

CIVIL WAR PRESERVATION TRUST

Saving America's Civil War Battlefields

John L. Nau, III
Chairman

James Lighthizer
President

August 26, 2010

RECEIVED

The Honorable Kevin O'Toole
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-9060

AUG 27 2010
PGCB
Executive Director

Dear Executive Director O'Toole,

As president of the Civil War Preservation Trust (CWPT), a 55,000 member national organization dedicated to protecting our country's remaining Civil War battlefields, I have watched the unfolding debate regarding a casino near Gettysburg with great interest. Doubtless, this is a complex issue and many avenues and arguments must be examined in order to make an informed decision as to what will most benefit Gettysburg and the surrounding region.

In the interest of ensuring that those charged with making such a decision have all possible information at their disposal for due consideration, an independent economic analysis was commissioned by the Civil War Preservation Trust (CWPT), National Parks Conservation Association (NPCA), National Trust for Historic Preservation and Preservation Pennsylvania on behalf of the Adams County organization Businesses Against the Casino. The report, entitled, *Impacts of the Proposed Mason-Dixon Casino on the Gettysburg Area – A Realistic Assessment*, is an examination of many of the key assertions put forward in a local impact report (LIR) produced by the investors in the Mason-Dixon proposal.

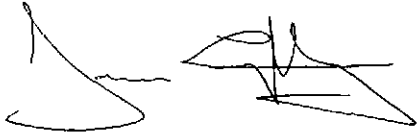
The information presented in *Realistic Assessment* is not a full analysis of all aspects of the Mason-Dixon project, but rather an examination of those claims put forward by Mason-Dixon in its LIR. It is designed to help you carefully examine and think critically about the promises that have been made regarding the casino and the likelihood that those promises can be fulfilled. As would be expected from any document prepared by investors, the Mason-Dixon LIR presents financial data in the rosiest of lights, while the *Realistic Assessment* report presents a more impartial examination.

Please take the time to examine the *Realistic Assessment* report carefully and the information presented within it. In particular, I think you will be surprised by the data related to casinos in Vicksburg, Mississippi, and their grave impact on the heritage tourism economic model. Also, I believe the applicant's failure to adequately address its potential geographic disadvantage, and the impact of neighboring, nearby casinos in Pennsylvania, Maryland and West Virginia should be of great interest.

(Over)

I hope you will find therein new perspectives from which to examine the Mason-Dixon project. Thank you for your time and your commitment to working toward an informed decision on these difficult matters.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Lighthizer', written in a cursive style.

James Lighthizer, President

enclosure

The Impacts of the Proposed Mason-Dixon Casino on the Gettysburg Area, and on Adams County, Pennsylvania

A Realistic Assessment



Lincoln Square, the heart of the Borough of Gettysburg's historic downtown, is a hub of activity. The Borough is the center of government for Adams County, for much of its commerce, and its vital tourism sector. It is ground-zero for adverse impacts such as occurred in Vicksburg, Mississippi in the aftermath of its casinos. The Borough is not mentioned in the Applicant's economic analysis. Gettysburg National Military Park is mentioned only in passing. The proposed casino would be about 4.5 miles from where this photo was taken and about 3.5 miles outside the Borough's corporate limits. It would also be about a mile from the boundary of Gettysburg National Military Park.

Prepared by:

Michael Siegel,

Public and Environmental Finance Associates,

on behalf of:

**Businesses Against the Casino,
Civil War Preservation Trust,
National Parks Conservation Association,
National Trust for Historic Preservation**

August 21, 2010
(updated August 26, 2010)

**The Impacts of the Proposed Mason-Dixon Casino on the Gettysburg Area,
and on Adams County, Pennsylvania;
A Realistic Assessment**

Prepared by:
Michael Siegel.

on behalf of:
**Businesses Against the Casino,
Civil War Preservation Trust,
National Parks Conservation Association
National Trust for Historic Preservation**

August 21, 2010
(updated August 26, 2010)

Executive Summary

Pennsylvania Gaming Control Board (PGCB) regulations require Applicants for a casino license to detail *“any”* adverse impact on *“existing tourism, including historical and cultural resources, or other municipal service or resource.”* However, the Applicant has failed to address numerous harmful impacts on these existing resources.

This independent analysis shows the proposed Mason-Dixon (M-D) Category 3 casino will have serious, substantial, and sustained adverse impacts on Gettysburg, Adams County, and the Commonwealth. Were it to operate consistent with its local impact report (LIR), the proposed casino will destroy up to about 1,130 jobs and an untold number of existing businesses in Adams County.

The LIR’s water assessment has determined that insufficient on-site capacity is available to meet significant new water demands. Some on-site wells are reported to be unreliable, and two fail to meet safe drinking water standards. Other areas of the site on which wells could be developed are reported to be contaminated. Nor is there any indication the Applicant has secured off-site water capacity as its consulting engineer recommends (see Appendix D).

Unlike its water assessment, the LIR’s wastewater assessment was not prepared by an engineering firm. The Applicant intends to utilize the Eisenhower’s existing on-site wastewater treatment plant (WWTP) for an indefinite period. Yet when standard design flows are applied, existing and proposed uses greatly exceed the WWTP’s permit capacity, more so during periods of wet weather. A publicly-owned WWTP may be constructed at an indefinite time and location. But there is no indication the Applicant has posted a bond to secure its construction so there is no assurance it would be built. Nor does the LIR indicate its cost, the M-D’s and other property owner’s share thereof, or the amount they would pay annually in user fees.

Lacking adequate water and wastewater capacity, the Applicant could have difficulty or delays in obtaining a building permit, certificate of occupancy, or fire insurance and/or business interruption

coverage for the proposed casino and related facilities. Accordingly, there is no date for the PGCB to expect the proposed casino to come on-line. Nor is there reason to believe it would resemble anything similar to what the Applicant's web site and application materials suggest.

"Gettysburg" is one of the most recognizable names in America. The historic Borough of Gettysburg, and parts of surrounding townships, are the site of one of the nation's foremost events, and are a crown jewel of the Commonwealth's historical, cultural, and tourism resources. The area is a gateway for hundreds of thousands of out-of-state visitors annually, many whom go on to visit other destinations throughout the Commonwealth.

In the heart of this area lies the historic Borough of Gettysburg, the seat of government for Adams County, and one of its primary business centers. The Borough and the surrounding area are ground-zero for any adverse impacts. Yet the Applicant's economic impact assessment does not even acknowledge the Borough's existence.

The proposed casino license will be highly consequential. Adams County and the Gettysburg area are too large for the M-D's adverse impacts to go unnoticed, but not nearly large enough for them to be of little consequence. Unlike more urban or more rural locations, the Gettysburg area lacks a dense urban fabric, the geographic isolation, or a significant physical barrier that would insulate it or dilute the proposed casino's adverse impacts.

The question of whether the proposed casino would generate net new jobs is absolutely critical. Yet Econsult's methodology is utterly incapable of answering this question. In fact, it erroneously counts jobs that would be destroyed at existing businesses as net new jobs.

This point is best illustrated by example. Let us assume the local job multiplier for newspaper publishing in Adams County is 1.30. Now, imagine an online newspaper goes into business in the county with the identical output (payroll and purchasing) profile as the Gettysburg Times. Its local job multiplier would also be 1.30. But what would the new online newspaper's job multiplier be if it caused the Gettysburg Times to go out of business? It would still be 1.30, despite its having destroyed every existing job and all of the economic output associated with the Gettysburg Times, and having failed to add a single net new job or dollar of output.

The Applicant's economic impact assessment ("the economic Report", or "the Econsult Report")¹ ignores any such adverse local impacts by:

- failing to account for the diversion to the M-D of any resident and visitor spending at existing businesses,

¹"Potential Economic Impacts of the Proposed Category 3 Mason-Dixon Resort and Casino", Econsult, March 2010.

- assuming any destroyed jobs and failed businesses are of no import so long as the spending that supported them is transferred to the M-D,
- employing a methodology that considers a job diverted to the M-D from an existing business to be a "net new" job,
- double-counting 195 imaginary "ancillary" jobs that, by definition, are included in its already overstated multiplier effect, or are attributable to existing visitors to the area,
- failing to consider impacts on the Borough of Gettysburg,
- failing to analyze impacts of casino gambling on Vicksburg, Mississippi the site of the second-most visited Civil War Battlefield when four casinos opened in the mid-1990's; and,
- failing to recognize the lack of a significant multiplier effect from Vicksburg's casinos and the adverse impact casinos have had on Vicksburg's critical historical, cultural, tourism, and municipal resources.

Tucked away in its concluding paragraph under the heading "Minimal impacts to neighborhoods, local government services or infrastructure", Econsult states:

"The impacts of the proposed resort and casino should have only minor impacts on the neighboring communities and the County government because this would not represent a significant change of use" (Econsult, p.21).

Contrary to this statement, a casino is a highly significant change of use for the property, particularly one that Econsult earlier projects to draw just under 767,000 visitors annually. The Report does not describe or detail what these impacts may be and simply dismisses them as "minimal" and "minor."

Econsult's presentation of the jobs it projects is a mix of apples and oranges which serves to disguise the unattainably high ratio of jobs to gaming positions on which it is based. Approaching or realizing the assumed level of staffing would likely assure its failure. When other key metrics and ratios underlying the economic Report are unraveled they are found to be without merit, along with the Applicant's pro-forma and its business case. And, as applied, Econsult's economic multiplier methodology is inappropriate, misleading, and erroneous.

Accordingly, the LIR does not fulfill the PGCB's requirement for Applicants to detail and assess "any" adverse impacts. Nor does it provide a reliable assessment of the proposed license on local communities and host governments. Many of the factors that cause the LIR to be unreliable are also likely to cause the M-D to underperform its revenue-generating potential for the Commonwealth.

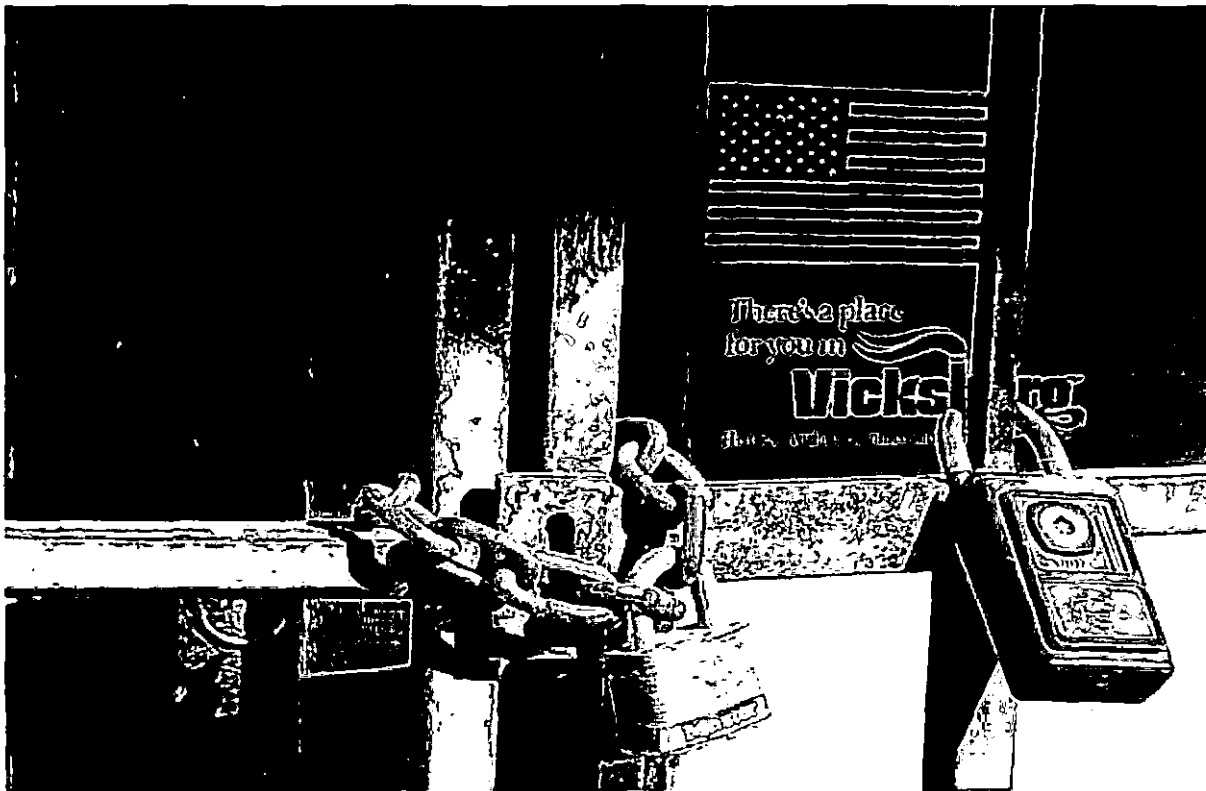
For these reasons, and as further detailed in this analysis, the proposed Category 3 casino license would be contrary to PGCB regulations, and to the public interest of residents and businesses in the Gettysburg area, elsewhere in Adams County, and the Commonwealth of Pennsylvania.

Introduction

About four years ago the Crossroads investor group, headed by Mr. David LeVan, applied for a Category 1 casino license to be located in Adams County just east of the Borough of Gettysburg. The Application was rejected by the PGCB amid widespread community opposition and concern over the Applicant's failure to identify and detail any adverse impacts on critical local, regional and Commonwealth resources.

Another consortium also headed by Mr. LeVan (Mason-Dixon Resort, L.P., "M-D") now proposes to locate a Category 3 'resort' casino at the existing Eisenhower Hotel and Conference Center about 3.5 miles south of the Borough of Gettysburg. As proposed, The M-D would have 600 slots and 50 table games for a total of about 900 gaming positions (at six gaming positions per table).

As this analysis shows, the proposed license will create a number of serious, substantial, and sustained adverse impacts for Adams County's historic, cultural, and tourism sectors, and to the local economy. Rather than creating almost 896 "net new" jobs as Econsult confusedly suggests, the M-D will destroy up to about 1,130 jobs at existing businesses throughout Adams County.



"There's a place for you in Vicksburg. History. And much, much more." Seventeen years after casinos opened nearby, Vicksburg's downtown continues to struggle. Forty percent of the structures in its historic Main Street area are vacant, and empty lots abound. Vicksburg's main casino complex begins about 2.5 miles from its historic downtown. It is about 4.5 miles from the entrance of the Vicksburg National Military Park, and about a mile from the closest park boundary.

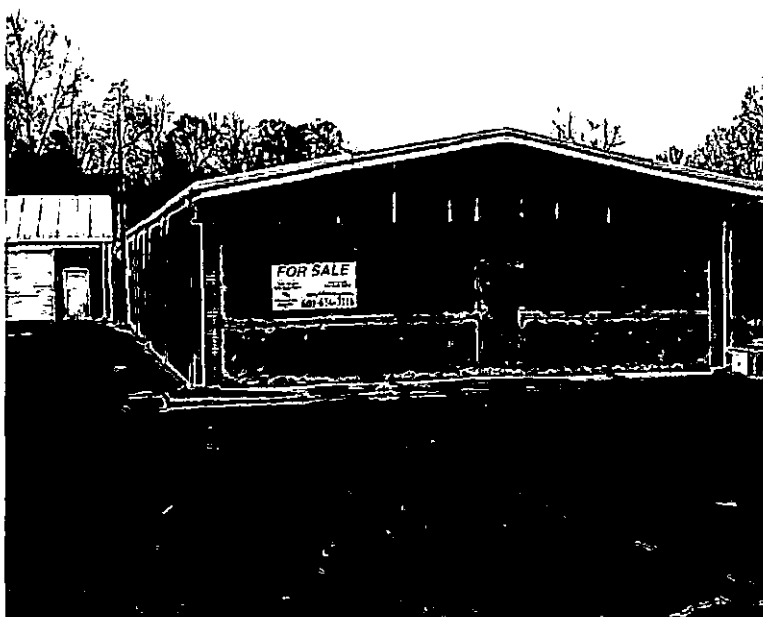
Perhaps the most startling finding of this analysis is that the Applicant expects the M-D's staffing ratio to far exceed Atlantic City's mega-casino complex, and even that of the Borgata, despite its being subject to an effective tax rate that is several times that of New Jersey's. The economic Report obscures the unattainably high level of staffing it assumes by reporting the number of jobs at the M-D as full-time equivalents (FTE).

When applying for a license four years ago, Mr. LeVan and his experts testified that Vicksburg, Mississippi best exemplifies the likely impact of a large casino on the Gettysburg area. As demonstrated then (Siegel, 2006),² the picture of its casinos harmonious co-existence with the local economy and the City's historical, cultural, and tourism resources was not supported by reality.

As the previous Applicant testified, Vicksburg (and Warren County), Mississippi are the best analogue for evaluating the impact of a large casino on Adams County and the Gettysburg area. Their experience is reflected in 17 years of contemporaneous official data. These data reflect the exposure of a relatively small community with a substantial historical, cultural, and tourism sector centered around a major Civil War battlefield that is physically intertwined with its namesake community to a large casino presence. It is through these data that one can observe the inaccuracies of Econsult's methodology.

A side-by-side comparison is instructive. For example, in June, 2010 Warren County (MS) unemployment rate of 11.6 percent greatly exceeded Adams County's 8.5 percent rate (BLS). Fully 18.7 percent of Warren's residents live below the poverty rate. Only 7.1 percent of Adams County residents do. Warren's median household income is 38 percent less than that in Adams County (U.S. Census).

As this analysis shows, the reality of Vicksburg's post-casino experience has been one of stagnation and decline. The number of casino jobs has fallen steadily to a fraction of what they were. Forty percent of the structures in Vicksburg's historic Main Street area are vacant, and under-utilized space abounds. Recent demolitions continue to add to the inventory of vacant lots. The gaming



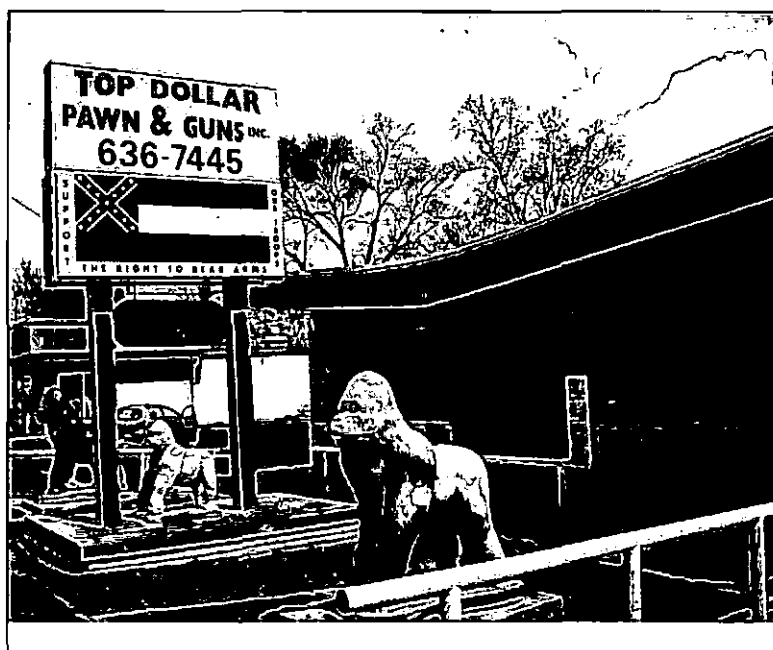
"For Sale". Dozens of vacant structures are found through Vicksburg's downtown and other commercial areas, including this one on Clay St. between VNMP and Vicksburg's historic downtown area.

²Testimony previously submitted to the PGCB in 2006 and incorporated by reference. This analysis updates and supercedes that testimony.

floor of the single downtown casino at the foot of Vicksburg's historic Main Street area is virtually deserted and the property is reportedly for sale, apparently attracting no takers. Meanwhile traffic, jobs, visitors, residents, and dollars are diverted to its main casino complex a few miles south.

Traffic counts at key road segments in and near Vicksburg's Main Street area have been in a downward trend since at least 1998. Visitation at VNMP plunged in the aftermath of the opening of four casinos nearby. While its visitation plummeted, traffic outside the Park's main entrance surged 12 percent.

Econsult's failure to examine Vicksburg's post-casino experience and its methodology – which is incapable of distinguishing between what it considers a “net new” job and one that is destroyed at an existing local business by diversion of its economic activity to the M-D – blind it from recognizing such impacts. Notably, Econsult also fails to disclose or justify the locale(s) from which its multiplier was obtained.



Top Dollar Pawn and Guns. S. Washington St. Vicksburg. One of several payday loan, collection, and pawn shops in Vicksburg.

The economic Report redoubles its methodological error by adding so-called “ancillary” economic activity and jobs for which there is no legitimate basis. The relevant academic literature and the Bureau of Economic Analysis’ (BEA, which Econsult cites as the source of its multipliers) documentation fail to support “ancillary” activity beyond what is captured in its multipliers.³

Econsult asserts this ancillary activity to be “an estimate of the incremental spending in the economy in addition to the resort and casino and other Mason-Dixon spending” (Econsult, p.

³Applying what amounts to a supra-multiplier on top of a RIMS II multiplier causes double counting. Most medium-to-large casinos, and their associated RIMS II multipliers, reflect a diverse range of other attractions such as concert and entertainment facilities, restaurants, bars, arcades, spas, simulcast, and other attractive amenities. Also, note that the job multiplier for a sector paying wages substantially lower than the region's average wages is characteristically lower than its output multiplier due to lower than average household sector spending.

14). But this is precisely what BEA's RIMS II (regional impact multiplier system) multipliers accomplish. The so-called and unsupported ancillary activity further compounds the LIR's overstatement of economic impact.

In the next paragraph Econsult acknowledges that these numbers are based on "Mason-Dixon's estimates of annual resort and casino visitors", indicating that Econsult is substituting the Applicant's opinion over the integrity of the BEA multiplier it has already mis-applied (see Addendum for an alternative explanation of the "ancillary" activity).

Econsult has elected to withhold the actual number of on-site jobs on which its analysis is based. Rather, it cites the M-D as having 375 *full-time equivalent* jobs (FTE). The earlier economic analysis for the Crossroads casino (Fuller, 2005) reported it would have 1,429 on-site jobs (full- and part-time jobs, not FTE).

Econsult confuses matters further by adding M-D's "375 new FTE" jobs to a mix full- and part-time multiplier jobs and non-existent ancillary jobs to arrive at a total of 896 "net new" jobs in Adams County. This would be like adding 5 nickels and 10 pennies and summing them to fifteen cents, and causes the economic Report's projection of the number of jobs to be meaningless.

One can work backward from the 326 multiplier jobs to discover the actual number of on-site jobs the Report assumes at the M-D. Dividing this number by .30 (the number of multiplier jobs for each job at the M-D)⁴ reveals the Applicant's pro-forma and economic Report are based on the M-D having a staffing complement of about 1,087 *full and part-time jobs*, most being part-time ($326 / .30 = 1,087$). As we shall see, this is an incredulous number.⁵

With a total of 900 gaming positions the M-D would have a staffing ratio of 1.21 (1,087 on-site jobs / 900 gaming positions = 1.21). This exceeds that of Atlantic City's casino industry, surpassing even that of the Borgata casino. This improbably high ratio invalidates the economic Report, the

⁴Econsult does not explicitly give its job multiplier. The job multiplier is related to, but distinct from, the 1.35 output multiplier it does apply. Warren County's (MS) BEA RIMS II job hotel/casino multiplier is 1.313. Warren's economy is somewhat smaller than Adams' so its multiplier might be somewhat lower multiplier than Adams. Bear in mind also that the job multiplier for a sector paying significantly less than average wages, such as the proposed M-D, is characteristically lower than its output multiplier due to lower household spending.

⁵The proposed table games at the M-D alone would account for about 470 jobs at ten per table. However, the M-D's high ratio of table games to slots is also likely to be unrealistic (see Figure 1). See, Rittvo, S., "The Impact of Table Games on Gaming Revenue", Harrisburg, PA., June 2009; 10,100 direct jobs / 1,075 tables = 9.4 jobs per table Commonwealth average.

Applicant's pro-forma, its business case, and other key financial projections which rely upon it.⁶

Irrespective of its staffing level, this analysis estimates that the M-D will destroy about 1,130 jobs at existing local businesses. At a more realistic staffing level, the proposed casino would likely destroy far more existing jobs than would be employed on-site.

Turning Econsult's Apples and Oranges into Apples and Apples

Econsult's estimate of 896 total "new" jobs in Adams County is a jumble of 375 FTE jobs at the proposed casino, plus 326 full- and part-time indirect and induced multiplier jobs, plus another 195 full- and part-time "ancillary" jobs that have no substantive basis.⁷

Based on the foregoing, the apples to apples accounting of the unrealistically high number of jobs Econsult assumes is:

- 1,087 on-site jobs
- + 326 off-site indirect and induced jobs
- + 195 off-site "ancillary" jobs
- =1,608 total, Adams County

Including the "ancillary" jobs, Econsult's local job multiplier is 1.48 ($1,608 / 1,087 = 1.48$). By way of example, this is more than 50 percent greater than Warren County's (Vicksburg, MS) RIMS II casino job multiplier of 1.313 ($.48 / .313 = 1.533$). Notably, Econsult does not cite the locale(s) from which its multiplier was drawn that would justify this high of a local jobs multiplier.

As we shall see, the M-D is highly unlikely to achieve anything close to the level of staffing and net new jobs Econsult projects.

⁶The improbably high M-D staffing level implicit in the economic Report is further evidenced by the Applicant's traffic study. Of the three Iowa casinos it cites, Harvey's (Harrah's) is the closest in size to the M-D. As of 2010, it has a 251 room hotel, a 1,500 seat conference center, 1,084 gaming positions (including 25 table games) and 735 employees (Iowa Racing and Gaming Commission, 2010), for a staffing ratio of .68. Note, the ratio of jobs to gaming positions in Iowa would typically be greater, as its effective casino tax rate is only about half that of Pennsylvania's.

⁷Evidencing that part-time nature of most of these jobs is their average wage which amounts to \$17,061 per year, or \$0.95 per hour more than the Federal minimum wage for Pennsylvania of \$7.25 per hour.

M-D's Staffing Level Assumed to be Equivalent to Atlantic City's Borgata

Only a few casinos in the U.S. – most in states with far lower effective casino tax rates than Pennsylvania – come anywhere close to the staffing ratio applied by Econsult. Among them are Atlantic City's Borgata. With a value of \$1.77 billion (2009, New Jersey Casino Control Commission), it is the highest value Atlantic City casino and ranks among the most valuable of such properties in the nation. By comparison, the M-D is projected to cost \$27.03 million to construct.



