

APPENDIX 35 – SECTIONS (3), (4), & (5)

CATEGORY 2 SLOT MACHINE LICENSE APPLICATION AND DISCLOSURE INFORMATION
FORM

MEMORANDUM

TO: Pennsylvania Gaming Control Board (“Board”)
FROM: Gregory A. Carlin, Chief Executive Officer, HSP Gaming, L.P.
DATE: December 28, 2005
RE: HSP GAMING, L.P. DIVERSITY PLAN STATEMENT

The Applicant has developed and will, if licensed, implement the enclosed Diversity Plan as same may be amended or modified by the Board to assure that all persons are accorded equality of opportunity in employment and contracting by the applicant, its contractors, subcontractors, assignees, lessees, agents, vendors and suppliers.

This Plan represents our good faith plan to recruit, train and upgrade diversity in all employment classifications in our proposed facility and our good faith plan for enhancing the representation of diverse groups in the operation of our facility through the ownership and operation of business enterprises associated with or utilized by our facility or through the provision of goods or services utilized by our facility and through the participation in our ownership.

We pledge to a good faith effort to assure that all persons are accorded equality of opportunity in employment and contracting by us and any contractors, subcontractors, assignees, lessees, agents, vendors and suppliers we may employ or engage directly or indirectly.

WINNING THROUGH DIVERSITY

HSP Gaming, L.P. Diversity Plan

HSP Gaming, Inc. is a newly formed company, but we are well aware that for too many years women and minorities in the gaming industry have been underrepresented in managerial positions, and minority and women suppliers and vendors had limited access to providing goods and services to the industry. HSP has been founded on the principle of winning through diversity at all levels – ownership, participation and operations.

HSP approaches winning through diversity strategically, and thus we have adopted this Diversity Plan in the same manner in which we have adopted other strategic plans essential to our success. We recognize that attracting a diverse pool of talented people and retaining them in positions at all levels of the company is essential to our success. Likewise, we must be able to contract for goods and services with diverse vendors and suppliers in order to be successful. Each component of the following Plan is designed to enable HSP to reach its goal of reaching the top of the gaming industry.

DIVERSITY MISSION STATEMENT

The following mission statement summarizes HSP’s commitment to diversity. It will be posted in prominent places throughout the facility. It will communicate the foundation of our diversity mission to employees, business partners and our community:

HSP Gaming, L.P. is devoted to building and nurturing a diverse environment and is committed to equal opportunity employment and participation by a diverse group of employees in all employment classifications throughout the organization, vendors, suppliers and contractors.

- *We are committed to recruiting, employing, training and advancing talented people of any race, sex, age, culture, religion, lifestyle or disability.*
- *We actively search for a diverse pool of candidates to provide us with a depth of talent, skills and potential to meet our goals in all employment levels of our operation.*
- *We celebrate our heterogeneous employee base and appreciate its cooperative power as a means to meet our business goals.*
- *We are dedicated to utilizing diverse Philadelphia area vendors, suppliers, contractors and other service providers to enhance the participation of such groups in the success of our facility, and to encourage the ownership and advancement of such firms.*
- *We require that our contractors and vendors practice equal opportunity policies when they deal with others who provide goods or services to us.*

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HSP believes that when we partner with diverse persons and businesses, there are limitless opportunities to share knowledge and expertise, and to ultimately assist each other to grow and succeed.

LEADING TO WIN

A strategic plan must be driven from the highest levels of a company if the plan is to succeed. At HSP the ultimate responsibility for winning through diversity lies with the President/General Manager of the company. Consequently, HSP's President/General Manager is the company's Chief Diversity Officer. As the Chief Diversity Officer, the President/General Manager is responsible for strategic planning and evaluating each department's success in the implementation of the Diversity Plan. HSP will also have a Senior Compliance Officer who will operate with the authority of the President/General Manager and will monitor the Diversity Plan and other initiatives. Reporting directly to the President is the Director of Administration and Diversity, or "Diversity Director" for simplicity. The Diversity Director ("DD") will have day-to-day responsibility for the implementation of the Diversity Plan and will also participate in strategic planning. The DD will be an experienced manager with a Human Resources background. The Administration and Diversity Department will also house the Human Resources Group. This will allow for fluid development, implementation and day-to-day management of the Diversity Plan's initiatives.

