levels or other demographics when determining GGR per adult.

Overall, the HLT analysis falls well short of industry standards and has made a horribly erroneous conclusion that the Brockton casino would result in less revenue for the Commonwealth. No decision maker should rely on this analysis.



## **Blue, Catherine (MGC)**

---

**From:** Ryne Tennant <tennant@rushstreetgaming.com>  
**Sent:** Thursday, April 28, 2016 9:34 AM  
**To:** Reilly, Janice (MGC); Ziemba, John S (MGC); Blue, Catherine (MGC)  
**Cc:** Scott Strusiner; 'jdonnelly@donnellyclark.com'  
**Subject:** RE: E&O from 4-27-2016  
**Attachments:** Letter to Massachusetts Gaming Commission, 4-28-16.pdf; Region C Revenue Estimates.pdf

We would like this e-mail to supplement the e-mail below. We have attached two letters for the commission.

- **Mitigation**
  - We request that the record reflects the fact that five of seven wards and 22 of 28 precincts in Brockton voted for our project at the referendum vote in May 2015. Further, the mayor of Brockton and many other local and state officials have come out publicly in strong support of our project. Also, it is our experience that public support for our projects dramatically increases once we open and the public can see the quality of our development and operations as well as the positive impact on the community.

**Ryne Tennant**  
Rush Street Gaming  
[tennant@rushstreetgaming.com](mailto:tennant@rushstreetgaming.com)  
O: 312-229-7647  
C: 217-369-6789

**From:** Ryne Tennant  
**Sent:** Wednesday, April 27, 2016 4:03 PM  
**To:** 'Reilly, Janice (MGC)' <Janice.Reilly@MassMail.State.MA.US>; 'Ziemba, John S (MGC)' <John.S.Ziemba@MassMail.State.MA.US>; Blue, Catherine (MGC) <catherine.blue@state.ma.us>  
**Cc:** Scott Strusiner <strusiners@lambllc.com>; 'jdonnelly@donnellyclark.com' <jdonnelly@donnellyclark.com>  
**Subject:** E&O from 4-27-2016

Below is a comment in response to the Mitigation section discussion today. We will be sending two short letters by tomorrow morning.

- **Mitigation**
  - We request that the record reflects the fact that five of seven wards and 22 of 28 precincts in Brockton voted for our project at the referendum vote in May 2015.

**Ryne Tennant**  
Rush Street Gaming  
900 N. Michigan Ave, 16<sup>th</sup> Floor  
Chicago, IL 60611  
[tennant@rushstreetgaming.com](mailto:tennant@rushstreetgaming.com)  
O: 312-229-7647  
C: 217-369-6789

April 28, 2016

Dear Massachusetts Gaming Commission,

We sincerely appreciate your hard work, dedication, professionalism and public service to the Commonwealth. Our respect and gratitude extends to the Commissioners, staff, and consultants. We wish you well in your deliberations over the Region C license.

However, in response to Chairman Crosby's statements yesterday when discussing the Overview /Wow section, we would like to say that not only do we respectfully disagree, but we think a lot of people in the City of Brockton, Region C and the Commonwealth strongly disagree.

It has been widely acknowledged by people who have visited our affiliated casinos and operations, including Commissioners and the President of the Metro South Chamber of Commerce (who visited Rivers Casino in Des Plaines over two days and met with city officials and the President of the local chamber of commerce) that we have a proven track record of forging very good relationships with host communities, promoting diversity (including among senior leadership), creating mutually beneficial alliances with community colleges and other hiring and training organizations, partnering with and purchasing from local businesses and other stakeholders, supporting through time and money local charities, and being the catalyst for further economic development that in turn generates more jobs and tax revenue, and most importantly, improves lives. While we have all come across organizations that make unfilled promises, we believe that the best proof that we are going to do a great job for the Commonwealth is our track record. The truth is that our casinos are consistently voted best in their respective jurisdictions, and we believe that frequently the best response we can give is to point to what we have consistently done well. If we are awarded the Region C license, we are confident that our proposal will be a first-class project which will make the Commonwealth proud.

We find it hard to believe that the Overview/Wow section was graded as "insufficient". Chairman Crosby mentioned that the Legislature intended for significant developments to take place by incorporating the \$500 million minimum investment requirement. Not only will we invest \$500 million in eligible costs to meet that requirement, we actually will invest closer to \$700 million. Our proposal certainly meets the requirements of the Expanded Gaming Act, and we respectfully disagree that a \$700 million investment is insufficient, especially when we have designed a well-conceived, first class project, appropriate for its context, which is not in a downtown setting. We further have tried to be sensitive to the project's surroundings while balancing our business needs. Recognizing that the forecasted revenues for Everett and Springfield are significantly higher than for Brockton, particularly if there is a casino in Taunton, we have designed what we think the Region C market can support and successfully sustain. Our team has discussed incorporating references to Brockton's history prior to yesterday, and while our plans may not show it at this early stage, it is something we intend to do. If we are awarded the Region C license, as we have done with our other projects, we will revisit our design – to make it better.