Atlantic City's Borgata casino complex. Valued at \$1.77 billion, the Borgata is one of the highest value casino properties in the nation. The Applicant expects the M-D to employ more people per gaming position, and offer a greater proportion of cost-intensive table games to slots than this top-of-the-market destination casino.

The Borgata is a high-end destination casino offering some of the highest amenities of any casino. It is located in a beach-front community readily accessible to tens of millions of people that hosts the second-largest casino complex in the nation. It attracts high-roller gamblers, an international clientele, and top-line marquee entertainers and musicians.

The Borgata's recent ratio of jobs to gaming positions is 1.19.⁸ It is not credible to assume the proposed M-D could offer the same or greater staffing ratio as the Borgata. Yet the Applicant has

submitted materials to the PGCB and local officials representing the M-D to have a staffing ratio of 1.21 jobs per gaming position.⁹

There is little prospect that the M-D would operate consistent with its economic Report and its proforma. At the assumed level of staffing, the M-D's labor overhead alone would cause it to be uncompetitive with other nearby casinos. Most critically for the PGCB, these same factors will tend to cause the M-D to underperform its revenue-generating potential to the Commonwealth.

⁸Quarterly Report, and Facility Statistics Report, New Jersey Casino Control Commission, 2009.

⁹The Applicant's web site lists among the M-D's amenities a billiards room, two go-kart tracks, 36 holes of putt-putt golf, an arcade, batting cages, paddle boats, and a meeting area smaller than the Borgata's bathrooms.

By way of comparison, had the earlier Crossroads casino to have included 50 table games, its ratio of jobs to gaming positions would have been around .55.¹⁰ This evidences how fundamentally out of sync the current proposal is with the previous proposal – each of which are oriented to essentially the same market.

It is not credible to suggest that additional on-site features would more than double the M-D's staffing ratio over what Crossroads would have offered with an equivalent number of table games. Econsult's operating pro-forma (Table 2.3.2, p.12) zeros out stabilized expenditures for its "events complex", and only \$80,000 is allocated to "other departments". Both proposals include a spa and meeting rooms. This leaves the M-D's far higher staffing ratio unexplained, as putt-putt golf, paddle boats, go-kart tracks, and a virtual reality game room are not known to be highly job-intensive.

The Borgata's cost per gaming position was nearly \$104,000 in 2009. As proposed, the M-D's would be \$58,000. Despite being subject to an effective tax rate that is several times the Borgata's, the economic Report assumes the M-D's staffing ratio to be equivalent to the Borgata's while incurring only half its operating cost per gaming position. This is not credible. For example, the overall staffing ratio for Atlantic City's casino industry was .90 in 2009.

Vicksburg's casinos provide a more realistic benchmark. At their height in 1995, they employed 1.02 persons per gaming position. However, the number of casino jobs began to shrink immediately thereafter as it became clear that they served a primarily local market. By 2000 they employed .75 persons per position. Five years later it was .53. In 2009, they employed just .40 persons per gaming position (Mississippi Gaming Commission, Quarterly Reports).

Another key metric is the ratio of table games to slots. Figure 1 shows the M-D's ratio to be substantially greater than the Borgata's, as well as Atlantic City and Vicksburg's casino sectors.

It is inconceivable that a small, isolated casino serving a mostly local clientele could provide 22 percent more high-cost table games than the Borgata, operate at top-of-the-market staffing ratios, and be competitive with other area casinos.

Figure 1 compares key operating statistics and ratios for the proposed casino, the earlier proposed Crossroads casino, the Valley Forge Category 3 casino, the Borgata, and industry-wide statistics for Atlantic City and Vicksburg.

Merely reducing its operating costs by cutting back on jobs would not solve the M-D's difficulties. It's business case is seemingly predicated on offering what would likely be the highest staffing ratio

¹⁰Crossroads staffing ratio with 50 table games: (50 * 9.4 jobs per table = 470 table game jobs; 1,429 slots and related jobs + 470 table game jobs = 1,899 total jobs). (3,000 slots + 600 table game positions @ 6 per table = 3,600 gaming positions). (1,899 jobs / 3,600 positions = .53). Round to .55.

of any Pennsylvania casino, exceeding that of Atlantic City's industry, and even eclipsing the Borgata's. A reduction in jobs also invalidates Econsult's Report.

In reality, more than half the M-D's assumed on-site jobs will not materialize.

Contrary to Econsult's Report, and consistent with the substantial decline in the ratio of jobs per gaming position at Vicksburg's casinos over the last 17 years, the "steady-state" for the proposed casino is likely to be one of instability and decline.

Figure 1. Key Operating Statistics and Ratios.

	Mason-Dixon	Crossroads (\$2009)+	Valley Forge (\$2009)+	Borgata (2009)	Atlantic City NJ, Industry (2009)	Vicksburg, MS, Industry (2009)
Operating cost	\$52,040,000	\$60,845,000	\$11,856,000	\$573,023,000	\$3,145,766,000	not available
Gaming positions	900	3,000	500	5,527	40,394	5,939
On-site jobs (full and part-time)	1,087	1,429	188	6,603	36,377	2,359
Key ratios						
Operating cost per gaming position	\$57,822	\$20,282	\$23,712	\$103,677	\$77,877	not available
M-D as % of		285.1%	243.9%	55.8%	74.2%	-
Jobs per gaming position	1.21	0.48	0.38	1.19	0.90	0.40
M-D as % of		253.6%	320.6%	101.1%	134.1%	304.1%
Table games to slots	0.083	not applicable	not available	0.068	0.052	0.020
M-D as % of		-	-	122.1%	159.6%	415.0%

Source: PEFA, BEA, BLS, EconSult, Fuller, New Jersey Casino Control Commission.

+Figures not reflective of table games.

Notes:

1) Atlantic City jobs include all on-site casino, hotel and related jobs not in independently leased space.

2) Crossroads ratio of jobs per gaming position with 50 table games would be 0.55.

Vicksburg and Warren County, Mississippi – Ideal Analogues for Gettysburg and Adams County

Turning our attention to Vicksburg, we find its actual experience to be contrary to the Econsult Report in virtually every respect, and to offer a number of red flags. Like its omission of any analysis of the Borough of Gettysburg, the economic Report neglects mention of Vicksburg or Warren County, Mississippi.

Yet Crossroads testified in 2006 that Vicksburg is an ideal case study for observing the likely impact of a large casino just outside the Borough of Gettysburg.

This observation is correct. There are no other locales in which casinos have been introduced that share as much in common as do the pair of Vicksburg/Warren and Gettysburg/Adams. Their fates continue to be intertwined, as they were in the Summer of 1863 when, a day apart, Gettysburg held and Vicksburg fell.



A number of large signs announce Vicksburg's casinos from miles away and at the highway approaches.

Vicksburg's casino complex stretches along old Highway 61 for about two miles beginning about 2.5 miles south of Vicksburg's central business district (CBD) and its historic Main Street area. Washington Street (old Highway 61) bisects the Main Street area. The complex is about 4.5 miles from the Battlefield's main entrance, and about a mile from the park's closest boundary. As with Adams County, Warren borders a neighboring state, and its casinos are located within about an hour's drive from the nearest larger urbanized city which is the State Capital.

Vicksburg and Warren County are close enough in size to the Borough of Gettysburg and Adams County to avoid scaling distortions which facilitates meaningful comparisons. Vicksburg and Warren County are also small enough that the impact of casinos can be readily discerned in the actual, contemporaneous, official data and records.

The ability to observe these impacts *at the sectoral level* is crucial. It enables one to rely on what actually occurred, and obviates the need to rely on a Philadelphia consultant's misleading, inappropriate, and unfounded methodology. The LIR ignores these actual, contemporaneous and

official data that are reflective of the reality of the pre- and post-casino experience of Adams County and Gettysburg's closest analogues.

Figure 2 provides a side-by-side comparison of the two communities:

Figure 2. Vicksburg and Gettysburg, Side-by-Side.

	Vicksburg, MS (Warren)	Gettysburg, PA (Adams)
Population, City/Borough (2000)	26,407	7,490
County population (2009 est., includes municipalities)	48,175	102,323
County population, percent change, 2000 - '08	-2.02%	10.1%
Distance of main casino complex from CBD (approx., miles)	2.5 to 4.5	4.5
Pawnshops ¹¹	8	none
Check-cashing establishments ¹²	10	none
Collection agencies ¹³	3	none
Unemployment rate, June 2010 (county/state, BLS)	11.6% / 11.1%	8.6% / 9.2%
Average vehicles per day, key "Main" Street segments ¹⁴	1,600 to 4,700	7,479 to 13,399
Average vehicles per minute, key "Main" street segments	1.1 to 3.2	5.2 to 9.3
Average annual change in total employment, 1992 to 2008 (BEA)	1.35%	2.48%
Average annual change in employment, excluding manufacturing and construction, 1992 to 2008 (BEA)	0.054%	3.21%
Median household income, 2008 (Census)	\$39,825	\$55,124
Individuals below poverty level, county, 2000 (%)	18.7%	7.1%
Change in visitation to National Military Park, 1992 to 2007 (%)	-30%	27%

¹¹Pawnshoplistings.com, viewed July 2, 2010. Local listings only.

¹²Google search "check cashing Vicksburg Mississippi", and "Gettysburg Pennsylvania", July 2, 2010. Local listings only.

¹³Google search "collection agency Vicksburg Mississippi, and "Gettysburg Pennsylvania", July 2, 2010. Local listings only, excludes earned income tax collections.

¹⁴Mississippi Department of Transportation, for segments of Clay, Mulberry, and S. Washington Streets; Pennsylvania Department of Transportation, at Lincoln Square.



"Keystone Ministries, Soup Kitchen", S. Washington St. about a mile south of Vicksburg's historic Main Street area. Warren County's (Vicksburg) most recent unemployment rate greatly exceeds Adams. It's median household income is 28 percent less than Adams.

Figure 2 shows Warren County to have lost population this decade while Adams' population has steadily increased. Warren County's June, 2010 unemployment rate of 11.6 percent is higher than Mississippi's and far exceeds Adams' rate of 8.6%. The unemployment rate in June, 2010 in Adams County is lower than Pennsylvania's.

Sadly, almost 20 percent of Warren County's residents live in poverty compared to 7.1 percent of Adams residents.

Warren County's rate of job growth from 2000 to 2008 has been only about half that of

Adams. Excluding manufacturing and construction – so as to better observe its casino and tourism-related sectors – Warren's job growth during this decade has been virtually non-existent. Adams' equivalent rate of growth was 3.2 percent.

Traffic counts at key intersections along Vicksburg's historic Main Street are a fraction of those in Gettysburg at Lincoln Square.¹⁵ Median household income in Warren County is 28 percent lower than in Adams.

At the time its four casinos opened, VNMP was a close second to GNMP in visitation to Civil War sites. In 1994, the first year during which all four Vicksburg casinos were open, visitation at VNMP plunged 20 percent.¹⁶ Aside from the opening of four casinos in Vicksburg, nothing else in the local, state, or national economy can explain this precipitous decline.

¹⁵At Lincoln Square and Chambersburg, 11,399 (2008); at Lincoln Square and Baltimore St., 13,265 (2009); at Lincoln Square and York, 13,367 (2008); at Lincoln Square and Carlisle, 7,479 (2009), Pennsylvania Department of Transportation, Bureau of Planning and Research.

¹⁶See, <http://www.nature.nps.gov/stats/viewReport.cfm>. The rate of change in visitation over the relevant historic period is unaffected by GNMP's method of calculating the absolute number of visitors.

As we shall see, this plunge was not anomalous. Every other substantial decrease in visitation at VNMP over the last three or four decades has coincided with a major shock at the local, state, or national level.

The linkage between the under-performance of Warren County's post-casino economy and the post-casino plunge in visitation to VNMP cannot be ignored or dismissed. The only shock that occurred in 1993/1994 was the opening of four casinos in Vicksburg.¹⁷

By 1998, visitation to VNMP had ultimately recovered to its pre-casino level and remained relatively stable until Hurricane Katrina hit the Lower Mississippi Valley in 2005. But the ability for visitation at VNMP to bounce back seems to be exhausted for now. Recent park visitation is at levels not seen since just after the imposition of visitors fees in the 1980's and the oil embargo in the early 1970's.

Visitation records for VNMP show the impact of Vicksburg's casinos to have occurred in three distinct phases over the last 17 years:

- a precipitous initial decline of 20 percent followed by a recovery period of 4 to 5 years to pre-casino levels; thereafter,
- a period of stability; followed by,
- a substantial decline caused by a natural disaster in 2005 from which no recovery is yet evident.

As Figure 3 shows, VNMP is the only national park property in Mississippi that has yet to experience a significant recovery from the impact of Katrina. It, along with Jean Lafitte National Park in New Orleans (which bore the brunt of the damage from hurricane Katrina), are the only park properties in the two-state area that have yet to recover most, or to exceed, their pre-Katrina visitor levels (Lafitte having suffered from being hit by two other hurricanes in 2008).

¹⁷The initial rate of decrease in post-casino visitation at VNMP is comparable to that caused by three earlier economic "shocks": 1) in 1981 as a result of the doubling in the real price of oil over the preceding two years; 2) in 1985 as a result of the closing of the World's Fair in New Orleans that attracted about 7 million people, many of whom passed through Vicksburg and visited VNMP; and, 3) in 1988 after substantial visitor fees were imposed (admission had been free prior to then). Previously, Crossroads and its experts spuriously attempted to 'average' away this plunge, or dismissed it as being anomalous, unexplainable, or unrelated to Vicksburg's casinos. In the late 1980's and early 1990's visitation was still recovering from imposition of significant visitor fees which invalidates attempts to average the observed plunge away.

Figure 3. National Park Visitors, Pre- and Post-Katrina

Park	Pre-Katrina, 2004	Post-Katrina Peak	Post-Katrina Peak Year	2009	2009 as % of 2004
Natchez, MS	239,903	272,091	2006	218,126	91%
Natchez Trace Parkway, MS	5,389,227	5,934,363	2009	5,934,363	110%
Vicksburg Military Park, MS	958,089	699,314	2007	584,105	61%
Gulf Islands National Seashore, MS	4,241,477	4,132,674	2009	4,132,674	97%
New Orleans Jazz, LA	44,226	80,828	2009	80,828	183%
Cane River Creole, LA	12,933	34,453	2006	27,411	212%
Jean Lafitte, LA	595,128	339,821	2008	335,075	56%

Source: National Park Service

Notes:

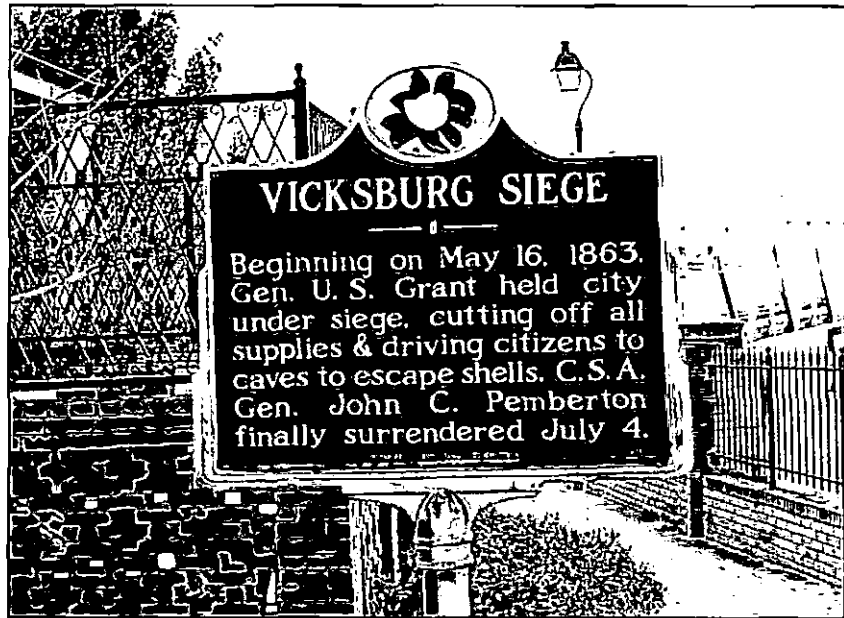
1) Brice Crossroads, and Tupelo, MS are non-reporting units.

2) Parts of Jean Lafitte, LA suffered substantial damage from Katrina and were used as recovery staging areas thereafter. Significant damage to Jean Lafitte was incurred again in 2008 as a result of Hurricanes Ike and Gustav, which again affected its visitation.

3) Hurricane Katrina came ashore to the east of New Orleans in late August, 2005.

MDOT Data Confirm Battlefield and Main Street Declines are Linked to Vicksburg's Casinos

Traffic counts by the Mississippi Department of Transportation (MDOT) confirm the causal and proximate link between the decline of Vicksburg's two primary historical, cultural, and tourism sites and its casinos. These data negate the contention that its casinos have been additive to visitation at VNMP and its historic Main Street area. These data also disabuse the notion that the precipitous post-casino plunge in visitation at VNMP was an unexplainable fluke for which Vicksburg's casinos played no part.



"Vicksburg Siege." Marker is near the center of Vicksburg's casino complex. Visitation to VNMP plunged 20 percent in the first year all four of Vicksburg's casinos had opened their doors. Soon thereafter traffic in and near its historic Main Street area also began to decline. Meanwhile, traffic increased near Vicksburg's casino complex and immediately outside VNMP's entrance.

Between 1992 and 1994 (last pre-casino year and first post-casino year in which all four casinos were open), average annual daily traffic (AADT) on the segment of Clay St. just outside the main entrance of VNMP increased 12 percent (MDOT). Yet visitation at the Battlefield fell by the same amount during this time (National Park Service).

At the same time, and about four miles away, MDOT shows traffic to have increased significantly outside Vicksburg's main casino complex. It increased 20 percent from 1992 (pre-casino) to 1995 (the first full year of operations for all Vicksburg's casinos).¹⁸ A few hundred yards north it exploded 64 percent along a segment of old Highway 61 connecting the complex to Vicksburg's CBD.

Something very big happened in Vicksburg between 1992 and 1994 that caused traffic passing directly outside VNMP's main entrance to increase substantially, while Battlefield visitation plunged and traffic around Vicksburg's main casino complex soared.

¹⁸Mississippi Department of Transportation. MDOT conducts actual counts every three years and carries prior year data forward for the ensuing two years until the more current data is available. Accordingly, the change in AADT shown in 1995 likely began in 1994.

And, between 1998 and 2008/09, AADT on Vicksburg's key Main Street area road segments fell 17 percent (see Appendix A).¹⁹ The foregoing provide objective evidence that the decline in Vicksburg's historic Main Street area is linked to its casinos.

The pattern is clear: traffic to casinos up; traffic and visitation at Vicksburg's two most significant historical, cultural, and tourism sites down.

Visible evidence of the casino-related decline in Vicksburg's historical, and cultural, and tourism resources is readily apparent in its historic Main Street area. A recent windshield survey found that of 83 structures in the area bounded by Grove and Veto streets, 34 – or 41 percent – are vacant, in addition to about a dozen vacant lots.²⁰ Two long-vacant structures were demolished at the time of this survey. The demolition contractor reported the owner had no plans to rebuild on the site.

No more than a handful of moving vehicles were observed during weekday business hours on Washington St. where it bisects Vicksburg's Main Street area. There was so little traffic, one could take photographs while standing in the middle of this street on a lovely Spring day and not obstruct

or delay a single vehicle. Not surprisingly, there was also a notable lack of pedestrians.



Vicksburg's historic Main Street, March 25, 2010. During weekday business hours looking North on Washington ("Main") St. there were just two moving vehicles and no pedestrians. Many of the structures in this photo are vacant, including "Fred's".

Some businesses (among them, a coffee shop, bookstore, a craft store, a restaurant/bar, a pharmacy, and a pawn shop) appeared to be doing well. Overall, however, business conditions in and near Vicksburg's historic Main Street area can only be described as dismal, particularly when compared to the Borough of Gettysburg's Main Street area.

Even Vicksburg's solitary downtown casino (Horizon)

¹⁹Mississippi Department of Transportation, Office of Intermodal Planning, <http://www.gomdot.com/Divisions/IntermodalPlanning/resources/Maps/TrafficVolumeMaps.aspx>, viewed June 2010.

²⁰Siegel, site visit, March 2010. Some vacant lots are used for surface parking.

at the foot of its historic Main Street area appears to be on the losing end of a struggle to survive. Its 19,000 square foot gaming floor was virtually deserted on a recent weekday afternoon. On a recent Friday evening its surface parking lot held just 33 cars, while cars too numerous to count crowded acres of parking in surface lots and decked parking at Vicksburg's main casino complex (Siegel, March 2010).

It is an inescapable conclusion that something has gone seriously wrong with Vicksburg's historical, cultural, and tourism sectors in the aftermath of its casinos.

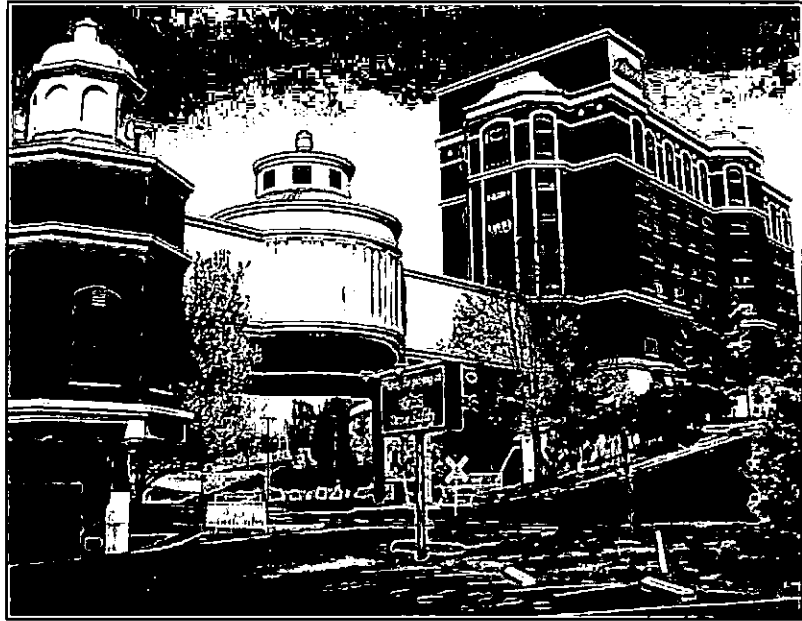
These adverse impacts have occurred despite construction of a 25,500 sq. ft. convention center and associated entertainment complex in Vicksburg's Main Street area in the late 1990's. As MDOT data show, this facility has been unable to arrest the area's decline.

Diversion of Existing Local Resident and Visitor Spending

An authoritative study prepared for the Iowa Racing and Gaming Commission, (Cummings, 2003) found that, on average, those living proximate to Iowa's casinos spent (lost) about \$776 (\$2010). This money did not fall from the Iowa sky. It came from its resident's disposable income, savings, or debt.²¹

Econsult does not consider diversion of local spending and the consequent destruction of existing jobs and local businesses. Rather, it incorrectly considers jobs at the M-D caused by this diversion to be "net new" jobs created by the M-D.

This is crucial for Adams County and the Gettysburg area, as all contemporaneous official data show Vicksburg's casinos to have exerted a powerful diversion effect. Enough to have negated virtually all, or more, of the multiplier jobs Econsult's methodology would project Vicksburg's casinos to have generated.

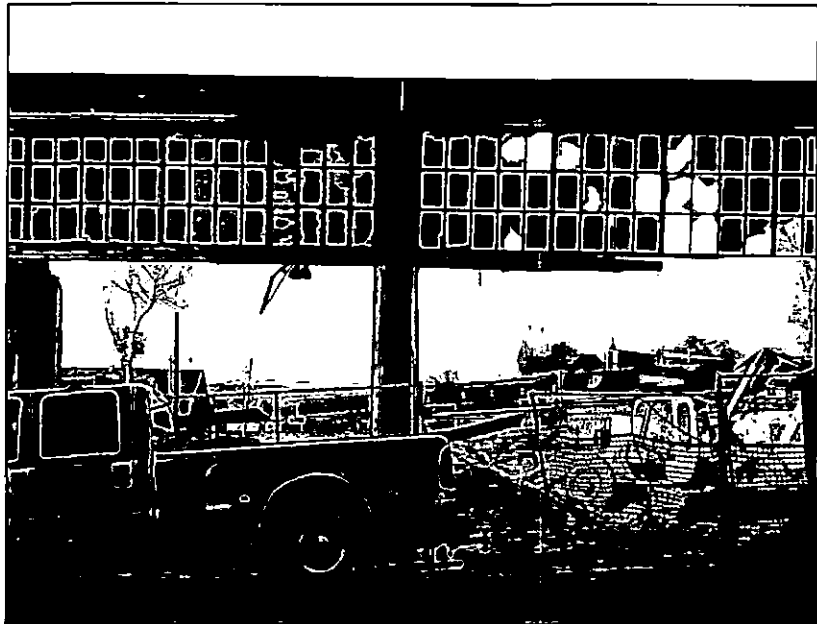


Horizon casino parking lot. At Vicksburg's only downtown casino, located at the foot of its historic Main Street area, the parking lot was nearly empty at mid-day. Its casino floor was virtually deserted, as it was also on a Friday evening.

Residents and businesses in the Borough of Gettysburg would face a similar intensity of exposure to casinos as those in Vicksburg. In 1998 there were about 7.0 gaming positions for each Vicksburg resident (MGC Quarterly Reports). The M-D would place 8.3 gaming positions within about the same proximity of each Borough resident and business.

²¹A small fraction of this spending would have also been recaptured from a few residents who would otherwise spend this money out of state. As the Cummings study shows, however, any recapture is vastly overwhelmed by increased spending due to the proximity effect.

Vicksburg's casinos have not protected its economy or local government budgets from the current economic downturn. Five months into its current fiscal year Vicksburg's gaming and sales tax collections – accounting for nearly half of its operating budget – are “down nearly 8 percent compared to fiscal year 2009”. Despite the opening of another casino in the preceding months, Vicksburg's casinos were reported to “not fare as well as others in the state”, with gambling taxes paid to the city, county and local school district down by 21.9 percent in February 2010.²²



“No plans to rebuild”. These two adjacent long-vacant mid-1800's-era structures in Vicksburg's Main Street area were tom down in late March, 2010. Two less vacant buildings, two more vacant lots.