HSP's ownership is itself a reflection of our commitment to winning through diversity. Jerry Johnson, an African-American and five women, Leslie Bluhm, Meredith Bluhm, Barbara Sprague, Katri Ross Lamb DePetris, and Amanda Lamb Griffen will, through affiliated entities, have ownership interests in HSP.

Mr. Johnson is currently the President of eMoney Advisor, a wealth planning software company in Conshohocken, PA. He had previously held senior management positions at Safeguard Scientifics and USWest and hold Masters in Management and Psychology from MIT Sloan School of Management and Northern Illinois University, respectively. He serves on several community and corporate Boards and was named to the "Top 40 Most Powerful Black Executives in Corporate America" in 1988 and 1993 by Black Enterprise Magazine. Mr. Johnson will own, as a limited partner, 20% of High Penn Gaming Partners, L.P., the General Partnership that will act as a parent for the Applicant, and 0.54% limited partnership interest in RSRP Gaming, L.P., a separate entity which will also have an interest in the Applicant.

Two women, Leslie and Meredith Bluhm, who are both experienced investors will on a combined basis, indirectly own 24.7811% of HSP Gaming, L.P. Ms. Sprague, Ms. DePetris, and Ms. Griffen will also indirectly own a small portion of HSP.

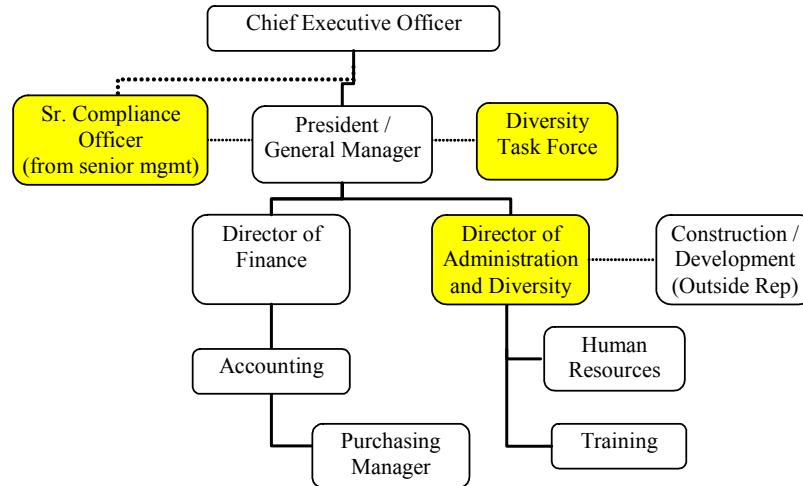
ORGANIZED TO WIN

A Winning Task Force and Senior Compliance Officer

The Director of Administration and Diversity, together with the Senior Compliance Officer and persons from purchasing, human resources, finance and marketing ("Task Force"), shall serve as an internal control and accountability system for executive level staff involvement in fulfilling the company's Diversity Plan. They shall constitute a Diversity Task Force that will participate in the implementation of the Diversity Plan. A table of organization depicting the designated Senior Compliance Officer, the Director of Administration and Diversity and the Diversity Task Force is as follows:

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The Director of Administration and Diversity

The DD duties shall include:

- Developing policy statements and diversity programs to effectuate the Diversity Plan.
- Developing and executing internal and external communication techniques including:
 - The dissemination of the Diversity Mission Statement throughout the company, to business partners, prospective employees, contractors and vendors.
 - The communication of the company’s Employment Policy Letter [Exhibit (A)], Vendor and Supplier Policy Letter [Exhibit (B)] and Contractor Policy Letter [Exhibit (C)] to all employees and candidates, existing and prospective vendors and suppliers and existing and prospective contractors and sub contractors. Policy Letters are attached as Exhibits to this Appendix 35.
- Identification of problem areas.
- Assisting line management in implementation of HSP’s Diversity Plan and in arriving at solutions to problems.
- Designing and implementing reporting systems that will:
 - Measure the effectiveness of the Diversity Plan;
 - Identify areas in need of remedial action;
 - Determine the degree to which objectives have been attained;
 - Provide all required statistical reports and documentation to the Pennsylvania Gaming

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Control Board on a timely basis.

