



Massachusetts Gaming Commission
RFA-2 Application Review
Category 2 License for Slots Parlor

Report to the Commissioners for: Category # 3 - Economic Development

**Commissioner: Bruce Stebbins
February 25, 2014**

Contents

1. Introduction

- Criteria ----- 2
- Rating System ----- 2
- RFA – 2 Category # 3 Question List----- 2

2. Overall Rating (Provisional) ----- 4

3. Criteria Rating Summary ----- 6

4. Review Detail ----- 9

- Criterion 1 Job Creation ----- 9
- Criterion 2 Supporting External Business and Job Growth ----- 27
- Criterion 3 Regional Tourism and Attractions ----- 40

5. Appendix ----- 52

- A1. Labor and Payroll
- A2. Benefit Comparison
- B. Host Community Demographic Characteristics
- C. Workforce Ethnicity – Applicant’s Other Facility
- D1. Construction Cost Overview
- D2. Operating Expenses Summary
- E. Market Focus and Marketing Activities
- F. Category 2 Community Agreement Hiring Commitments
- G. Category 2 Community Agreement Purchasing Commitments

1. Introduction

Category 3 encompasses the Economic Development aspects of the Applicant proposals, specifically as it relates to areas of job creation, support of external business and job growth, and regional tourism and attractions.

Main Criteria

Category 3 is comprised of 3 Criteria:

- Criterion 1 (Questions 3-1 to 3-13): Job Creation
- Criterion 2 (Questions 3-14 to 3-23, 3-30): Supporting External Business and Job Growth
- Criterion 3 (Questions 3-24 to 3-33): Regional Tourism and Attractions

Rating System

Color coding and rating explanation

INSUFFICIENT	Failed to present a clear plan to address the topic, or failed to meet the minimum acceptable criteria of the Commission.
SUFFICIENT	Comprehensible and met the minimum acceptable criteria of the Commission; and/or provided the required or requested information.
VERY GOOD	Comprehensive, demonstrates credible experience and plans, and /or excels in some areas.
OUTSTANDING	Uniformly high quality, and demonstrates convincing experience, creative thinking, innovative plans and a substantially unique approach.

Question List

- 3-1 Studies and Reports
- 3-2 Employees
- 3-3 Massachusetts Community College Workforce Training Plans
- 3-4 Job Opportunities and Training for Unemployed and Underemployed
- 3-5 Experience with Hiring Unemployed and Underemployed
- 3-6 Plan for Workforce Development
- 3-7 Affirmative Action Plan
- 3-8 Workforce Development
- 3-9 HR Practices
- 3-10 Organized Labor Contracts
- 3-11 Labor Harmony
- 3-12 Employee Retention Record
- 3-13 Ethnic Diversity
- 3-14 Local Business Promotion
- 3-15 Local Suppliers
- 3-16 Local Business Owners
- 3-17 Assisting Businesses
- 3-18 Promoting Regional Businesses
- 3-19 Vendor Supplied Goods
- 3-20 Minority, Women, and Veteran Businesses
- 3-21 Projected Benefit for Regional Businesses
- 3-22 Domestic Slot Machines
- 3-23 Gaming Equipment Vendors
- 3-24 Local Agreements
- 3-25 Cross Marketing
- 3-26 Collaboration with Tourism and Other Industries
- 3-27 International Marketing Efforts
- 3-28 Other Amenities
- 3-29 Unique Business and Marketing Strategies
- 3-30 Regional Economic Plan Coordination
- 3-31 Other Community Enhancements
- 3-32 Record of Success
- 3-33 Entertainment and Athletic Events

2. Overall Rating (Provisional)

Introduction

The RFA-2 review process consisted of: a review of the applications and supporting documents by individual reviewers, presentations by the applicants and questions by the Commission at public hearings, public input review of background material prepared by subject matter experts, and group meetings to discuss individual reviews, culminating in the preparation of a provisional ratings. The review process was augmented by field visits to a sample of Applicant’s existing operations and reference calls.

The review group consisted of the following:

- MGC staff: Jill Griffin, Director Workforce Development and Supplier Diversity
- Independent Evaluators – Betsy Wall (MA Office of Travel and Tourism), Lynn Browne (Economist), Jennifer James (Undersecretary, Labor and Workforce Development)
- Subject Matter Experts/Consultants – Lyle Hall (HLT Advisory Inc.), Carla Giancola (HLT Advisory Inc.)
- Coordinator – Nancy Stack, Melissa Martinez (Pinck & Co., Inc.)

Recognizing that RFA-2 Applications for a Category 2 Gaming License are focused on a regional marketplace with less profound tourism impact, the jobs category was considered a higher priority.

VG	Leominster/PPE
	<p>The Leominster/PPE applicant was relatively strong in describing workforce development but lacked detail in the implementation of HR practices and had no defined strategy regarding ensuring labor harmony during operations. Limited detail on the approach to identifying and hiring the unemployed or underemployed was provided, although the Application did reference an agreement with ARC of Opportunity to facilitate employment of disabled individuals. Leominster’s 5-year revenue projections had the least year-over-year fluctuation (due to anticipated competition) which resulted in the least variance in payroll and benefits. Leominster verbally agreed to maintain employment levels as a condition of the license, subject to negotiations</p> <p>Leominster/PPE demonstrated established relationships using local suppliers and women’s/minority businesses.</p> <p>Leominster/PPE showed a unique approach with the M3D3 program, the positive economic benefits of which tie into the regional economic development plan in an area of high unemployment.</p> <p>The application described how the applicant’s proven marketing and promotional activities at Maryland Live! would be applied in Leominster. The Application also noted compatibility with the regional economic development plan and linkage to “Gateway City” characteristics. Finally, Leominster demonstrated outreach to existing tourism promotion entities (Johnny Appleseed Trail Association) and regional entertainment venues (e.g., DCU Center) but did not define relationships to existing Mass. Statewide marketing infrastructure (e.g., Mass Office of Tourism).</p>

VG	<p>Plainville/SGR</p> <p>Plainville provided evidence of having extensive experience with a variety of facilities in a number of different jurisdictions, similar in size and scope (or larger) to the Application presented for Plainridge Park. Plainville proposed the lowest employee count and payroll, however, the proportion of union employees (as measured by number of employees and total payroll) are the highest – this being supported by a positive track record at existing locations and evidence of anticipated union representation and executed Project Labor Agreements (PLA’s). The projections also incorporate a full-time benefits package with the highest overall company contributions towards medical/dental/disability. The numerous facilities owned/operated by Plainville offers mobility opportunities and the benefit of a standardized corporate structure/support network. Plainville agreed in a written response to maintain employment levels as a condition of the license, subject to negotiations</p> <p>In addition to providing outreach plans for contractors and suppliers during operations, Plainville demonstrated established relationships with local businesses in multiple jurisdictions in which they currently operate (numerous support letters were provided as evidence). Lacking an applicable regional development plan Plainville did propose to create a new economic development organization to leverage new employment and local revenues from gaming.</p> <p>Plainville provided many examples of working with local convention and visitors bureaus in their other jurisdictions and provided numerous letters of local support with the application. Plainville’s outreach plans included major area retailers (Wrentham Village Outlet Mall), sports/entertainment venues (Gillette Stadium,) and other local tourist destinations. Plainville identified existing Massachusetts marketing infrastructure (e.g., Massachusetts Office of Tourism), attractions/infrastructure and market segments but had not entered into any form of preliminary arrangements. Plainville proposes to continue harness racing at the racetrack in Plainville and continuation of associated payroll, and positive economic benefits.</p>
S	<p>Raynham/RP</p> <p>Raynham provided numerous responses to questions that demonstrated evidence of past practices and programs in place at their existing facility. However, there was a general lack of specific linkage and elaboration regarding the implementation of programs and plans at Raynham. Raynham projected the largest staff complement and payroll, with a significant number tied to future non-gaming elements of the facility; however limited back-up or substantiation was provided to enable reconciliation with overall projected operations. Additionally, very limited detail was provided on how Raynham would identify/hire the unemployed and underemployed, except for targeting former dog track employees.</p> <p>Raynham showed significant allocation of spending for marketing and entertainment; however, provided a lack of detail or supporting documentation to demonstrate how marketing and entertainment programs will link to the proposed development. Little detail was provided on how the applicant intends to work with local business. Surrounding community agreements detailed minimum gift certificate purchases from local businesses.</p> <p>Raynham did not demonstrate an awareness or attempt to reach out to existing Massachusetts marketing infrastructure (e.g., Massachusetts Office of Tourism), attractions/infrastructure and market segments. Raynham committed to provide funds towards a limited racing program at Brockton Fairgrounds (for one year, possibly longer), in the event that the racetrack at Plainville closed, which could provide some economic benefit through payroll and local spending, albeit more limited than if a full racing program was proposed.</p> <p>Raynham did propose targeted relationships with local sport teams.</p>

3. Criteria Rating Summary

	Leominster/PPE	Plainville/SGR	Raynham/RP
1. Job Creation	Very Good	Very Good	Sufficient
<p>Applicants demonstrated an awareness of staffing requirements for their proposed facilities but, for the most part, fell short in describing how staff would be identified, trained and retained—notably the underemployed and unemployed. Workforce development plans were generally weak, providing little to no focus on career path/advancement opportunities and pre-employment programs. Applicants were sensitive to affirmative action requirements.</p> <p><u>Leominster/PPE</u></p> <ul style="list-style-type: none"> • Best overall description of workforce development. • Demonstrated awareness of local partners (arrangements with UMass, ARC) and past experience in Maryland (Center for Social Change) • Community-based hiring center demonstrates forward thinking • Employer-based internship program (Fitchburg State University MOU). • M3D3 proposal has potential to enhance business activity in the region together with job creation opportunities outside the gaming/hospitality area • Less variance in payroll/employment levels over a five year term. <p><u>Plainville/SGR</u></p> <ul style="list-style-type: none"> • Most realistic payroll and labor estimates, especially in post-competitive environment/scenarios. • Overall description of workforce development reasonably good and inclusion of unique retention strategies (e.g., role playing) • Described approach to conduct industry briefings at job centers. • Demonstrated positive track record in union relationships. • Broad existing human resource management and job development infrastructure at more than two dozen similar gaming facilities in multiple jurisdictions. • Maintains racing employment at Plainridge Racecourse and supports associated support businesses and farms. <p><u>Raynham/PR</u></p> <ul style="list-style-type: none"> • Overall description of workforce development provided limited detail • Did not demonstrate clear awareness of Massachusetts-wide or local employment operating environment. • Provided limited answers to most questions. • Referenced Parx experience in Pennsylvania but failed to provide linkages to strategies for Massachusetts. • The Raynham revenue projections are believed to be aggressive. The associated payroll and employee estimates are also believed to be aggressive without sufficient clarification 			

	Leominster/PPE	Plainville/SGR	Raynham/PR
2. Supporting External Business and Job Growth	Very Good	Very Good	Sufficient
<p>All applicants recognized the significant direct (e.g., construction costs, goods purchased, on-site payroll) and indirect (e.g., marketing relationships with local businesses) economic benefit a gaming facility could have on the host community (and surrounding area). In general, all applicants demonstrated these benefits from existing operations and detailed how these benefits would materialize in Massachusetts. As a result, all applicants noted the importance of buying locally and, to different degrees, facilitating buy-local policies.</p> <p><u>Leominster/PPE</u></p> <ul style="list-style-type: none"> • Details provided on outreach plans for contractors (sub trades) and suppliers during operations. • M3D3 proposal (up to \$1.5 million year funding for five years) is unique approach to business stimulation; fits with regional economic plan. <p><u>Plainville/SGR</u></p> <ul style="list-style-type: none"> • Broadest operational track record with significant number of endorsement letters for economic development and community support. • Details provided on outreach plans for contractors (sub trades) and suppliers during operations. • Despite no regional economic development plan (Plainville proposes to create a new economic development organization to leverage new employment and local revenues from gaming. • Contains more meaningful “local content” focus – “Play, Stay, Shop” • Maintenance of existing racing operation at Plainridge Racecourse (annual expenditures of \$7 million+ on payroll and operating expenses, excluding purses and mutuels). <p><u>Raynham/PR</u></p> <ul style="list-style-type: none"> • Raynham operating costs, notably marketing and entertainment spending while higher than other applicants is insufficiently explained/backed-up Raynham identified sports partnerships as potential marketing opportunities (in and out-of-state). • Provided no context or linkage to the existing regional economic development plan. • Taken in conjunction with aggressive revenue projections, the Raynham application is lacking in connection with and commitment to the local area. • Lack of specifics on how Raynham might work with local businesses. • Strong pre-existing business relationships between the Carney Family over the years. 			