Warren County's Missing Multiplier Jobs

Econsult applies a ‘multiplier’ to estimate the indirect and induced impacts of the proposed casino on Adams County. As applied by Econsult, this approach is incapable of accurately representing the *net impact* on jobs or economic activity.

RIMS II multipliers are a point-in-time ‘snapshot’ of economic relationships between *then-existing* sectors. They do not necessarily reflect the net change in aggregate jobs or economic activity attributable to a facility's output. As with the earlier example of an on-line newspaper, the M-D's output or job multiplier may be accurately stated to be 1.30. However, this does not mean it will generate .30 *net new* jobs elsewhere in the economy as Econsult would have us believe.

In fact, were the casino to destroy a thousand or more jobs at existing businesses by diverting local spending to the casino, its job multiplier would still be accurately stated as being 1.30. This is why Vicksburg's casinos have generated few (if any) net new multiplier jobs in the County in the years after they opened, as shown in Figure 4.1.²³

²²Sanoski, S., Vicksburg Post, March 25, 2010, p. 1.

²³1995 is the first full year after all four Vicksburg casinos opened. By 2000, sufficient time would have elapsed to reflect changes and adjustments in other sectors in their aftermath.

Following Econsult's erroneous methodology, Warren County's RIMS II casino job multiplier of 1.313²⁴ would suggest the 3,281 jobs at its casinos in 1995 generated 1,027 net new jobs elsewhere in the county ($3,281 * .313 = 1,027$). This did not happen.

Figure 4.1 shows the effect of other important sectors on Warren County's multiplier jobs. Netting out these sectors multiplier effect leaves a residual that is attributable to the balance of the county's other sectors, including its casinos (note, the number of multiplier jobs attributable to Vicksburg's casinos would be less than the residual).²⁵

The related Figure 4.2 estimates the universe of possible multiplier jobs in Warren County. Between 1993 and 1995, there was a total increase of 938 new private sector jobs in Warren County outside of its casinos, exclusive of its manufacturing, construction, and government sectors.²⁶

As Figure 4.1 shows, after accounting for changes in other major sectors of the local economy, there are a residual 567 potential multiplier jobs attributable to the remaining sectors (primarily casinos, finance, insurance and real estate, proprietors, and the balance of its services sector).²⁷ Even if one were to incorrectly attribute all of the residual jobs to Vicksburg's casinos, the number is far less than the 1,027 such jobs Econsult's methodology would project.

However, Vicksburg's casinos were likely to have been destroying other jobs in the community five years later, as Figure 4.1 also demonstrates. By 2000, there was a residual of only 311 multiplier jobs. Considering other sectors contributions, it would appear that any positive job multiplier effect Vicksburg's casinos may have had early on evaporated. Indeed, their multiplier effect may have been negative five years after the first casino opened its doors.

²⁴RIMS II multipliers, Table 1.5, BEA, 2002/2007 for hotels and motels, including casinos.

²⁵Auto supply-chain manufacturing was an entirely new industry in Warren County. Both manufacturing and federal government jobs are considered to be 'basic' or 'export'-oriented industries and do not take jobs or business away from other sectors of the local economy. Accordingly, their economic activity and their job multipliers are virtually 100 percent additive at the aggregate county level. This is not the case for non-basic, non-export type industries such as a casino that draws a large number of its patrons from existing residents and visitors.

²⁶Manufacturing jobs are excluded as these are not casino-related. Construction jobs are excluded because these are non-operating jobs and construction of Vicksburg's casinos was completed by 1995. A few such jobs might be related to off-site contractors performing ongoing maintenance and repair-type activities at the casinos.

²⁷It is not possible to further distribute these residual jobs due to lack of detail in BEA's pre-2001 employment data.

Figure 4.1. Estimated change in Warren County Private Sector Multiplier Jobs

	Gains, '92-'95	Losses '92-'95	Net Multiplier Job Growth, '92-'95	Job Growth, '93-'95	Residual Multiplier Jobs, 1995	Gains '92-'00	Losses '92-'00	Net Multiplier Job Growth, '92-'00	Job Growth, '93-'00	Residual Multiplier Jobs, 2000
Federal government multiplier jobs (multiplier = 1.273)		(102)								
Manufacturing multiplier jobs (multiplier = 1.8032)	329					1,203	(305)			
Construction multiplier jobs (multiplier = 1.466)	144									
Sum	473	(102)	371	938	567	1,406	(305)	1,101	1,412	311
Casino jobs, on-site, 1995 and 2000						203				
										3.281

Source: PEFA, BEA, Mississippi Gaming Commission.

Notes:

- 1) The finance, insurance and real estate (FIRE), proprietor, and balance of non-casino services sectors would have also generated multiplier jobs.
- 2) See Figure 4.2 for derivation of "Job growth". Job growth begins in 1993 to account for lag effect of indirect/induced multiplier jobs, and mid- and late-calendar year opening of Vicksburg's casinos. Job growth in this table excludes casino, manufacturing, construction, and federal government. Manufacturing, and federal government are excluded as these jobs are "basic" or "export" jobs not related to Vicksburg's casinos (e.g. not a result of local demand). Their multiplier-jobs are virtually 100 percent additive (or negative) at the county level. Construction is excluded to focus on ongoing impacts. A small number of independent contractor jobs would be related to ongoing maintenance and repair at the casinos, however, these would not significantly affect the results.
- 3) Federal multiplier from BEA RIMS II multipliers, "other services", 2002/2007, Table 1.5; manufacturing from Table 2.5 for "motor vehicle body, trailer, and parts"; construction from Table 1.5. Table 1.5 manufacturing multipliers are more specific to each sector/business type than Table 2.5 multipliers.

Figure 4.2. Employment, Warren County, MS.

Warren, MS	1991	1992	1993+	1994+	1995*	1996	1997	1998	1999	2000
Total employment, ex. manufacturing, construction, government	13,935	14,114	15,358	18,791	19,133	19,106	18,936	19,017	19,453	19,297
Change from prior year		179	1,244	3,433	342	(27)	(170)	81	436	(156)
Casino-related jobs, on-site (MGC)		444	2,697	3,281	3,072	2,882	2,815	3,066	2,971	
Total employment, ex. manufacturing, construction, government, and casino	14,114	14,914	16,094	15,852	16,034	16,202	16,387	16,326		
Sum, post-'93 new employment, ex. manufacturing, construction, government, and casino jobs					938	1,120	1,140	1,288	1,473	1,412

Source: BEA, Mississippi Gaming Commission Quarterly Reports (MGC).

+ - casino construction plus some operations

* - first year of full operations, and no casino construction.

Notes:

- 1) On-site casino-related jobs not available from MGC for 1993 and 1994. These years are estimated based on percent of months open applied to 1995 actual jobs. MGC reports jobs data quarterly. Number of on-site casino jobs cited in this Figure represent average annual.
- 2) Figure likely overestimates potential multiplier effect jobs as it includes all proprietors.
- 3) Vicksburg's first casino did not open until mid-August, 1993, the last of these four opened later in 1994.

Mason-Dixon Casino Will Destroy 727 to 1,130 Jobs at Adams County Businesses

As estimated herein, Adams County residents are estimated to lose about \$54.6 million annually at the M-D (Cummings, 2003). They would also purchase approximately \$14.08 million (primarily food, drink and other entertainment) while they are there, for a total diversion of \$68.8 million (\$2010, consistent with Cummings gravity effect, both figures are adjusted by a factor of .80 percent to account for lower spending by those located further away).

Assuming conservatively that only half of this amount would have been spent elsewhere locally (a sizable majority of spending by households typically occurs within a few miles of their residence), the M-D would divert about \$34.4 million in expenditures from existing local businesses. Were the M-D to divert \$35 apiece in expenditures (gaming and non-gaming revenue) by existing overnight and day-visitors another \$35.4 million would also be diverted, representing a loss to existing businesses of \$69.8 million per year.

Based on Econsult's "ancillary" spending, however, the loss would be only \$45.75 million and would result in the destruction of about 727 jobs. Either way, much, if not most, of this loss would fall upon businesses located in and near the Borough of Gettysburg.

Figure 5 converts the estimates of diverted local spending (which include non-gaming revenue) into the number of destroyed jobs at Adams County businesses.

Figure 5. Estimated Number of Jobs Destroyed and Lost from the Proposed Casino.

Item	Amount	Amount	Detail
Local spending diverted to casino (est. \$2010) ²⁸	\$69,800,000	\$44,750,000	Existing resident and visitor spending, includes non-gaming revenue.
Estimated output per Adams County private service sector (PSS) job	\$61,585	\$61,585	York County proxy GDP per related job, adjusted to Adams (see Appendix C)
Total jobs destroyed at Adams County businesses	1,133	727	Local diverted spending divided by output per PSS job
Casino jobs on-site (full- and part-time)	1,087	1,087	Econsult, converted to actual from FTE
Aggregate direct impact	(46)	360	Casino jobs less total destroyed
Multiplier effect, indirect and induced	(14)	108	Local multiplier effect @ 1.30
Aggregate impact, direct plus multiplier	(60)	468	Direct plus multiplier

Source: PEFA, BEA.

Notes:

1) See Appendix C for detailed explanation of output per Adams County private service job.

2) Under-performance of the M-D's pro-forma would reduce the amount of diverted spending and destroyed jobs as reducing gross gaming revenue. Neither diversion estimate does not account for actual net loss in park visitors to the area. This would cause the equivalent amount of job loss, but would significantly reduce gross gaming revenue beyond that estimated herein.

²⁸In Iowa the average resident proximate to a casino spends (loses) a total of \$776 annually (\$2010, see, Cummings, W., "Analysis of Current Markets for Casino Gaming in Iowa, with Projections for the Revenues And Impacts of Potential New Facilities, Update", April 18, 2005, p. 11). Existing visitors to Adams County are estimated to spend a combined average of \$35 each (Econsult estimates \$120 for overnighters and \$25 for day trippers) at M-D that would otherwise have been spent locally.

As shown, the M-D would not generate any net new jobs in Adams County. Rather, over the ensuing years, it would destroy up to about 1,130 jobs at existing county businesses by diverting the economic activity supporting these jobs to the proposed casino.²⁹ At this level an untold number of existing businesses would face bankruptcy or closure. The relative level of job destruction in Adams County is anticipated to be greater than what occurred in Warren County (MS) as a Gettysburg location would not have a lock on the Harrisburg, PA area market – as Vicksburg’s casinos do on the Jackson, MS market – and to higher levels of employment and income in Adams County.

Any minimal amount of recaptured spending would not begin to offset the number of destroyed jobs and businesses. The best studies on this subject show spending by local residents increases inversely, and logarithmically, as distance to a casino decreases (Cummings, 2003).

Brand Confusion from a Failed Business Model

It is obvious from the Applicant’s web site that the Applicant intends to develop a family and children-oriented theme park and recreation complex in close proximity to the proposed casino and hotel. The Applicant’s web site provides the following list of features to be co-located in close proximity to the proposed casino:³⁰

- Virtual Reality Thrill Ride
- Virtual Reality Pebble Beach Golf
- Arcade games and rides
- Indoor and outdoor soccer fields
- Indoor and outdoor pools
- 36 holes of miniature golf
- 14-acre fishing lake with paddle boats
- Batting cages
- Basketball and volleyball courts
- Outdoor pavilion
- Two go kart tracks

Most of these features are highly attractive to families with children. Curiously, the renderings found on the Applicant’s web site fail to identify or locate many of these features.

Of relevance to this analysis is the co-location in close proximity of adult-style entertainment and gambling with child-centric amusement park features. The ‘casino as family-friendly theme-park’ model is problematic for the Gettysburg area. A number of Las Vegas casinos attempted and then largely abandoned this model a decade or so ago due to brand confusion.

²⁹Diverted amount exceeds output as output excludes the approximate 45 to 50 percent applicable effective state tax rate.

³⁰See, <http://www.masondixongamingresort.net/product.html>, viewed July 19, 2010.

"There are pros and cons to the concept that Las Vegas is a family vacation destination. That was certainly true a decade ago, but the direction of Las Vegas has changed ...a complete about face from that of the early 1990's.

The "family fun" marketing pitch has now been replaced by "adult pleasure." Its new direction is "What happens in Vegas stays in Vegas!" as you have no doubt noticed in its TV ads. The message now is that Las Vegas is the place for the middle-class affluent looking for a fantasy weekend getaway ...a Disneyland for adults.

The "something for everyone" concept has been greatly de-emphasized over the past few years and the family friendly resort is now only a small niche market. The historic "G-rated" orientation of Las Vegas is now more "X-rated."³¹

This model confused Las Vegas' primary adult-oriented market by mixing in family-oriented themes. The M-D would do the opposite by confusing Gettysburg's primary family-oriented market with adult-oriented themes. The effect, however, is the same – largely incompatible products are to be promoted to largely incompatible market segments.

One must consider this in light of Vicksburg's experience which saw its family-oriented tourism identity degraded by its casinos. The Applicant is proposing to operate an adult-oriented entertainment and casino complex that would be financially and physically intertwined with a family- and child-oriented amusement park. This product is to be offered in a community whose historical and cultural tourism sites are highly family-centric.

This could create both brand confusion as well as brand pollution.

The Borough and GNMP are a key gateway for many of the Commonwealth's historical, cultural, and other tourism sites. Any degradation in the public perception of the family-oriented "Gettysburg" brand could have knock-on effects extending well beyond Adams County.

Summary

Econsult's Report might be considered acceptable were the proposed license to be located in a larger metropolitan area where any adverse impacts would go largely unnoticed, or an area that is not as critical to the Commonwealth's branding and to its economically vital historical, cultural, and heritage tourism sector.

The LIR's discussion of water resources and capacity shows that existing reliable capacity to serve the proposed development does not exist and cannot be provided on-site. It also indicates that additional water capacity necessary to serve the proposed development has not been secured.

³¹See, <http://lasvegas4newbies.com/chap1-6.html> viewed August 3, 2010.

It's wastewater analysis was not performed by a qualified engineering firm, but by a surveying firm. The little data that is provided shows that, as proposed and envisioned by the Applicant, the existing on-site WWTP would be overwhelmed during periods of seasonally-high use.

The economic Report's lack of local context, its failure to acknowledge the existence of the Borough of Gettysburg or to take note of Vicksburg's experience, and its use of an inappropriate and misleading methodology results in its failing to meet the requirement to identify, detail, and assess the impact of the proposed Category 3 license on the local economy and communities.

The economic Report contains no meaningful data on Adams County's economy and job base. Among the sectors most likely to be most adversely affected are the County's retail, lodging, food services, entertainment, and recreation sectors. These sectors accounted for 23 percent of all jobs in the county in 2008 (BEA), many being located in and around the Borough of Gettysburg.

Vicksburg's experience shows the potential adverse impacts to existing businesses, which includes transfer of resident and visitor spending to the proposed casino, job destruction at existing establishments, increased bankruptcies, and depressed levels of future job growth for years to come, is not hypothetical. Spillover effects on community character and associated brand pollution could cause yet additional adverse impacts.

The economic Report completely ignores the adverse impact of the proposed casino on the viability of the more than 100 retail establishments and 40 restaurants in the Borough of Gettysburg, or its existing lodging sector.³² These establishments, along with others nearby and the jobs they support, are literally at ground zero for exposure to any adverse impacts.

Econsult's Report, the proposed casino's pro-forma, and its business case are not credible based on a number of key operating ratios. Every indicator discussed in this analysis shows the proposed casino will fall substantially short of its pro-forma and its business case, and will cause significant adverse impacts to existing job-holders, residents, and businesses.

The economic Report also ignores Vicksburg's experience. With that experience as a guide, however, Gettysburg and Adams County leaders can expect the M-D to irrevocably alter local spending, travel, and visitation patterns, the character of nearby communities, and threaten the viability of the area's critically important historical, cultural, and tourism resources.

³²See, <http://www.mainstreetgettysburg.org/business.html>, viewed, July 2010.

Appendix A. Bankruptcy Filings, Mississippi Southern District Court.

Researchers at Purdue and Georgetown (Barren, et. al, 2000) published an exhaustive multi-county, multi-variate statistical analysis of the relationship between casinos and bankruptcy filings. This study is incorporated by reference in this analysis. It included all of Mississippi's casino-impacted counties and found that in such counties

“the proximity of casino gambling appears to be associated with higher bankruptcy rates, **but the local impact is far more pronounced** than the influence of casino gambling on national filing rates” (emphasis added).³³

Bankruptcy filings for Mississippi at the U.S. District Court (multi-County) level confirm these observations. Post-casino personal and business bankruptcy filings in Mississippi increased more rapidly than did national filings. The rate of filings in Mississippi's Southern District bankruptcy court, which includes Vicksburg, Gulfport, and Biloxi, substantially exceeded the national rate beginning in 1995 through 1998.

The pattern observed at the District Court level in Mississippi corresponds to what one might expect after multiple casinos open in an area that did not previously have ready access to large-scale casino gambling. However, the increase in filing rates at the District Court level is certain to understate the increase in bankruptcy filing rates in casino host counties as they represent a minority of the counties in the District Court's jurisdiction.

The introduction of casinos would tend to be most disruptive to existing businesses in the first few years. After a couple years, most affected businesses that are unable to adapt, or that try to hang on, will begin to close or face bankruptcy. Personal bankruptcies could be expected to follow a similar pattern. Some gamblers may be able to rely on savings, credit cards, or borrowing to sustain their spending and gambling patterns for a year or so.

Mississippi's first casinos opened on the Gulf Coast in 1991. Several more followed in the ensuing years. Four casinos opened in Vicksburg in 1993 and 1994.³⁴ In total, 14 casinos opened in the Southern District during 1992 to 1994. Mississippi's Southern District bankruptcy court filings between 1990 and 2000 are shown in Figure A.1.

³³Barren, Staten, Wilshusen, “*The Impact of Casino Gambling on Personal Bankruptcy Rates*”, Krannert School of Management, Purdue University, McDonough School of Business, Georgetown University, August 18, 2000.

³⁴Mississippi Gaming Commission.

Figure A.1. Bankruptcy Filings, Southern District of Mississippi and the U.S.

Year	District Filings	U.S. Filings	% Change, District	% Change, U.S.	Casino Openings in District
1990	7,494	782,960			
1991	8,484	943,987	13.2%	20.6%	
1992	8,122	971,517	-4.3%	2.9%	3 ³⁵
1993	6,742	875,202	-17.0%	-9.9%	6
1994	6,539	832,829	-3.0%	-4.8%	5
1995	7,822	926,601	19.6%	11.3%	
1996	10,317	1,178,555	31.9%	27.2%	
1997	12,667	1,404,145	22.8%	19.1%	2
1998	12,474	1,442,549	-1.5%	2.7%	
1999	11,833	1,319,465	-5.1%	-8.5%	1
2000	12,144	1,253,444	2.6%	-5.0%	4
2001	14,275	1,492,129	17.5%	19.0%	
2002	14,228	1,577,651	-0.3%	5.7%	
2003	13,855	1,660,245	-2.6%	5.2%	1
2004	12,757	1,597,462	-7.9%	-3.8%	
Increase as a factor of 1993					
1993 - 97	1.9	1.6			
1993 - 03	2.1	1.9			

Source: <http://www.uscourts.gov/bkrpctystats/statistics.htm#june>, Administrative Office of the U.S. Courts. Data after 2004 is not consistent for purposes of historical comparisons as modifications in bankruptcy laws that caused filings to increase prior to the new law coming into effect, and a substantial decline thereafter.

Note: The rate of increase in filing rates at the District Court level understates the increase in bankruptcy filings in casino host counties as they are a minority of the counties in the District Court's jurisdiction.

³⁵Openings in Harrison County during latter half of 1992: August 1st, August 13th and October 19th.

As is evident in Figure A.1, there was a large spike in the Southern District's bankruptcy filings during the three years beginning in 1995, as there was nationally. However, the rate of increase in Mississippi surpassed the national rate by a large margin. This effect is most pronounced in the 1993 to 1997 period when Mississippi's Southern District bankruptcy filings increased by a factor of 1.9 compared to 1.6 nationally. The effect continues to be noticeable at the District level over the 1993 to 2003 period when the factors were 2.1 and 1.9, respectively.

Appendix B. AADT, Selected Main Street Area Road Segments, Vicksburg, Mississippi.

Figure B.1. Vicksburg Main Street Area Traffic Counts (AADT), Key Segments.

Identifier #	Street(s)	1998	2000	2002	2004	2006	2008/09
750090	N. Washington	8,900	6,600	6,600	7,100	7,500	7,200
750890	S. Washington @ 1 st E St.	8,900	7,700	7,700	7,100	7,500	7,200
750880	S. Washington b/n Jackson and Grove	5,300	4,200	4,200	2,500	2,500	2,400
750010	Clay b/n Walnut and Monroe	4,600	4,600	4,700	4,700	4,700	4,600
755380	Mulberry b/n Crawford and South	3,400	3,400	3,900	2,200	2,200	2,500
755165	1 st E between S. Washington and Walnut	3,800	3,300	3,300	3,200	2,900	2,900
755100	Cherry b/n Jackson and Grove	6,100	4,800	4,800	5,900	7,500	7,600
755190	Jackson b/n Cherry and Adams	3,600	1,000	3,500	3,200	3,200	4,100
755160	Levee b/n Grove and Mulberry	3,500	3,100	3,100	3,300	3,300	3,200
755225	Clay b/n Mulberry and S. Washington	2,900	3,800	3,800	3,800	1,400	1,600
755125	Monroe b/n Veto and South	4,000	4,000	4,900	3,800	3,800	4,700
755200	Grove b/n 3 rd and 4 th N.	5,400	3,200	2,700	2,700	2,200	2,100
	Sum	60,400	49,700	53,200	49,500	48,700	50,100
	Percent Change from 1998 to 2009						-17.1%

Source: Mississippi Department of Transportation, Office of Intermodal Planning.

Appendix C. Estimating Number of Destroyed Adams County Jobs.

The Bureau of Economic Analysis (BEA) does not publish Adams County's GDP (economic output).

BEA data for York County, PA is used as a proxy to estimate Adams' private service sector GDP. York and Adams private service sector (PSS) jobs are estimated using BEA total jobs (excluding government, manufacturing, mining, utilities, transportation, and warehousing sectors). The difference between the average wage between York and Adams is 85 percent. Other inputs (materials, rent, utilities, taxes, insurance, etc.) would likely be about the same. Accordingly, York's GDP-PSS per related job is adjusted downward by 80 percent to estimate Adams GDP-PSS per private service sector job.

The estimated amount of local spending diverted to the M-D is divided by Adams GDP-PSS per job to estimate the total number of Adams jobs that would be destroyed by the proposed casino. The number of destroyed jobs is subtracted from the number of on-site casino jobs to estimate their aggregate impact on jobs at the county level. The associated multiplier jobs related to the aggregate job loss at the county level are estimated at the casino's 1.30 job multiplier (.30 indirect and induced jobs for each direct job) to obtain the number of destroyed multiplier jobs.

York County (PA) 2008 GDP for private service jobs was \$8.95 billion. York 2008 wage and salary jobs less government, manufacturing, mining, utilities, transportation, and warehousing equal 116,262, which yields GDP-PSS of \$76,981 per related job. Adams PSS

Average York and Adams wage and salary job pays \$39,352 and \$33,308, respectively; Adams as percent of York = 84.6%.

Appendix D. Water and Wastewater.

The LIR does not estimate the M-D's water (consumptive and irrigation) demand or wastewater flows as represented and proposed by the Applicant. Its water assessment clearly states that existing on-site wells have insufficient reliable capacity to serve the proposed development. The application of standard unit wastewater design flows show the existing on-site WWTP would be overwhelmed during periods of high utilization that coincide with peak wet-weather flows.

Water

Advantage Engineers ("Advantage") estimates the existing on-site wells have a "reliable" yield of 20,000 to 25,000 gallons per day (gpd) during dry weather conditions. Advantage estimates an additional 25,000 gpd in well capacity would be required *for a casino-only operation*. This does not include any additional water use for other proposed on-site facilities (e.g., restaurants, spa, pools, bars, entertainment and amusement facilities, expanded convention space, playing fields, etc.), higher occupancy and utilization levels, additional irrigation, and other non-consumptive uses.³⁶

Advantage concludes the condition and capacity of existing on-site wells is insufficient, two on-site wells do not meet safe drinking water standards, and the ability to develop additional on-site wells is questionable due to contamination from the Gettysburg Foundry site. Advantage recommends development of additional off-site wells to serve the property, and abandonment of some or all on-site wells in favor of off-site wells.

Based on Figure D.1, the on-site water system would need to have a reliable capacity of about 140,000 gpd to serve the proposed M-D consistent with the Applicant's representations along with the existing Devonshire condominiums which are apparently also served by the on-site water system. Significant additional capacity would be required for irrigation and other non-consumptive use.

Accordingly, the M-D's water needs have not been assessed in the LIR, the capacity required to serve the proposed casino and related facilities does not exist on-site, and no off-site well locations have been identified, tested, or secured.

Wastewater

The permitted capacity of the existing WWTP is stated in the Applicant's LIR to be 110,000 gallons per day (gpd).

Advantage indicates the on-site utility systems also serves the 76-unit Devonshire Condominiums located adjacent to the Eisenhower complex. Water use for this complex is not estimated by Advantage. At an estimated 130 gpd per unit, it would require WWTP capacity of almost 10,000 gpd,

³⁶Advantage Engineers, correspondence to Yannetti, B., March 26, 2010.

excluding excessive inflow and infiltration (I/I).

Unlike it's assessment of the M-D's water system, the LIR's wastewater assessment does not appear to have been prepared by a qualified engineering firm. Rather, the "Report on Wastewater Treatment Facilities at the Proposed Mason-Dixon Resort" was prepared by Sharrah Design Group ("Sharrah") which describes itself as offering "Architectural Design and Surveying Services" with no mention of any experience or capability in wastewater facility planning, needs assessment, operations, management, construction, or engineering.³⁷

Sharrah erroneously concludes the capacity of the existing on-site facility is sufficient to handle the M-D's flows.

As shown in Table D.1, with the M-D, and consistent with the Applicant's plans and representations, the on-site WWTP would receive about 169,000 gpd of wastewater during periods of high utilization that coincide with periods of peak wet weather conditions. This exceeds its permitted capacity by 59,000 gpd, as shown in Table D.1.