- Serving as liaison between HSP and law enforcement agencies, local organizations concerned with employment opportunities for minorities and women, community action groups and community service programs.
- Performing periodic reviews of training programs, hires, promotions, terminations, seniority practices, job classifications, management and supervisory practices, work assignments and training/apprenticeship programs to ensure that there are no impediments to the Diversity Plan.
- Conducting periodic on-site visits in the casino to ensure that Diversity Plan statements are displayed, to establish that minorities and females are indeed on the job, and to answer questions pertaining to HSP's Diversity Plan.
- Keeping company management and line supervisors informed of the latest developments pertaining to Diversity and monitoring best practices in Diversity among gaming companies with guidance from the American Gaming Association.
- Ensuring compliance in establishing, conducting and evaluating career upward mobility programs.
- Assisting purchasing department in the development of diverse vendor and supplier base in order to meet minority-, women-, and disadvantaged business entities ("M/W/DBE's") targets. Assuring that vendors and suppliers are in compliance the Diversity Plan, including their status as Equal Opportunity Employers.
- Assisting purchasing department in the utilization of certified and qualified M/W/DBE's for construction purposes. This will include the application of participation agreements and direct contracts. Assuring that contractors and subcontractors are in compliance with the Diversity Plan, including their status as Equal Opportunity Employers.
- Assisting managers and suppliers in fulfilling the goal of creating participation opportunities for diverse groups in the supply of goods and services to the facility.
- Serving as liaison with the Senior Compliance Officers as needed to accomplish the assigned tasks, and working with the Task Force in implementing and monitoring the Diversity Plan.

Winning Managers and Supervisors

Each HSP manager and supervisor is responsible for implementation of the Diversity Plan and the goal of Winning through Diversity. Performance objectives reflect that responsibility and each supervisor and manager will be evaluated accordingly. The responsibilities of managers and supervisors include:

- Assisting in the identification of problem areas and the establishment of unit objectives.
- Participating in HSP's Mentoring Program by conducting an evaluation of all minority and female personnel and selecting candidates for the Mentoring Program (described in further detail in Leadership Development section below). Meeting with the candidates to discuss opportunities for advancement and responsibilities of all participants in the Mentoring Program.

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If selected candidate(s) decide to participate in the Program, the manager and/or supervisor must design a long-term plan for the continued career development of each candidate. The manager and/or supervisor is responsible for monitoring the progress and performance of each employee being mentored, and, providing assistance, guidance, and support when necessary.

- Assuring fair treatment of all employees while preventing the harassment, intimidation or coercion of all employees.
- Encouraging women, minority, and other targeted employees to seek advancement in respective departments.
- Promoting and fostering a collaborative work environment that celebrates diversity. Specific strategies could include the recognition of ethnic holidays and providing ethnic foods in cafeteria on selective basis.
- With guidance and assistance from the DD, collecting data and issuing reports needed for periodic Diversity reporting, including annual Participation Reports as defined by the Pennsylvania Gaming Control Board.
- Pertaining to purchasing in conjunction with outside vendors, suppliers, contractors and subcontractors, managers and supervisors will be required to work with the DD on development of M/W/DBE network and the implementation of Diversity Plan. This includes proper monitoring for internal goals and monitoring of vendors, suppliers, contractors and subcontractors for Equal Opportunity practices and general minority and women representation.
- Pertaining to construction/development: Developing and helping to implement Participation Plans with Tier 1 contractors in order to meet company Diversity Plan requirements.
 - Participation Plans will include efforts to assure levels of M/W/DBE subcontractors from the Philadelphia area to perform on-site work at HSP property that are satisfactory to HSP’s Diversity Plan and the Pennsylvania Gaming Control Board.

WINNING PROGRAMS: DIVERSE EMPLOYEES AT ALL LEVELS OF THE COMPANY

Recruitment

Requisition Process

The DD in conjunction with Administration and Diversity Department shall review approved Employee Requisitions (“ERs”) for compliance with the Diversity Plan. The ER form will contain a Diversity Action section in addition to typical personnel items. The Diversity Action section will have to be completed prior to job posting. The DD will oversee this process with periodic reviews. Employee Requisition forms will be maintained by the Administration and Diversity Department to monitor the effectiveness of the Diversity Plan. The DD and Administration and Diversity Department will work to establish diversity at all levels of the company.

Recruiting Practices

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The Administration and Diversity Department shall maintain and distribute a list of job openings by ER number to management staff. Hiring plan goals include the development of a diverse workforce sourced from the Philadelphia area, consistent with the Diversity Plan.