	Leominster/PPE	Plainville/SGR	Raynham/RP
3. Regional Tourism and Attractions	Very Good	Very Good	Sufficient
<p>The approach taken by applicants in the tourism marketing and attractions section reflects the considerable pent-up demand for gaming in Massachusetts and the monopoly afforded to the Category 2 license for the initial few years of operation (i.e., limited need to market aggressively in initial years). All applicants presented a range of traditional marketing, partnership, advertising and reward (i.e., player card) programs. All applicants were weak in demonstrating a connection to existing Massachusetts marketing infrastructure (e.g., Massachusetts Office of Tourism), attractions/infrastructure and market segments.</p> <p><u>Leominster/PPE</u></p> <ul style="list-style-type: none"> • Tie into to Maryland Live!’s existing player database and affinity with other “Live!” projects (entertainment/music focus as opposed to gaming). • Goals linked to Gateway City initiative. • Other community enhancements and guaranteed annual monetary commitment to support the M3D3 program. . <p><u>Plainville/SGR</u></p> <ul style="list-style-type: none"> • Tie into Penn National’s existing player database (“Marquee Rewards”) with cardholders across the U.S. • Broadest marketing track record with significant number of endorsement letters. • On-site harness racing taps into complementary market segment; Penn National proposal is the most likely avenue to maintain uninterrupted harness racing activity. • Significant number of references from other jurisdictions in which Penn operates. <p><u>Raynham/PR</u></p> <ul style="list-style-type: none"> • Very limited detail provided on marketing plans, partnerships with local tourism businesses/marketing entities and description of new operations (Parx) • Entertainment and advertising budgets, while substantive (significantly higher than the other two applicants), were neither well explained nor linked to the proposed development Proposal for creating harness racing operations at Brockton Fairgrounds if selected. 			

4. Review Detail

Criterion 1: Job Creation (Q. 3.1-3.13)			
Overall Comments	Applicants demonstrated an awareness of staffing requirements for their proposed facilities but, for the most part, fell short in describing how staff would be identified, trained and retained—notably the underemployed and unemployed. Workforce development plans were generally weak, providing little to no focus on career path/advancement opportunities and pre-employment programs. Applicants were sensitive to affirmative action requirements as well as MBE/WBE needs.		
	Leominster/PPE	Plainville/Penn National	Raynham/PR
Criterion 1 Rating	<ul style="list-style-type: none"> • Very Good 	<ul style="list-style-type: none"> • Very Good 	<ul style="list-style-type: none"> • Sufficient
Justification	<ul style="list-style-type: none"> • Best overall description of workforce development. • Demonstrated awareness of Mass situation (arrangements with UMass, ARC) and past experience in Maryland (Center for Social Change), however failed to identify one-stop career center. • Community-based hiring center demonstrates forward thinking • Employer-based internship program (Fitchburg MOU). • M3D3 proposal has potential for job creation outside the gaming/hospitality area • Less variance in annual revenue (over 5-year term) results in less payroll/employment variance. 	<ul style="list-style-type: none"> • Most realistic payroll and labor estimates. • Reasonably good overall description of workforce development. • Described approach to use industry briefings at job centers. • Demonstrated positive track record in union relationships. • History of human resource management and job development over more than two dozen similar gaming facilities in multiple jurisdictions. • Maintains racing employment at Plainridge Racecourse. 	<ul style="list-style-type: none"> • Weakest overall description of workforce development. • Did not demonstrate clear awareness of Massachusetts-wide or local employment operating environment. • Provided cursory answers to most questions. • Referenced Parx experience in Pennsylvania but failed to provide detail or linkages to Massachusetts. • Raynham’s revenue projections in the third to fifth year are notably higher than other applicants due, in large measure, to assumptions on future competition. Limited narrative explanation is provided in the application. The Raynham revenue projections are believed to be aggressive. The associated payroll and employee estimates are also believed to be aggressive.

3.1 Studies and Reports — Provide completed studies and reports showing the proposed gaming establishment’s: (i) economic benefits to the region and the Commonwealth; (ii) impact on the local and regional economy, including the impact on cultural institutions and on small businesses in the host community and surrounding communities.			
Expectations of Applicant	<ul style="list-style-type: none"> • Massachusetts-specific and/or project specific (independent or company) studies and reports that address: <ul style="list-style-type: none"> ○ Job Creation <ul style="list-style-type: none"> ▪ Evidence (i.e., what Applicant is proposing specific to Mass or work done in other jurisdictions) demonstrating incremental employment? ○ Supporting External Business and Job Growth <ul style="list-style-type: none"> ▪ Creation of synergies and/or joint ventures with local businesses? ▪ Evidence of incremental employment? ▪ Evidence in incremental visitation? ○ Regional Tourism <ul style="list-style-type: none"> ▪ Evidence of incremental visitation to the host community (e.g., hotel room nights or similar measures)? 		
Overall Comments on all Applications	Not separately rated.		
	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	• Not Relevant	• Not Relevant	• Not Relevant
Existing and past practices supporting commitments	• Not Relevant	• Not Relevant	• Not Relevant

3.2 Employees —State the number of employees to be employed at the proposed gaming establishment, including detailed information on the pay rate and benefits for employees, and describe how the applicant proposes to ensure that it provides a high number of quality jobs in the gaming establishment.			
Expectations of Applicant	<ul style="list-style-type: none"> • Full-time versus Part-time positions? • Comprehensiveness of benefits for full and part time? • Description of types of positions and wage levels per position (number of management (salaried) versus hourly wage positions)? • Ratio of management to general staff (management and supervisory positions used as proxy for “quality” jobs)? • Comparison of average wage per FTE to Mass averages? • Locally hired employees versus “imported”? 		
Overall Comments on all Applications	<p>In the initial response to this question, all applicants addressed some of the “expectations of applicant” listed above. A clarification question/template was sent to all applicants. While the subsequent responses more comprehensively addressed these expectations, the degree to which the initial response to the question matched the clarification response differed amongst applicants.</p> <p>Additional information provided in Appendix A1 – Labor and Payroll and Appendix B – Host Community Demographic Characteristics.</p>		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<p><u>Stabilized Year</u></p> <ul style="list-style-type: none"> • FTEs – 615 • \$/FTE - ██████ • Benefits: <ul style="list-style-type: none"> ○ Project the most benefits per F/T employee - ██████, but the lowest benefits per P/T employee - ██████. ○ Overall Benefits as a % of payroll is ██████ (the highest of all applicants). • Retention rate (█████) lies in between the other two applicants (although only slightly higher than Penn’s ██████). • Project ██████ of FTEs to be Union, representing ██████ of overall wages/benefits. • Payroll clarification submission was consistent with answer (# FTEs, total payroll and \$/FTE). 	<p><u>Stabilized Year</u></p> <ul style="list-style-type: none"> • FTEs – 404 • \$/FTE – ██████ • Benefits: <ul style="list-style-type: none"> ○ Project the least benefits per F/T employee - ██████, but more benefits per P/T employee than PPE - ██████. ○ Overall benefits as a % of payroll is ██████ • Project the lowest retention rate (█████). • Project the highest overall union representation (█████ of FTEs) and highest % of overall wages/benefits (█████) paid to union employees. • Payroll clarification submission was consistent in some respects with answer (total payroll, \$/FTE), however # FTEs was not consistent (447 vs. 404). 	<p><u>Stabilized Year</u></p> <ul style="list-style-type: none"> • FTEs – 635 • \$/FTE – ██████ • Benefits: <ul style="list-style-type: none"> ○ Project the second highest benefits per F/T employee - ██████ and the highest benefits per P/T employee - ██████ - benefit package appears to be the most comprehensive for P/T employees. ○ Overall benefits as a % of payroll are ██████ (same benefit % for both F/T and P/T employees). • Project the highest retention rate (█████). • Project the lowest overall union representation (█████ of FTEs) and lowest % of overall wages/benefits (█████). • Payroll clarification submission was consistent in some respects with answer (# FTEs), however, total payroll and \$/FTE was not consistent.
Existing and past	• Extensive detail provided on current	• Limited detail provided on current	• Extensive detail provided in current Benefits

practices supporting commitments	retention strategy, training initiatives and team benefits for Maryland Live! (presumably will be offered at Mass).	practices - refers to "Penn National Gaming" corporate benefit package (presumably will be offered at Mass).	and Retirement plan at Parx Casino (presumably will be offered at Mass).
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3.3- Massachusetts Community College Workforce Training Plans —Describe any plans the applicant has for working with the Massachusetts Community College Casino Careers Training Institute or other training organizations as the applicant trains and hires the staff for its facility and specifically its plans for staffing gaming positions with Massachusetts residents.			
Expectations of Applicant	<ul style="list-style-type: none"> Existing agreements in place with colleges/institutions (other jurisdictions and/or Mass)? Proposed legacy arrangements (i.e., any facilities, programs, etc. that will remain in community)? Examples of college/institution relationships in other jurisdictions? Examples of college/institution relationships specifically related to gaming and hospitality training? Examples of past experience staffing using employees that are locally trained and local residents? 		
Overall Comments on Applications	All Applicants provided MOUs with Massachusetts Community College Casino Careers Training Institute. Contractual relationship includes a range of activities such as recruiting, screening, workforce development, job placement, career pathways, and career advancement. All applicants intend to provide preference to host community residents (as per HCA agreement).		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Provided additional MOUs for Fitchburg (student internships) and ARC of Opportunity (re: screening, hiring and training of disabled). Will work with Fitchburg State University to cross-market FSU's cultural activities and facilities to Leominster's database of customers. 	<ul style="list-style-type: none"> Stated a goal of 90%+ local hires. 	<ul style="list-style-type: none"> Committed to work with "other local accredited training providers" but no details provided. Plan to hire 80% of employees within 15 miles and 65% within 10 miles of the site (preference to former Raynham Park employees) - answer to 3.6. Identified an in-house HR director to facilitate plans.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> Referenced relationship with Anne Arundel Community College (Maryland Live! Casino). Received Award of Excellence from Maryland State Department of Education for their partnership with Anne Arundel Community College—more than 500 graduates of Anne Arundel received employment with Maryland Live! 	<ul style="list-style-type: none"> Described history with Hollywood Casino Columbus – 87 locals trained through college partnerships (slots), 77 locals trained through college partnerships (player services), 175+ employees received financial assistance for training. 	<ul style="list-style-type: none"> Referenced the Director of HR and Training at Parx Casino will be working with Raynham to develop the new casino.

3.4 – Job Opportunities and Training for Unemployed or Underemployed – Provide strategy as to how applicant will focus on job opportunities and training in areas and demographics of high unemployment and underemployment.			
Expectations of Applicant	<ul style="list-style-type: none"> • Are there internal programs/systems in place in other jurisdictions? • Is there evidence of contact and/or arrangements with local career centers? • Quantification of jobs earmarked for unemployed/underemployed? • Proportion of available jobs earmarked for unemployed/underemployed (i.e., have specific targets been set; how will targets be measured)? 		
Overall Comments on Applications	<p>All applicants committed to provide opportunities for underemployed/unemployed (as referenced in respective MOUs with MCCCTI) however, a clearer strategy surrounding how to identify, reach out to and engage the underemployed/unemployed would be preferable. No hiring targets were provided.</p> <p>Additionally, none of the applicants identified career centers within their respective community. This may be premature but lack of mention demonstrates a lack of knowledge of need areas. Additional data provided in Appendix B - Host Community Demographic Characteristics.</p>		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • ARC MOU agreement (working with disabled). • Provided MOU Fitchburg (student internships). • Acknowledged Leominster’s “Gateway City” status and associated meaning. • Intend to host at least 2 local job fairs, create a community based employment center and website providing employment information. 	<ul style="list-style-type: none"> • Committed to working with local community organizations, and the office of Labor and Workforce Development to target unemployed/underemployed. • Committed to conducting job information sessions prior to opening. • Referenced on-the –job training for low skilled positions and partnering with MCCCTI for more highly skilled position training. 	<ul style="list-style-type: none"> • Provided an attachment of career centers but no identification of which center(s) apply to Raynham. • Passive reliance on “contacting appropriate local, state and federal agencies in the surrounding areas” to inform them of job opportunities and search their databases for unemployed/underemployed. • Identified prior employees of Greyhound Track as potential unemployed/underemployed candidates.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Provided excerpts from HR manual from Maryland Live! – no specifics on targeting unemployed/underemployed. • Held a “free” dealer training program in conjunction with Anne Arundel – could presumably target unemployed – but not specifically mentioned as targeting this demographic segment. 	<ul style="list-style-type: none"> • Provided information on job fairs held at state job centers specifically targeted to the unemployed and underemployed in other jurisdictions. 	<ul style="list-style-type: none"> • None provided