We look forward to helping the City of Brockton design and fulfill its vision of an Entertainment District and engaging with the community in many other ways (from partnering with Campanelli Stadium and the Shaw Center, to hiring and purchasing locally, to participating and giving to local charities and other philanthropic causes, and to holding outdoor farmers markets, as we have done at our affiliated casinos). In addition, our affiliated casinos are some of the most well-designed in the industry, and we have award winning food & beverage programs. Furthermore, while Chairman Crosby would like to

have seen more detail regarding our marketing plans, we outperform our fair market share in every market in which we operate.

While we respectfully cannot give Chairman Crosby his entire wish list, we have provided a first class proposal. If the Commission votes to not award us the Region C license, not only will we not be able to deliver everything that everyone might want, but the City of Brockton, Region C and the Commonwealth will get nothing. By voting no because we have not given everything, the Commission will be voting to deny the City of Brockton a strong catalyst for future development. The City of Brockton, while a great city, is in need of economic development, and without our proposed casino resort, the Entertainment District almost certainly will not occur, the Exhibition Hall almost certainly will not be renovated, and the City almost certainly will not see another opportunity like this one. We would urge you to not deny the City of Brockton this opportunity for jobs, revenue and economic development.

Thank you for your consideration.

Sincerely,

Mass Gaming & Entertainment, LLC

**Mass Gaming & Entertainment, LLC**  
900 N. Michigan Avenue / Suite 1600 / Chicago, IL 60611

April 28, 2016

Massachusetts Gaming Commission  
101 Federal Street; 12<sup>th</sup> Floor  
Boston, MA 02110

**Re: Region C Revenue Estimates**

Dear Commissioners:

While we respect HLT Advisory, I must respectfully disagree with HLT's analysis of the Massachusetts gaming market. Rush Street Gaming and its affiliates have successfully developed new casinos and resorts in Niagara Falls, Canada; Des Plaines, IL; Philadelphia and Pittsburgh, PA; and Vicksburg, MS. Approximately two years ago, we analyzed the Brockton market assuming there would be a casino in Taunton and engaged two prominent firms, The Innovation Group and Maxim Strategy Group, to perform gravity model assessments to estimate the gaming revenue for a casino in Brockton, assuming a tribal casino in Taunton. Their numbers were fairly consistent, but independently determined. Our potential partner, Clairvest, which has extensive experience in investing in casinos throughout North America, hired a third firm, Leisure Dynamics, and came to a similar conclusion as we did. Further, leading banks have given us highly confident letters in support of our conclusions, with and without a casino in Taunton. Further, all of the projections done by HLT and our group assumed that the Taunton facility was built out without phasing. While our underwriting was satisfactory based on the full build-out of the Taunton facility, we believe there is upside potential because a smaller phase one property may be all that is ever built in Taunton.

We are convinced that the projections supported by The Innovation Group and the two other leading firms, our own experience and those of Clairvest and the banks are such that we are confident that the Brockton casino will be successful, dramatically outperform HLT's projections (which we believe are too conservative, possibly in response to Plainridge underperforming previous forecasts), and generate more gaming revenue for the Commonwealth with or without a casino in Taunton.

We are putting our own equity that I have earned over the years for myself and my family into this project, as would Clairvest, assuming it is found to be suitable.

If we believed there is any realistic chance that HLT's numbers would turn out to be correct, I would withdraw my application for a license because I would not want to risk my own family's money in a project that could possibly be unsuccessful.

If Taunton believed the HLT numbers, they should be welcoming us in Brockton since their profits would be higher with such high revenue and no taxes. They must not believe these numbers themselves

This is an important decision for the City of Brockton, Region C and the Commonwealth. I suggest you rely on the experience of highly credible, proven and successful investors in the industry using industry-leading forecasting methodology to help you make it.

Sincerely,

Neil G. Bluhm

A handwritten signature in black ink, appearing to read "Neil G. Bluhm". The signature is written in a cursive style with a large initial "N".

Chairman

Mass Gaming & Entertainment, LLC

## **Mayor Carpenter's Open Letter to the Mass Gaming Commission 4/27/16**

To the State Gaming Commission:

As Mayor of the City of Brockton I feel it necessary to respond to Chairman Crosby's criticism of Mass Gaming & Entertainment's response to the overview entitled "Wow Factor".