- A list of job openings shall be distributed on a regular basis to recruitment sources such as the Philadelphia *CareerLink*, Philadelphia and Pennsylvania high schools, colleges, community action agencies, minority recruitment sources including the Greater Philadelphia Hispanic Chamber of Commerce, The Urban League of Philadelphia, Asian American Chamber of Commerce of Greater Philadelphia and the African-American Chamber of Commerce of PA, NJ and DE among others, and public employment services.
- HSP will also have an informational employment section on its website explaining the Diversity Plan and listing available openings with link-ins from Chambers of Commerce or other community action agencies with which HSP has partnered.
- Posted positions will be advertised. In addition to typical advertising efforts, HSP will engage in targeted print advertising in women and minority-centric publications in the Philadelphia area, such as the Philadelphia Tribune, Black Enterprise Magazine, Ebony, Essence and minority-centric radio stations such as WDAS and WRTI . Only the Administration and Diversity Department may authorize employment advertising.
- The Administration and Diversity Department, as part of the Diversity Plan, will monitor ERs for diversity deficiencies by job classification. The Department will take appropriate measures with employment sources to find qualified minorities and/or females be included in the applicant pool to fill the diversity deficient positions.

Job Postings

All positions at appropriate salary grades shall be posted and maintained adjacent to the Job Postings section of all bulletin boards or other posting sites where employees congregate (“Bulletin Boards”). Postings will also appear on the employee intranet.

- Posted positions shall be listed as JOB OPPORTUNITY BULLETINS in accordance with the Diversity Plan: Job Posting Program.
- The JOB OPPORTUNITY BULLETINS shall be posted on Bulletin Boards throughout the facility.
- JOB OPPORTUNITY BULLETINS are posted for five days.

Applicant Referral Process

- All applicants, internal and external, shall be referred to Human Resources.
- When Administration and Diversity Department and/or DD have identified Diversity Plan deficiencies in any given department, the Administration and Diversity Department will attempt to fill position(s) with referrals in the following order:

1st: Qualified minority and female applicants from the department with the vacancy.

2nd: External qualified minority and female applicants that are recruited by any means, including referrals from local partners/organizations such as the Greater

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Philadelphia Hispanic Chamber of Commerce, The Urban League of Philadelphia, Asian American Chamber of Commerce of Greater Philadelphia and the African-American Chamber of Commerce of PA, NJ and DE among others.

3rd: All other qualified applicants from that department.

4th: All other external qualified applicants.

- Referrals by the Administration and Diversity Department to position in a department which has not been identified as being Diversity Plan deficient are in the following order.

Posted Positions:

1st: All qualified internal applicants who apply through the job posting process, unless the position's salary is at a level to be established or more per year, in which case the qualified minority and female candidates shall be referred first.

2nd: All qualified external candidates for the position unless, the position's salary is at a level to be established or more per year, in which case qualified external minority and female candidates will be referred first.

Non-Posted Positions:

1st: All other qualified internal candidates.

3rd: All other qualified external candidates.

College Recruitment

The DD shall issue notices to all Philadelphia area and selected national colleges and their respective placement officers informing them of our interest in interviewing minority and female graduates whose educational training prepares them for opportunities within our industry. Such notices will describe job opportunities available with special emphasis on those job groups, in which women and minorities are underrepresented, and describe company sponsored training programs for such jobs.

Career Fairs

The DD shall attend career fairs in which minorities and females traditionally participate and distribute information which describes the job opportunities available and company sponsored training programs

Minorities and Women Not Currently In the Workforce

Minorities and women not currently in the work force who live in the Philadelphia area who have requisite skills shall be considered whenever suitable openings are available. Positive attempts shall be made to recruit those utilizing appropriate recruiting techniques. HSP will search out new opportunities for those minorities and women not currently in the work force.

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The Network

Aside from specific recruiting practices, HSP will rely on a substantial Philadelphia area network utilizing placement offices of local MBA programs and minority agencies including the Greater Philadelphia Hispanic Chamber of Commerce and the African-American Chamber of Commerce of PA, NJ and DE among others. Additionally, the DD will contact national professional minority and female organizations (minority MBAs, minority CPAs, National Minority Business Council, National Hispanic Corporate Council, NAACP, etc.) that can serve as feeder groups for qualified candidates. These organizations will be informed of HSP's corporate organization, the types of positions most likely to become available, the general qualifications required, and HSP's interest in attending the organization's conventions for the purpose of networking among its membership and officers. Through these contacts, the DD can build a file of resumés. When a vacancy does arise, the DD can contact those whose resumés meet the job's qualifications and promote the application of minorities and females. This approach is targeted at higher-level management positions that do not typically have high vacancy rates. Having a network of women and minority sources in place will be a valuable resource when positions do open.