During drier months, the indicated poor condition of the on-site collection system could cause untreated sewage to leak into the ground. Advantage indicates groundwater depth is quite shallow on the site. This could create localized conditions of near-surface soils becoming saturated with untreated sewage. Additional exposure to bio-hazards could occur if any leakage of untreated sewage were to find its way to the surface, into existing wells, or to one of the on-site ponds or active water-features.

At some indefinite time, the LIR indicates a publicly-owned WWTP may be built by the township to serve the Greenmount area where the Eisenhower is located. The location, type, capacity, treatment levels, receiving stream, and cost of this plant is not specified in the LIR. Nor is the financing mechanism, or the method, quantity, and location for off-site sludge disposal.

The LIR indicates that some of the cost of a publicly-owned WWTP would come from tap fees paid by the M-D, but it does not specify the amount of these fees, or the proportionate share of the M-D's contribution to the cost of a new WWTP.

The Applicant has not committed any funds for its share of a new publicly-owned WWTP. Nor does it appear to have included its share of its costs in its construction budget. Nor has the Applicant posted a bond to assure the facility would be built. The amount that would be paid by other property owners who would be required to hook-up and contribute to the cost of this plant is not specified (this could amount to several thousand dollars, or substantially more for larger users). Nor has the Applicant indicated the amount of their annual user fees for the cost of operation, maintenance, sludge disposal and the balance of any financing costs.

³⁷See, <http://www.goguild.com/gettysburg/sharrah-design-group>, viewed August 2, 2010.

Were it to be built and operated consistent with the Applicant's representations (and assuming sufficient water capacity can be obtained) the proposed M-D would cause the existing WWTP to be out of compliance with its permit by causing it to discharge raw- or partially-treated sewage during periods of seasonally-high utilization and/or peak wet weather conditions.

Should insufficient water and/or wastewater capacity be available, the proposed M-D cannot be constructed or operated as proposed and represented by the Applicant.

Figure D.1. Estimated Peak Wastewater Flows, M-D Casino and Resort.

	GPD, Per Unit	Units	Total Flow
Gaming positions	15	900	13,500
Hotel, per pillow (@ 2.75 per hotel room)	75	844	63,319
Restaurant, per seat	75	250	18,750
Entertainment and conference facilities, per walk-in guest	5	1,250	6,250
Bar and lounge, per seat	30	150	4,500
Spa and pool guests	10	350	3,500
Employee personal use	15	1,087	16,305
Amusement park, arcade, pavilion, fields, per walk-in guest	5	600	3,000
Subtotal, M-D consumptive use			129,124
Devonshire condominiums consumptive use	130	76	9,880
I/I (May, 2009)			30,000
Total peak day WWTP flow			169,004
Permitted capacity, existing on-site WWTP			110,000
Over / (under) capacity			59,004

Source: PEFA, Environmental Navigation Services, Inc., Bikis Water Consultants, LLC.

Notes:

- 1) Per unit amounts from Pauma Casino Environmental Assessment, Appendix H-Water Supply Study, February, 2008. Unique amusement park users estimated at same unit rate as walk-in guests.
- 2) The LIR does not provide number of pillows per room, restaurant, bar and lounge seats, number of walk-in guests (casino patrons not staying on-site), unique conference attendees, amusement park, spa, and pool guests. These units are estimated.
- 3) I/I is the difference between May 2009 peak and average flows. Amount would be greater if recent or earlier peak flows are higher than May 2009.
- 4) The LIR estimates casino-only water use would be 15,000 gpd. Accordingly, total flow could be 1,500 gpd greater than estimated here.

A location on the Boyd's Bear property is apparently the preferred site. A review of the Township's current "537 Wastewater Facilities Plan" (2004) shows a WWTP at this site and related collection system would cost \$3.1 (.250 mgd) to \$5.5 million in \$ 2004. If this site is not available, the cost for the WWTP and related collection at an alternate site could be as high as \$7.0 million (\$2004).

For a WWTP on the Boyd's Bear property would be \$3.6 to \$6.3 million in 2010 dollars (BLS, CPI), while the cost for another site could be as high as \$8.0 million in 2010 dollars.

Consistent with the Economic Report and the Applicant's web site, the M-D's estimated peak day flows would make it responsible for approximately 58 to 67 percent of a publicly-owned WWTP's up front capital fees. Accordingly, the M-D would be required to make a payment of between \$1.2 to \$1.7 million for its pro-rata share of the up front capital fees for a WWTP at the Boyd's Bears property, and substantially more at an alternate location.

To assure the construction of a publicly owned WWTP in the Greenmount area, however, the M-D, at a minimum, would need to post a bond for the entire share of the facility's up front capital fees. This amounts to about \$2.14 to \$2.64 million (\$2010) for a location on the Boyd's Bear property.

The M-D would also pay a proportionate share of the WWTP's operating, maintenance (O&M), and balance of its financing costs through its monthly fees. However, it does not appear that the M-D's share of these costs (or for purchased/leased water) is included in its pro-forma. Econsult's report shows an increase in "utility cost" of only \$90,000. In addition to wastewater, however, this would include electrical, gas, cable, satellite, internet, phone, trash service, and potentially purchased/leased water. Yet the M-D's share of monthly sewer charges as estimated in the Township's Facilities Plan (\$2010) would equal or exceed this amount, allowing for no additional increase in other utility costs.

About the Author

Mr. Michael Siegel has more than thirty-two years of experience in the fields of economic and fiscal impact analysis, public, and environmental finance. He is the Principal of Public and Environmental Finance Associates based in Washington, DC. Previous positions include regional impact specialist for the Colorado West Area Council of Governments, Director of the Office of Commercial Revitalization for the State of Maryland, and Assistant Director of the Research Center of the Government Finance Officer's Association.

While at the Office of Commercial Revitalization, Mr. Siegel authored legislation and regulations for the State's targeted revitalization loan program and subsequently prepared underwriting and project packaging for projects seeking loan assistance and for the State's Community Development Block Grant economic development projects.

In the 1980's, he prepared the economic and fiscal impact analyses of the deployment of the U.S. Air Force's Peacekeeper Missile in Wyoming and Nebraska. Subsequently, he assisted with preparation of economic and fiscal impact analysis of Homeport Everett for a carrier vessel battle group to be stationed in Washington State.

In the early 1990's, Mr. Siegel formed Public and Environmental Finance Associates. (PEFA). His clients include State and local governments, land owners and public interest groups. PEFA specializes in economic and fiscal impact analysis, utility rate setting, demand forecasting and needs analysis.

Projects include econometric and allocation-based fiscal impact models and analyses for various clients including the U.S. Virgin Islands, Loudoun County Virginia, Shelby County Tennessee, the Minnesota Department of Agriculture and Lancaster/Lincoln Nebraska. These models incorporate general purpose, education and water and wastewater services and revenue streams. He has also analyzed the impact of various projects on local government service providers including the proposed Disney *America* project in Prince William County, Virginia, the corporate headquarters for the WorldCom corporation in Loudoun County, Virginia, and a proposed casino for Gettysburg, Pennsylvania.

More recently, he developed recommended rates and tariffs for the Dhaka (Bangladesh) Electrical Service Corporation, and prepared an analysis of the fiscal impact of the reversion (dis-incorporation) of the City of Bedford on Bedford County, Virginia.

Mr. Siegel has also prepared rate studies, needs analysis and fiscal planning for water and wastewater utility systems. In the 1990's, he was commissioned by the U.S. Environmental Protection Agency to develop rate setting software for small and medium size water and wastewater utilities. This software has been utilized by more than 500 small and mid-size utility systems throughout the U.S.

Addendum

Potential for Greater Economic Damage in Adams County, PA relative to Warren County, MS

The proposed casino can be expected to generate lower net new jobs, and relatively greater job destruction in Adams/Gettysburg PA than occurred in Vicksburg/Warren, MS. This is because Vicksburg has a lock on most of the nearby Jackson, MS (Hind County, population 250,000) convenience market as the next closest casinos are between 2 to 4 hours drive time from downtown Jackson. Vicksburg is about 50 minutes drive time from downtown Jackson.

A recent Friday evening survey of license plates in Vicksburg's casinos parking lots (Siegel, March 26, 2010) found 63 percent were from other Mississippi counties, with Hind County plates being predominant.

A Gettysburg-area location does not have this advantage relative to the Harrisburg (Dauphin County, PA, population 258,000) market area, as the existing Hollywood casino in Grantville, PA is only about 16 miles, or about 22 minutes drive time, from downtown Harrisburg. The M-D would be about 47 miles, or about 55 minutes drive time, from downtown Harrisburg (Mapquest).

Accordingly, a far greater share of the M-D's gaming revenue can be expected to be derived from existing Adams residents and visitors than has been the case with Vicksburg's casinos. This would cause the level of diverted activity and economic dislocation to be greater in Adams, PA than occurred in Warren County, MS.

Alternate Calculation of Diversion of Spending by Existing Visitors, and "Ancillary" Activity

Econsult estimates 93,000 "non-local" visitors from outside the area would visit the casino, among whom some would stay overnight, but does not further describe them. Ancillary visitors are likely to include existing visitors to the area some of whose local spending would be diverted to the M-D.

Econsult estimates local "ancillary" direct spending at \$11.35 million (Table 2.4.2). Note that some existing visitors would stay at the M-D but not visit the casino, while others would stay elsewhere and visit the M-D. Were these to offset, the \$11.35 million amount would represent a reasonable alternate estimate of diversion by existing visitors. At this level, the M-D would divert a total of \$44.75 million in local spending from existing residents and visitors and would destroy about 727 jobs elsewhere in Adams County. Considering Econsult's grossly inflated estimate of the M-D's on-site full- and part-time jobs, this lower figure is likely to exceed the realistic number of M-D jobs.

BEA's multipliers are explicitly designed by BEA to capture all economic activity associated with the a casino. For Econsult to justify its assumed 'ancillary' activity as being 'net new' it would need to cite an appropriate locale(s) hosting a similar facility that has a substantially higher casino-sector multiplier. Accordingly, this activity is already captured by Econsult's multiplier, or it represents

spending by existing visitors. Either way, it is double-counted.

Figure 2, additional background

Warren County poverty rate in 1990 and 2008 was 22.4 and 18.7 percent, respectively; Adams was 6.7 and 7.1 percent, respectively.

Warren's median household income (not inflation-adjusted) in 1990 and 2008 was \$29,216 and \$39,825, respectively; Adams' was \$30,304 and \$55,124, respectively. After adjusting for inflation (BLS, CIP-U, all items), Warren's MHI decreased by about \$5,000 while Adams' increased by \$3,000.

Warren's modestly improved poverty rate between 1990 and 2000 may have been partly attributable to an increase in low-wage casino jobs. However, manufacturing employment, which pays higher than average wages and generates substantially greater multiplier jobs, also increased robustly during this time. Accordingly, this sector was likely to have been responsible for much of this improvement. Much or all of Adams' modest increase was likely due, in part, to normal fluctuation in this statistic which is sensitive to sample size (which is substantially less than 100 percent).

However, any modest improvement in Warren's poverty rate was overwhelmed by a \$5,000 real (inflation-adjusted) loss in MHI and associated purchasing power among its residents and households between 1990 and 2008. The modest increase in Adams' poverty rate between 1990 and 2008 was far over-shadowed by its \$3,000 increase in MHI.

In a nutshell, more households lost income in Warren between 1990 and 2008, while more households gained income in Adams.

**CIVIL WAR PRESERVATION TRUST
NATIONAL PARKS CONSERVATION ASSOCIATION
NATIONAL TRUST FOR HISTORIC PRESERVATION
PRESERVATION PENNSYLVANIA**

June 30, 2010

Mr. Gregory C. Fajt, Chairman
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060

Dear Chairman Fajt:

I write to you today as the president of the Civil War Preservation Trust (CWPT). CWPT, a 55,000 member national nonprofit battlefield preservation organization, has joined together with other preservationists and concerned citizens opposed to the proposed Mason-Dixon casino near the Gettysburg battlefield in Adams County, Pennsylvania.

As you are certainly aware, the proposal has drawn significant criticism from the preservation and Civil War communities. Contrary to what the project's proponents would have you believe, this opposition does not stem from any sort of moral opposition to gambling, but solely from the belief that Gettysburg is not an appropriate location for this enterprise.

Since the project was first announced, numerous individuals and groups have made their opinions on the matter known. Among the many outspoken individuals opposing the proposal have been a variety of men and women who have a special affinity for Gettysburg, as they make it their lives' work to study the events of it and the other battles of the war. No one knows the importance and significance of Gettysburg better than Civil War historians.

Enclosed in this package you will find correspondence from these historians, each urging you to protect the Gettysburg battlefield for future generations by rejecting the application of Mason-Dixon Resort and Casino, LLC. These men and women are true scholars, and among them are many of the foremost experts on the battle and the war itself. They write to you out of their love for history and special understanding of the power that is present at those locations featuring so prominently in it.

For your convenience, we have arranged the letters alphabetically. Among the enclosed, you will find correspondence from: Edwin C. Bearss, Chief Historian *Emeritus* of the National Park Service; Kent Masterson Brown, author of *Retreat from Gettysburg*; Gary Gallagher, author of *The Second Day at Gettysburg*; James McPherson, Pulitzer Prize-winning author of *The Battle Cry of Freedom*; James I. Robertson, author of *Robert E. Lee: Virginian Soldier, American Citizen*; and many others highly respected within the field.

The original signatures will be produced as a part of our evidentiary testimony during the hearing process.

As always, thank you for your consideration in this matter.

Sincerely,



O. James Lighthizer, President

June 2010

Mr. Gregory C. Fajt, Chairman
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060

Dear Chairman Fajt:

As you consider applications for Category 3 Gaming Licenses, I urge you to reject the proposed Mason-Dixon Resort & Casino gaming facility proposed near Gettysburg, ½ mile from Gettysburg National Military Park (NMP).

By its very nature, the proposed casino unavoidably conflicts with the essential meaning of Gettysburg's place in American history and the respectful atmosphere that the Borough of Gettysburg and Gettysburg NMP seek to foster and to market.

As a professional historian, I feel strongly that Gettysburg is a unique historic and cultural treasure deserving of our protection. Gettysburg belongs to all Americans equally—future generations no less than those of us alive today. I concur with the judgment of Governor Ed Rendell who said in 2005, during the last controversy, that, "I wouldn't want a casino two blocks from the Liberty Bell in Philadelphia and if it were my decision, I wouldn't want it anywhere close to the historic area of Gettysburg." Governor Rendell was correct in his thinking and I agree that it is our solemn duty to protect this resource — and appeal to what President Abraham Lincoln called "the better angels of our nature," rather than spoiling this hallowed ground.

During the last application period, the Pennsylvania Gaming Control Board repeatedly stated that public opinion would be among the categories considered during the licensing process. And so, as was the case in 2006, the people of Pennsylvania and the entire nation are once again clearly stating that the very idea of putting a casino so close to the Battlefield at Gettysburg is simply incomprehensible.

Today, I am proud to be counted among the many thousands who have made publicly known our opposition to Mason-Dixon's plan to put a casino at Gettysburg.

There are many places in Pennsylvania to build a casino, *but there's only one Gettysburg.* I respectfully urge you and your fellow board members to defend Gettysburg for all Americans by denying the Mason-Dixon Resort & Casino application.

Respectfully,

Terrie Aamodt
Sean Adams
Garry Adelman
Lee D. Adkins II
A. J. Aiséirithe
Dr. James Anderson
Adam Arenson

Dr. Arthur H. Auten
Dr. Michael Averbach
Professor Jean Harvey Baker
John R. Baker, DVM
William B. Baker
Alwyn Barr
Dr. Craig Bauer

Erik R. Bauer
Edwin C. Bearss
John M. Belohlavek
Dr. Jeffrey Bennett
Shannon Bennett
Melvyn S. Berger
Edward H. Bergstrom Jr.
Ms. Sarah M. Beris
Dr. Ira Berlin
Dr. Eugene H. Berwanger
Fred W. Beuttler
Keith Bohannon
Philip Sullivan Bolger
Dr. Alan Brick-Turin
Col George M. Brooke III,
Bruce A. Brown
Kent Masterson Brown
Todd M. Bryda
Dr. Stephen J. Buck
James M. Burgess, Jr.
Orville Vernon Burton
Kimberly Butler
Frank J. Byrne
Eric Campbell
Joaquin (Jack) J. Cardoro
Matthew Carey
JoAnn D. Carpenter
Jane Turner Censer
Professor William Cheek
Aimee Lee Cheek
Dr. John Cimprich
Dr. Thomas G. Clemens
Ronald S. Coddington
Dr. Edward M. Coffman
William Cohen
Dr. William S. Collins
Clarissa Confer
Patrick D. Conroy
Benjamin Cooling
Dr. William J. Cooper
Leroy H. Corbin
Dr. Florence Fleming Corley
Dr. John M. Coski
Lynda L. Crist
Daniel S. Cuvala, Jr.
Emmanuel K. Dabney
Gordon E. Dammann
Dr. William C. Davis
Dr. Stephen Davis

Dr. John D'Entremont
Dr. Charles B. Dew
Dr. Steven Deyle
Richard L. DiNardo
Aide D. Donald
Dr. James P Donohue, Jr.
Faye E. Dudden
Richard R. Duncan
Dr. David Dykstra
Henry P. Elliott
Sam D. Elliott
Robert F. Engs
Truman R. Eyler, Jr.
Daniel M. Feller
Rex H. Felton
Dr. Paul Finkelman
Dr. Joseph C. Fitzharris
Dr. Eric Foner
George B. Forgie
John D. Fowler
Karl Friend
Ernest B. Furgueson
Dr. Gary W. Gallagher
Dr. Jonathan W. Gantt
Dr. Jane E. Gastineau
Louis S. Gerteis
James C. Gilliam
Mary A. Giunta
Richard J. Goedkoop
Dr. Robert M. Gopin, Jr.
Dr. Thomas M. Grace
Dr. Susan W. Gray
Dr. Ann N. Greene
Winston Groom
Dr. Lisa Guinn
Linda J. Guy
Dr. Edward J. Hagerty
Judith Lee Hallock
Noel Harrison
D. Scott Hartwig
Richard H. Haunton
Robin Higham
Sarah M. Hilgendorff
Michael Hill
T. John Hillmer, Jr.
David Hochfelder
Sylvia D. Hoffeet
James W. Holland, Jr
Kurt Holman

Mack P. Holt
Dr. Ari Hoogenboom
Patrick Hotard
Joan Lee House
Richard F. Houston
Randal L. Hoyer
James Jobe
Dr. M. Jane Johansson
Willie Ray Johnson
Steve Jones
Vivian Lee Joyner
Dr. Walter D. Kamphoefner
Michael Kanazawich
Dr. Philip M. Katz
Frank Keeler
Lynn J. Kimball
Dr. George W. Knepper
Christopher Kolakowski
Dr. Carl Kramer
Dr. John R. Krohn, Jr.
Gary Kross
Benjamin Labaree
Dr. Daniel Lane, Jr.
Daniel M. Laney
Connie Langum
Phil J. Lechak
Patricia A. Lee
Dr. William P. Leeman
Professor Bruce A. Lesh
Astrid Liverman
M. Philip Lucas
Dr. Jonathan Lurie
Dr. Thomas C. Mackey
Jack P. Maddex, Jr.
Blake A. Magner
Wayne Mahood
James L. Martin
Mr. William D. Martin
William Marvel
Dr. George T. Mazuzan
Nathan McAlister
Dr. Russell McClintock
Dr. James M. McPherson
Warren L. Metzger
Brian Craig Miller
Mark E. Miller
Randall Miller
Dr. Roger E. Miller
Wilbur R. Miller

Eric J. Mink
Dr. Robert E. Mitchell
Dr. Haskell Monroe
Christina C. Moon
Richard S. Moore
Richard J. Morey
Dr. Geoffrey F. Morrison
Dr. Earl F. Mulderink III
Richard Myers
Kenneth W. Noe
Dr. Robert D. Neuleib
Justin Oakley
Edward T. O'Donnell
Nicole L. Osier
Beverly Wilson Palmer
Dr. T. Michael Parrish
Dr. Arnold M. Paulovsky
Dr. William H. Pease
Graham A. Peck
Aubrey Pennington
James A. Percoco
Michael Perman
Tom Perry
J. David Petruzzi
Donald C. Pfanz
Dr. Donald K. Pickens
Dr. Larry L. Ping
Dr. Thomas W. Porter
Dr. Lawrence N. Powell
Gerald J. Prokopowicz
Dr. John W. Quist
Steven J. Rauch
S. Waite Rawls III
Dr. Carol Reardon
Barbara L. Reasner
Douglas Reasner
Nathan A. Reasner
Richard Reasner
John Reid
Joseph R. Reinhart
Michael Reis
Robert V. Remini
Dr. Charles T. Rezner
Gordon C. Rhea
Bruce R. Rice
Jeffrey I. Richman
David L. Richards
Joseph Rizzo
Dr. James I. Robertson, Jr.

Dr. James A. Ross-Nazzal
John W. Rudie
Robert J. Rushak, Sr.
Dr. Paul S. Rykken
Ted Savas
Dr. Lawrence D. Schiller
Steven Schwartz
Professor John Schroeder
Glenna R. Schroeder-Lein
Frederick Schult
Richard D. Schwartz
Dr. Gustave L. Seligmann
Professor Richard H. Sewell
Dana B. Shoaf
Charles Siegel
Dr. Stephen N. Siciliano
Dr. Richard W. Smith
Timothy H. Smith
Dr. Mark Snell
Mark. A Snyder
Rev. John Sotak, OSA
Steven Stanley
Dr. Werner Steger
Clay W. Stuckey
Edward D. Surovell
James W. Tate
Donald B. Taylor
Dr. Robert A Taylor
Dr. Paul H. Tedesco
Dr. Emory M. Thomas
Jack Thomson
Dr. Joseph R. Timko
Henry P. Trawick, Jr.

I. Bruce Turner
Dr. Allen W. Trelease
Mr. Edwin C. Ulmer, Jr
Joseph Trent
Tony L. Trimble
Dr. Gregory J. W. Urwin
Michael A. Vieira
Joseph F. Von Deck
George N. Vourlojanis
Carl W. Wachsmuth
John P. Walsh, Jr.
Andrew H Ward
Margaret Washington
David Weaver
Dr. John B. Weaver
Dr. Lowell E. Wenger
Jeffry D. Wert
Dr. Timothy C. Westcott
Dr. Richard Whaley
Dr. David Williams
Garry Wills
Roger B. Wilson
Terrence J. Winschel
Eric J. Wittenberg
Neal E. Wixson
Dr. Michael Vaughan Woodward
Donald Yacovone
Mitchell Yockelson
Gerry D. York
Carl A. Young
Dr. William D. Young
Jack Zevin
Calvin Goddard Zon

June 2010

Mr. Gregory C. Fajt, Chairman
Pennsylvania Gaming Control Board
P.O. Box 69060
Harrisburg, PA 17106-9060

Dear Chairman Fajt:

As you consider applications for Category 3 Gaming Licenses, the undersigned historical organizations urge you to reject the proposed Mason-Dixon Resort & Casino gaming facility proposed near Gettysburg, ½ mile from Gettysburg National Military Park (NMP). Collectively, the undersigned organizations represent over 35,000 professional historians and researchers, many of whom specialize in the history of the Civil War.

By its very nature, the proposed casino unavoidably conflicts with the essential meaning of Gettysburg's place in American history and the respectful atmosphere that the Borough of Gettysburg and Gettysburg NMP seek to foster and to market.

We feel strongly that Gettysburg is a unique historic and cultural treasure deserving of our protection. Gettysburg belongs to all Americans equally—future generations no less than those of us alive today. We concur with the judgment of Governor Ed Rendell who said in 2005, during the last controversy, that, "I wouldn't want a casino two blocks from the Liberty Bell in Philadelphia and if it were my decision, I wouldn't want it anywhere close to the historic area of Gettysburg." Governor Rendell was correct in his thinking and we agree that it is our solemn duty to protect this resource — and appeal to what President Abraham Lincoln called "the better angels of our nature," rather than spoiling this hallowed ground.

During the last application period, the Pennsylvania Gaming Control Board repeatedly stated that public opinion would be among the categories considered during the licensing process. And so, as was the case in 2006, the people of Pennsylvania and the entire nation are once again clearly stating that the very idea of putting a casino so close to the Battlefield at Gettysburg is simply incomprehensible.

Today, our historical organizations are proud to be counted among the many thousands who have made publicly known our opposition to Mason-Dixon's plan to put a casino at Gettysburg. There are many places in Pennsylvania to build a casino, *but there's only one Gettysburg*. We respectfully urge you and your fellow board members to defend Gettysburg for all Americans by denying the Mason-Dixon Resort & Casino application.

Sincerely,

American Historical Association
National Coalition for History
National Council on Public History

Organization of American Historians
Society for Military History
Southern Historical Association



Realistic Mason-Dixon Gettysburg Casino Market Assessment

Keith E. Miller

9/15/2010

Mason-Dixon has overestimated the market potential for a Gettysburg Casino. Lying in a conservative rural area, surrounded by casinos within an hour's drive which do not charge entrance fees and which offer more amenities, Mason-Dixon would struggle to achieve 30% of its projected gross gambling revenue. It is not the best choice for the PGCB to award the remaining Category 3 license. Keith Miller is a former business executive and consultant residing in Ridgefield, Connecticut. He is a member of the Civil War Preservation Trust and No Casino Gettysburg. He has voluntarily written several reports on the potential impact of casino gambling on Adams County.

Summary

As in 2006, David LeVan presents Pennsylvania with the most contentious and least attractive option for a casino license.

In denying the previous Gettysburg Casino license application from Crossroads, the Pennsylvania Gaming Control Board concluded:

"The Crossroads location is primarily rural without nearby population centers. As discussed below in Section C, Crossroads touts its location as desirable because of the populations to the South in the Baltimore/Washington D.C. markets. As addressed in that Section, the Board finds that Crossroads has not demonstrated to the Board's satisfaction through credible evidence that the Crossroad's location presents the advantages and benefits asserted by Crossroads."