3.5 – Experience with Hiring Unemployed and Underemployed – Describe the applicant's approach to and experience with hiring in areas and demographics of high unemployment and underemployment in other jurisdictions where the applicant has done business in the last 10 years.			
Expectations of Applicant	<ul style="list-style-type: none"> • Evidence of past experience in other jurisdictions with hiring unemployed/underemployed? • Length (years) of experience in hiring unemployed/underemployed? • Programs in place with career/job creation centers? • How to consider those in jurisdictions without unemployed/underemployed • What has Applicant done in other jurisdictions (and does the Applicant propose to do in Mass)? • Measures of how programs have worked? 		
Overall Comments on Applications	This question focused on past experience, not current or future commitments. All applicants referenced past experience with hiring unemployed/underemployed.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Not Relevant 	<ul style="list-style-type: none"> • Not Relevant 	<ul style="list-style-type: none"> • Not Relevant
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Recognized for working in partnership with Center for Social Change in Maryland for employment of disabled at Maryland Live! • Reference partnership with Anne Arundel Workforce Development Corporation (Maryland Live!) to develop a transit solution (public transit to facilitate those without transportation to have access to job opportunities). • Provided Disability Commitment policy in place at Maryland Live! (non-discriminatory employment and accommodation). 	<ul style="list-style-type: none"> • Referenced 5 casino openings since 2008; highlighted 2 casinos in Ohio with underemployment/unemployment issues. • Detailed an unemployed/underemployed strategy that was implemented in Toledo, Ohio resulting in 1,400 jobs for the community. • Detailed a strategy to target the "Westside" of Columbus, Ohio (a pocket of high unemployment within a city below the national unemployment average). Penn created partnerships with local YMCA and Westside organizations such as the Hilltop Shalom Zone, local NAACP Chapter, and Central Ohio Workforce Investment. Result is 41% employment at Columbus casino from "Westside". 	<ul style="list-style-type: none"> • Referenced 200 people hired at Parx Casino that were previously unemployed – but no specifics were provided (i.e., Applicant stated "no formal records are kept").

3.6 – Plan for Workforce Development – Provide your plan for workforce development as set forth in the host community agreement and any surrounding community agreements that the applicant has executed.			
Expectations of Applicant	<ul style="list-style-type: none"> • Number of jobs? • Number of positions where internal growth is possible? • Has proponent demonstrated workforce development in past experience? • Length of experience with workforce development/training programs? • Number of employees who have completed workforce development/training programs? • What has Applicant done in other jurisdictions (and does the Applicant proposed to do in Mass) to work with community-based organizations to identify the unemployed and underemployed for job opportunities? • Linkage/agreements in place with colleges/institutions? • Evidence of historical arrangements with colleges/institutions? 		
Overall Comments on Applications	<p>Each Host Community Agreement focused more on local hiring goals (in addition to contractor/vendor selection, use of union labor, MBE/WBE targets) than workforce development strategies/plans. None of the applicants submitted a comprehensive workforce development plan (i.e., identification of positions showing on-boarding practices, growth and training paths, and relating back to local population) or occupational “career pathways” specific to required positions.</p> <p>Applicants referenced workforce development activities within the MOUs with community college system- but in a largely generic manner.</p>		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Plan for community employment center, an online application tool and internal training. • Intend to host “multiple” job fairs. 	<ul style="list-style-type: none"> • Provided a workforce development plan that addresses: equal opportunities, job fairs, employment diversity, and internal training/job growth initiatives, commitment to employee promotion (i.e., management apprentice program), intent to partner with higher education, local minority agencies, Chambers and government, multiple forms of job posting/advertising of available positions. 	<ul style="list-style-type: none"> • Committed to adhere to the requirements as laid out in the Host Community Agreement (e.g., job fairs, reporting, local employment, union employment, priority to former dog track employees).
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Provided equal opportunity hiring preferences policy and high-level training initiatives and HR operations overview document for Maryland Live! 	<ul style="list-style-type: none"> • Did not reference practices in place in other jurisdictions. 	<ul style="list-style-type: none"> • Referenced local hiring track record of Greenwood Racing in Pennsylvania (80% employees residing 15 miles/65% within 10 miles).

3.7 Affirmative Action Plan – Provide an explanation as to how the applicant proposes to establish and implement an affirmative action program of equal opportunity whereby specific goals for the utilization of minorities, women and veterans on construction jobs; provided, however, that such goals shall be equal to or greater than the goals contained in the executive office for administration and finance Administration Bulletin Number 14.			
Expectations of Applicant	<ul style="list-style-type: none"> • Targeted number of positions earmarked? <ul style="list-style-type: none"> • Sub-breakdown by need? • Targets for management versus hourly positions? • Quality of positions available? • Evidence of past experience with affirmative action programs? • Agreements in place with career centers? 		
Overall Comments on Applications	All applicants identified Administrative Bulletin #14 about MBE/WBE targets and committed to meet requirements (minimum of 15.3% for minorities and 6.9% for women). Additional information contained in Appendix B – Host Community Demographic Characteristics and Appendix C – Workforce Ethnicity – Applicant’s Other Facilities.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Have established a Diversity and Inclusion Policy; a Commitment to Equal Opportunity, and a program to encourage participation from MBEs, WBEs and Veterans in both construction and operations. • Plan to implement “General Conditions” for construction and for purchasing goods and services to encourage MBE/WBE, veteran participation. 	<ul style="list-style-type: none"> • Provided a Diversity Plan for Plainville detailing strategies for obtaining MBE/WBE and Veteran participation in construction and procurement of goods and services. • Included a construction summary plan for Affirmative Action which includes a number of strategies to engage LBE/MBE/WBE including: Building Pathways pre-apprenticeship program and an intention to partner with Mass. Supplier Diversity office. 	<ul style="list-style-type: none"> • Plan to adopt program in place at Parx Casino in Pennsylvania – no details provided.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Indicated a “strong record in implementing affirmative action plans and achieving their stated goals” in both construction and operations. • Provided the Diversity Development plan in place at Maryland Live! • Received recognition by Maryland DC Minority Contractors Association as “the most inclusive corporation of the year for minority contractors” Maryland Live! Casino. • Achieved nearly 36% participation by minority and woman-owned 	<ul style="list-style-type: none"> • Past experience with affirmative action (construction and design) detailed for a number of properties including: <ul style="list-style-type: none"> ○ Kansas City: Construction Goals: 15% LBE, 15% MBE, and 7% WBE - Results: LBE 47.8% (\$46.7m), MBE 16.2%, (\$15.8m); and WBE 29.6%, (\$28.9m). ○ Toledo: Construction Goal: 15% MBE/WBE, Results: 19.3%, (\$39.5m) MBE/WBE. 	<ul style="list-style-type: none"> • Greenwood Racing recognized by the Director of Diversity for the Pennsylvania Gaming Control Board, for its outreach to minority and women owned businesses at Parx Casino in Pennsylvania. • Provided Parx Casino construction participation levels: 2009-2012 - \$194m spent on construction projects - \$40.6m LBE (12.3%), \$40.5m MBE/WBE (20.3%) and 50 contractor pre-bid meetings went to MBE/WBE/LBE vendors.

	<p>subcontractors for Maryland Live!</p> <ul style="list-style-type: none">• Provided MBE/WBE targets and performance for a number of past projects (met or exceeded targets for each).		
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<p>3.8 – Workforce Development – Describe your workforce development plan and explain how the applicant proposes to implement it such that it:</p> <ul style="list-style-type: none"> (i) incorporates an affirmative action program of equal opportunity by which the applicant guarantees to provide equal employment opportunities to all employees qualified for licensure in all employment categories, including persons with disabilities (applicant may reference response to question 3-7); (ii) utilizes the existing labor force in the commonwealth; (iii) estimates the number of construction jobs a gaming establishment will generate and provides for equal employment opportunities and which includes specific goals for the utilization of minorities, women and veterans on those construction jobs; (iv) identifies workforce training programs offered by the gaming establishment; (v) identifies the methods for accessing employment at the gaming establishment; and (vi) addresses workplace safety issues for employees. 			
Expectations of Applicant	<p>Overall targets for workforce development:</p> <ul style="list-style-type: none"> • Total number of positions earmarked for minorities, women and veterans? • Number of jobs earmarked for local residents • Number of construction jobs earmarked for minorities, women and veterans? • Agreements in place with local colleges/institutions? • Ratio of jobs where progression is possible • Experience with workplace safety policies and practices in other jurisdictions? Is there evidence/Applicant demonstrated workplace safety record elsewhere? 		
Overall Comments on Applications	<p>All applicants committed in “good faith” to hire locally, use union labor, and advance MBE/WBE participation for construction and operations. References were provided detailing past experience hiring from local workforces and data on ethnic workforce participation (construction and operations). All acknowledged implementation of appropriate workplace safety measures.</p> <p>None of the applicants addressed “how” they would implement workforce plans in their respective area of Massachusetts; none of the applicants have arrangements in place with local career centers. No applicant demonstrated knowledge of the demographics and unemployment rates of the community in which they intend to operate.</p>		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Provided MOU for ARC of Opportunity (disabled) and Fitchburg (internship programs). • Intend to host local job fairs and a community-based employment center. • Plan for community employment center, an online application tool on website, and internal training. 	<ul style="list-style-type: none"> • Committed to working with MCCCTI on workforce development initiatives. • Intend to target advertising to the local community for job opportunities (traditional and new media). • Post positions and applications on website. 	<ul style="list-style-type: none"> • Commit to training and development programs for all employees (job training, guest service training, safety training and specific “casino-oriented” mandatory training). • Management level will receive more advanced training programs in specific areas (finance, legal, HR, marketing).
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Referenced an agreement with Center for Social Change at their Maryland Live! facility (opportunities for developmentally disabled). • Received recognition by Maryland DC 	<ul style="list-style-type: none"> • Referenced experience with workplace safety at 28 gaming facilities - each property has a Risk/Safety Manager, a safety committee, periodic quality assurance, safety visits and an 	<ul style="list-style-type: none"> • Plan for Workplace safety training as at Parx Casino in Pennsylvania. • Reference experience in job training and employment opportunity awareness from experience at Parx Casino.

	<p>Minority Contractors Association as "the most inclusive corporation of the year for minority contractors" Maryland Live! Casino.</p> <ul style="list-style-type: none"> • Provided a Diversity and Inclusion Policy, Non-Discriminatory Policy and Equal Opportunities commitment from Maryland Live! • Provided a Business Development Plan for MBE/WBE from Maryland Live! • Have a written Team Member Safety and Security Policy (workplace safety). 	<p>orientation process with safety training.</p>	
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3.9 – HR Practices – State whether the applicant has prepared, and how the applicant proposes to establish, fund and maintain human resource hiring and training practices that promote the development of a skilled and diverse workforce and access to promotion opportunities through a workforce training program that:

- (i) establishes transparent career paths with measurable criteria within the gaming establishment that lead to increased responsibility and higher pay grades that are designed to allow employees to pursue career advancement and promotion;
- (ii) provides employee access to additional resources, such as tuition reimbursement or stipend policies, to enable employees to acquire the education or job training needed to advance career paths based on increased responsibility and pay grades; and
- (iii) establishes an on-site child day-care program.