A similar strategy shall be employed for headhunters that specialize in the placement of minority and female professionals. The DD shall contact such firms and educate them regarding HSP's structure and the type of credentials most commonly desired for target positions.

Leadership Development

The "Win-Win" Mentoring Program: Internal Career Development

A primary focus of efforts to achieve the Diversity Plan's placement goals for manager and supervisor positions will be on preparing current employees for advancement within the company when existing positions are vacated. A part of this plan will be HSP's Mentoring Program.

The DD shall oversee the Mentoring Program policy in each department and provide general guidelines regarding selection of candidates. The DD shall be responsible for monitoring the program and review at least semi-annual evaluations of each candidate's progress and the performance of each mentoring manager/supervisor. The implementation and day-to-day management of the Program will be the responsibility of the respective department managers.

The Mentoring Program shall require each department manager and/or supervisor to identify at least one employee under their direction whom they will mentor through a career development program, although it may be necessary for some to select more than one employee in order to create the pool required for the program. Efforts will be made to help employees in the program who are not part of the targeted pool by positioning them to fill positions vacated by those being prepared for manager and supervisor positions. Managers and/or supervisors will select employee(s) based on a set of criteria established by the Administration and Diversity Department. The DD shall assist each department manager and/or supervisor in development of a long-term Career Advancement Plan for the selected employee(s) where needed. Such a plan may include specialized training conducted either internally or externally, academic training, cross training and flexible work assignments that provide opportunities to learn new or related skills.

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All Career Advancement Plans will be submitted to the Administration and Diversity Department for evaluation prior to acceptance and implementation. Each plan shall be evaluated to ensure that all components meet the following requirements: (a) are relative to the Diversity Plan, the employee's ability and career goals, the organization's staffing requirements; b) include specific methods to measure progress on a quarterly basis; c) incorporate leadership development programs designed to support career advancement.

Each member of the operating committee (senior level executives of HSP) in meeting with their managers/supervisors shall review the progress of the employee(s) being mentored and evaluate such progress relative to the goals of the candidate's Career Advancement Plan and the Diversity Plan. The results of such reviews will be a part of the manager's and/or supervisor's performance evaluation. The results will be submitted to the DD who will submit an overall evaluation report to the President/General Manager. The President/General Manager shall work with the operating committee, individually and collectively, to eliminate obstacles that may inhibit the advancement of employees participating in the Mentoring Program. The President/General Manager and DD shall work with operating committee members to help individual managers and/or supervisors achieve the goals of their plans.

WINNING PROGRAMS: DIVERSE SUPPLIERS, VENDORS, AND CONTRACTORS

To assure representation and participation of diverse groups in the ownership and operation of businesses that will serve the facility and provide goods and services to the facility, HSP will take the following actions:

- HSP will utilize the list of the minority and women's business enterprises that are prequalified by the Bureau of Minority and Women's Business Enterprises of the Pennsylvania Department of General Services to seek goods and services from diverse vendors.
- HSP will "partner" with local organizations, including the Minority Business Enterprise Council of Philadelphia in its effort.
- HSP will create a procurement website itemizing procurement needs and providing informational assistance, such as certification requirements and certification bodies, for M/W/DBEs.
- HSP will produce and distribute brochures describing procurement needs, processes and contract information to local M/W/DBEs.
- HSP will participate in American Gaming Association events such as the Opportunity Expo, to find qualified and certified M/W/DBEs to conduct business.
- Applicable purchasing managers will work with identified M/W/DBE firms closely to ensure compliance with equal employment opportunity policies and to confirm ownership and/or other minority participation.
- Applicable purchasing managers will help qualified vendors and suppliers (as defined by the Pennsylvania Department of General Services), where necessary, by providing pertinent

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information and feedback so that they can compete effectively on price, service and product quality.

- Purchasing personnel will track dollar volume and performance of suppliers and vendors and provide reports/data to the DD to monitor compliance with the Diversity Plan.