"The Gettysburg area itself is primarily a rural area without large population centers nearby to sustain the casino."¹

Little has changed in four years. Adams county remains a conservative rural county unable to support a Category 3 license. In making its case at the August 31, 2010 Public Hearing, Mason-Dixon failed to explain why it presented an attractive opportunity for a Category 3 License in Pennsylvania. No one presented Mason-Dixon's forecast. The closest any of the presenters came was a statement by Peter Angelides of Econsult who prepared Mason-Dixon's Local Impact Report:

"Our data comes from Mason-Dixon, which we have reviewed for reasonableness. For example, Mason-Dixon supplied the number of employees for the hotel and casino and based on our experience with hotels and other facilities given the number of rooms and visitors the projection of 375 FTE's seemed reasonable. Similarly the number of visitors also came from Mason-Dixon seemed reasonable."²

Mr. LeVan made some references to tapping into the Baltimore market, but no one-- not Penn National, not David LeVan, not TRG, not Econsult-- no one stepped up under oath and took ownership for Mason-Dixon's projected gambling revenues. This was distinctly different from the presentation at the other applicants. At Fernwood, Steve Snyder of Penn National, who also spoke on behalf of Mason-Dixon at the Public Input Hearing on August 31, stepped up and presented Fernwood's projections.

Three possible reasons for the applicant hiding from his projections are: 1) no one wanted to present the suspect forecast under oath; 2) no one wanted to tell the supporters in the audience that, for the casino to succeed, 30% of Adams adults have to lose \$1284 a year; and/or Mason-Dixon's forecast for a

¹ Pennsylvania Gaming Control Board, *Adjudication of the Pennsylvania Gaming Control Board in the Mattes of the Application for Category 2 slot Machine Licenses in a Revenue or Tourism Enhanced Location* pages 84 & 101

² August 31, 2010, testimony of Peter Angelides Econsult before the PGCB Part 1 of 7 25:00 into tape.

locals casino proves it is not a fit candidate for a Resort Casino Category 3 license. A forecast is but an estimate, but the fact that Penn National was willing to take ownership of Fernwood's but not Mason-Dixon's forecast says something about the verisimilitude of Mason-Dixon's numbers.

In my August 31, 2010, testimony before the Pennsylvania Gaming Control Board at the Public Input Hearing, I demonstrated that the rural area around Adams County cannot sustain a casino. I asked the room packed with about 200 people divided between casino supporters and opponents who had \$1284 on them. Only two hands went up: casino advocate Gene Golden's and another man's, whom I did not recognize. When I asked who was willing to lose this at the casino, the other man's hand went down, but Gene kept his up.³ Mason-Dixon's plan requires that 30% of Adams adults go to a casino 12 times a year and lose \$107 on each visit. Less than 1% of those in attendance had the \$1284 required by Mason-Dixon's plan,⁴ and only one out of about 200 was willing to support the plan.

Casino advocates fail to accept that this is a locals casino. In May, when casino advocate Richard Kitner was presented with the reality that millions would be "sucked out" of the Adams County economy by the casino he wrote "This county would have difficulty getting \$42 thousand 'sucked out' of it."⁵ In debating me on August 31, 2010, on PCN, ProCasinoAdamsCounty leader Jeff Klein tried to deny that Mason-Dixon's plan requires 30% of Adams adults to lose \$1284. Klein said "That's a complete fallacy. What you are saying is that if a casino comes we are all going to become gambling degenerates and that's not the case. Only one percent will be pathological gamblers. It's not an issue."⁶

The reaction of those who came to testify, as well as Mason-Dixon's most ardent supporters proves the PGCB got it right the first time when they said, "the Gettysburg area itself is primarily a rural area without large population centers nearby to sustain the casino." Mason-Dixon's supporters are correct in pointing out that Mason-Dixon will not be able to achieve its business plan requirement to extract \$1284 from 30% of Adams adults.

Mason-Dixon's forecast proves it is simply a locals casino and not a well established resort hotel offering substantial year-round recreational guest amenities. Only 5.7% of Mason-Dixon's forecast for attendance are guests of the Eisenhower Inn (43,675). 88% (673,894) are daytrip locals coming from an hour away, and 49,658 are hotel guests of surrounding hotels. These forecasts prove that this is a locals casino and not a resort.

In pursuing a Slots license four years ago, Crossroads, Mason Dixon's predecessor, claimed, "A Slots only facility like the one being proposed for the Adams County ... have a tendency to be much less visually ostentatious, and feature attractions that are more in line with the conservative culture found in our area." Even Mason-Dixon's promoters understood that Adams county is a conservative rural community for which a full blown casino attempting to draw high rollers is a bad bet. Over and over, Mr. LeVan claimed that a Gettysburg casino would not draw high rollers.

³ Keith Miller, Category 3 License Public Input Hearing -- Mason-Dixon Resorts, LP -- Cumberland Township, Adams County, Part 1 of 2 hours 13 minutes

⁴ Appendix 41 (B) Local Impact Report, Engineering Repors (sic), and Traffic Studies received by the PGCB July 26, 2010, Page 185; Mason-Dixon Local Impact Report March 2010; Econsult, "Potential Impact of the Proposed Category 3, Mason-Dixon Resort & Casino." Philadelphia, PA, March 2010. Page 2

⁵ Richard Kitner, "Another Look at Casino Facts," *The Gettysburg Times*, May 19, 2010

⁶ PCN Call In Program 7-8PM, August 31, 2010.

Mason-Dixon is surrounded by Penn National casinos to its north and south, and soon casinos in Maryland. One can imagine that Penn National views its partnership with Mason-Dixon as a win-win. If Mason-Dixon fails to obtain a license, Penn National will continue to funnel business from Adams County to its casinos in Grantville, Pennsylvania, and Charles Town, West Virginia. If Mason-Dixon obtains a license, Penn National will control operations at Mason-Dixon such that most customers, particularly good ones, will go to its casinos in Charles Town and Grantville, with only the locals who cannot afford the gas for an hour's drive going to the Mason-Dixon casino. In watching Penn National present at Fernwood and Gettysburg, it is clear they prefer the Fernwood application.

In this environment, Mason-Dixon will struggle to achieve half its projected attendance and 30% of its projected revenues from a constrained conservative rural economy.

The proposed Mason-Dixon casino is neither a resort casino drawing visitors from around the nation, nor a locals casino located in a populous urban or suburban market. The Eisenhower Inn was selected because, in the opinion of the investors, it satisfied the gaming control legislation⁷ and, as a faltering institution, it was available on the cheap. Pennsylvania has more lucrative and less controversial options for a Category 3 license.

The below paper expounds on these points, taking, in turn,

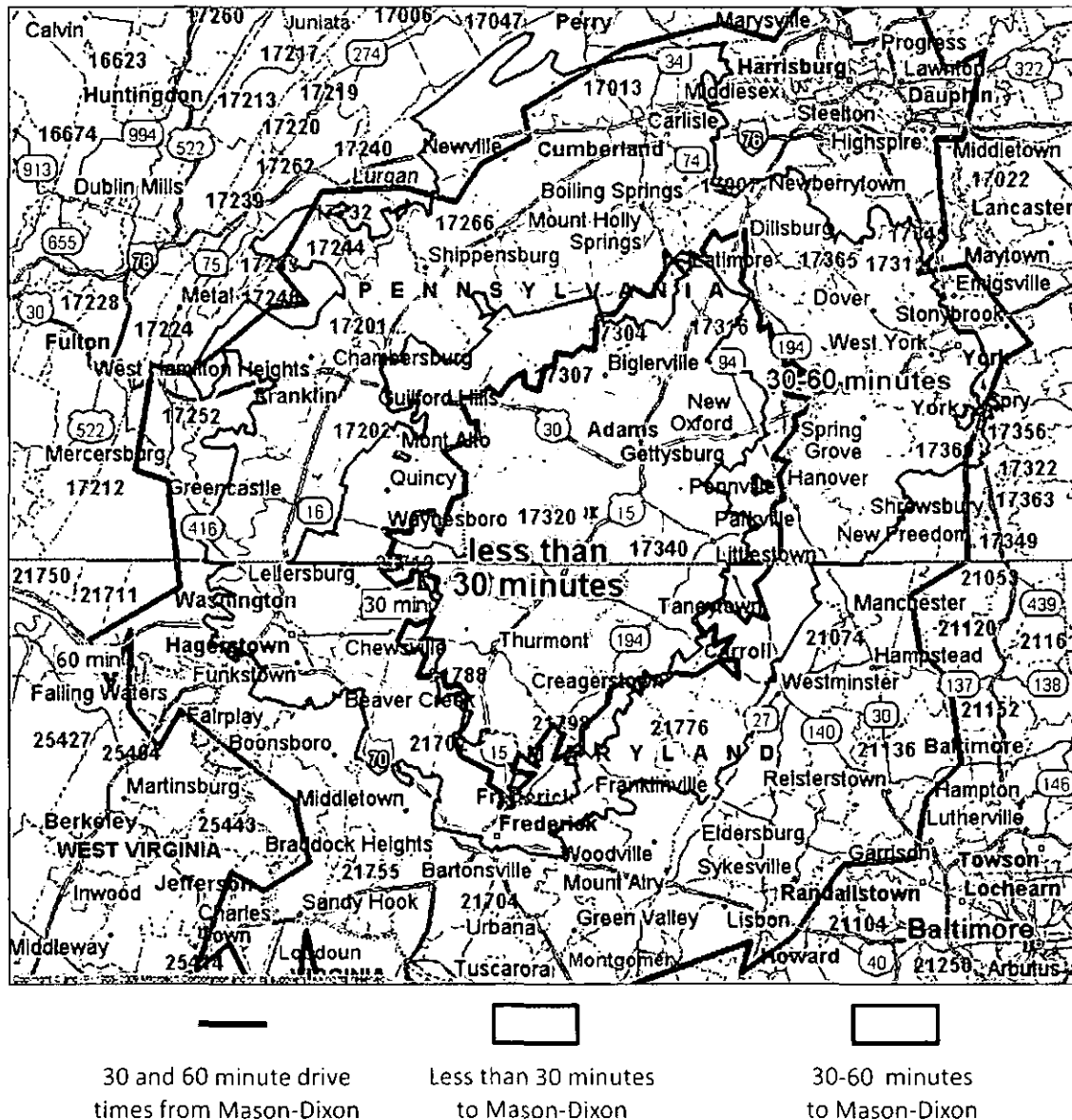
1. Residential Day Trip Potential
2. Overnight Hotel Casino Visitor Potential
3. Table Games vs. Slots
4. Small Rural Locals Casinos vs. Suburban Urban Casinos
5. Win Per Attendee
6. Cumulative Impact a Realistic Forecast
7. Traffic
8. Better Options for Resort Casinos
9. Conclusion

⁷ Transcript: 04/07/10 Casino applicant and Gettysburg businessman David LeVan appears on 1320 WGET. published April 21, 2010 Gettysburg Times.

1) Residential Day Trip Potential

Mason-Dixon's current residential forecast is shown in Table 1. It relies primarily on revenues from 49 zip codes in Adams, Franklin, Cumberland, and York counties in Pennsylvania, and Carroll, Frederick, and Washington Counties in Maryland. Mason-Dixon's own forecast concedes that its market reach will be limited by Penn National's casinos in Grantville and Charles Town and a future competitor in Baltimore. As shown in Figure 1, less than half the zip codes in the target counties located within an hour of the Mason-Dixon casino are considered viable, and none of the zip codes in Dauphin County Pennsylvania, or Montgomery or Baltimore counties in Maryland are considered viable.

Figure 1 Replication Mason-Dixon Forecast



⁸ Zip Codes assigned using Microsoft MapPoint 2010 and replicating Mason-Dixon's forecast for 2000 population.

Table 1 Mason-Dixon Marketing Study

Marketing Study

Zone	County	State	# of Zip Codes	Populations - 2000		Est. Adult Population 2014
				Total	Adults	
Zone 1:	Adams	PA	10	79,978	58,265	87,398
	York	PA	3	10,588	7,571	9,126
	Franklin	PA	3	35,503	28,225	31,511
	Carroll	MD	2	12,108	8,186	10,025
	Frederick	MD	7	53,412	37,317	48,185
			25	191,589	135,564	166,247
Zone 2:	York	PA	7	186,283	140,365	169,197
	Franklin	PA	4	75,742	54,910	65,978
	Cumberland	PA	5	85,771	67,408	76,289
	Carroll	MD	2	23,544	16,276	18,933
	Frederick	MD	2	41,884	29,849	38,672
			4	93,277	67,423	79,984
			24	526,481	376,331	450,053
Totals			48	718,070	511,895	618,300

Residential Gamers:

Partic. %s	Visits Per Year	M-D Share	Patrons
30%	12	75%	181,978
30%	12	75%	24,641
30%	12	75%	85,081
30%	12	75%	27,088
30%	12	75%	130,101
			446,888
25%	4	50%	84,589
25%	4	50%	32,989
25%	4	50%	38,144
25%	4	50%	9,966
25%	4	50%	19,336
25%	4	50%	39,992
			225,026
			873,894

Zone 1 is within half an hour, Zone 2 is 30-60 minutes away
 Source: Appendix 41(B) received by PGCB Licensing July 25-1010, page 185

Mason-Dixon's forecast presupposes that it will share the market shown in Figure 1 with Penn National in Grantville and Charles Town, and the casino in Baltimore. No one is certain what the impact of entrance fees will be on Resort Casinos. Undoubtedly, it is not helpful. Several states charge admission fees, but they are typically only a few dollars. Pennsylvania's requirement that Resort Casinos charge an entrance fee was a significant barrier to Resort Licenses being aggressively pursued in the past. The fee has been reduced to \$10 and could take the form of vouchers for meals or drinks, but given a choice of equal distance or even a few more minutes to another facility with more amenities and no entry fee, most consumers will prefer the free casino.

Table 2 depicts the current gambling behavior of Adams County residents. This is based on a survey conducted at the request of Mason-Dixon by Terry Madonna and Bernwood Yost in March, 2010. The survey asked adults how often they went to Charles Town or Grantville. The answers were converted into an estimated number of total visits. Note that for those answering six or more, it was necessary to estimate how many visits per year were made. This was done by looking at the distribution of visits for one, two, three etc., and placing the remaining percentage for six and above along an even tail. If those making six or more trips per year made the minimum number of trips (6) then a total of 528 trips would be made or 0.87 per adult. Mason-Dixon assumes that 25% of adults living 30-60 minutes from a casino like Mason-Dixon's will make 4 trips per year to a casino for an average of 1 trip per adult (25% participation x 4 trips per participating adult per year). We cannot calculate the percent participation from Mr. Madonna's surveys. Some respondents may go to both Charles Town and Grantville. If there was complete overlap, then participation would be 20.5%, and if there were no overlap, participation would be 36.5%⁹. The results of Terry Madonna's March survey of Adams County residents conducted

Table 2 Current Gambling Activity of Adams Residents

	Charlestown			Grantville				
	People	Visits per	Tot Visits	People	Visits per	Tot Visits		
One Time	48%	60	1	60	45%	44	1	44
Two Times	22%	27	2	55	19%	18	2	37
Three Times	9%	11	3	33	10%	10	3	29
Four Times	5%	6	4	25	5%	5	4	19
Five Times	2%	2	5	12	11%	11	5	53
Six of More Times	14%	17	10	175	10%	10	7	65
Total and Average		124	2.9	360		97	2.6	247
Visits Per Year Per Adult			0.60				0.41	
Total Visits						607		
Sample Size						604		
Visits per Adult						1.01		

⁹ Complete overlap implies only 124 people gambled with all of them going to Charles Town and 97 of the 124 going to Grantville. $124/604 = 20.5\%$. If there is no overlap, then 124 gambled at Charles Town and a different 97 gambled at Grantville, so a total of $124+97= 221$ people gambled which is 36.5% of the 604 surveyed.

¹⁰ Terry Madonna and Bernwood Yost, Adams County Gaming Survey, 3/15/2010

for Mason Dixon provides a base line for current gambling behavior of adults living in south central Pennsylvania about an hour from a casino.

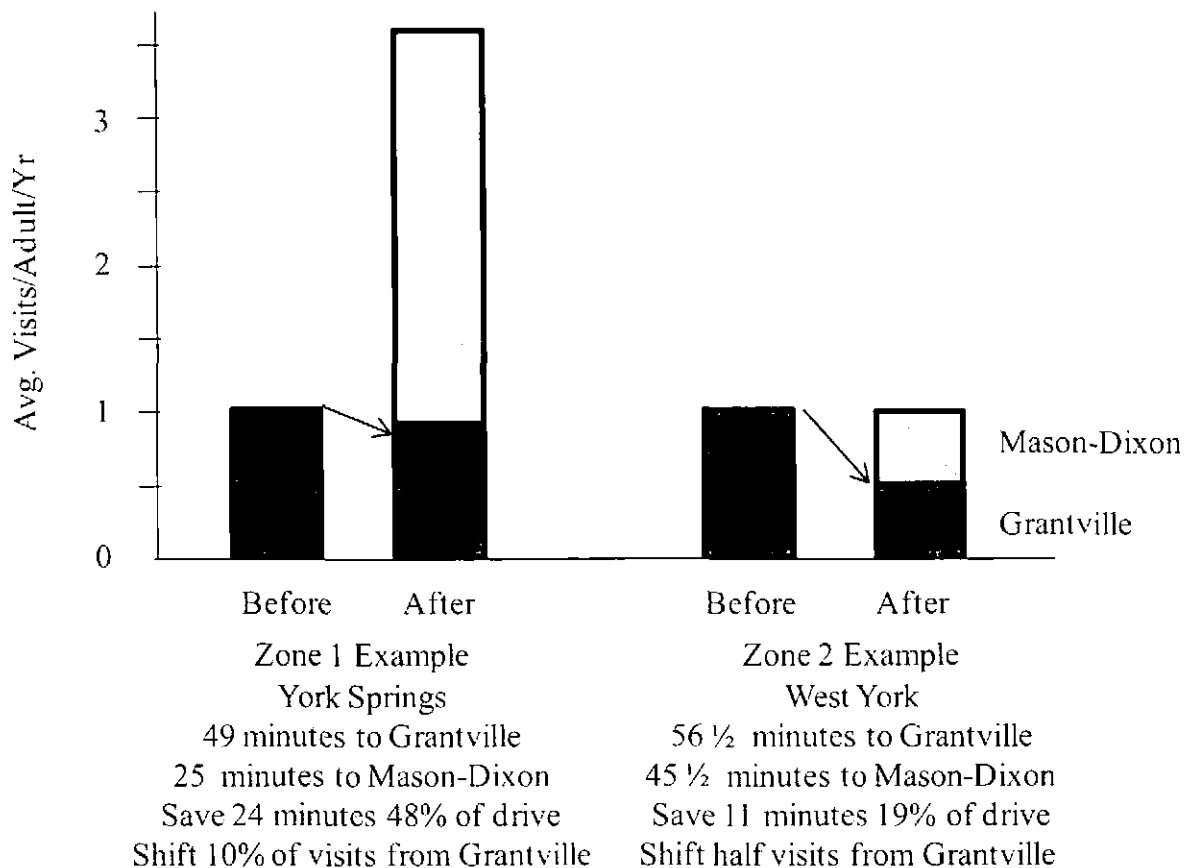
Mason-Dixon's forecast was replicated through an examination of the surrounding zip codes and assigning each zip code based on distance from the proposed casino until Mason-Dixon's total populations per zone and county were achieved. It was not possible to wholly recreate Mason-Dixon's forecast, but the variance between the Replication and Mason-Dixon's Forecast is about ½ %. A comparison of the Replication and Mason-Dixon's Forecast is provided in Table 3, with the details of which zip codes were used provided in Appendix 1.

Table 3 Mason-Dixon Forecast vs. Replication of Mason-Dixon Forecast

County	State	# of Zip Codes	Population 2000	# of Zip Codes	Population 2000	# of Zip Codes	Population 2000
Mason-Dixon Forecast		Zone 1		Zone 2		Total	
Adams	PA	10	79,978			10	79,978
York	PA	3	10,588	7	196,283	10	206,871
Franklin	PA	3	35,503	4	75,742	7	111,245
Cumberland	PA			5	95,771	5	95,771
Carroll	MD	2	12,108	2	23,544	4	35,652
Frederick	MD	7	53,412	2	41,864	9	95,276
Washington	MD		-	4	93,277	4	93,277
			191,589		526,481	0	718,070
Replication of Mason-Dixon Forecast							
Adams	PA	10	79,754			10	79,754
York	PA	1	3,396	11	203,774	12	207,170
Franklin	PA	3	36,779	6	71,624	9	108,403
Cumberland				8	100,481	8	100,481
Carroll	MD	2	12,134	2	24,307	4	36,441
Frederick	MD	6	59,626	2	37,356	8	96,982
Washington	MD		-	5	92,711	5	92,711
			191,689		530,253	0	721,942
Variance							
Adams	PA	-	(224)	-	-	-	(224)
York	PA	(2)	(7,192)	4	7,491	2	299
Franklin	PA	-	1,276	2	(4,118)	2	(2,842)
Cumberland		-	-	3	4,710	3	4,710
Carroll	MD	-	26	-	763	-	789
Frederick	MD	(1)	6,214	-	(4,508)	(1)	1,706
Washington	MD	-	-	1	(566)	1	(566)
			100		3,772	0	3,872

Mason-Dixon's methodology is optimistic. As is shown in Figure 2, Mason-Dixon's forecast assumes 25% of adults living 30-60 minutes from a casino participate with a frequency of 4 visits per year for an average casino attendance of once per year per adult. With the introduction of the proposed Mason-Dixon casino, those patterns change. In the example of York Springs, located 49 minutes from Grantville and 25 minutes from Mason-Dixon, adults increase their participation to 30%, and frequency to 12 visits per year for an average of 3.6 visits per adult per year. Mason-Dixon assumes that 25% of the increased attendance, 0.9 visits per year, continues to go to Grantville and 2.7 visits per year go to Mason-Dixon. In the situation where a potential patron could save 24 minutes driving, almost half the drive time, they maintain 90% of their visits to Grantville. West York is located 56½ minutes from Grantville and 45½ minutes from Mason-Dixon. It is in Zone 2 of either casino. For Pennsylvania in aggregate, there is no change to casino revenue, just a question of which casino captures it. In the case of West York, Mason-Dixon assumes that 50% of Grantville's patrons will shift their loyalty to Gettysburg to save these ten minutes. It is hard to reconcile these two examples. In the case where a patron can save 24 minutes they shift only 10% of their visits, while in the case where they save 10 minutes they shift half their loyalty. In much of Zone 2, Mason-Dixon will be competitively challenged, and it is highly unlikely that they will be able to divert half the patronage.

Figure 2 Impact of Mason Dixon on Casino Visits



Adjustments were made to the Replicated Mason-Dixon Forecast when the assumptions were found wanting and an Adjusted Forecast was created. These adjustments were made when it was found that Mason-Dixon rounded down on distance and ignored competitors. The adjustments made were:

- Distance. Several zip codes that Mason-Dixon counted in Zone 1 were, in fact, more than 30 minutes from the proposed casino. These were shifted to Zone 2.
- Disadvantaged. Several zip codes are simply closer to competing casinos. It is highly unlikely that Mason-Dixon will take share from a casino that offers more amenities, is free to enter, and is a shorter drive.
- Challenged. Although several zip codes were closer to Mason-Dixon than competing facilities, the difference was less than 20%. For example, if it were a 30-minute drive to Mason-Dixon and a 36-minute drive to a competing facility, Mason Dixon is Disadvantaged, because it is highly unlikely that existing casino customer will shift their loyalty to save 6 minutes' drive time when they will have to pay to enter and will receive fewer amenities.

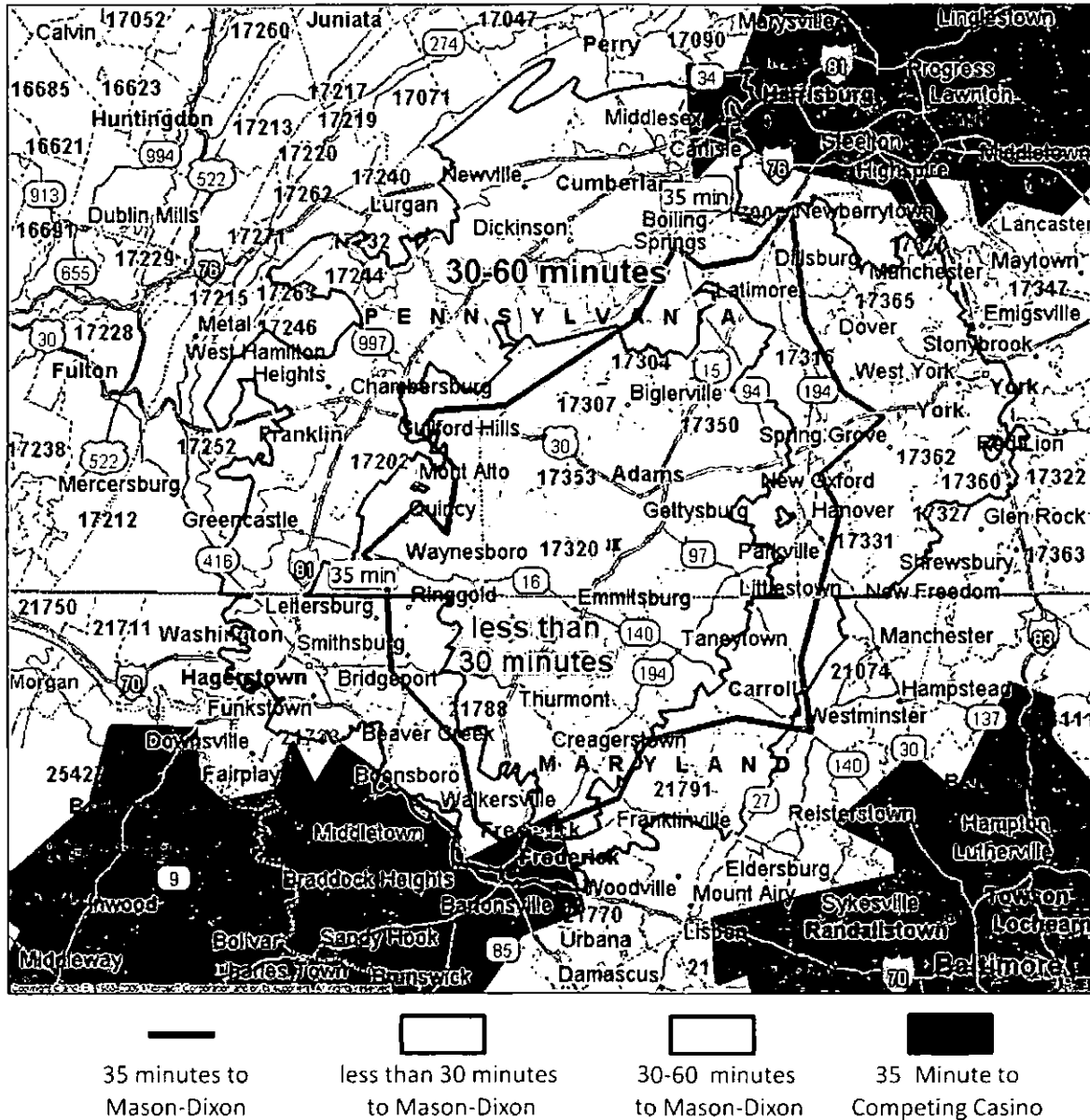
Table 4 Distance Adjustments to Replicated Mason-Dixon Forecast

Zip	Town	County	Population	Time to Mason-Dixon		
				Google	Mapquest	Average
17307	Biglerville	Adams	PA (5,422)	40	29	34.5
17316	East Berlin	Adams	PA (7,262)	37	33	35
			(12,684)			
17301	Abbotstown	Adams/York	PA (3,396)	30	32	31
17241	Newville	Cumberland	PA (11,708)	70	65	67.5
17222	Fayetteville	Franklin	PA (8,972)	31	37	34
17268	Waynesboro	Franklin	PA (26,823)	38	33	35.5
			(35,795)			
21798	Woodsboro	Frederick	MD (1,888)	32	31	31.5
21702	Frederick	Frederick	MD (30,983)	33	36	34.5
21793	Walkersville	Frederick	MD (9,414)	36	33	34.5
			(42,285)			
21780	Sabillasville	Washington	MD 1,604	25	25	25
21719		Washington	MD 1,583	26	26	26
			3,187			

Maps were made looking at travel times using Microsoft MapPoint North America 2010. The distances were also checked using an average of the estimated travel times provided by Google Maps and MapQuest. As shown in Table 4: eight zip codes were moved from Zone 1 to Zone 2, two zip codes were

moved from Zone 2 to Zone 1, and one zip code was removed from zone 2. 17301 was changed from York to Adams. Travel time is important in Mason-Dixon's model in that it determines participation and frequency. By understating times and ignoring competition, Mason-Dixon was overstating visitation.