Further, identify whether the applicant plans to establish employee assistance programs, including those relative to substance abuse and problem gaming, and outline its plan to establish a program to train its gaming employees in the identification of and intervention with customers exhibiting problem gaming behavior

Expectations of Applicant	<ul style="list-style-type: none"> • Job descriptions for each position? • Additional resources earmarked for job training and promotion? • Funds earmarked for on-site daycare program? • Is there a funding provision for employee assistance programs, including problem gambling/substance abuse counseling programs? 		
Overall Comments on Applications	Applicants showcased diverse workforces at existing facilities. Applicants touched on HR policies and practices across a spectrum of requirements (e.g., tuition reimbursement, daycare, job training), however, the responses to this section lacked detail regarding implementation. Career paths (including advancement and promotion opportunities) were not detailed. All applicants addressed workplace diversity requirements in previous questions.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Provided detailed job descriptions (wages, job description, responsibilities, skill sets) in a “Jobs Compendium.” • Employee support will include: retention programs (promotion from within, continued training) and benefit plans (Life Assistance Programs (EAP), a 401K, medical, dental and vision coverage, disability insurance, and access to local wellness and daycare programs) similar to those in place at Maryland Live! • No plans to provide an on-site daycare program – although support provided through EAP. • To provide training on responsible gaming and alcohol service. 	<ul style="list-style-type: none"> • Provided organization chart and high-level job descriptions as part of internal control manual. • No plans to provide on-site daycare, however have signed an MOU with Preschool Adventures (local daycare provider – answer 4.18). • Will provide internal promotion preferences (Penn operates 28 gaming facilities across the U.S. and Canada). 	<ul style="list-style-type: none"> • Provided job descriptions as part of internal control manual for operations compliance purposes not HR (e.g., does not contain wages, skill sets). • Employee support will include: an employee assistance program (provider not identified) through a third party provider, and career path/promotion opportunities. • No plans to provide an on-site daycare program – although support provided through EAP.
Existing and past	• Provided excerpt from various HR	• Discussed additional monetary resources	• Reference “best practice” HR policies in

practices supporting commitments	documents/policies, including: training initiatives, benefits, retention methods, promotion requirements (presumably at Maryland Live!)	allocated at other facilities for job training/promotion programs (Charles Town \$125k, Lawrenceburg \$115k, Toledo \$50k).	place at Parx Casino – no details provided.
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<p>3.10 – Organized Labor Contracts – State whether the applicant has, is subject to, or is negotiating any contract with organized labor, including hospitality services, and whether the applicant has the support of organized labor for its application, which specifies:</p> <ul style="list-style-type: none"> (i) the number of employees to be employed at the gaming establishment, including detailed information on the pay rate and benefits for employees and contractors; (ii) the total amount of investment by the applicant in the gaming establishment and all infrastructure improvements related to the project; (iii) completed studies and reports including an economic benefit study, both for the Commonwealth and the region; and (iv) whether the applicant has included detailed plans for assuring labor harmony during all phases of the construction, reconstruction, renovation, development and operation of the gaming establishment. <p>3.11 – Labor Harmony – Outline the applicant’s plans for ensuring labor harmony during the construction and operational phases of the project including whether the applicant plans to enter into any Project Labor Agreements (“PLA”) or neutrality agreements. (Reference may be made to the response to question 3-10). If the applicant does not intend to enter into any such agreements, please explain.</p>			
Expectations of Applicant	<ul style="list-style-type: none"> • History of employing unionized staff? • Experience negotiating with unions? • (i) Ratio of unionized to non-union employees? • (ii) The proportion of union jobs/payroll to total payroll? <ul style="list-style-type: none"> • Funds allocated for unionized versus non-unionized staff • (iii) Are there any completed reports showing economic benefit to the region? <ul style="list-style-type: none"> • Examples of previous projects providing economic impacts? • (iv) Past experience with unionized staff in construction and development of gaming establishments • Experience with project labor/neutrality agreements? • History of strike actions and outcomes? • Measures in place to deal with union disputes? 		
Overall Comments on Applications	All applicants indicated an intention to work with unions as laid out in respective Host Community Agreements (construction and operations), however no applicant addressed strategies to ensure labor harmony during operations. Additional detail on planned union composition contained in Appendix A1 – Labor and Payroll.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • As stipulated in Host Community Agreement – Leominster intends: to enter into agreements with organized labor ensuring labor harmony, to have the construction manager develop a roster where Host City residents, who are members of the various construction trades, can express their interest in working, has agreed to provide quarterly reports on compliance with these commitments 	<ul style="list-style-type: none"> • Referenced anticipated representation by 3 unions (SEATU, UFCW, and International Association of Machinists). • Representatives of the Norfolk County Labor Council, AFL CIO and the Brockton and Vicinities Building Trades Council (“Trades Council”) and are in the process of negotiating a Project Labor Agreement and Neutrality Agreement with the construction trades through the Trades Council to ensure labor harmony with 	<ul style="list-style-type: none"> • Indicates preliminary discussions with organized labor have taken place and believes it has the support of organized labor. • Intend to negotiate and execute a Project Labor Agreement to determine the terms and conditions of employment for employees working on the construction. • Plan to seek provisions to prevent strikes or other work stoppages during construction.

	<p>to the Host City.</p> <ul style="list-style-type: none"> • Has received the endorsement of the Laborer’s International Union of North America (Local 39). • Financial projections indicate union payroll \$ representing 45% and FTEs (70%) as a % of total FTEs. 	<p>broad provisions prohibiting labor disruptions.</p> <ul style="list-style-type: none"> • Provided an MOU executed in advance of the PLA. • Financial projections indicate the highest union payroll \$ representing 70% and FTEs (73%) as a % of total FTEs. 	<ul style="list-style-type: none"> • Indicate willingness to discuss the inclusion in the PLA of terms under which a defined proportion of local workers would enter union apprenticeship programs assigned to work on the project. • Provided a letter of support from the International Brotherhood of Electrical Workers, Local Union No. 233. • Financial projections indicate the lowest union payroll \$ representing 30% and FTEs (47%) as a % of total FTEs.
<p>Existing and past practices supporting commitments</p>	<ul style="list-style-type: none"> • Provided Collective Bargaining draft agreements for Maryland Live! (UFCW and SEATU) and has completed negotiations on a third Collective Bargaining Agreement with one of these unions on a new bargaining unit. • Provided a letter of support from SEATU for Maryland Live! • Entered into two Labor Peace Agreements (LPA) with interested unions at Maryland Live! 	<ul style="list-style-type: none"> • Indicated that Penn has not experienced a material work stoppage in connection with any development project or any operations. • Provided detail of past use of union labor for major construction projects at 12 facilities totaling +\$1 billion in union participation (81.4%). • Provided a chart that illustrates the operating unions at Penn facilities across the country. 	<ul style="list-style-type: none"> • No past practices referenced in answer.

3.12 – Employee Retention Record – Please describe and provide documentation that outlines applicant's employee retention record at other operational sites.			
Expectations of Applicant	<ul style="list-style-type: none"> • Projected ratio of employee retention (positioning of “retention” vs. “turnover”) • Benchmarks of employee turnover at similar sites? • Employee retention programs in place? 		
Overall Comments on Applications	All applicants provided current employee turnover rates at existing facilities. Additional detail on planned retention rates contained in Appendix A1 – Labor and Payroll.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Will implement “tools” to encourage employee retention – bonus programs, comprehensive benefits, policies such as tuition reimbursement and promotions from within. • Will institute similar programs in Massachusetts as are in place at Maryland Live! 	<ul style="list-style-type: none"> • Will implement “tools” to encourage employee retention – onboarding training/orientation, training, career advancement (“iLead” supervisor/management training), benefits, recognition programs and tuition reimbursement and employee surveys. 	<ul style="list-style-type: none"> • Did not provide detail on plans for employee retention.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Provided turnover rates by position at Maryland Live! for 2012. Jul-Dec 2012 – 518 leaves out of 1,135 total employees (41% turnover). Note: casino had just opened – probationary turnover. • Provided excerpt from various HR documents/policies, including: training initiatives, benefits, retention methods, promotion requirements (presumably at Maryland Live!) 	<ul style="list-style-type: none"> • Current turnover rate averages 25% across all Penn facilities. 	<ul style="list-style-type: none"> • Provided turnover rates for Parx Casino: From Jan-Sep 2013 -287 left out of 1,850 total employees– 30% of which left during probationary period of employment. • Parx Casino expects approximately 400 leaves in 2013 – a labor turnover rate of about 21%.

3.13 – Ethnic Diversity – Please describe and provide documentation that outlines the ethnic diversity of the applicant's workforce at other locations, the plans for workforce diversity the applicant has used at those facilities, the results of those plans and, unless they are self-explanatory, the metrics the applicant has used to determine those results.			
Expectations of Applicant	<ul style="list-style-type: none"> • Ratio of minority employees to total? • Levels of promotion of minority employees? • Management versus hourly positions held by minorities? • Salaries and wages of minority employees? • Consistency of minority employment practices over time? • Programs in place for workplace diversity? • Evidence that employee diversity programs have been implemented? 		
Overall Comments on Applications	This question focused on past experience, not current or future commitments. All applicants have proven success in operating with an ethnically diverse workforce at existing facilities. Additional information contained in Appendix B – Host Community Demographic Characteristics and Appendix C – Workforce Ethnicity – Applicant’s Other Facilities.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Provided a Diversity Plan for Mass. Live! (based on current program at Maryland Live!) 	<ul style="list-style-type: none"> • Provided an Equal Opportunity Policy, Employment Mission and Employment Goals for Plainville. • Employment Mission includes recruiting practices that will be undertaken to target minorities. 	<ul style="list-style-type: none"> • No diversity plans or policies provided for Raynham.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Demonstrated past experience working with community-based groups (community colleges and universities, workforce development agencies, veterans groups and social agencies), in sourcing and training potential applicants. • Provided existing ethnic composition of workforce at Maryland Live! • Provided documents (Equal Employment Opportunity, Hiring Preferences, Disabled Commitment, Non-Discriminatory hiring policy) provided relating to existing practices at Maryland Live! 	<ul style="list-style-type: none"> • Provided detail on breakdown of employment by minorities employed at 5 Penn facilities. 	<ul style="list-style-type: none"> • Provided detail on breakdown of employment by minorities employed at Parx Casino in Pennsylvania.

Criterion 2: Supporting External Business and Job Growth (Q. 3.14-3.23)			
Overall Comments	All applicants recognized the significant direct (e.g., construction costs, goods purchased, on-site payroll) and indirect (e.g., marketing relationships with local businesses) economic benefit a gaming facility could have on the host community (and surrounding area). In general all applicants demonstrated these benefits from existing operation and detailed how these benefits would materialize in Massachusetts. As a result, all applicants noted the importance of buying locally and, to different degrees, facilitating buy-local policies.		
	Leominster/PPE	Plainville/Penn National	Raynham/PR
Criterion 2 Rating	<ul style="list-style-type: none"> • Very Good 	<ul style="list-style-type: none"> • Very Good 	<ul style="list-style-type: none"> • Sufficient
Justification	<ul style="list-style-type: none"> • Details provided on outreach plans for contractors (sub trades) and suppliers during operations. • M3D3 proposal (\$1 million year funding) is unique approach to business stimulation; ties to Gateway City focus. 	<ul style="list-style-type: none"> • Broadest operational track record with significant number of endorsement letters for economic development and community support. • Details provided on outreach plans for contractors (sub trades) and suppliers during operations. • Contains more meaningful "local content" focus • Maintenance of existing racing operation at Plainridge Racecourse (annual expenditures of \$7 million+, excluding purses and mutuels). 	<ul style="list-style-type: none"> • Raynham operating costs, notably marketing and entertainment spending while higher than other applicants is insufficiently explained/backed-up (Quantum of marketing also conflicts with market analysis suggesting substantial pent up demand). • Taken in conjunction with aggressive revenue projections, the Raynham application is lacking in connection with and commitment to the local area. • Passive approach to demonstrating how Raynham might work with local businesses (e.g., providing a listing of potential suppliers but no indication of outreach).

<p>3.14 – Local Business Promotion – Describe plans for promoting local businesses in host and surrounding communities including developing cross-marketing strategies with local restaurants, small businesses, hotels, retail outlets and impacted live entertainment venues.</p> <p>3.18 – Promoting Regional Businesses – Provide plans to demonstrate how you will support and/or promote regional businesses. (Applicant may refer back to response to question 3-14).</p>			
Expectations of Applicant	<ul style="list-style-type: none"> • Number of local/regional businesses with partnership arrangements? • Dollar amount of goods/services? • Variety of local/regional business sectors partnered? • Arrangements already in place with local/regional businesses? • Extent of relationships with local/regional businesses in other jurisdictions? • Impact of cross-marketing initiatives in other jurisdictions? 		
Overall Comments on Applications	All applicants indicated intention to support local/regional businesses through direct purchases of goods and services, networking, vendor fairs, participation in regional organizations and cross-marketing initiatives as well as partnership agreements (e.g., supporting customer loyalty programs). Examples given of similar programs at existing facilities.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Plan to establish relationships similar to those in place at Maryland Live! • Plan to promote local businesses through outreach programs (construction and operations). • Plan to establish cross-marketing programs (through loyalty card) with area hotels, restaurants and attractions. • Plan to use local restaurant operations as third party operators at the facility. 	<ul style="list-style-type: none"> • Plan to work with local retailers to create cross marketing opportunities and programs (gift cards for loyalty card users). • Plan to partner with local hoteliers and retailers to create “Play, Stay and Shop” packages – including booking link on website (have identified some retail shops but no MOUs indicated). • Plan to partner with local organizations for festivals and other unique outdoor events (regional music, food festivals). • Plan to explore sponsorships with the Boston-area sports teams (buy blocks of tickets, hosting charity golf tournaments). 	<ul style="list-style-type: none"> • Plan to use local businesses as vendors and service providers. • Plan to launch a Community Partners program (similar to Parx Casino) – discount offered at local businesses customers with loyalty card. • Cross marketing with local business through loyalty card program (brochures, website advertising). • Plan to partner with local hotels to negotiate set rates as partner hotels for loyalty card members.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Maryland Live! partners with local restaurants having them run operations within the casino. • Provide reservation links to local hotels on the website. Sponsors major league sports teams (e.g., Baltimore Orioles). • Provided a listing of current partnerships with local business at 	<ul style="list-style-type: none"> • Provided a Bangor ME study showing the increased spend at local retail/hotel as a result of casino operation (\$897k/month – retail, \$368k/month- hotel). • Provided examples of retail and sport sponsorships in place at other facilities (Kansas, Toledo). 	<ul style="list-style-type: none"> • Letters provided from Mayor of Bensalem, Bensalem Economic Development and Bucks County commissioner on the positive impact on local business from Parx Casino. • Provided a Nearby Communities Impact Report showing total spend of \$550m with local business (construction and operation) since 2006.

