#### REMARKS OF THOMAS C. BONNER

Counsel to

Greenwood Gaming & Entertainment, Inc.

Before the Pennsylvania Gaming Control Board October 22, 2008

#### **Greenwood Gaming & Entertainment, Inc.**

Category 1 Licensee Operating Philadelphia Park Casino and Racetrack in Bensalem, Pennsylvania

- 23 Miles from Valley Forge
- Philadelphia area market for slots gaming is already saturated
- Granting Valley Forge a Category 3 license will merely redistribute existing slots revenue
- A Category 3 license should be reserved for true resort hotel applicant in the future

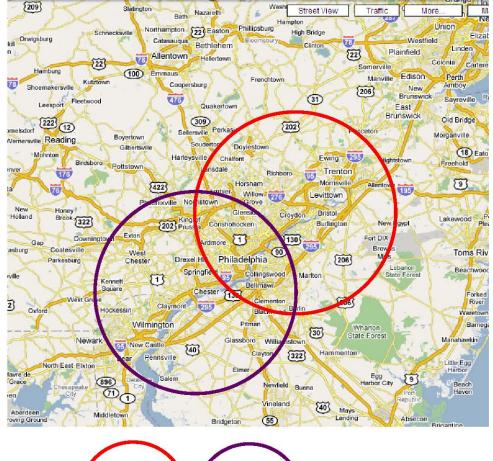
#### Five Casinos Competing For Slots Patrons in Greater Philadelphia Area Already

- Category 1 Licensees:
  - Philadelphia Park
  - Harrah's
- Category 2 Licensees:
  - Foxwoods
  - Sugarhouse
  - Sands Bethworks

#### Slots Patrons In The Philadelphia Market Are Local

- 65% of Philadelphia Park Players Club Members live within 25 miles of casino
- Nearly all of Philadelphia Park's repeat players live within 25 miles of casino
- One-Third of Philadelphia Park patrons also live within 25 miles of Harrah's





PPC has a database of 350,000 patrons.

225,000 (64%) live within 25 miles of PPC.

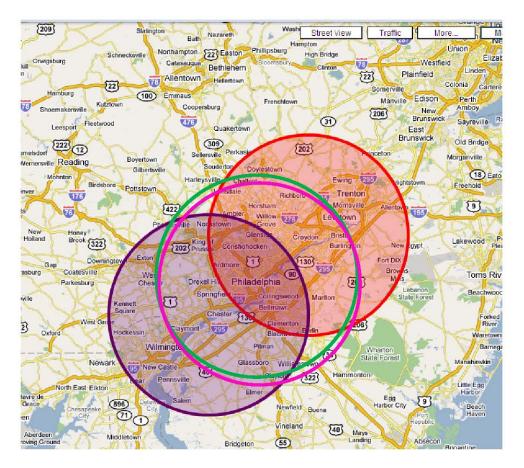
121,000 (35%) live within 25 miles of Harrah's.

Phila. Park 25 Miles Harrah's 25 Miles

#### Slots Patrons In The Philadelphia Market Are Local (con't)

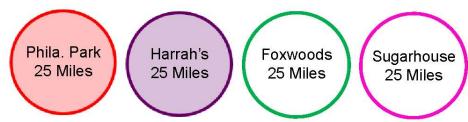
 More than 50% of Philadelphia Park patrons live within 25 miles of Foxwoods and Sugarhouse





203,000 (58%) live within 25 miles of the Foxwoods site.

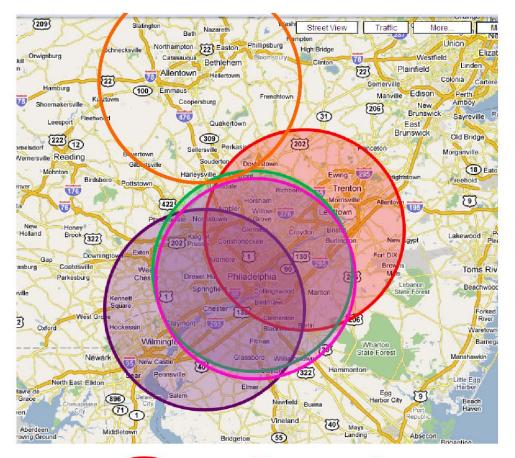
198,000 (56%) live within 25 miles of the Sugarhouse site.



## Slots Patrons In The Philadelphia Market Are Local (con't)

 5% of Philadelphia Park patrons live within 25 miles of Sands Bethworks





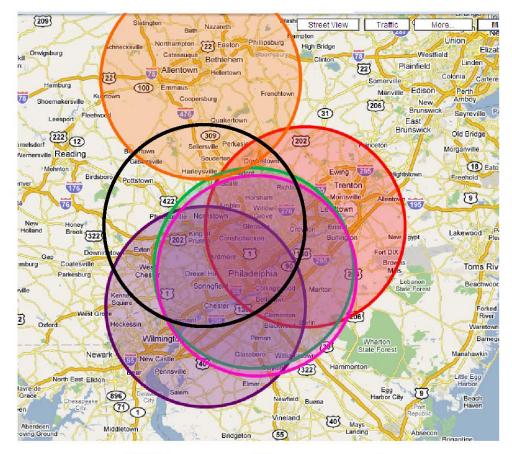
16,000 (5%) live within 25 miles of Bethworks.



## Slots Patrons In The Philadelphia Market Are Local (con't)

 50% of Philadelphia Park's patrons also will live within 25 miles of Valley Forge, if it is granted a license





176,000 (50%) live within 25 miles of the Valley Forge site.

Of the 225,000 patrons that live within 25 miles of PPC, 198,000 (88%) live within 25 miles of another casino.



# Valley Forge's Core Market Will Significantly Overlap The Core Markets Of Each Of The Other Existing Philadelphia-area Licensees

- Major criterion of repeat business is proximity
- Insignificant crossover between horseracing patrons and slot machine gaming patrons
- Amenity charge not expected to deter local patrons from choosing Valley Forge

#### Licensing Valley Forge Not in the Best Interest of the Commonwealth

- Purpose of Gaming Act is to maximize new revenues, not redistribute existing revenues
- One Category 3 license should be held in reserve for a true "well-established resort hotel" elsewhere in the Commonwealth to contribute incremental gaming revenues
- The Board should avoid undue concentration of licensees in Philadelphia region