Figure 3 Competitive Landscape 35 minutes from Mason-Dixon and Competing Casinos



Distances to competing casinos were also examined. Mason-Dixon's assumption that it would win 50% market share from competing casinos that offered a shorter drive, more amenities, and did not charge to enter, is highly suspect. Figure 3 shows the Replicated Mason-Dixon market overlaid with blue zones showing the reach of competing casinos. As can be seen in Figure 3, Carlisle is closer to Grantville than to Mason-Dixon. Mason-Dixon is fundamentally disadvantaged in competing for Carlisle adults.

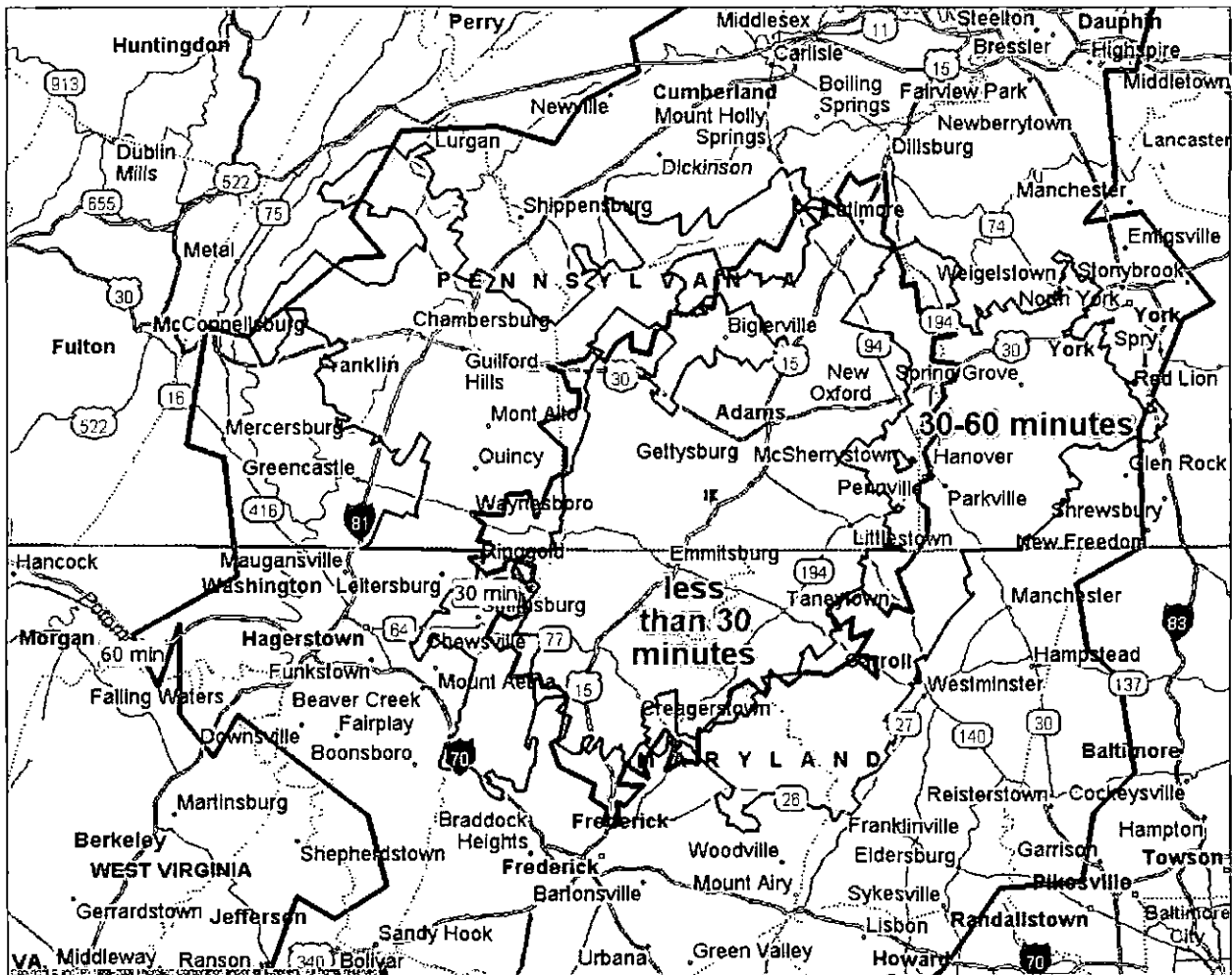
Table 5 Competitively Disadvantaged and Challenged Zip Codes

ZIP Code	Town	County	State	2000 Pop	Average Drive Time to Casino from Zip Code		
					Gettysburg	Charles Town	Grantville
York							
17315	Dover	York	PA	(22,664)	52.5		51.5
17401	York	York	PA	(17,307)	53.5		51.5
17404	York	York	PA	(28,253)	54.5		47.5
17403	York	York	PA	(35,979)	60.0		55.0
York Disadvantaged				(104,203)			
17019	Dillsburg	York	PA	(15,404)	36.0		43.0
17365	Wellsville	York	PA	(2,403)	44.5		51.0
York Challenged				(17,807)			
Franklin							
17225	Greencastle	Franklin	PA	(16,222)	53.5	62.0	
Franklin Challenged				(16,222)			
Cumberland							
17007	Boiling Springs	Cumberland	PA	(5,114)	44.0		45.0
17013	Carlisle	Cumberland	PA	(31,272)	54.5		43.0
17015	Carlisle	Cumberland	PA	(20,722)	52.0		41.0
Cumberland Disadvantaged				(57,108)			
17065	Mt Holly	Cumberland	PA	(3,714)	44.0		50.5
17257	Shippensburg	Cumberland	PA	(23,164)	51.0		57.0
17266	Walnut Bottom	Cumberland	PA	(490)	55.0		56.5
Cumberland Challenged				(27,368)			
Frederick							
21702	Frederick	Frederick	MD	(30,983)	34.5	40.0	
21793	Walkersville	Frederick	MD	(9,414)	34.5	40.0	
21701	Frederick	Frederick	MD	(32,042)	37.5	39.5	
Frederick Challenged				(72,439)			
Washington							
21740	Hagerstown	Washington	MD	(56,314)	52.0	44.5	
Washington Disadvantaged				(56,314)			
21742	Hagerstown	Washington	MD	(23,566)	44.5	53.0	
Washington Challenged				(23,566)			

Furthermore, since Penn National owns Grantville and is only managing Mason-Dixon, it is hard to believe they would permit their customers to be cannibalized. As shown in Figure 3, although Mason-Dixon may be closer to some zip codes in Zone 2, the advantage is marginal and it is inconceivable that half the patronage will change. For example, Dillsburg is 43 minutes from Grantville and 36 minutes from Mason-Dixon. It is highly unlikely that that patrons in Dillsburg will shift their patronage from

Penn National to Mason-Dixon where they will have to pay \$10 to enter, and will enjoy fewer amenities simply to save seven minutes in drive time. Challenged zip codes are those where Mason-Dixon offers less than a 20% travel time advantage and these were subtracted from Mason-Dixon's potential market. Table 5 shows the average drive time (Google and Map Quest) for various zip codes for which Mason-Dixon is Disadvantaged and Challenged.

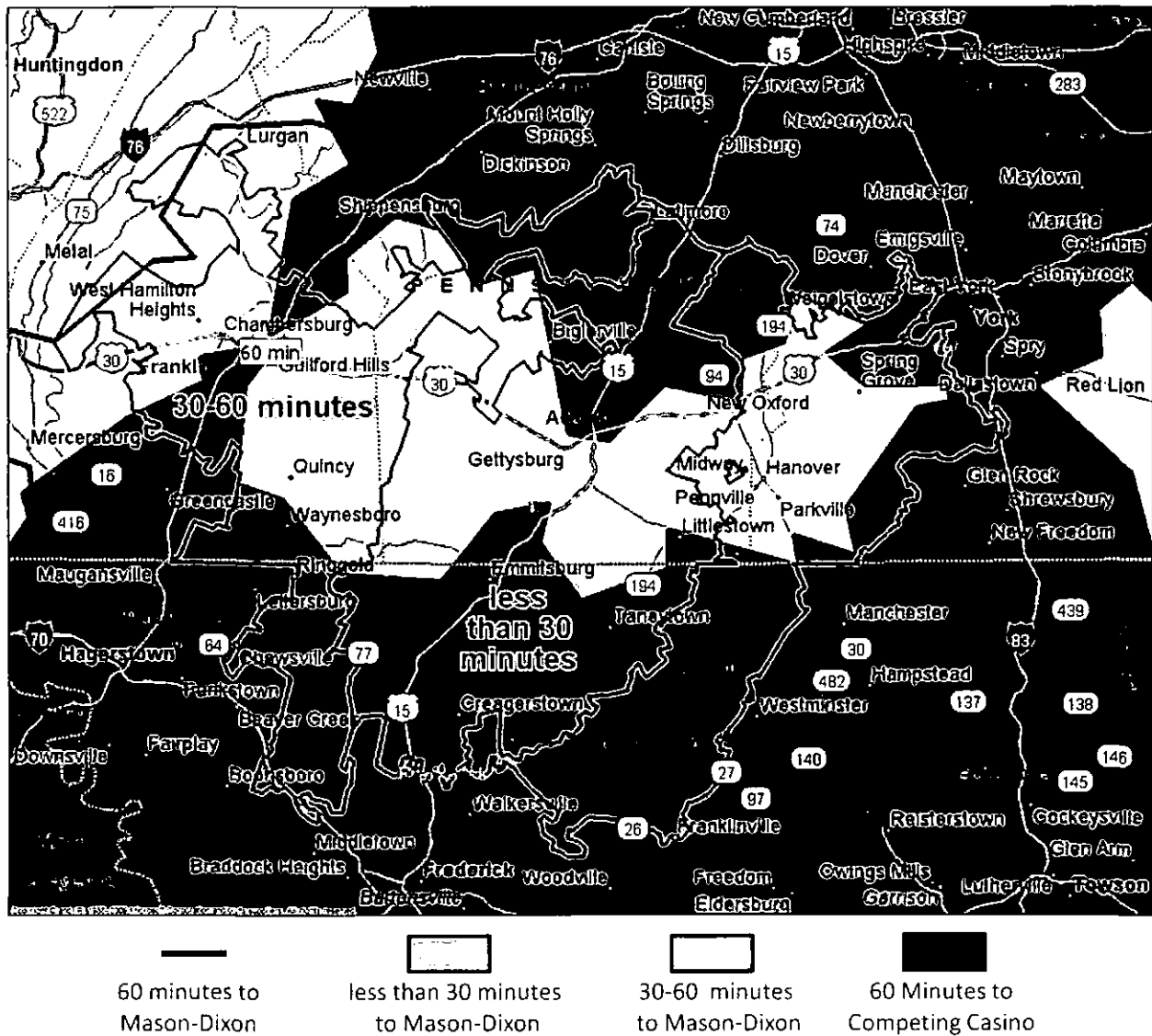
Figure 4 Adjusted Mason-Dixon Market



After adjusting for distance and competition, Mason-Dixon presents a far more limited market as is shown in Figure 4. This forecast is still optimistic because much of Zone 2 remains within a 60 minute reach of Grantville and Charles Town. As shown in Figure 3, it is unlikely that half the existing casino patrons of zip codes in zone 2, when faced with the option of maintaining their loyalty to an existing casino, will shift to another one for a small savings in drive time, given they will have to pay \$10 to enter and will enjoy fewer amenities. As shown in Figure 5 by the blue area, much of the Adjusted Mason-Dixon market remains within an hour's reach of Penn National's Grantville and Charles Town. Maryland is covered in blue. Mason-Dixon will serve a narrow rural band from Chambersburg to Hanover. Residential volume using Mason-Dixon's own methodology, but adjusted for actual distances and competition, will be half of Mason-Dixon's forecast. As shown in Table 6, the Adjusted Forecast for

Residential visitation is 334,189 vs. the 673,985 projected by Mason-Dixon. Potential patrons from Shippensburg, Carlisle, York, Frederick and Hagerstown will continue to go to the existing Penn National facilities in Grantville and Charles Town. Adams County adults represent almost half of the Adjusted Residential Day Trip visits.

Figure 5 Adjusted Mason-Dixon Market vs. Competition



In its presentation to the PGCB on August 31, Mason-Dixon presented a video narrated by David LeVan which described Mason-Dixon's market opportunity. While a map of Mason-Dixon's market flashed on the screen as shown in Figure 6, Mr. LeVan explained,

"The Mason-Dixon Resort and Casino will be located two miles from the Maryland border in southern Adams County, and unlike the development that continues to take place on the battlefield, Mason Dixon is not located on a single inch of the 6,000 acre national park. Its proximity to Maryland will allow the state to tap a new market place and avoid further saturating its existing

markets. Other Category 3 applicants will place their casinos in existing markets where Pennsylvania Casinos are still working to establish a foothold."

Figure 6, Mason-Dixon's Projected Market



11

The grey area highlighted in Figure 6 excludes most of York County, and much of Cumberland. It reaches down into Maryland's rural regions, but not to Baltimore. It appears to imply, without explanation, that Mason-Dixon will compete better with Charles Town than with Grantville. This map, recreated in Figure 7, shows that Mason-Dixon is ceding to Grantville areas within 50 minutes of Grantville including the northern tip of Adams County, while it is claiming it will capture Hagerstown and Frederick, which are well within 50 minutes of Charles Town. In fact Mason-Dixon's map implies that Mason-Dixon will be able to capture market within 30 minutes of Charles Town despite the fact that Mason-Dixon is smaller, offers fewer amenities, and you have to pay \$10 to enter. Mason-Dixon's claim that it will tap important portions of Maryland appears to be without foundation. Mason-Dixon will penetrate areas like Emmitsburg and Taneytown which are similar to Adams County in their conservative rural outlook.

¹¹ Mason-Dixon Presentation to PGCB August 31, 2010, Part 1 of 7 46:00 minutes.

Table 6 Summary Comparison of Adjusted Mason Dixon Forecast

Total Patrons	Adams	York	Franklin	Cumberland	Carroll	Frederick	Washington	Total
Zone 1	<u>PA</u>	<u>PA</u>	<u>PA</u>	<u>PA</u>	<u>MD</u>	<u>MD</u>	<u>MD</u>	<u>Total</u>
Mason Dixon Forecast	79,978	10,588	35,503	-	12,108	53,412	-	191,589
Replication	79,754	3,396	36,779	-	12,134	55,526	-	187,589
<u>Adjustments</u>								
Distance	(12,684)	(3,396)	(35,795)	-	-	(38,185)	3,187	(86,873)
Disadvantaged							-	-
Challenged	-	-	-	-	-	-	-	-
Adjusted	<u>67,070</u>	<u>-</u>	<u>984</u>	<u>-</u>	<u>12,134</u>	<u>17,341</u>	<u>3,187</u>	<u>100,716</u>
	84%	86%	89%	80%	85%	90%	86%	
2014 Adults	56,521	-	873	-	10,273	15,644	2,733	86,045
Participation	30%	30%	30%	30%	30%	30%	30%	30%
Visits/Year	12	12	12	12	12	12	12	12
M-D Share	<u>75%</u>	<u>75%</u>	<u>75%</u>	<u>75%</u>	<u>75%</u>	<u>75%</u>	<u>75%</u>	<u>75%</u>
	2.70	2.70	2.70	2.70	2.70	2.70	2.70	2.70
Patrons	152,607	-	2,358	-	27,737	42,240	7,379	232,321
Zone 2								
Mason Dixon Forecast	-	196,283	75,742	95,771	23,544	41,864	93,277	526,481
Replication	-	203,774	71,624	100,481	24,307	37,356	92,711	530,253
<u>Adjustments</u>								
Distance	16,080		35,795			42,285	(3,187)	86,873
Disadvantaged		(104,203)		(57,108)			(56,314)	(217,625)
Challenged	-	(17,807)	(16,222)	(27,368)	-	(72,439)	(23,566)	(157,402)
Adjusted	<u>16,080</u>	<u>81,764</u>	<u>91,197</u>	<u>4,297</u>	<u>24,307</u>	<u>7,202</u>	<u>9,644</u>	<u>234,491</u>
	84%	86%	89%	80%	85%	90%	86%	
2014 Adults	13,551	70,474	80,943	3,423	20,579	6,497	8,270	203,736
Participation	25%	25%	25%	25%	25%	25%	25%	25%
Visits/Year	4	4	4	4	4	4	4	4
M-D Share	<u>50%</u>	<u>50%</u>	<u>50%</u>	<u>50%</u>	<u>50%</u>	<u>50%</u>	<u>50%</u>	<u>50%</u>
	0.50	0.50	0.50	0.50	0.50	0.50	0.50	0.50
Patrons	6,775	35,237	40,471	1,711	10,289	3,249	4,135	101,868
Adjusted	159,383	35,237	42,829	1,711	38,027	45,488	11,513	334,189
% of Total	48%	11%	13%	1%	11%	14%	3%	100%
Mason Dixon Forecast	181,978	109,240	118,070	38,144	37,034	149,437	39,992	673,895
% of Total	27%	16%	18%	6%	5%	22%	6%	100%
V to Adjusted	(12%)	(68%)	(64%)	(96%)	3%	(70%)	(71%)	(50%)

More volume may be possible from Gettysburg and Emmitsburg. Casino studies have repeatedly shown that visitation increases for those living adjacent to casinos. Analysis by Cummings Associates indicates that casino losses can run from \$582 in Detroit Windsor to over a \$1000 per adult in Nevada for adults

living adjacent to casinos.¹² The American Gaming Association's current report, *2010 State of the States the AGA Survey of Casino Entertainment*, provides that on average 28% of Americans went to a casino last year, but for those living in a casino county, visitation was 42%.¹³ According to a 2008 report, 38% of Iowa adults living in counties with casinos went to a casino.¹⁴ Mason-Dixon forecasts that 30% of adults living within 30 minutes of it will make 12 visits losing \$107 per visit or \$1284 per participating adult. The average annual loss per Adams adult is therefore \$385 (30% x \$1284). This result indicates that Mason-Dixon anticipates Resort Casinos, with their entrance fee, will underperform regular casinos.

If 40% of Gettysburg adults (zip 17325 11 minutes from the casino) and 40% of Emmitsburg adults (zip 21727 10 minutes from the casino) went to the casino 15 times a year they would make an additional 50,790 and 13,760 visits respectively increasing losses per adult for adults in these zips from \$385 to \$642, and adding \$6.9 million to Mason-Dixon's GGR. It is doubtful if casinos charging a \$10 entry fee can achieve the success of casinos that do not. Further, as will be discussed below, Mason-Dixon's current assumption of \$107 lost per visit is high relative to other Category 3 applicants, and relative to what is achieved nationally.

2) Overnight Hotel Casino Visitors

Mason-Dixon's forecast shows it is a locals casino. 88% of the attendance comes from patrons within an hour, and only 12% is forecast to come from overnight visitors. Mason-Dixon's Local Impact Report prepared by Econsult, states,

In addition, approximately 93,000 visits and \$11.2 million in gross gaming revenue would come from hotel guests at both Mason-Dixon and hotels in the area.

Note that the estimates for gaming visits by hotel guests (at Mason-Dixon hotel and nearby hotels) are based on existing market occupancy levels, and do not account for any additional hotel room nights generated by the existence or operation of the facility.¹⁵

This is the same language found in Econsult's Local Impact Report for the VFCC casino, and Mason-Dixon, LIR repeats the comment on page 14 of its report.¹⁶ Later in its LIR for VFCC, Econsult notes,

In their work for the Philadelphia Gaming Advisory Task Force, the Innovation Group (IG) estimated that only a small proportion (2-4%) of visitors to Slots-only facilities stay overnight at

¹² Analysis of the Current Markets for Gaming in South Dakota with Projections for the likely impacts of New or Enlarged Facilities, Cummings Associates, April 5, 2004, 135 Jason St., Arlington, MA

¹³ The American Gaming Association, *2010 State of the States the AGA Survey of Casino Entertainment* page 25 and 29

¹⁴ Survey of 1,722 households living within 50 miles of Iowa's 17 casinos. Deepak, Chhabra,

¹⁵ Econsult, "Potential Impact of the Proposed Category 3, Mason-Dixon Resort & Casino." Philadelphia, PA, March 2010. Page 2

¹⁶ Econsult, "Potential Local Economic Impacts of the Proposed Category 3 Entertainment Center Gaming Facility for the Valley Forge Convention Center," Philadelphia June 2007 Page 2; Econsult, "Potential Impact of the Proposed Category 3, Mason-Dixon Resort & Casino." Philadelphia, PA, March 2010. Page 14

the destination. This estimate should clearly be adjusted down for VFCC since city facilities are closer to many of the region's main attractions and tourist destinations. We conservatively assume that 1%, or 4,900 of the new visitors will become overnighers and stay in area hotels outside of the VFCC hotels, with an average length of stay (LOS) of 1.5 nights and 1.8 occupants per room.¹⁷

Clearly Econsult believes there is little potential for a Mason-Dixon Resort Casino to draw new overnight patrons.¹⁸

Figure 6 Mason-Dixon Hotel Gaming "visitors" forecast

"Visitors":		
Total gaming "visitors"		93,333
Mason-Dixon guests:		
Occupied rooms	83,191	
Adults/occupied room	1.75	
Adult guest-nights	145,584	
ALOS	2.00	
Separate hotel guests	72,782	
% gaming	60%	
Mason-Dixon separate patrons	43,875	
Visits/stay	1.00	
Mason-Dixon patrons (on site already)	<u>43,675</u>	<u>43,675</u>
Visitors from other hotels (all to the north)		<u>49,658</u> <u>49,658</u>

19

Figure 6 shows Mason-Dixon's Hotel Gaming "visitors" forecast. The methodology is straightforward. Mason-Dixon predicts that 60% of overnight hotel guests at the Mason-Dixon casino (former Eisenhower Inn) will make at least one casino visit per stay. Per Mason-Dixon's forecast, the former Eisenhower Inn has become an adults-only facility with 1.75 adults staying in each room and enjoying an average length of stay of two nights per room.

As shown in Table 8, applying this same methodology to the balance of Gettysburg hotels and backing into the forecast 49,658 overnight casino visitors staying at area hotels indicates that Mason-Dixon

¹⁷ Econsult, "Potential Local Economic Impacts of the Proposed Category 3 Entertainment Center Gaming Facility for the Valley Forge Convention Center," Philadelphia June 2007 Page 12-13 * Philadelphia Gaming Advisory Task Force: The Final Report, 2005.

¹⁸ Econsult, "Potential Impact of the Proposed Category 3, Mason-Dixon Resort & Casino." Philadelphia, PA, March 2010. Page 15-16. Despite the fact that Econsult was clear in stating that the predicted 93,333 existing overnight guests going to the Mason-Dixon represented existing hotel guests, it would later contradict itself claiming they represented new economic activity.

¹⁹ Mason-Dixon Category 3 License Application Appendix 41 (B) received by PGCB Licensing Bureau July 25, 2010 page 185

believes 24% of adults staying at Gettysburg area hotels will go to the casino. Since many of Gettysburg guests are traveling with families this is a staggeringly large number. Furthermore, it is optimistic compared to other facilities. VFCC in its LIR predicted that 85,000 of the existing hotel guests to its facility or surrounding hotels would visit its casino losing \$6 million dollars.²⁰ The Accommodation industry in the Valley Forge area is seven times larger than that in Adams County. If Mason-Dixon drew overnight gambling visitors like Valley Forge did, its overnight GGRs would be less than a million dollars.

Table 8 Overnight Casino Attendance

	Prepared by Mason Dixon			Adjusted		
	Mason- Dixon	Other Gettysburg Hotels	Total	Mason- Dixon	Other Gettysburg Hotels	Total
Overnight Casino Attendance						
Rooms	307	1818		307	1818	
Days	365	365		365	365	
Occupancy Rate	74%	74%		74%	74%	
Occupied Rooms	83,191	492,642		83,191	492,642	
Adults/Occupied Room	1.75	1.00		1.75	1.00	
Adult guest-nights	145,584	492,642	638,227	145,584	492,642	638,227
ALOS (Avg. Lngth of Stay)	2.00	1.50	1.59	2.00	1.50	1.59
Separate hotel guests	72,792	328,428	401,220	72,792	328,428	401,220
% gaming	60%	15%	23%	60%	0%	11%
Mason-Dixon separate patrons	43,675	49,658	93,333	43,675	-	43,675
Visits/Stay	1.00	1.00	1.00	1.00	1.00	1.00
Mason-Dixon patrons (on site already)	43,675	49,658	93,333	43,675	-	43,675
Losses Per Visit	\$ 120.00	\$ 120.00	\$ 120.00	\$ 120.00	\$ 70.00	\$ 120.00
Total Losses \$ Millions	\$ 5.2	\$ 6.0	\$ 11.20	\$ 5.2	\$ -	\$ 5.2

According to the AGA, 28% of American adults gambled at casinos in 2010. Most went just to local casinos, but 23% of the 28% made an overnight trip to a local casino or destination resort.²¹ Accordingly, only 6.4% of adults made an overnight stay at a casino. To suggest that 24% or even 11% of adults going to an area overnight will be gambling, suggests the area is a destination casino and Gettysburg-- located in rural conservative Adams County-- will not achieve this level of performance.