	<p>Maryland Live! on website.</p> <ul style="list-style-type: none">• Provided MOUs for local Chamber, North Central Development Corporation, Johnny Appleseed Tourism, Buckingham Bus Lines.		
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3.15 – Local Suppliers – Describe plans for use of Massachusetts based firms, suppliers and materials in the construction and furniture, fixtures, and equipment (“FFE”) furnishing phase of the applicant’s project.			
Expectations of Applicant	<ul style="list-style-type: none"> • Number of local suppliers with partnership arrangements? • Dollar amount of goods/services? • Variety of local business sectors partnered? • Ratio of local suppliers to total in the construction, FFE phase? • Arrangements already in place with local suppliers? • Extent of relationships with local suppliers in other jurisdictions? 		
Overall Comments on Applications	All applicants committed to using local suppliers, host vendor fairs and work with local Chambers of Commerce however, limited “hard” commitments provided. Proposed capital costs summarized in Appendix D1 – Construction Cost Overview.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Committed to outreach programs to encourage local companies to bid on construction services and FF&E. • As per Host Community Agreement: will create a roster for union members to express interest and agreed to union labor for construction. • Will structure bid packages to facilitate local businesses obtaining construction contracts. • Plan to host vendor fairs for construction, liaise with other operators and companies to obtain local vendor lists, network with local businesses, participate in local trade organizations, provide vendor application forms and bid information on website. • Identified a list of potential suppliers (Construction, FF&E) – however, no Leominster suppliers. 	<ul style="list-style-type: none"> • Plan to create a communications plan to generate interest in construction and fit-out needs, hold outreach meetings, project fairs, public meetings and advertising, consult with local and state trade organizations. • Plan to use national corporate contract suppliers to identify local/state firms for participation in the project and structure major contracts to require local/state participation • Plan to provide periodic reporting to track goals and make changes. • Referred to Turner Construction (General Contractor) Affirmative Action Plan – references use of local contractors (for construction and fit out). 	<ul style="list-style-type: none"> • Committed to use MA and local firms and suppliers (construction and furnishing). • As per Host Community Agreement: commits to make “good faith efforts” to purchase materials and services from local businesses and utilize local contractors in constructing its project. • Will work with the Town of Raynham and the Taunton Area Chamber of Commerce to achieve local contracting. • Plan to hold business fairs for local vendors and contractors, actively solicit local firms, and advertising business opportunities locally.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Provided MOU for North Central MA Development Corporation (use of local contractors/suppliers). 	<ul style="list-style-type: none"> • Referred to a “comprehensive and successful approach for the inclusion of local/state/regional contractors and suppliers”. <ul style="list-style-type: none"> ○ Provided examples of prior Penn construction and design total spend 	<ul style="list-style-type: none"> • Indicates since 2006, Greenwood Racing has spent \$514 million (total spend \$1b) on business with local firms. • Parx Casino: participate in numerous chambers of commerce and business associations, held many meetings for local

		and LBE participation for (Kansas). Kansas City: Construction Goals: 15% LBE, Results: LBE 47.8%(\$46.7m).	and diverse suppliers and contractors on how to do business with Parx Casino, and has conducted over 700 outreach meetings and interviews since 2008 and held at least 50 contractor pre-bid meetings for MBEs, WBEs and local businesses.
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3.16 – Local Business Owners – Describe plans for contracting with local business owners for provision of goods and services to the gaming establishment, including developing plans designed to assist businesses in the Commonwealth in identifying the needs for goods and services to the establishment.			
Expectations of Applicant	<ul style="list-style-type: none"> • Number of local business owners with contracted arrangements? • Cost analysis of partnering with local business owners? • Variety of local business owners partnered? • Arrangements already in place with local business owners? • Extent/length of relationships with local business owners in other jurisdictions? • Quantification of success record in other jurisdictions (including explanation of why buy local programs may have or not have worked) 		
Overall Comments on Applications	All applicants committed to favor local suppliers to the extent possible (The PPE and PR/Raynham HCAs include reference to this). All applicants committed to identify and communicate local opportunities through vendor fairs, networking and Local Chambers of Commerce. Operating expenditures for each applicant are summarized in Appendix D2 – Operating Expenditures.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Intend to host a vendor fair multiple times throughout the year geared toward all needed goods and services. • Plan to provide local business with Casino’s requirements, (initial and ongoing) to participate and bid competitively. • Plan to network with local businesses through chambers of commerce, various meetings and vendor fairs. • Plan to participate in local development organizations and activities. • Plan to feature vendor application forms on website. 	<ul style="list-style-type: none"> • Stated a “Buy Local/Hire Local” philosophy. • Intend to create vendor plans and institute mentoring programs with larger contractors and Plainville management to benefit small contractors. • Will conduct vendor fairs and provide smaller local vendors with information and support in bidding for other projects. • Have held a business community outreach “Expo” at Plainridge Park and demonstrated a working relationship with local Chambers (hosting a breakfast, sponsoring a local business expo). 	<ul style="list-style-type: none"> • Plan to work with the Town of Raynham and the Taunton Area Chamber of Commerce to achieve local procurement – no details. • Plan to hold business fairs for local vendors and contractors, actively solicit local firms, and advertise business opportunities locally.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Provided detail on local vendor spending at Maryland Live! casino (26.5 % of goods and services from Host Community) and approximately 60% of goods and services are from within State). 	<ul style="list-style-type: none"> • Provided example from Kansas – named most successful MBE/WBE/LBE project in history of Wyandotte County. • Provided letter from Mayor of Toledo acknowledging Penn’s support of local business partnerships. 	<ul style="list-style-type: none"> • Supplied a list of Mass based vendors used by Raynham Park “Year to Date” (expenditure ██████ - no year provided)

3.17 – Assisting Businesses – Provide your plans to assist businesses owners in the Commonwealth in identifying the future needs of the applicant for the provision of goods and services to the establishment.			
Expectations of Applicant	<ul style="list-style-type: none"> • Arrangements in place with local business owners? • Dollar amount of these arrangements? • Types of roles local business will play? • Length and type of arrangement with local business? 		
Overall Comments on Applications	All applicants committed to assist business owners provide goods and services to the venue.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Plan to post purchasing opportunities on website, host vendor fairs, direct communication and meetings with vendors and its Purchasing Department. • Plan to provide all suppliers with adequate quotation lead times and any further assistance with their questions. • Plan to assist small businesses by splitting large purchasing packages into smaller components and facilitating partnerships between large and small vendors. 	<ul style="list-style-type: none"> • Intend to conduct vendor fairs to educate local and area businesses on the products and services the facility will need. • Commit to promote, advertise, and host the vendor fairs throughout the area to target vendors. • Commit to give preference to MA businesses. • Indicate having been in contact with the Gaming Commission to assist in local business procurement. • Turner Construction Affirmative Action Plan also speaks to splitting large purchasing packages into smaller components. 	<ul style="list-style-type: none"> • Plan to establish partnerships with business organizations and chambers of commerce and seek membership and engagement with community organizations. • Intend for Raynham executives to serve on chamber committees that represent economic development organizations. • Plan to support local small business development through membership, participation and funding of events and initiatives. • Commit to reach out to local small businesses.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Do not reference past practices in answer, however past practices (Maryland Live!) assisting businesses are provided in answers to questions 3.14 and 3.16. 	<ul style="list-style-type: none"> • Refer to purchasing local products at 28 gaming facilities but do not provide examples in response to this question. • Extensive recommendation letters provided by local economic development authorities in other jurisdictions implies local business activity. 	<ul style="list-style-type: none"> • Provided a list of current business affiliations for Parx Casino.

3.19 – Vendor Supplied Goods – Provide plans detailing an outside spending budget for vendor supplied goods and services and breakdowns by category of expenditures.			
Expectations of Applicant	<ul style="list-style-type: none"> • Past experience with budgeting for vendor supplied goods? • Benchmarks provided? • Benchmarks in line with industry averages? • Extent of experience with vendor supplied goods? 		
Overall Comments on Applications	All applications contained commitments to local vendor purchasing for core operations purchases. Applicant projections for vendor spending on core operations (e.g., food and beverage for resale, cleaning, paper, uniforms) range from \$20m to \$60m. Marketing and entertainment is largest variable ranging from \$4.4m to \$31.1m. Additional information is contained in Appendix D2 – Operating Expenditures.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Projected approximately \$18-\$21m annually (vendors providing goods and services to the casino and food & beverage outlets). • Project approx. 86% of total annual vendor spend, (\$15.4 - \$18.3m) with MA businesses. <ul style="list-style-type: none"> • “Hard” Marketing Spend (advertising, external comps, PR, loyalty card operations; no internal, complimentaries or cash back) - [REDACTED] • COGS (F&B, Retail) - [REDACTED] 	<ul style="list-style-type: none"> • Project expenditures will be approximately \$37m, of which \$6.8m will be cost of goods for our food, beverage, and retail operations. <ul style="list-style-type: none"> • “Hard” Marketing Spend - [REDACTED] • COGS (F&B, Retail) - [REDACTED] 	<ul style="list-style-type: none"> • Project to spend (\$43.2m) on vendor supplied goods and services – stabilized year. (incl. F&B, Advertising/Promotion, slots, facilities). <ul style="list-style-type: none"> • “Hard” Marketing Spend - [REDACTED] • COGS (F&B, Retail) - [REDACTED]
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Provide an MOU with North Central MA Development Corporation (to source local vendors). • Do not provide examples from other jurisdictions in answer to this question. 	<ul style="list-style-type: none"> • Do not provide examples from other jurisdictions in answer to this question. 	<ul style="list-style-type: none"> • Do not provide examples from other jurisdictions in answer to this question.

3.20 – Minority, Women and Veteran Businesses – Provide a copy of a marketing program, and an explanation as to how the applicant proposes to implement the program, by which the applicant identifies specific goals, expressed as an overall program goal applicable to the total dollar amount of contracts, for utilization of:

- (i) minority business enterprises, women business enterprises and veteran business enterprises to participate as contractors in the design of the gaming establishment;
- (ii) minority business enterprises, women business enterprises and veteran business enterprises to participate as contractors in the construction of the gaming establishment; and
- (iii) minority business enterprises, women business enterprises and veteran business enterprises to participate as vendors in the provision of goods and services procured by the gaming establishment and any businesses operated as part of the gaming establishment. (See related attestation in section *B. Signature Forms*).