Construction

- HSP will work with its construction contractor(s) to encourage and support the engagement of M/W/DBEs as subcontractors/suppliers where appropriate. To this end, HSP will work with Philadelphia’s Diversity Apprenticeship Program to develop a potential network of direct and indirect construction contractors.
- HSP plans to retain Keating Building Corporation (“Keating”) (an entity associated with Daniel J. Keating, III, one of the owners of HSP) as primary construction contractor. Keating has extensive experience and a strong track record in the execution of its M/W/DBE plan. For example, Keating tracks M/W/DBE participation on all its projects and achieved 58% of M/W/DBE participation on its largest project, Lincoln Financial Field. HSP will work with Keating and the Board to develop a precise Participation Plan utilizing Keating’s extensive experience in the Philadelphia area with M/W/DBE firms. Keating has a detailed M/W/DBE plan. Key points of the plan are the following:
 - Identify local, state and regional M/W/DBE firms.
 - Prequalify firms by area of expertise, similar experience, track record for and financial capability.
 - Prepare and divide bid packages in a manner that maximizes the utilization of M/W/DBE firms.
 - Assist in developing joint ventures between M/W/DBE and non-M/W/DBE subcontractors.
 - Encourage bidder participation through direct solicitation of and assistance where required in bid preparation.
 - Ensure diversity across all areas of the specifications.
 - Assist M/W/DBE firms with their performance, fast-track and multi-track projects.
 - Provide economic and bonding support, where required.
 - Work with the local trade organizations to provide meaningful participation opportunities to both the skilled and unskilled available minority workforce.

Communication

- All identified prospective and existing vendors, suppliers, contractors and subcontractors will receive either HSP’s Vendor and Supplier Policy Letter [Exhibit (B)] or Contractor Policy Letter [Exhibit (C)].

Quantifiable Goals

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- After a more thorough review of the Philadelphia area market, HSP will set quantifiable parameters for sourcing arrangements as they relate to M/B/DBEs. These may include requirements for M/B/DBE inclusion request for bid procurement processes valued at more than a certain amount or a defined percentage of procurement budget allocated exclusively for qualified and certified M/B/DBEs.

WINNERS NEVER QUIT: AUDIT AND REPORTING SYSTEM

At HSP we knew that we were aiming high when we set Winning Through Diversity as our goal. And we know that winners cannot rest on their laurels. Consequently, our plan for winning includes self-scrutiny, because winning means always setting the bar higher.

Internal Progress Reports

The DD/Administration and Diversity Department shall monitor company progress to carry out the Diversity Plan. The DD shall receive employment activity reports for each department and M/W/DBE participation reports from construction and development Tier 1 contractors on a regular basis. These reports shall be used to compile a periodic progress report to be submitted to the Diversity Plan Task Force for review and comments. The Administration and Diversity Department shall assist department managers and supervisors and project site managers by recommending specific actions to improve identified problem areas.

Report of Participation

HSP shall file an annual report with the Pennsylvania Gaming Control Board (“PGCB”) concerning the performance of its Diversity Plan. The report shall contain all of the following:

- Employment data, including information on minority and women representation in the workforce in all job classifications; salary information; and recruitment and training information, including executive and managerial level recruitment and training; and retention and outreach efforts.
- The total number and value of all contracts or transactions awarded for goods and services.
- The total number and value of contracts or transactions awarded to certified M/W/DBEs.
- The total number and value of contracts awarded that contain a Participation Plan for M/W/DBE subcontractors.
- The total number and value of all subcontracts to be awarded to M/W/DBEs under contracts containing a Participation Plan.
- An identification of each subcontract actually awarded to a minority or women’s business enterprise under contracts containing a participation plan during each calendar quarter and the actual value of each such subcontract.
- A comprehensive description of all efforts made by the licensed entity or applicant to monitor and enforce the participation plan.

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- Information on minority and women investment, equity ownership, and other ownership or management opportunities initiated or promoted by the licensed entity.
- Other information deemed necessary or desirable by the PGCB to ensure compliance with The Pennsylvania Race Horse Development and Gaming Act.

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EXHIBIT A
EMPLOYMENT POLICY LETTER

TO: ALL HSP GAMING, L.P. EMPLOYEES:

Our company recognizes Diversity and Equal Employment Opportunity as a fundamental policy commitment at our facilities and on all construction/renovation projects.