²⁰ Econsult, "Potential Local Economic Impacts of the Proposed Category 3 Entertainment Center Gaming Facility for the Valley Forge Convention Center," Philadelphia June 2007 Page 2

²¹ The American Gaming Association, 2010 State of the States the AGA Survey of Casino Entertainment page 29

Such performance may be possible at a five-star resort like Nemaquin or Fernwood, but the same is unlikely at the Eisenhower Hotel and Convention Center which is surrounded by Penn National casinos which are free and offer more amenities. If only gamblers and spouses stay at the Eisenhower, then according to Mason-Dixon 11% of overnight guests to Gettysburg would be diverting \$5.2 million into casino losses. Compared to Valley Forge and other markets \$5.2 million may be too optimistic.

3) Table Games vs. Slots

In applying for a license in 2006, Mason-Dixon's predecessor, Crossroads Resort and Spa, declared the conservative Adams County area was inhospitable and inappropriate for Table Games. The current proposal from Mason-Dixon includes 50 Table Games and predicts 27% of the revenue will come from these operations. Given the investors' prior assertions that Table Games were inappropriate for Adams County, and an examination of other facilities, this claim for Table revenue seems grossly inappropriate and unrealistic. Mason-Dixon's Table operations would at best be about a third of their announcements.

When Mr. LeVan proposed a Slots casino for Adams County in 2005, he claimed it was appropriate for a conservative Adams County because it excluded Table Games. The original website for the Gettysburg Gaming Resort and Spa promoted by Mr. LeVan claimed:

"A Slots only facility like the one being proposed for the Adams County area is very different from the types of facilities one sees in places like Atlantic City and Las Vegas. Specifically, the Slots facilities have a tendency to be much less visually ostentatious, and feature attractions that are more in line with the conservative culture found in our area. For these and other reasons, the customers that are most likely to regularly frequent Slots-only facilities are usually older, are more likely to be women, and tend to arrive by car or bus. They are very unlike the "high rollers" that patronize Atlantic City and Vegas gaming venues."²²

On December 30, 2005, Chance Enterprises launched its new Crossroads Gaming Resort and Spa website which explained:

"Studies show that people who patronize Slots gaming are very different from people who regularly patronize at high-stakes Table gaming casinos such as those in Nevada, Louisiana and New Jersey. Visitors to Slots-only facilities tend to be infrequent gamblers who patronize casinos like Crossroads for entertainment rather than in an attempt to win large amounts of money."²³

Crossroads protested comparisons to Indiana casinos stating, "The attempt to compare the Indiana Riverboat Casinos to what will happen in Gettysburg is not an appropriate comparison. Indiana has

²² Gettysburg Gaming Resort and Spa <http://www.gettysburggamingresortandspa.com/faq.htm>

²³ Crossroads Gaming Resort and Spa <http://www.crossroadsgaming.com/faqs.html>

Table gaming which is well recognized as the biggest source of problem gambling.²⁴ In supporting the slots only casino, Mr. LeVan's nephew, J. Mathew LeVan, wrote the PGCB:

"When someone says the word casino, people automatically think of Las Vegas, Atlantic City, and a lot of Neon Lights, but what they don't realize is that the Crossroads Gaming Resort will be just that, a Luxury Resort and Span that just happens to have a big room with Slot machines. No Roulette wheel, No Black Jack, and no poker, which translates to no "Hard Core" gambling, Just entertainment.²⁵

According to the applicant's own statements and those of its supporters, Adams County, South Central Pennsylvania, and the tourists they draw are not high rollers interested in gambling large sums of money on the turn of a card.

Table 9 July 2010 Slots and Table Games in Pennsylvania

Casino	Slots	Tables	Slots/ Table
Harrah's Chester Downs	2,957	99	30
The Rivers	2,800	85	33
Mount Airy	2,438	72	34
Sands Bethlehem	3,030	89	34
Mohegan Sun	2,222	62	36
Presque Isle	2,030	48	42
Penn National	2,450	50	49
The Meadows	3,506	62	57
Parx	3,470	57	61
Total	24,903	624	40 ²⁶

Mason-Dixon's claim that it will install 50 Tables and 600 Slots is without precedent for what is basically a locals casino. As shown in Table 9, Pennsylvania existing casinos operated 24,903 Slots and 624 Table Games in July 2010, for a ratio of 40 Slots to each Table Game (with a low of 30 for Chester Downs and a high of 61 for the Parx Casino.)²⁷ This is consistent with locals casinos across the nation. In 2009, Missouri had 19,132 Slots and 532 Table Games or 36 Slots for each Table, and Iowa had 17,554 Slots and 492 Table Games or 36 Slots for each Table Game. As is shown in Table 10, seven smaller casinos in these two states averaged a higher ratio of 38 Slots for each Table. These seven smaller casinos operated an average 595 Slots and 16 Table Games. The ratio of Slots to Tables ran from a low of 27 at Catfish Bend to a high of 50 at Terrible's St. Jo Frontier.

²⁴ "Crossroads Gaming Resort and Spa Brief Comments on Presentation of Keith Miller and Presentation of Michael Siegel." January, 2006

²⁵ Written Comment to be included in the Evidentiary record of the Public Input Hearings PGCB By J. Mathew LeVan

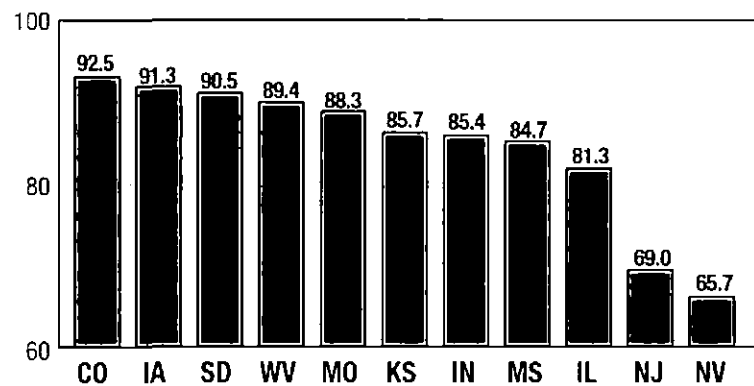
²⁶ PGCB Monthly Revenue Report July 2010

²⁷ PGCB July 2010 Revenue Report

Fernwood and Nemaocolin have been far more reasonable in their applications for a Category 3 license. Fernwood, supported by Penn National, is proposing 500 Slots and 10 Poker Tables and 16 banked Table Games. Nemaocolin's application includes 600 Slots and 28 Table Games. Mechanicsburg, like Mason-Dixon, claims it will use the maximum permitted 600 Slots and 50 Table Games.

Mason-Dixon forecasts it would generate \$60.25 million in Slot gaming revenue and \$22.85 million in Table Gaming revenue for a total of \$83.1 million.²⁸ Table Games represent 27% of the Mason-Dixon's total forecast. As is seen in Figure 6, with the exception of Vegas and Atlantic City, Table revenues average 12% for most of the balance of the nation. Assuming Mason-Dixon's Slots revenue is correct, and Table revenues were 12% of the total then Table revenues would be only \$8.2 million

Figure 6, Gaming Machine Revenue as a Percentage of Overall Gaming Revenue in Commercial Casino States 2009



**Commercial casino states not listed here either do not have table games or do not collect separate revenue data for table games and gaming machines.*

29

4) Small Rural Locals Casinos vs. Suburban Urban Casinos

As Table 10 shows small rural casinos underperform larger more urban casinos in Missouri and Iowa. Losses per attendee are comparable at \$41 a visit, but larger suburban and urban casinos simply draw more visits per gaming position allowing them to produce almost 50% more revenue per gaming position: \$198 vs. \$135 for smaller casinos. Larger casinos are operated in richer and more densely populated regions. 2008 per capita earnings for counties with small casinos was 18% less than per capita income in counties with large casinos: \$32,000 vs. \$39,000. Small casino counties had a population density only 13% of large casino counties.

²⁸ Econsult, "Potential Impact of the Proposed Category 3, Mason-Dixon Resort & Casino." Philadelphia, PA, March 2010 Page 17

²⁹ The American Gaming Association, 2010 State of the States the AGA Survey of Casino Entertainment page 33

Table 10 Small Casinos vs. Large Casinos in Missouri and Iowa

Missouri	Slots	Tables	Hotel		Admissions	GGR \$	win/	Empl/	Daily	
			Rooms	Slots/ table						Millions
Terrible's St. Jo Frontier	550	11	-	50	1,230,987	\$37.7	\$30.7	284	0.45	\$164.9
Lady Luck of Caruthersville	600	17	-	35	989,194	\$33.2	\$33.5	326	0.45	\$126.4
Terrible's Mark Twain Casino	650	14	-	46	1,200,057	\$36.4	\$30.3	243	0.32	\$133.4
9 Larger Casinos	17,512	490	1,774	36	48,916,377	\$1,596.4	\$32.6	10108	0.48	\$208.8
Iowa										
Lady Luck Isle of Capri	604	13	24	46	385,022	\$29.2	\$75.8	244	0.35	\$115.0
Wild Rose Clinton	593	13	40	46	784,801	\$39.2	\$49.9	328	0.48	\$156.8
Catfish Bend Casino	645	24	180	27	781,327	\$38.7	\$49.5	210	0.26	\$130.3
Wild Rose Emmetsburg	520	17	70	31	549,646	\$28.7	\$52.1	268	0.42	\$122.9
13 Larger Casinos	15,192	425	1593	36	19,606,800	\$1,228.6	\$62.7	8276	0.46	\$185.3
Total 7 Small Casinos	4,162	109	314	38	5,921,034	\$243.0	\$41.0	1903	0.39	\$135.2
Average Small Casino	595	16	45		845,862	\$34.7		272	0.39	
IA & MO 22 Larger Casinos	32,704	915	3,367	36	68,523,177	\$2,825.0	\$41.2	19237	0.49	\$197.9
Average Larger Casino	1,487	42	153		3,114,690	\$128.4		874		
Adams Mason-Dixon Forecast	600	50	307	12	767,000	\$83.1	\$108.3	375	0.39	\$239.7
Adams Adjusted Forecast	600	16		38	377,864	\$43.9	\$116.2	274	0.39	\$169.4
Pennsylvania	24,903	624		40	NA	\$2,164.8				\$241.4

The proposed Mason-Dixon casino has the characteristics of Iowa's and Missouri's small casinos. With 88% of the attendance coming from locals, it is not a resort. Adams' 2008 per capita income of \$31,750 is 20% below that of counties currently hosting casinos, and its population density is 28% of current casino host counties. Given these differences, one would expect Mason-Dixon, like small rural locals casinos in Iowa and Missouri, to underperform Pennsylvania's other casinos by at least 30%. The 30% still does not account for the \$10 entrance fee required at Mason-Dixon.

5) Win per Attendee

Mason-Dixon's forecast that it will win \$107 per day trip attendee and \$120 per overnight attendee,³⁰ is significantly greater than what is predicted by competing casinos and what is achieved nationally. Mason-Dixon claimed in its LIR:

Using various reasonable assumptions about annual growth rates, market penetration, and utilization ramp-up, the resort and casino is forecast to generate approximately 767,000 visits and \$83.1 million in gross gaming revenues upon completion. Of this, almost 674,000 visits and \$72 million in gross revenues would be generated by daytrippers to Mason-Dixon. In addition, approximately 93,000 visits and \$11.2 million in gross gaming revenue would come from hotel guests at both Mason-Dixon and hotels in the area.³¹

In preparing VFCC's LIR, Econsult, the same firm which prepared Mason-Dixon's LIR noted that VFCC would generate \$80 per day trip attendee and \$70 per overnight attendee.,

Using various reasonable assumptions about annual growth rates, market penetration, and utilization ramp-up, the entertainment center is forecast to generate approximately 740,000 entertainment center visits and \$59.8 million in gross gaming revenues, or "entertainment center wins", in its first full year of operation (for our purposes, assumed to be 2009). Of this, almost 660,000 visits and \$53 million in gross revenues would be generated by visitors to Valley Forge. In addition, approximately 85,000 visits and \$6 million in gross gaming revenue would come from hotel guests at both VFCC hotels and hotels in the area.³²

Like VFCC, Mason-Dixon is proposing a locals casino dependent primarily on locals for revenue. Median 2008 Household Income in Adams is \$55,124 which is almost 30% less than the \$77,993 achieved around Valley Forge. It is inconceivable that locals from around Gettysburg would lose 34% more than locals around Valley Forge. If loss per attendance were adjusted for income, then the loss per attendee at the Mason-Dixon casino would be \$56.54 or 29.3% less than the \$80 predicted loss per local attendee

³⁰ Econsult, "Potential Impact of the Proposed Category 3, Mason-Dixon Resort & Casino." Philadelphia, PA, March 2010. Page 2

³¹ Econsult, "Potential Impact of the Proposed Category 3, Mason-Dixon Resort & Casino." Philadelphia, PA, March 2010. Page 2

³² Econsult, "Potential Local Economic Impacts of the Proposed Category 3 Entertainment Center Gaming Facility for the Valley Forge Convention Center," Philadelphia June 2007 Page 2

at Valley Forge. Given that Econsult prepared LIR's for both VFCC and Mason-Dixon, Econsult's comment during Mason-Dixon's public input hearing on August 31, that Mason-Dixon's forecast appears "reasonable" is unexplainable.

During Fernwood's September 2, 2010 Public Input Hearing, Penn National presented Fernwood's interim revenue estimate of \$86,126,000 in revenue from 1,076,750 attendees or \$80 per attendee.³³ Most of those attendees are wealthy vacationers to the eastern Poconos and Fernwood resort. Penn National did not present or defend Mason-Dixon's estimate of \$107 per attendee from primarily rural local residents of more limited means.

As shown in Table 10, Midwest Locals casinos achieve an average win per admission of \$68.73 ranging from a low of \$32.55 in Missouri to a high of \$103.38 in Indiana. Missouri, Indiana, and Illinois charge for admission, ranging from \$2.00 to \$4.00.

Table 10 AGR/Admission.

	AGR	Admissions	AGR/Admit	Admission
Missouri	\$ 1,703,637,656	52,335,276	\$ 32.55	\$2.00
Iowa	\$ 1,412,817,242	22,955,618	\$ 61.55	None
Mississippi	\$ 2,584,890,618	35,502,745	\$ 72.81	None
Louisiana	\$ 3,214,147,113	35,237,921	\$ 91.21	None
Indiana	\$ 2,408,297,251	25,905,384	\$ 92.97	\$3-\$4.00
Illinois	\$ 1,474,460,000	14,262,077	\$ 103.38	\$2-\$3.00
	\$ 12,798,249,880	186,199,021	\$ 68.73	

³⁴

Mason-Dixon's prediction that attendees will lose \$107 is simply too high. Adams area residents are not as wealthy as Valley Forge residents or the vacation travelers drawn to Fernwood and Nemaquin. It is hard to imagine that Mason-Dixon would do much better than the \$68.73 achieved in the Midwest.

6) Cumulative Impact a Realistic Forecast

If, as discussed above, Mason-Dixon enjoyed half its predicted day trip attendance, and the loss per attendee was \$70 per visit, its Gross Gambling Revenue for day trip attendees would be, as shown in Table 11, about \$23.4 million. Assuming Mason-Dixon was able to fill the Eisenhower with gamblers as claimed and that these gamblers lost \$70 per visit, then overnight gamblers would contribute \$3.1 million to Gross Gambling Revenue. Total Gross Gambling Revenue would be \$26.5 million. Assuming win per gambling position per day was 30% below Pennsylvania's average, then only 431 gambling positions would be required or less than half the 950 gambling positions predicted by Mason-Dixon. If

³³ Fernwood presentation to PGCB, Public Input Hearing Bushkill Group Sept 2, 2010

³⁴ Indiana Gaming Commission Annual Report FY 2009 Page 47. Indiana Data excludes Hoosier Park and Indiana Live which do not collect admission data.

12% of these were Table positions, then a total of 7 Table Games and 379 slots would be required. Over half of this revenue, \$14.2 million, is a diversion from the Adams economy. The adjusted revenue projections require that approximately 30% of Adams' adults lose \$840 a year going to a casino twelve times and losing \$70 at each visit. This is less than Mason-Dixon's plan but still more than what casino supporters like Richard Kitner say Adams can afford.

Table 11 Mason-Dixon Revenue Forecast vs. Realistic Assessment

	<u>Mason-Dixon</u>	<u>Realistic</u>
Day Trip		
<u>Attendance</u>	673,894	334,192
<u>\$ per attendance</u>	<u>\$107.0</u>	<u>\$70.0</u>
GGR \$ millions	\$72.1	\$23.4
Overnight		
<u>Attendance</u>	93,333	43,675
<u>\$ per attendance</u>	<u>\$120.0</u>	<u>\$70.0</u>
GGR \$ millions	\$11.2	\$3.1
Total		
<u>Attendance</u>	767,227	377,867
GGR \$ millions	\$83.3	\$26.5
Gaming Positions		
<u>Slots</u>	600	379
<u>Tables</u>	350	52
<u>Total</u>	950	431
<u>Tables</u>	50	7
<u>\$ per position per day</u>	\$240	\$168

7) Traffic

Mason-Dixon's June 2010 Transportation Impact Study prepared by Transportation Resources Group (the TIS) is inconsistent with Mason-Dixon's market forecast. The TIS understates the volume of traffic which will come through Gettysburg and south on the Emmitsburg Road/ Steinwehr Ave.³⁵ A potential one sixth to one third traffic increase on the Emmitsburg Road through Gettysburg National Military Park and the Borough of Gettysburg may be a problem. The TIS demonstrates this is a locals casino that will drive virtually no business into town. The TIS overlooks the burden that park roads and small rural roads may face due to the casino.

Mason-Dixon's TIS was prepared based upon the ITE article prepared by Michael Trueblood and Tara Gude, *Trip Generation of Small and Medium Sized Casino*. Trueblood's and Gude's work was based on five casinos from Iowa and Missouri that contained a mix of slots and table games, summarized in Table 12. Because only partial information was available concerning traffic around the Casino Queen in St. Louis, it is omitted from Table 12.

The final column of Table 11 describes Mason-Dixon based upon ratios developed in the ITE article. Based on this ITE article, TRG estimated Mason-Dixon's slots would generate 5,958 trips per day Monday to Friday, and an average of 6,464 trips per day or 3,232 vehicles per day on average which TRG reported.³⁶

3,232 vehicles per day implies 1,179,680 vehicles will arrive at the casino per year. This is greater than Mason-Dixon's forecast 767,228 attendance. Assuming Mason-Dixon's claim of 375 FTE employees is correct, and that they work 40 hour weeks 48 weeks a year, then on an average day 247 would be at work adding 90,247 vehicles per year, increasing the total to 857,475, which is 73% of the 1,179,680 provided for in the TIS. This assumes that each patron and employee arrives by themselves.

It appears that TRG based its results on multiplying the number of slots claimed by Mason-Dixon by the trips per slot produced by the ITE study, without checking to see if the result was consistent with Mason-Dixon's forecast. An alternative use of the ITE study is to compute the number of required slots. That is, if there are 857,475 vehicles arriving producing 1,722,170 trips per year or 4,698 trips per day, then only 450 slots would be needed.

³⁵ Much of this analysis is based on Mason-Dixon Resorts and Casino Transportation Impact Study revised June 2010, prepared by Transportation Resources Group, York, PA. and included in Appendix 41 (B) Local Impact Report, Engineering Repors (sic), and Traffic Studies received by the PGCB July 26, 2010, Page numbers are shown first from the PDF page numbers in this document, and second if applicable in parenthesis from the TIS contained in that document.

³⁶ Transportation Impact Study prepared by TRG, June 2010, as found in Appendix 41 (B) Local Impact Report, Engineering Repors (sic), and Traffic Studies received by the PGCB July 26, 2010, pages 28 & 32, (TIS pages 13 and 17). For some reason, TRG's math appears off on the 6464 trips per day.

Table 12 Summary Trueblood and Gude Trip Generation of Small and Medium Sized Casinos

Amenities	Council Bluffs Iowa			St. Louis	Average	Mason Dixon
	Harvey's	Ameristar	Bluffs Run	St. Charles		
Slots	1169	1446	1479	1847	1485	600
Total Tables	53	51	0	90	49	50
Gaming Positions	1540	1803	1479	2477	1825	950
% Slots	76%	80%	100%	75%	81%	63%
Gaming Sq Ft	28,250	38,000	34,280	50,000	37,633	
Hotel Rooms	251	356	0	Not Appl	202	308
Employees	1257	1329	1046	Not Avail	1211	375
Pari Mutual	No	No	Yes	No		
Convention Seats	900	170	0	Not Avail	357	

Adj Street Peak Hour PM

	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>
Monday-Friday	453	340	427	378	442	373	475	600				
Saturday/Sunday	423	334	491	413	490	467	Not Avail					

Adj Street Peak Hour PM/Slot

	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	Estimate	
Monday-Friday	0.39	0.29	0.30	0.26	0.30	0.25	0.26	0.32	0.31	0.28	186	169
Saturday/Sunday	0.36	0.29	0.34	0.29	0.33	0.32	Not Avail		0.26	0.22	155	133

Adj Street Peak Hour PM/Gaming Position

	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	Estimate	
Monday-Friday	0.29	0.22	0.24	0.21	0.30	0.25	0.19	0.24	0.26	0.23	243	220
Saturday/Sunday	0.27	0.22	0.27	0.23	0.33	0.32	Not Avail		0.22	0.19	209	181

Average Daily Traffic Rates

Monday-Friday	13,249	12,496	15,325	17,362
Saturday/Sunday	14,443	16,026	18,554	19,959

ADT/Slot

	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	Estimate	
Monday-Friday	11.33	8.64	10.36	9.40	9.93	5,958		
Saturday/Sunday	12.36	11.08	12.54	10.81	11.70	7,020		
Monday-Sunday					10.44	6,261		

ADT/Gaming Position

	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	<u>In</u>	<u>Out</u>	Estimate	
Monday-Friday	8.60	6.93	10.36	7.01	8.23	7,815		
Saturday/Sunday	9.38	8.89	12.54	8.06	9.72	9,232		
Monday-Sunday					8.65	8,220		

³⁷

A similar calculation could be done based on Mason-Dixon's predicted attendance and the ADT per gaming position. Using the same casinos as in the ITE study, an average ADT/Gaming position of 8.65 was calculated. If Mason-Dixon generated 4,698 trips per day, that would imply it needs 543 gaming

³⁷ Michael Trueblood and Tara Gude, Trip Generation of Small and Medium Sized Casinos, as replicated in Appendix 41 (B) Local Impact Report, Engineering Repors (sic), and Traffic Studies received by the PGCB July 26, 2010, pages 187-195

positions. If 81% of the gaming positions were Tables, as is the case with these four casinos, then it would have 442 Slots, and 14.4 Tables.

A second cause for the apparent disconnect between Mason-Dixon's forecast and the ITE study may be due to the difference in loss per visit. As shown in Table 10, Missouri and Iowa casinos average attendee loses \$41, not the \$107 predicted by Mason-Dixon. It is possible that Missouri and Iowa gamblers who do not have to pay \$10 to enter a casino go with a greater frequency, losing less money per visit than is predicted by Mason-Dixon. If Mason-Dixon could replicate this behavior it would demonstrate greater traffic without a revenue increase.

The TIS understates the volume of traffic which will come through Gettysburg and travel south on the Emmitsburg Road/ Steinwehr Ave to the casino. Traffic on the Emmitsburg Road/Steinwehr Avenue could increase by 1000 to 2100 trips per day.

Page 13 of the TIS states

Site Trip Distribution and Assignment.

Figure 9 in the appendices shows the trip distribution percentages for the site traffic on the major roadway system. Figure 10 in the Appendices shows the total site trip distribution and assignment of the proposed development on the major roadway system at full buildout of the proposed development. Site trip distribution was based on existing patterns, a marketing study of the casino and engineering judgment. The following trip distribution was assumed for the site trips generated by the proposed development:

- 9% oriented to/from the north on the Emmitsburg Road (S.R. 3001)
- 1% oriented to/from the east on Barlow Greenmount Road (S.R. 3006)
- 50% oriented to/from the south on Route 15
- 38% oriented to/from the north on Route 15
- 2% oriented to/from the south on Emmitsburg Road (S.R. 3001)

On a daily basis, the existing driveway on Emmitsburg Road (S.R. 3001) will have an estimated ADT of 6,464 trips or 3,232 vehicles, which is a high volume operation. Details of the site trip distribution and assignment are included in the Appendices.³⁸

Table 1 of this report showed Mason-Dixon's Market Forecast. Table 13 shows Mason-Dixon's forecast's distribution of patrons by arrival route to Mason-Dixon. 455,277 patrons would arrive from the north on Route 15.