Expectations of Applicant	<ul style="list-style-type: none"> • Amount of funding provided to employ minorities, women and veterans for design elements. • Amount of funding provided to employ minorities, women and veterans for construction elements. • Amount of funding provided to employ minorities, women and veterans for provision of goods and services.
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Overall Comments on Applications	All applicants commit to using MBEs, WBEs and VBEs, but no specifics provided for construction versus design versus ongoing operations. No target spending levels were set. All plan for a Diversity Committee/Task Force. No applicant refers to the specific demographics of their local market area.
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Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Provided a “Diversity Plan” for Massachusetts Live! • Plan to implement “General Conditions” for construction and for purchasing goods and services to encourage MBE/WBE, veteran participation. • Identified administrative bulletin about MBE/WBE and committed to meet requirements (minimum of 15.3% for minorities and 6.9% for women) for construction. • Plan to create a MBE/WBE/Veteran Business Development Task Force (identify, encourage and provide opportunities for participation). • May use the casino’s purchasing power with suppliers to assist MBE/WBE/VBE with the purchase of materials and services. • Intend to develop a mentoring 	<ul style="list-style-type: none"> • Provided Diversity Plan specific to Plainville – outlines equal access policy and opportunities for MBE/WBE/VBE (construction and vendor purchasing). • Will create a Diversity Committee to oversee diversity initiatives. • Identify and intend to use various Mass based organizations (Massachusetts Minority Business Development Agency (MBDA) and Massachusetts's Office of Economic Opportunity (MEDC)). • Will implement a mentoring program. 	<ul style="list-style-type: none"> • To be managed by a “Director of Diversity and Inclusion” with responsibility to manage the diversity and inclusion plan-outreach to MBE/WBE/VBE (construction and operations). • Have identified specific targets for participation in building and operations for MB/WBE/VBE and local businesses: MBE- 15%, WBE/VBE – 10%, LBE- 35%. Note: MBE – 15% is lower than Administrative Bulletin 14 target of 15.3%

<p>Existing and past practices supporting commitments</p>	<p>program for MBE/WBE/VBE.</p> <ul style="list-style-type: none"> • Detailed past performance in Maryland using MBE/WBE via establishing a Diversity and Inclusion Policy; a Commitment to Equal Opportunity, and a program to encourage participation from MBEs, WBEs and Veterans in both construction and operations. • Received recognition by Maryland DC Minority Contractors Association as "the most inclusive corporation of the year for minority contractors" Maryland Live! Casino. • Achieved nearly 36% participation by minority and woman-owned subcontractors for Maryland Live! • Provided a MBE spending report for Maryland Live! (total \$1.2m) – no year provided. 	<ul style="list-style-type: none"> • Detailed past performance with affirmative action (construction and design) for a number of properties including: <ul style="list-style-type: none"> ○ Kansas City: Construction Goals: 15% LBE, 15% MBE, and 7% WBE - Results: LBE 47.8% (\$46.7m), MBE 16.2%, (\$15.8m); and WBE 29.6%, (\$28.9m). ○ Toledo: Construction Goal: 15% MBE/WBE, Results: 19.3%, (\$39.5m) MBE/WBE • Provided examples of awards received for diversity efforts in other jurisdictions: <ul style="list-style-type: none"> ○ 2009 - Corporate Partner of the Year - National Black Chamber of Commerce. ○ 2012 Community Partner of the Year – United Way of Central Ohio. ○ 2012 Corporate Champion of Diversity – Columbus, Ohio NAACP. 	<ul style="list-style-type: none"> • Detailed past performance in Pennsylvania by providing a Diversity Plan for Parx Casino in Pennsylvania: • Since 2008 have awarded \$10m in contracts to MBE/WBE vendors and have conducted 450 vendor meetings. • From 2009-2012 - \$35m in construction contracts awarded to MBE/WBE.
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3.21 – Projected Benefit for Regional Businesses – Provide projections for increases in gross revenues for regional businesses as a result of gaming establishment operations each year for the first five years of operations on a best, average and worst case basis, identifying and describing the methodology used to produce the projections and describe the assumptions on which each projection is based.			
Expectations of Applicant	<ul style="list-style-type: none"> • Are projections in line with Applicants efforts in other jurisdictions? • Are projections based on previous experience? Examples? • Are projections realistic and achievable? • Evidence of incremental visitation to the host community (e.g., hotel room nights, visitation, attraction attendance or similar measures)? • Are benchmarks used to create projections in line with industry norms? 		
Overall Comments on Applications	This question focused on the applicant’s estimate of economic benefits generated as a result of constructing and operating the proposed gaming establishment. Applicants used different methodologies for calculating projected regional benefit. Regional benefit for all applicants is tied to the projected gaming and non-gaming revenues generated by the facility (i.e., higher projected revenues = higher projected regional benefit). Additional information is contained in Appendix D2 – Operating Expenditures		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Projects lower revenue in first years of operation, but the most stable revenue over the five-year license. • Benefit is projected from Economic Impact Study based on: <ul style="list-style-type: none"> ○ Purchase of goods and services by the casino. ○ Casino employees spending in the local community. ○ Visitors spending in the local community. 	<ul style="list-style-type: none"> • Shows the greatest negative impact on revenue from competition entering the market. • Benefit is projected from Impact Study for Bangor ME: <ul style="list-style-type: none"> ○ Study showed the impact on local lodging, restaurants and retail from each dollar spent at the casino. • Conflicting economic impact studies provided (Bangor, Maine in addition to an Innovation Group-prepared study) 	<ul style="list-style-type: none"> • Projects the largest sum of money for regional business due to the highest win projections. • Benefit is projected from Economic Impact Study based on: <ul style="list-style-type: none"> ○ Purchase of goods and services by the casino. ○ Indirect and induced spending from casino operations. ○ Increased revenues to local hotel and retail from direct jobs created.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Not Relevant 	<ul style="list-style-type: none"> • Not Relevant 	<ul style="list-style-type: none"> • Not Relevant

3.22 – Domestic Slot Machines – Describe any plans the applicant has for purchasing domestically manufactured slot machines for installation in the gaming establishment.			
Expectations of Applicant	<ul style="list-style-type: none"> • Ratio of domestic to imported? • Dollar spend on domestic slot machines versus total slot spend? • Repair/service contracts with domestic providers? 		
Overall Comments on Applications	All applicants identified similar slot machine manufacturers with extensive domestic inclusion.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	• Not Relevant	• Not Relevant	• Not Relevant
Existing and past practices supporting commitments	• Not Relevant	• Not Relevant	• Not Relevant

3.23 – Gaming Equipment Vendors – Realizing that formal plans may not be finalized, please provide the names of all proposed vendors of gaming equipment to the best of your present knowledge and belief. If more space is needed, please use an attachment. Provide the primary business address for each vendor in an attachment.

Expectations of Applicant	<ul style="list-style-type: none"> • Local vendor connection? • Ratio of domestic to imported? • Dollar spend on domestic slot machines versus total slot spend? 		
Overall Comments on Applications	All applicants identified similar gaming equipment vendors with extensive domestic inclusion.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	• Not Relevant	• Not Relevant	• Not Relevant
Existing and past practices supporting commitments	• Not Relevant	• Not Relevant	• Not Relevant

Criterion 3: Regional Tourism and Attractions (Q. 3.24-3.33)			
Overall Comments	The approach taken by applicants in the tourism marketing and attractions section reflects the considerable pent-up demand for gaming in Massachusetts and the monopoly afforded to the Category 2 license for the initial few years of operation (i.e., limited need to market aggressively in initial years). All applicants presented a range of traditional marketing, partnership, advertising and reward (i.e., player card) programs. All applicants were weak in demonstrating a connection to existing Massachusetts marketing infrastructure (e.g., Massachusetts Office of Tourism), attractions/infrastructure and market segments.		
	Leominster/PPE	Plainville/Penn National	Raynham/PR
Criterion 3 Rating	<ul style="list-style-type: none"> • Very Good 	<ul style="list-style-type: none"> • Very Good 	<ul style="list-style-type: none"> • Sufficient
Justification	<ul style="list-style-type: none"> • Tie into to Maryland Live!’s existing player database and affinity with other “Live!” projects (entertainment/music focus as opposed to gaming) • Goals linked to Gateway City initiative. • Other community enhancements through the M3D3 program guaranteed annual monetary commitment. 	<ul style="list-style-type: none"> • Tie into Penn National’s existing player database (“Marquee Rewards”) with cardholders across the U.S. • Broadest marketing track record with significant number of endorsement letters. • On-site harness racing taps into complementary market segment; Plainville proposal is the most likely avenue to maintain uninterrupted harness racing activity. • Significant number of references from other jurisdictions in which Penn operates. 	<ul style="list-style-type: none"> • Very limited detail provided on marketing plans, partnerships with local tourism businesses/marketing entities and • Description of existing operations (Parx) was superficial. • Entertainment and advertising budgets while substantive (significantly higher than the other two applicants), were neither well explained nor linked to the proposed development (e.g., no discussion of size scale of entertainment centre; inconsistencies between complimentary budget and food/beverage cost). • Potential for supporting harness racing operations at Brockton if selected.

3.24 – Local Agreements – Provide local agreements designed to expand gaming establishment draw (i.e. - number of patrons brought to the region).			
Expectations of Applicant	<ul style="list-style-type: none"> • Past experience using local agreements? • Amount of incremental visitation? • Amount of incremental spend? 		
Overall Comments on Applications	Responses were generally weak but may also reflect the preliminary nature of the process (e.g., the successful applicant would have ample time to enter into agreements once selected and prior to opening of the slots venue). All applicants indicated intention to create local agreements and partner with local business. Applicants demonstrated a general lack of local knowledge of local tourism entities and groups.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Sets out characteristics of potential partner relationships/ agreements in the following categories: retail, gas, hotel, cable, health/entertainment. • Partner relationships linked to “Live!” Loyalty card program. • Provided an MOU template for use with local partners. • Signed MOU in place with Johnny Appleseed and DCU Center (SMG Management). 	<ul style="list-style-type: none"> • Acknowledged Plainville location at nexus of several sport, entertainment and shopping destinations. • Provided an MOU template for use with local partners. • Provided 13 signed MOUs for local hotel, entertainment, gas and restaurants businesses of various sizes ranging from large (Wrentham Outlets) to small (individual gas stations and small restaurants). 	<ul style="list-style-type: none"> • No template MOU prepared and none in place; intend to do so in future.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Live! Loyalty card in place at Maryland casino. • Maryland Live! Casino contains website profile and direct links to 10+ local hotels. 	<ul style="list-style-type: none"> • Penn National loyalty card in place across all 28 gaming facilities. • Penn websites contain links to various local and regional businesses. 	<ul style="list-style-type: none"> • None provided.

3.25 – Cross Marketing – Provide plans that demonstrate how you will cross-market with other attractions.			
Expectations of Applicant	<ul style="list-style-type: none"> • Target markets aligned with State/regional goals? • Arrangements in place? • Dollars allocated to marketing versus other departmental expenditure? • Ration of dollar amount spend in marketing to projected gaming win? • Past experience in local attraction cross-marketing initiatives? • Marketing tactics detailed? Historical success with marketing tactics? • Are there agreements in place with local tourism agencies? 		
Overall Comments on Applications	Responses were generally weak but may, as with Q. 3.24, also reflect the preliminary nature of the process (e.g., the successful applicant would have ample time to structure agreements with other attractions).		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Plans to focus on hotel/retail partnerships – special events, database marketing. • Draft MOU provided and two signed MOUs (Johnny Appleseed, SMG). 	<ul style="list-style-type: none"> • Acknowledged Plainville location at nexus of several sport, entertainment and shopping destinations; names major stadia, attractions. • Plan to partner with major attractions, gift card programs, “Stay/Play/Shop” packages. • Indicated ongoing discussions with major attractions, some MOUs signed with local partners. 	<ul style="list-style-type: none"> • Plan to create a “Community Partners” program (i.e., to work with regional and cultural tourism attractions using RP loyalty program)—no details provided. • Plan to cross-market with local sports teams—no details provided.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Plans to emulate the program in place at Maryland Live! 	<ul style="list-style-type: none"> • Past cross-marketing initiatives detailed at other Penn facilities. 	<ul style="list-style-type: none"> • Plans to emulate program at Parx Casino in Pennsylvania—limited detail provided.

3.26 – Collaboration with Tourism and Other Industries – Provide plans that detail collaboration by the applicant with tourism and other related industries including the Massachusetts tourism and other related industries.			
Expectations of Applicant	<ul style="list-style-type: none"> • Past experience collaborating with local tourism bodies in other jurisdictions? • Arrangements in place with local tourism/attractions bodies? • Impact on gaming win/ancillary spend of collaboration initiatives? • Dollars allocated to tourism collaboration initiatives versus other departmental expenditure? • Has Applicant demonstrated awareness/knowledge of local tourism industry where gaming facility is proposed to be located? Is this knowledge linked to marketing activities? • Are the proposed marketing activities substantive, quantifiable and measureable? 		
Overall Comments on Applications	While the applicant's responses to this question reflect the preliminary nature of the bidding process, applicants failed to even acknowledge/address MOTT role in marketing the state or to tie the applicant's venue marketing plans to MOTT activities/strategic plan.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Plans to collaborate with local chambers, regional and state tourism, historical society. • MOU with Johnny Appleseed • Commit to develop outreach for partners through casino website. • No mention of specific local/regional attractions or Mass Office of Travel and Tourism statewide marketing program. 	<ul style="list-style-type: none"> • Demonstrates awareness of tourism context and major attractions in area. • Details specific plans to work with Mass Office of Travel and Tourism existing marketing programs. • Mentions regional tourism councils but no specific collaboration. • Plans to market local tourism attractions at the casino and on website: brochure racks, social media. 	<ul style="list-style-type: none"> • No mention of major local attractions, Mass regional CVB, Chambers, Mass Office of Travel and Tourism, or other destination marketing programs. • No mention of using CVB, Chambers, or other DMOs to cross-market.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Experience with working with regional businesses on cross-marketing programs at Maryland Live! – no specifics provided. 	<ul style="list-style-type: none"> • Numerous examples of collaboration with local CVBs at existing facilities provided. 	<ul style="list-style-type: none"> • Mentions experience with collaboration at Parx Casino in Pennsylvania and plans to emulate programs in place at Parx Casino in Pennsylvania.