The Chairman is correct, Brockton is not Springfield. The challenges Brockton faces are immediate and set the stage for economic development. Those challenges include but are not limited to:

- Public Safety
- Public Schools (a projected \$10 million deficit may lead up to 200 teacher layoffs)
- The rebuilding of a 45 year old high school that houses over 4,000 students
- Unemployment which is 150 percent of the state average (the resort casino will put our residents to work)

Rebuilding Brockton's economy has always been an integral part of the plan linking the development of the resort-casino to the economic revitalization of Brockton. The Host Community Agreement between Mass. Gaming & Entertainment and the City provides funding for a planning study to create the entertainment district.

In fact, several provisions in the Host Community Agreement will directly grow Brockton's economy. The Host Community Agreement contains a "residence preference" in hiring. We estimate that 80 percent of the 1,800 new jobs created will go to Brockton residents. Conservatively, that pumps \$60 million per year into our local economy.

Additionally, the Host Community Agreement contains a local purchasing requirement of the resort casino that requires the casino to look first in Brockton whenever purchasing goods or services. This requirement will generate millions of dollars per year in sales for Brockton-based businesses, creating additional jobs in the private section.

Brockton does not have a four-star hotel, in fact the majority of the hotels in the city are being used BY THE STATE as homeless shelters. The city has no first-class restaurants, the resort-casino will bring five such restaurants into the city. The city has also underutilized Campenelli Stadium and the Shaws' Conference Center. The resort-casino will allow us to repurpose and to expand their usage.

One only needs to look at Rush Street's history; their success in Philadelphia, Pittsburgh and Des Plaines. In all three cases, Rush Street has been integrally involved in the revitalization of the surrounding community.

I ask the Chairman and the members of the Committee to return to Brockton in 10 years; after \$125 million has been generated to the city by a resort-casino; after 1800 jobs have been created; after the local economy is infused with business generated by this project. Come back and share in the success and know that you changed the future of a city and its residents.

Bill Carpenter, Mayor, City of Brockton

## **Stand UP for Brockton Responds to Mayor Carpenter's Open Letter**

We all agree Brockton is not Springfield. That seems to be the end of the agreement. Mayor Carpenter has identified four areas where Brockton has issues and needs help.

- **Public Safety** – This is an area of grave concern for all residents of Brockton. Adding police officers and enhancing fire protection service are needed. For this there is no debate. But deploying the extra services to a casino and entertainment region will leave much of the rest of the city with less protection than it has now.
- **Public Schools** – Yes, there is a financial shortfall here. There are many reasons for this. The \$10 million deficit for the next fiscal year is not quite accurate now. \$1 million more has been provided from the Commonwealth in recent days, the superintendent is making administration cuts to the tune of \$1.5 million dollars and there is a suggestion to close one elementary school for a savings of \$4.5 million. Simple math now reveals a deficit of \$3 million and this is for the next school year, which proposed casino revenues will not help since it will not be open. Much talk has gone on about the \$10 million annual money to the City but when one listens carefully it has been spent several times over for each year already.
- **Brockton High Upgrade** – Yes, this may be needed. I cannot attest to that. But maintenance is better than new construction to control school department annual and capital costs. If a new school is really needed, build it on the fairgrounds property.
- **High Unemployment** – A real problem in Brockton that does not seem to be going away. The claim of 80% of the 1800 jobs will be filled by residents of Brockton is a little unrealistic to me. To work at a casino there are several critical tests that must be done (CORI and credit ratings). Many of those who are under employed and unemployed will not qualify so someone else that is a non-Brockton resident will have to take the jobs. Jobs are needed in Brockton, no one argues that, but how to achieve these goals, well that answer is still being sought. When a non-Brockton resident gets one of these jobs they shop in their home towns and that does not go into the Brockton economy.

A resort casino is what Rush Street Gaming, Mayor Carpenter, George Carney and MG&E declared they were trying to bring to Brockton when that spent over \$1.6 million on the May 12<sup>th</sup> vote, it is what they still claim they are offering. But as well stated by Chairman Crosby, the numbers, the preparations, the marketing plan, the weak presentations all lead to a “local convenience casino” and not a “resort destination casino”.

Within the Host Community Agreement is local purchasing requirement. This sounds like a great idea, but if the companies do not exist in Brockton now to provide these services, then the purchasing goes outside of Brockton and the projected economic boost is simply a concept that fails to materialize. Bringing such businesses into Brockton is a great way to generate new money into the local economy. It seems that Mayor Carpenter is putting the cart before the horse.

Just what is a first class restaurant? There are many restaurants in Brockton that I have dined at over the years that I rate as first class. They provide a great meal at a reasonable price with good service. The name of a restaurant does not make it first class. While traveling I have eaten in some of those restaurants and walked away disappointed and vow to never return. You ruin my steak, I never come back.