The Pennsylvania Race Horse Development and Gaming Act and Pennsylvania Gaming Control Board regulations require all Casino licensees and applicants to provide an opportunity to any person to apply for, obtain and retain employment, transfer, promotion, pay raises, benefits and training without regard to race, religious creed, color, national origin, ancestry, affectional or sexual orientation, gender, age, familial status, handicap or disability and use of guide animals. Furthermore, we have initiated a Diversity Plan to increase our employment of minorities and females in accordance with the policies established by the Act.

Each of our divisions, departments and construction/renovation projects has established a written Diversity Plan which outlines the steps to be taken in our policies. All division and department managers, and all supervisors, will be assessed on their demonstrated involvement with and commitment to this policy. Similarly, all other employees are expected to lend their support to the implementation of this policy.

_____ is the Director of Administration and Diversity for HSP Gaming, Inc. and reports directly to me. I know I can count on your complete cooperation with _____ and _____ staff in this most important company and state endeavor.

Sincerely,

President/General Manager

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EXHIBIT B
VENDOR AND SUPPLIER POLICY LETTER

TO: ALL HSP GAMING, L.P. VENDORS AND SUPPLIERS:

Our company recognizes the importance of Diversity in all aspects of our business, including the procurement of goods and services. As such, we accept the challenge to identify and contract with minority-, women-, and disadvantaged business entities (“M/W/DBEs”) that provide desired high-quality products, superior service and competitive prices.

The Pennsylvania Race Horse Development and Gaming Act and Pennsylvania Gaming Control Board (“Control Board”) regulations require all Casino licensees and applicants adopt Diversity Plans that include equality of opportunity be accorded to vendors, suppliers, lessees, agents and assignees. Our Diversity Plan requires good faith efforts to enhance the representation of diverse groups in the provisioning of goods and services for our operations. The Control Board has also created a directory of pre-qualified local M/W/DBEs that we will use as one of our sources for building a diverse vendor and supplier network. Furthermore, we intend to put forth our best effort to ensure that our vendors and suppliers, of any kind, are vigilant equal opportunity employers, as we are.

Our written Diversity Plan outlines the steps to be taken in ensuring that we meet and exceed the Control Board’s expectations as they related to vendors and suppliers and other diversity opportunities. Our commitment to diversity will permeate all of our departments at all levels of our organization. Division and department managers, and all supervisors, will be assessed on their demonstrated involvement with and commitment to this policy. Similarly, all other employees are expected to lend their support to the implementation of this policy.

_____ is the Director of Administration and Diversity for HSP Gaming, Inc. and reports directly to me. I know I can count on your complete cooperation with _____ and _____ staff in this most important company and state endeavor.

Sincerely,

President/General Manager

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EXHIBIT C
CONTRACTOR POLICY LETTER

TO: ALL HSP GAMING, L.P. CONTRACTORS:

Our company recognizes the importance of Diversity in all aspects of our business, including the construction of our facilities. We believe diversity among contractors can enhance quality, cost and performance. As such, we accept the challenge to identify and contract with minority-, women-, and disadvantaged business entities (“M/W/DBE’s”) that can provide quality services up to our standards. Because of the dearth of Tier 1 M/W/DBE contractors required for the construction of our facilities, our challenge will be to ensure that our Tier 1 contractors effectively engage in participation plan agreements with qualified M/W/DBEs that will be conducting business on our property. Where possible, we will use our best efforts to directly contract with M/W/DBEs.

The Pennsylvania Race Horse Development and Gaming Act and Pennsylvania Gaming Control Board (“Control Board”) regulations require all Casino licensees and applicants adopt Diversity Plans that include equality of opportunity be accorded to contractors and subcontractors. Our Diversity Plan requires good faith efforts to enhance the representation of diverse groups in the provisioning of services, including construction, for our operations. Furthermore, we intend to put forth our best effort to ensure that our contractors and subcontractors, of any kind, are vigilant equal opportunity employers, as we are.

Our written Diversity Plan outlines the steps to be taken in ensuring that we meet and exceed the Control Board’s expectations as they related to contractors, subcontractors and other diversity opportunities. Our commitment to diversity will permeate all of our departments at all levels of our organization. Division and department managers, and all supervisors, will be assessed on their demonstrated involvement with and commitment to this policy. Similarly, all other employees are expected to lend their support to the implementation of this policy.

_____ is the Director of Administration and Diversity for HSP Gaming, Inc. and reports directly to me. I know I can count on your complete cooperation with _____ and _____ staff in this most important company and state endeavor.

Sincerely,

President/General Manager

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