3.27 – International Marketing Efforts –Provide plans for international marketing efforts. Reference may be made to the response to question 3-26.
(Optional For Category 2 applicants)

Expectations of Applicant	<ul style="list-style-type: none"> • Target markets aligned with State/regional goals? • Are target markets identified? • International marketing tactics detailed? Historical success with international marketing tactics? • Arrangements in place with local tourism and local attractions (hotels, restaurants, attractions) • Dollars allocated to international marketing versus other departmental expenditure? • Ration of dollar amount spend in international marketing initiatives to projected gaming win? • Past experience in international marketing initiatives with other gaming facilities? 		
Overall Comments on Applications	This question was noted as optional for Category 2 applicants. Applicants provided limited responses to this question and, as such, responses to this question were not evaluated. The applicant’s stated market focus is summarized in Appendix E —Market Focus and Marketing Activities.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	• Not Relevant	• Not Relevant	• Not Relevant
Existing and past practices supporting commitments	• Not Relevant	• Not Relevant	• Not Relevant

3.28– Other Amenities – Provide plans for planned attractions and amenities beyond hotel, gaming, restaurants and in-house entertainment to draw customers. <i>(Note- hotel optional For Category 2 applicants).</i>			
Expectations of Applicant	<ul style="list-style-type: none"> • Extent of ancillary development planned? Dollar amount? • Incremental employment generated from other amenities? • Incremental visitation to the host community (e.g., hotel room nights, visitation, attraction attendance or similar measures) as a result of other amenities? • Impact on gaming win from other amenities? • Joint ventures with local businesses? • Extent to which other amenities complement gaming facility? • Previous projects completed with other amenities? 		
Overall Comments on Applications	Two applicants proposed attractions/amenities “beyond hotel, gaming, restaurants and in-house entertainment “as set out in this question. In both cases the additional attractions/amenities focused on horse racing.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • No Information provided. 	<ul style="list-style-type: none"> • Commits to continue on-site horse racing and simulcast activities at Plainridge Park. • Will cross-market slot operation with Hambletonian and Triple Crown events. 	<ul style="list-style-type: none"> • Continuation of existing simulcast betting offering at Raynham Park. • Proposal to redevelop (no details) Brockton Harness Track to accommodate 40 race days per annum if Plainville closes.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Substantial development and operational experience with a broad range of entertainment, food & beverage and gaming projects. 	<ul style="list-style-type: none"> • Racing offering coincides with Penn’s experience operating 11 racetracks in other North American jurisdictions. 	<ul style="list-style-type: none"> • Prior history of greyhound racing at Raynham Park. • Ownership and operation of Brockton for other purposes.

3.29 – Unique Business and Marketing Strategies – Provide additional plans that demonstrate unique business and marketing strategies to draw new revenues from new customers.			
Expectations of Applicant	<ul style="list-style-type: none"> • Customer database/player card system? • Are loyalty programs (e.g., player card systems that obtain/retain player databases) proactively used in marketing? Are they used in conjunction with local tourism businesses/agencies? • Win generated from player card versus total win? • Impact of ancillary facilities on gaming win? • Impact of marketing spend on gaming win? • Incremental visitation? • Joint ventures with local businesses/tourism bodies? • Pre-opening and grand opening activities arranged? • Use of complimentaries (e.g., food, beverage, entertainment and related giveaways) in marketing the gaming facility with local businesses or independently? 		
Overall Comments on Applications	All applicants propose to use a blend of traditional (e.g. advertising, public relations) and customized marketing approaches to promote their venue, as well as introduction of loyalty programs. Market analysis suggests that marketing during the initial years of operation may be limited given the substantial pent up gaming demand. Marketing budgets are summarized in Appendix E —Market Focus and Marketing Activities.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Potential linkage to existing online gaming offering at Maryland Live! • Other programs illustrated in place at Maryland Live! may not be applicable for the Mass market (e.g., happy hour, gender specific promotions) demonstrating lack of jurisdictional awareness. 	<ul style="list-style-type: none"> • Direct marketing programs specifically designed for new customers. • Implement VIP programs. • Data mining and customer follow up. • No linkage to racing operations or racing patronage. 	<ul style="list-style-type: none"> • Generic discussion of marketing activities with few details. • Substantial marketing, free play and entertainment budgets in financials are not well described.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Reference to use of online gaming site to attract players - “Play for Free” at Maryland Live! 	<ul style="list-style-type: none"> • Extensive marketing capability, player database and skill-sets from other Penn venues. 	<ul style="list-style-type: none"> • Plan to emulate direct marketing approach used at Parx Casino in Pennsylvania – no details of proposed program.

3.30 – Regional Economic Plan Coordination – State whether the applicant's proposed gaming establishment is part of a regional or local economic plan, and provide documentation demonstrating inclusion and coordination with regional economic plans.			
Expectations of Applicant	<ul style="list-style-type: none"> • Incremental visitation? • Incremental employment? • Use of local/regional business in all phases of casino complex? • \$ amount of economic impact projected? • Evidence of past experience working with local economic development agencies? • How has the development, operation and marketing of the gaming facility been tied to the applicable regional economic plan? 		
Overall Comments on Applications	<p>No consistency between the applicants with respect to answers for this question, in part because regional plans are out of Applicant's control.</p> <p>Relevant regional plans include:</p> <ul style="list-style-type: none"> • <i>"Growing the Economy of Southeastern Massachusetts: Comprehensive Economic Development Strategy"</i>, (June 2013) prepared by the Southeastern Regional Planning and Economic Development District - regional authority for both Plainville and Raynham. • <i>"Montachusett Regional Strategic Framework Plan"</i>, (April 2011), prepared by the Montachusett Regional Planning Commission - regional authority for Leominster. 		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Regional Plan designated State Route 117/Lancaster Street between Pioneer Drive and Harvard Street as priority area. Applicant response identifies and draws linkages to the regional economic plan. • Response ties proposed casino into economic development, transportation and future growth goals of Leominster, Montachusett regional planning commission, and "Gateway Cities" program. 	<ul style="list-style-type: none"> • Not inconsistent with regional plan. • Applicant has met with and begun the process of joining Chambers and economic development groups to create strategies for economic development. • Applicant proposes the creation of a new economic development organization to leverage new employment and local revenues from gaming. 	<ul style="list-style-type: none"> • Not inconsistent with regional plan. Applicant has taken no steps to link proposal to regional economic plan.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Provided endorsements from other cities in which Cordish operates (incl. Maryland Live!). 	<ul style="list-style-type: none"> • Endorsement letters from three chambers/economic development agencies surrounding other Penn facilities: Lea Country (New Mexico, Bangor (Maine) and Jefferson County (West Virginia). 	<ul style="list-style-type: none"> • Nothing provided.

3.31 – Other Community Enhancements – Provide plans outlining community enhancements not already covered by section 3. <i>Economic Development.</i>			
Expectations of Applicant			
Overall Comments on Applications	This question permitted applicants to submit additional economic development information not requested in other sections. The three applicants took very different approaches to respond.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> Proposed funding \$1 million/annum to support M3D3. 	<ul style="list-style-type: none"> Commitment to supporting “those in need in our host community as well as in surrounding communities.” 	<ul style="list-style-type: none"> No additional information provided.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> Demonstrated a history of significant financial support for community organizations and events. 	<ul style="list-style-type: none"> Two support letters from PA foundations and Joliet, IL. Numerous examples of financial and volunteer labor contributions at various Penn facilities across the U.S. Total funds contributed of \$12.7 million. 	<ul style="list-style-type: none"> No examples of past practices provided.

3.32– Record of Success – Provide documentation that outlines the applicant's record of success at other operational sites in other jurisdictions in meeting objectives similar to those discussed in the responses to questions 3-24, 3-25, 3-26, 3-27, and 3-29.			
Expectations of Applicant			
Overall Comments on Applications	This question is focused on past performance at other sites.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Not Relevant 	<ul style="list-style-type: none"> • Not Relevant 	<ul style="list-style-type: none"> • Not Relevant
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Maryland Live! is the only casino currently operated by Applicant. • Has a track record of building and operating award-winning retail/entertainment projects (some of these projects have included gaming operations such as in Indiana and Florida). • Maryland Live! won awards for “best casino”, innovation, education, diversity, community relations. 	<ul style="list-style-type: none"> • Extensive past and current experience developing and running casinos, slot operations and racetracks (a total of 28 gaming facilities in 17 jurisdictions). • Provided 21 support letters from various communities where Penn operates. 	<ul style="list-style-type: none"> • Parx Casino in Pennsylvania is the only casino currently operated by the Applicant. • Applicant’s response focused on history of building community partnerships, working with local (Penn) sports teams and tourism agencies - no detail or examples provided. • Long list of organizations to which Greenwood belongs; but no detail on working relationships, if any. • Endorsement letter from Bensalem Economic Development.

3.33 – Entertainment and Athletic Events – Provide details of the applicant’s plans for using entertainers and entertainment, including athletic events, to attract patrons to the applicant's facility.			
Expectations of Applicant	<ul style="list-style-type: none"> • Amount gaming win generated by entertainment? • Incremental visitation? • Amount of ancillary win generated by entertainment? • Past experience using entertainment to drive gaming revenues? 		
Overall Comments on Applications	All applicants identified in-house and external events and entertainment promotions as a basis for building additional demand. Incremental visitation as a result of these activities was not addressed. Additional information is contained in Appendix E —Market Focus and Marketing Activities.		
Application Rating	Leominster/PPE	Plainville/Penn National	Raynham/PR
Application Commitments (e.g., targets, processes, plans)	<ul style="list-style-type: none"> • Propose a ~400 seat performance space inside casino; propose a 6 – 7 night performance schedule with a range of classic rock, blues, jazz and country acts. 	<ul style="list-style-type: none"> • Identify a range of entertainment (music, TV shows) and sport (golf tournaments events proposed for the site. Use infield as location for temporary/event venues (e.g., Wheel of Fortune). • “Doug Flutie” relationship and sports pub. • Continuation of harness racing at Plainridge Racecourse. 	<ul style="list-style-type: none"> • Identify plans to offer “full calendar” of entertainment including live music entertainment as well as tickets to regional professional sporting events through partnerships. No detail is provided (entertainment budget in financial projections is substantive but contains inconsistencies). • Continuation of simulcast wagering at the facility and live racing at Brockton.
Existing and past practices supporting commitments	<ul style="list-style-type: none"> • Track record with using entertainment to drive attendance at Maryland Live! (500-seat Ram’s Head theater). • Extensive experience programming and operating live performance venues in other “Live!” precincts in Baltimore, Kansas City, Houston and Philadelphia among others. 	<ul style="list-style-type: none"> • Examples of past entertainment-oriented events and promotions at several Penn facilities. • Examples of past sport-oriented events and promotions at several Penn facilities. 	<ul style="list-style-type: none"> • Nothing provided.

5. Appendix

APPENDIX A1 – LABOR & PAYROLL

	Full-Time						Part-Time					Total							Union					
	# F/T	F/T Payroll (\$)	F/T Benefits	F/T Payroll/Benefits	Benefits as	Total Payroll	# P/T	P/T Payroll (\$)	P/T Benefits	P/T Payroll/	Benefits as	Total Payroll	# Jobs	# FTEs*	Total Payroll	Total Benefits	Total Payroll/	Benefits as	Total Payroll	Retention %	FTEs	Total Payroll/		
					% of F/T	& Benefits/				P/T	% of P/T	& Benefits/					Benefits/	% of	& Benefits/			Benefits	Payroll	FTE
Year 1																								
Gaming																								
Non-Gaming																								
Facilities																								
Administration																								
Total																								
Leominster/PPE																								
Stabilized Year																								
Gaming																								
Non-Gaming																								
Facilities																								
Administration																								
Total																								
Plainville/Penn National																								
Year 1																								
Gaming																								
Non-Gaming																								
Facilities																								
Administration																								
Total																								
Stabilized Year																								
Gaming																								
Non-Gaming																								
Facilities																								
Administration																								
Total																								
Raynham/PR																								
Year 1**																								
Gaming																								
Non-Gaming																								
Facilities																								
Administration																								
Total																								
Stabilized Year																								
Gaming																								
Non-Gaming																								
Facilities																								
Administration																								
Total																								

APPENDIX A2 – BENEFIT COMPARISON

Appendix A2 – Benefit Comparison Comments

Appendix A2 illustrates the applicant response to the benefit clarification question. The following points are noted:

- Applicants provided varying levels of detail in the responses to the clarification question:
 - **Leominster/PPE** - provided benefit breakdowns in dollar amounts. PPE allocates the greatest percentage (and \$ amount) of benefits to the Meals/Bonus/Vacation benefit category (discretionary payments subject to change).
 - **Plainville/Penn National** – provided benefit breakdowns as percentages. Dollar amounts shown in Appendix A2 are calculated by HLT based on these percentages. Penn National allocates the greatest percentage (and \$ amount) of benefits to the Medical/Dental/Vision/Life/Disability benefit category (annual commitments based on employment contracts/agreements). *Note: HLT allocated Penn's Tuition Reimbursement and Paid-Time-Off (PTO) benefits to the Meals/Bonuses/Vacation category.*
 - **Raynham/PR** – provided no detail or breakdown of benefits. Raynham provided a high-level breakdown for Parx Casino (Pennsylvania) shown in percentages (payroll tax, benefits, other benefits). HLT assumed the Parx breakdown would apply to Raynham; dollar amounts shown in Appendix A2 for Raynham are calculated by HLT based on percentages provided.
- Full-time benefits for all three applicants range from [REDACTED]. No applicant provided meaningful benefits for the part-time workforce (part-time benefits ranging from [REDACTED]).

APPENDIX B – HOST COMMUNITY DEMOGRAPHIC CHARACTERISTICS

Appendix B-

Host Community Demographic Characteristics

Host Community	Leominster/PPE		Plainville/Penn National		Raynham/PR	
	City of Leominster	Worcester County	Town of Plainville	Norfolk County	Town of Raynham	Bristol County
Population	40,884	794,981	8,176	666,426	13,208	547,305
Demographics-Age						
<21	26.0%	28.2%	27.5%	26.4%	29.7%	26.8%
21-34	17.1%	16.6%	14.9%	16.2%	13.0%	17.0%
35-54	31.8%	30.8%	34.5%	30.7%	32.0%	30.0%
55+	25.1%	24.4%	23.1%	26.7%	25.3%	26.1%
Demographics- Ethnicity						
White alone	74.4%	81.4%	94.0%	81.1%	91.6%	86.1%
Hispanic or Latino alone	14.7%	9.1%	1.3%	3.2%	2.4%	5.8%
Black or African American alone	5.6%	3.6%	0.8%	5.4%	2.0%	3.1%
Asian alone	2.8%	3.9%	2.1%	8.5%	1.5%	1.9%
Other	2.4%	2.0%	1.9%	1.9%	2.5%	3.0%
Unemployment Rate	6.7%	5.6%	4.8%	4.7%	4.2%	6.6%
Average Household Income	\$70,810	\$81,964	\$91,618	\$112,422	\$94,862	\$72,461
Median Housing Price	\$250,600	\$274,900	\$337,800	\$398,100	\$334,500	\$296,400

Source: HLT Advisory Inc. Based on U.S. Census Bureau, 2007-2011 American Community Survey

Note: Host cities and towns are included in county totals.

APPENDIX C – WORKFORCE ETHNICITY – APPLICANT’S OTHER FACILITIES

**Appendix C-
Workforce Ethnicity- Applicant's Other Facilities**

	<u>Leominster/PPE</u>	<u>Plainville/Penn National</u>				<u>Raynham/PR</u>	
	Maryland Live!	Hollywood Casino Toledo	Hollywood Casino Columbus	Zia Park Casino	Gold Strike Casino Resort	Hollywood Casino Bangor	Parx Casino
Host County	Anne Arundel County, MD	Lucas County, OH	Franklin County, OH	Lea County, NM	Tunica County, MS	Penobscot County, ME	Bucks County, PA
<u>Demographic- Ethnicity (%)</u>							
White alone	73.0%	71.4%	67.8%	43.9%	23.6%	94.8%	87.2%
Hispanic or Latino alone	5.8%	5.9%	4.6%	50.0%	2.2%	1.1%	4.1%
Black or African American alone	14.9%	18.5%	20.8%	4.3%	72.0%	0.7%	3.5%
Asian alone	3.4%	1.5%	3.8%	0.1%	0.7%	0.9%	3.8%
Other	3.0%	2.5%	3.0%	1.7%	1.5%	2.5%	1.4%
<u>Casino Staff</u>							
White alone	36.0%	68.8%	67.9%	38.0%	32.6%	91.0%	67.5%
Hispanic or Latino alone	4.8%	3.1%	2.5%	53.2%	1.0%	2.4%	6.1%
Black or African American alone	40.2%	18.4%	22.3%	6.4%	64.0%	1.0%	11.4%
Asian alone	8.8%	2.6%	3.1%	n/p	n/p	n/p	13.0%
Other	10.1%	7.2%	4.3%	n/p	n/p	n/p	1.9%
<u>Over/Under Representations</u>							
White alone	-36.9%	-2.6%	0.0%	-5.9%	9.0%	-3.8%	-19.7%
Hispanic or Latino alone	-1.0%	-2.9%	-2.1%	3.2%	-1.2%	1.3%	2.0%
Black or African American alone	25.4%	-0.1%	1.5%	2.1%	-8.0%	0.3%	7.9%
Asian alone	5.4%	1.0%	-0.7%	n/a	n/a	n/a	9.2%
Other	7.1%	4.6%	1.3%	n/a	n/a	n/a	0.5%

Source: HLT Advisory Inc. Based on U.S. Census Bureau, 2007-2011 American Community Survey and Applicant submissions.

Note: Penn National used different regions in their submission to compare workforce ethnicity to the local population.

n/p- Not provided.

n/a- Not applicable.

APPENDIX D1 – CONSTRUCTION COST OVERVIEW

**Appendix D1-
Construction Cost Overview**

	Plainville/ Leominster/PPE Penn National		Raynham/PR		Total
			Temporary*	Permanent	
<u>Construction</u>					
Building					
Architectural and Engineering					
Insurance					
Permits					
Parking Garage					
Total Construction					
<u>FF&E</u>					
Slot Equipment					
Other FF&E					
Total FF&E					
<u>Other Costs</u>					
License and Application Fee					
Start-up Capital and Cage Cash					
Financing Costs					
Pre-opening Expenses					
Contingencies					
Other					
Total Other Costs					
Total Capital Cost	\$215,717,083	\$225,000,000			\$227,299,000
Construction Labor**					

APPENDIX D2 – OPERATING EXPENSES SUMMARY

**Appendix D2-
Operating Expenses Summary**

Year 1 Year 2 Year 3 Year 4 Year 5

	Year 1	Year 2	Year 3	Year 4	Year 5
Cost of Goods Sold (F&B and Retail)					
Leominster/PPE					
Plainville/Penn National					
Raynham/PR					
Operating Expenditures					
Leominster/PPE					
Plainville/Penn National*					
Raynham/PR					
Marketing Hard Costs					
Leominster/PPE					
Plainville/Penn National					
Raynham/PR					
Entertainment Expenses					
Leominster/PPE					
Plainville/Penn National					
Raynham/PR					
Total**					
Leominster/PPE					
Plainville/Penn National					
Raynham/PR					

APPENDIX E – MARKET FOCUS AND MARKETING ACTIVITIES

Appendix E - Market Focus and Marketing Activities

Leominster/PPE

Plainville/Penn National

Raynham/PR

Projected Gaming Revenue (5-Year) - Net of Free Play

Year 1			
Year 2			
Year 3			
Year 4			
Year 5			

Markets/Size/Analysis (From 3rd Party Market Study)

Market Area	120 min drive time (includes 22 market areas based on a gravity model)	120 min drive time (created a gravity model with 14 market areas based on zip codes)	Approx 90 min drive time -10 Counties in Region A & C: Suffolk, Middlesex, Essex, Norfolk, Worcester, Bristol, Plymouth, Nantucket, Dukes, Barnstable (based on a gravity model)
Adults in Market Area	8.4 million (2012), 8.5 million (2017)	8.3 million (2012), 8.5 million (2016)	4.23 million (2012)
Current Competition	3-hour radius from site: Connecticut - 2 (Foxwoods, Mohegun Sun) Rhode Island - 2 (Twin Rivers, Newport Grand) New York - 3 (Aqueduct, Yonkers, Saratoga)	Primary regional competition: Connecticut - 2 (Foxwoods, Mohegun Sun) Rhode Island - 2 (Twin Rivers, Newport Grand)	Primary competitor is Twin Rivers (Rhode Island)
Projected Competition	Full Service Category 1 Casinos: Boston (Region A - 2018) Springfield (Region B - 2018) Taunton (Region C - 2019)	Full Service Category 1 Casinos: Boston (Region A - 2018) Springfield (Region B - 2017) Taunton (Region C - 2018)	Market Assessment does not provide details on timing of competition.

# of Visits			
Projected \$ Spend/Visit			
Out-of-State (\$/visits)			
Market Focus (Marketing Plan/Business Plan)			

Appendix E - Market Focus and Marketing Activities (Cont'd)

Leominster/PPE

Plainville/Penn National

Raynham/PR

Marketing Strategies

In-State

Out of State (cross marketing)

Entertainment

Sports (cross marketing)

Local Partners (cross marketing)

Food and Beverage

Appendix E - Market Focus and Marketing Activities (Cont'd)

Leominster/PPE

Plainville/Penn National

Raynham/PR

Detailed Marketing Budgets (Year 4)

Soft Costs

Loyalty Program

Free Play

Promotional Allowances (Internal Comps)

Total Soft Costs

Hard Costs

Advertising/Sponsorship

External Comps

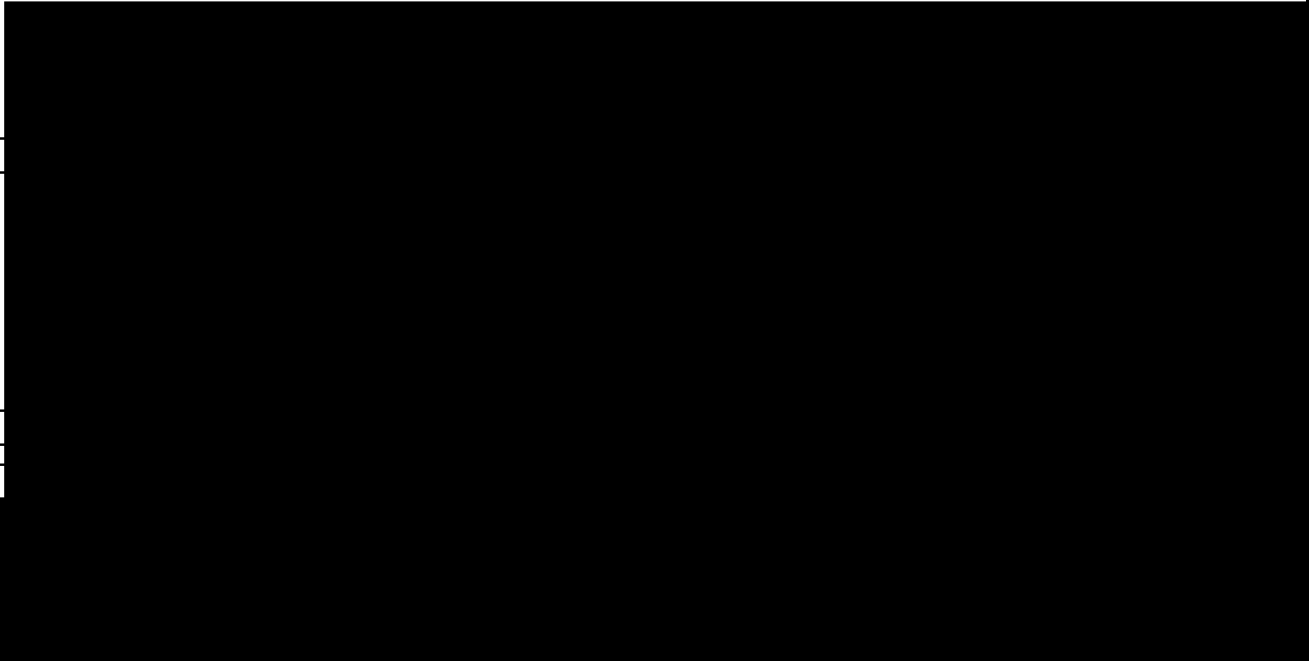
Promotions

Special Events

Other Marketing

Subtotal Hard Costs

Total Marketing



Appendix E - Market Focus and Marketing Activities (Cont'd)

Leominster/PPE

Plainville/Penn National

Raynham/PR

Marketing Activities

Loyalty Program

Name

Existing Customer Base

Tier Levels

Points Redeemable for

Other Marketing Activities

Direct Mail Program

Advertising Plan

Junkets

Bus Program

Promotions Strategy

Public Relations

Grand Opening