³⁸ Transportation Impact Study prepared by TRG, June 2010, as found in Appendix 41 (B) Local Impact Report, Engineering Reports (sic), and Traffic Studies received by the PGCB July 26, 2010, page 28, (TIS page 13)

Table 13 Mason-Dixon Patron Forecast by Arrival Route

			MD Forecast Patrons	Percentage Coming on Route 15 From		Patrons Coming on Route 15 From	
				North	South	North	South
Zone 1	Adams	PA	181,978	90%	10%	163,780	18,198
	York	PA	24,641	100%		24,641	-
	Franklin	PA	85,081	80%	20%	68,065	17,016
	Carroll	MD	27,068		100%	-	27,068
	Frederick	MD	<u>130,101</u>		100%	-	<u>130,101</u>
	Washington						
			448,868			256,486	192,383
Zone 2	Adams						
	York	PA	84,599	100%		84,599	-
	Franklin	PA	32,989	80%	20%	26,391	6,598
	Cumberland	PA	38,144	100%		38,144	-
	Carroll	MD	9,966		100%	-	9,966
	Frederick	MD	19,336		100%	-	19,336
Washington	MD	<u>39,992</u>		100%	-	<u>39,992</u>	
			225,026			149,134	75,892
			673,894			405,619	268,275
						49,658	
						455,277	

39

An examination of drive times by zip code indicates that Mason-Dixon's Forecast by Arrival Route and TRG's forecast are inaccurate. Appendix 2 provides the Drive Time by zip code by route. This examination shows that the Emmitsburg Road provides the shortest travel time for 21% of the day trip attendance. 9% would find traveling from the north on Highway 15 to be the most convenient. 22% would find that they could save a minute or two using Highway 15 vs. the Emmitsburg Road. While saving time is attractive, the implication is that none of these patrons would spend an extra minute driving through the Borough of Gettysburg to patronize its businesses, even though it is basically on their way. 44% of the day trip attendance would arrive from the South on Highway 15. 5% would arrive on Highway 15 or spend a minute or two more traveling Barlow-Greenmount Road. TRG predicts that 2% of the traffic would come over Barlow-Greenmount indicating that 40% of the local traffic would

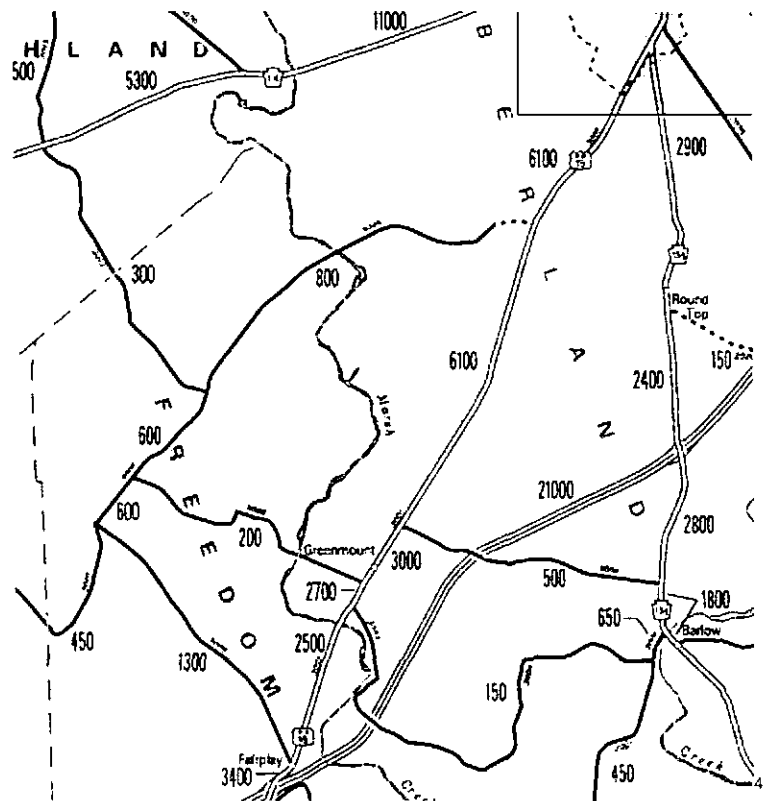
³⁹ Appendix 41 (B) Local Impact Report, Engineering Reports (sic), and Traffic Studies received by the PGCB July 26, 2010, page 185

Table 14, Traffic Patterns Mason Dixon Forecast

			Patrons coming from				
			Recreated	N on 15 or	North on	South on	South on
			Patrons	North on 15	Emmitsburg	Emmitsburg	15 or B-G
Zone 1	Adams	PA	181,468	29,882	51,755	83,960	15,871
	York	PA	7,903	7,903			
	Franklin	PA	88,138			21,501	66,637
	Carroll	MD	27,737				7,207
	Frederick	MD	145,238				145,238
	Washington						
			450,484				
Zone 2	Adams						
	York	PA	87,827	19,874	67,954		
	Franklin	PA	31,785			24,586	7,199
	Cumberland	PA	40,020	1,479	27,409	11,133	
	Carroll	MD	10,289				10,289
	Frederick	MD	16,850				16,850
	Washington	MD	39,749				39,749
			226,522				
			677,006	59,138	147,117	141,180	298,752
				9%	22%	21%	44%
Visitors from Area Hotels			49,658	24,829		24,829	
Employees 375			90,247	14,861	25,739	41,755	7,893
			816,911	98,828	197,685	182,934	306,645
				12%	24%	22%	38%
							30,819
							4%

use a back road over a highway. If they had used the same heuristic to the north, then 40% of those traveling down Highway 15 for whom the Emmitsburg Road represented another minute or two, 17% of the total traffic, would have used the Emmitsburg Road. Although TRG understands that locals may prefer local roads over highways, it ignored this phenomena with respect to borough traffic. Table 14 provides a summary of these traffic patterns. It adds in visitors from area hotels, about which more will be said shortly as well as employees. At least 22% of the traffic would come through the borough down the Emmitsburg road and as much as 46% might choose this route. This would equate to an additional 1000 to 2100 vehicles per day traveling from the borough to the casino along the Emmitsburg Road. According to PennDOT information, as shown in Figure 7, this would equate to a 1/6 to 1/3 increase at the borough and up to an 80% increase in traffic just north of the casino.

Figure 7 Current Traffic Flows



As discussed elsewhere in this report, Mason-Dixon will not obtain their projected visitation. Table 16 shows the origination of patrons and employees for the Adjusted Forecast of 334,192 Day Trip local visitors, no visitors from Area Hotels, and 275 employees (a smaller casino will not need nor will it be able to afford 375 employees). Arrivals from the south on 15 and or Barlow-Greenmount have been reduced 58%, while those from the north along 15 and/or the Emmitsburg Road are reduced 46%. Arrivals from the Emmitsburg road north of the casino are reduced from a range of 182,934 to 380,619 for the Mason-Dixon forecast shown in Table 15 (the higher number reflecting patrons for whom the Emmitsburg road route through the borough of Gettysburg would add a minute or two) to 125,042 to 195,232 for the Adjusted Forecast shown in Table 16. 31% to 48% of patrons and employees will use the Emmitsburg Road under the Adjusted Forecast.

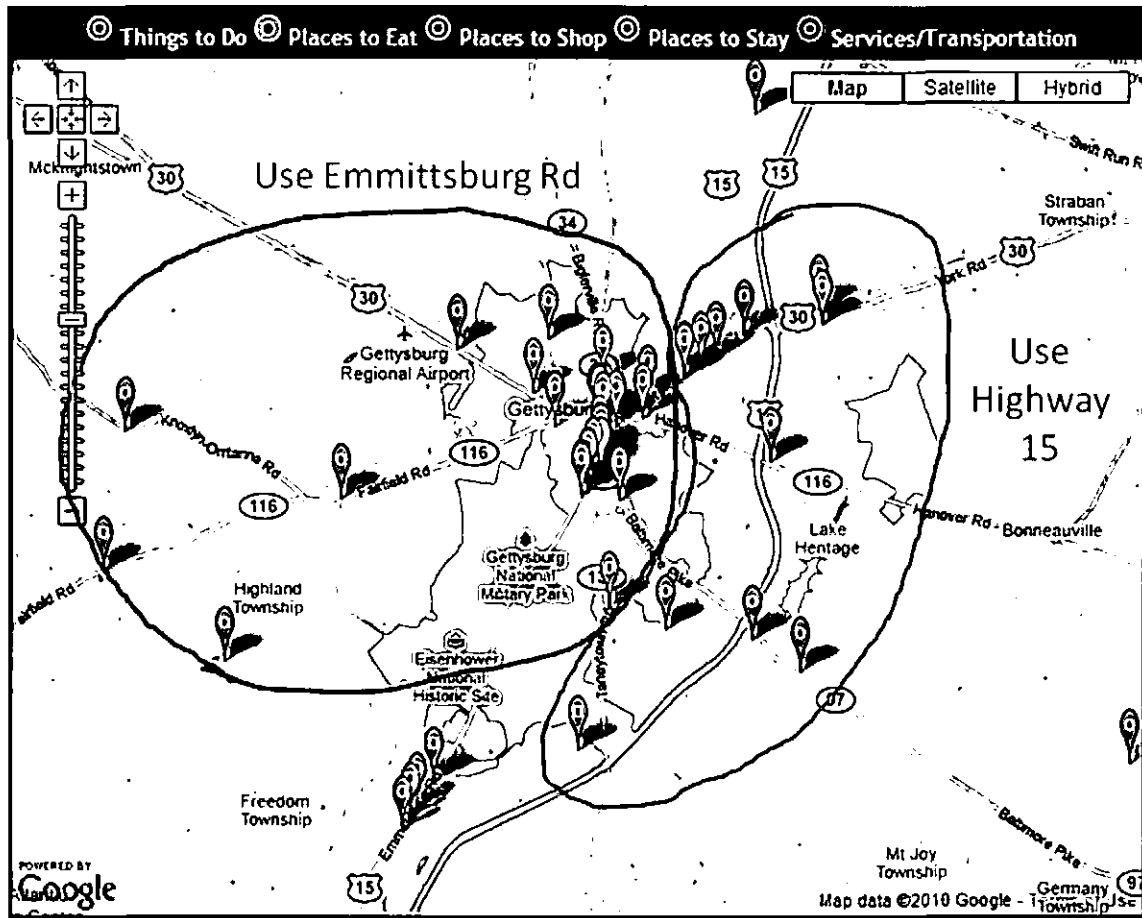
⁴⁰ Traffic Volume Map Adams County Pennsylvania Published December 2009, Pennsylvania Department of Transportation.

Table 16 Traffic Patterns Adjusted Forecast

			Patrons coming from						
		Adjusted Patrons	North on 15	N on 15 or Emmitsburg	North on Emmitsburg	South on 15	South on 15 or B-G		
Zone 1	Adams	PA	152,607	29,882	35,231	71,623	15,871	-	152607
	York	PA	-	-	-	-	-	-	-
	Franklin	PA	2,358	-	-	-	2,358	-	2358
	Carroll	MD	27,737	-	-	-	7,207	20,530	27737
	Frederick	MD	42,240	-	-	-	42,240	-	42240
	Washington		7,379	-	-	-	7,379	-	7379
Zone 2	Adams		6,775	1,431	3,060	2,285	-	-	6775
	York	PA	35,241	18,981	16,260	-	-	-	35237
	Franklin	PA	40,471	-	-	28,568	11,903	-	40471
	Cumberland	PA	1,711	-	-	1,711	-	-	1711
	Carroll	MD	10,289	-	-	-	-	10,289	10289
	Frederick	MD	3,249	-	-	-	3,249	-	3249
	Washington	MD	4,135	-	-	-	4,135	-	4135
			334,192	50,294	54,551	104,187	94,341	30,819	
				15%	16%	31%	28%	9%	
Visitors from Area Hotels									
	Employees 275		66,181	12,959	15,279	31,061	6,883		
			400,374	63,253	69,830	125,402	111,070	30,819	
				16%	17%	31%	28%	8%	

As illustrated in Figure 8, many of Gettysburg's hotels are located in town. These hotels contain about half the rooms located in the area. Patrons of these hotels, if they go to the casino as forecast by Mason-Dioxn, would travel down the Emmitsburg Road to the casino. It is worth noting that the fastest way to get from the visitors' center to the Eisenhower Inn is through town, and not back out to Highway 15. The 5.9 mile trip through town takes 10 minutes, while the 10.5 mile drive via Highway 15 takes 17 minutes. If one was visiting the casino and the battlefield and town, one would drive up the Emmitsburg Road.

Figure 8 Gettysburg Area Hotels



Rural Roads

By claiming that 90% of the traffic arrived from highway 15, TRG and Mason-Dixon masked the impact that this casino will have on the small rural roads in the region and circumvented PennDOT's March 19, 2010, request to describe the potential impact of traffic on all intersections projected to generate 100 or more new trips during the peak hour.⁴¹

M-D should have done a more thorough analysis of traffic along the Emmittsburg road. The TIS predicts:

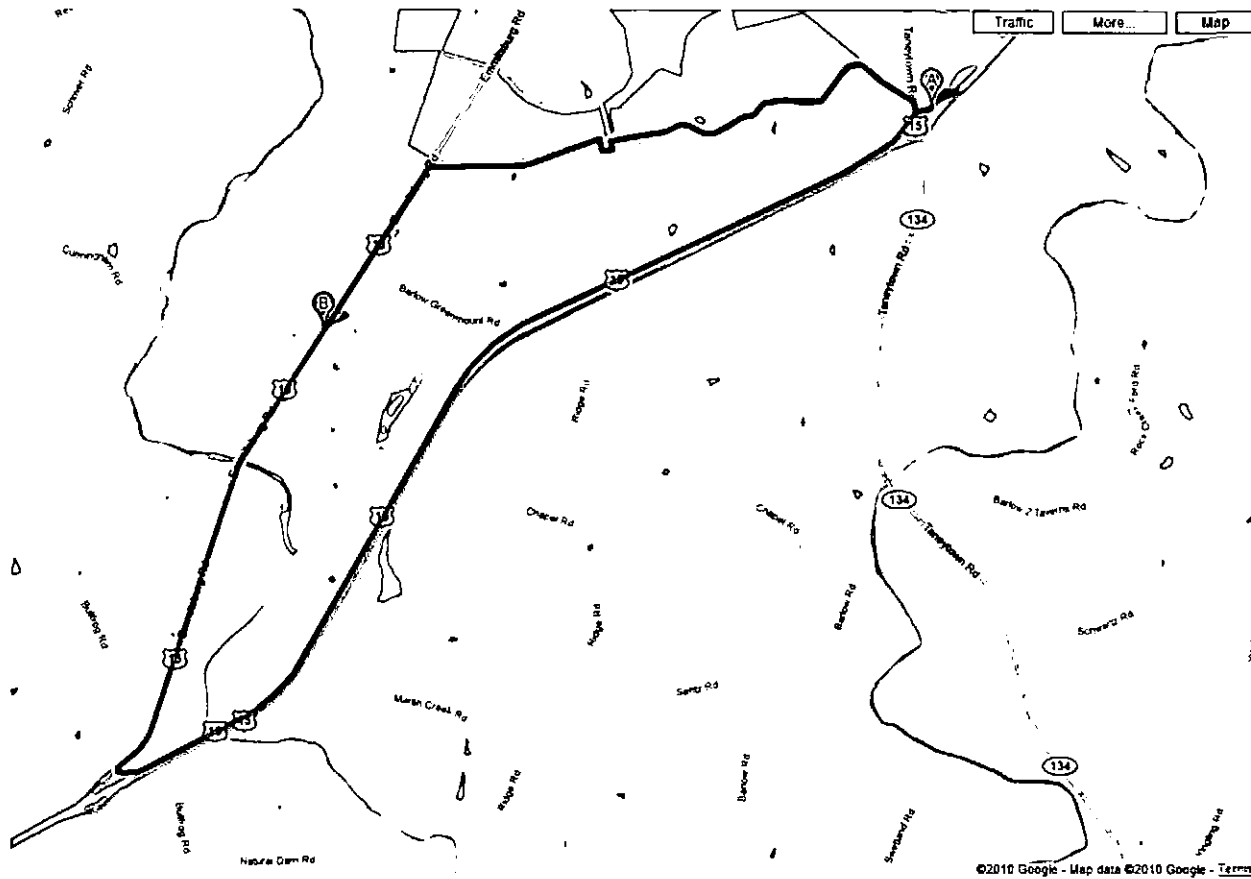
The proposed Mason-Dixon Resorts and Casino is anticipated to generate an estimated 354 new trips during the typical weekday PM peak hour, 414 new trips during the Friday PM peak hour and 468 new trips during the Saturday peak hour.⁴²

⁴¹ Tucker Ferguson District Executive PennDOT, to Daniel J. Thornton TRG, March 19, 2010 found Mason-Dixon Category 3 Traffic Study, part 2, page 238, replicated Appendix 5

⁴² Appendix 41 (B) Local Impact Report, Engineering Repors (sic), and Traffic Studies received by the PGCB July 26, 2010, page 32 (TIS page 17)

If 22% of the casino traffic is traveling down the Emmitsburg Road then Saturday Peak Hour will see an additional 102 peak hour trips.

Figure 9 Knight Road vs. Highway 15



The traffic study has not accounted for the potential diversion of traffic over Knight Road. As shown in Figure 9, local casino employees and patrons will understand that they can shorten their trip by using this minor two lane country road. Google maps indicates that from the Taneytown Rd Exit on Highway 15 to the Eisenhower Inn is an 8 minute 6.1 mile drive south on Highway 15 to the Emmitsburg road and then north on that road to the casino. Mapquest provides that this is a 7 minute drive. Alternatively Google Maps provides that traveling over Knight and Ridge Roads from the Taneytown exit is a 3.0 mile 9 minute drive while Mapquest suggests it can be completed in 6 minutes. I did the shorter drive in five minutes while the longer drive took seven minutes. Locals will use this short cut to save time. If 36% of the traffic (12% for which Route 15 to the North is simply a quicker route, and 24% for whom 15 is a minute or two quicker than driving through the Borough) uses this route, then Saturday peak traffic along Knight Road is 168 vehicles, well above the 100 threshold set by PennDOT. This route borders the southern boundary of the GNMP.

8) Better Options for a Resort Casino

Section 1305 of the Gaming Act provides the specific eligibility criteria for a Category 3 license. These include the following: the applicant, its affiliate, intermediary, subsidiary or holding company has not applied for or been approved or issued a Category 1 or 2 license; the applicant seeks to locate the Category 3 licensed facility in a well-established resort hotel having no fewer than 275 guest rooms under common ownership and having substantial year-round recreational guest amenities; a Category 3 license may only be granted upon the express condition that an individual may not enter the gaming area of the licensed facility if the individual is not a registered overnight guest of the established resort hotel or a patron of one or more of the facility's amenities.⁴³

Unlike several of the other applicants, the Eisenhower Hotel and Conference Center is not a "well-established resort hotel ... having substantial year-round amenities." In fact it is, in the words of David LeVan, an unsuccessful "aging and struggling hotel" in need of saving. As shown in Table 17 the Eisenhower Hotel and Conference Center is a seasonal hotel charging over 50% more in the summer than the winter. Mr. LeVan proposes to transform the hotel into a resort by adding the single amenity of a casino. During the August 31, 2010, Public Input Hearing, Mr. LeVan testified,

"The Mason-Dixon Resort and Casino is a key to boosting the region's sustainability. The aging and struggling Eisenhower hotel and conference center provides the perfect start. The current space would be transformed into a beautiful naturally rich and rustic world class resort with more than 300 guest rooms, 20,000 square feet of meeting and exposition space, spacious parking, and exciting entertainment facilities. The casino will include 600 of the most state of the art slot machines, fifty popular table games, casual and fine dining restaurants, pools, athletic and entertainment facilities, and other amenities. This is a perfect use of a Category 3 license. The casino wouldn't just be an added perk to an already successful business. The state has a unique opportunity to embrace a real economic development project, by saving a once popular resort, and one hundred local jobs."⁴⁴

Table 17 provides a comparison of the Eisenhower Hotel and Conference Center to Valley Forge which was licensed and the three other current applicants.

⁴³ Adjudication, Application of Valley Forge Convention Center Partners, LP Application for Category 3 Slot Machine License filed March 8, 2009 page 2-3

⁴⁴ Testimony of David M. LeVan August 31, 2010, Category 3 License Public Input Hearing- Mason-Dixon Resorts, LP - Cumberland Township, Adams County - Part 1 of 7 45:00-46:00

Table 17 Category 3 Applicant Comparison

	<u>Eisenhower</u>	<u>Valley Forge</u>	<u>Fernwood</u>	<u>Nemacolin</u>	<u>Mechanicsburg</u>
	<u>Hotel and</u>	<u>Conference</u>	<u>Resort</u>	<u>Woodland</u>	<u>Holiday Inn</u>
	<u>Conference</u>	<u>Center</u>	<u>Resort</u>	<u>Resort</u>	<u>Center</u>
Rooms	307	488	905	335	239
RV Park				v	36
Estimated Room Nights	60,000	160,000	230,000	105,000	60,000
Estimated Occupancy	54%	90%	70%	86%	69%
Annual Visitors	100,000	650,000	420,000	350,000	100,000
Room Rate					
April-Oct	\$120	\$153-\$229	\$100	\$300-400	\$103
Nov-March	\$78	\$130-\$239	\$120	\$300-400	\$99
Fantasy Suites		58			
Inroom Jacuzzi		220			
Acres			440	2000	23
Amenities					
Golf			v	vv	
Minigolf	v		v	v	v
Tennis				v	
Raquet Ball		v			
Skiing				v	
Snow Tubing			v	v	
Indoor Pool	v	v	v	v	v
Outdoor Pool	v		v	v	v
Bumper Boats			v		
Fitness Center		v	v	v	v
Spa		v	v	v	
Paintball			v	v	
Horseback Riding			v	v	
Art Collection				\$45 million	
Car Museum				v	
Airplane Museum				v	
Gun Museum				v	
Zoo				v	
Event Center				v	
Night Club		v			
Retail Shops				14	
Five Star Restaurants				1	
Fine Dining	1	1	1	2	
Casual Dining	1	2	2	12	3
Meeting Space	20,000	116,000	42,000	31,000	16,000
Billiard Room	v				
Arcades	v		v		
Sports Fields	v		v	v	v
Batting Cages	v				
Volleyball	v		v	v	v

Fernwood and Nemaquin offer true Resort Casino options that service primarily out of state patrons. These are not rural locals casinos.

The Pocono region is a well established resort destination. According to Fernwood CEO Andrew Worthington, 26.5 million people live within 100 miles of the region, and the Poconos draw 23.8 million overnight visits a year. Monroe and Pike County possess 7,000 guest rooms, and within a five mile radius of the Fernwood resort there are 38,500 vacation homes. These homes rent to groups of relatively affluent adults and families who enjoy extended vacations in the region. Affluent vacationers flock to the area year round to enjoy the outdoors, golf, spas, shows, and skiing. With 900 rooms, the Fernwood resort serves 425,000 customer visits annually. 84% are out of state: NY, 48%; NJ, 23%; MD, 2%; CT, 2%; other states, 9%. Put simply, the Pocono Region and Fernwood are resort destinations an order of magnitude larger than Gettysburg.⁴⁵

According to the National Park Service, the Delaware Water Gap is the ninth greatest destination amongst the National Parks drawing 5.2 million visitors a year. The same report lists Gettysburg as drawing a million visitors. While we would contend that the vast majority of such tourists have no interest in a casino, if 5% wanted to go to a casino this would represent 50,000 in the case of Gettysburg but 260,000 in the case of Fernwood.

In its 2008 projections for a 500 slot casino, Innovation group estimated that Fernwood would enjoy patronage of 400,000 and produce Gross Gambling Revenues of about \$28 million (\$154 per gaming position and \$70 per attendee). Only a third of this revenue was from local day-trip gamblers, two thirds was from resort attendance. 81% of gaming revenues were new revenues to Pennsylvania not cannibalized. Innovation assumed that Split Rock located 90 minutes away to the northwest along US Interstate 81 would also receive a Category 3 license. Innovation believed that the geographically large Pocono region could easily support three licenses, Mount Airy, Split Rock and Fernwood.⁴⁶

During the September 2, 2010 public input hearing, Steve Snyder of Penn National said that because Penn National would be converting an existing tennis barn into a casino, "Because of its existing infrastructure, the fact that it is there, the current building, it is something that we feel upon selection we could mobilize very quickly, and be open as quickly, in fact more quickly, than any of the other Category 3 applicants."⁴⁷ Mr. Snyder is also working with Mason-Dixon and understands their situation with respect to water and sewer and the need for renovations. Penn National presented that Fernwood could be up and running in 6-9 months from licensure, while Mason-Dixon talked about 2014 operations.

After describing the facility, Steve Snyder went on to present Penn National's projections for the Fernwood Casino based on demographics within 60 miles of the site.

⁴⁵ Fernwood Resort & Casino, Pennsylvania Gaming Control Board Public Input Hearing, September 2, 2010 19 minutes into presentation by Andrew Worthington

⁴⁶ Fernwood Resort & Casino, Pennsylvania Gaming Control Board Suitability Hearing, October 23, 2008

⁴⁷ Fernwood Resort & Casino, Pennsylvania Gaming Control Board Public Input Hearing, September 2, 2010; 30 minutes into presentation Steve Snyder

"We believe, based on decisions in New Jersey, that this facility could easily achieve gaming revenues of \$100 million within five years, as it approaches stabilized operations. This does not take revenues from existing gaming facilities in the commonwealth. It produces revenue from neighboring locations. (In presenting a map of the region Mr. Snyder went on to say) The revenue is strictly from an area 60 miles to the east not to the west because of the existence of existing casinos at Mohegan Sun Pocono Downs and Mount Airy. But we have looked at the ability to penetrate the New Jersey market place and into New York. The challenge will be what will happen in New Jersey. I would not envision, given the current discussions, that New Jersey will build casinos in the northern portion of the state prior to maturity being achieved at Fernwood."⁴⁸

Table 18 Fernwood Projections

	<u>Open</u>	<u>Interim</u>	<u>Stable</u>
Patronage	807,830	1,076,750	1,345,755
Win per Position per day			
Slots	308	410	513
Tables	1539	2052	2565
\$ Millions			
Gross Gaming Revenue	64.6	86.1	107.7
State Tax	28.1	37.3	46.6
County/Municipal LSA	2.4	3.2	4.0
Win per attendee	80.0	80.0	80.0

Reaching into New Jersey, Penn National significantly increased Fernwood's revenue projections over the previous projections which were based primarily on existing resort guests. The win per attendee is in line with that predicted by Valley Forge and lower than the \$107 predicted by Mason-Dixon. The win per gaming position is much higher than existing Pennsylvania casinos. It is in line with what the Financial Suitability Task Force found for VFCC. The Task Force projected that VFCC 500 slots would produce \$340/slot/day which was greater than the \$308/slot/day forecast by PKF who had been retained by VFCC.⁴⁹ If the interim win per day was reduced to \$240 per day per slot, which is what Pennsylvania casinos average, Gross Gaming Revenue would be \$53 million. \$240 is used because this is a Resort Casino and not a Locals Casino located in a small rural market as is the case with Mason-Dixon. It is important to note that these revenue projections were based upon 500 slots, 16 table games and 10 poker tables. With room to expand, the win per position could be reduced.

In 2006, The Nemaocolin Woodland Resort applied for a 500 slot Category 3 license. A major stumbling block was the requirement that Resort Casino patrons purchase at least \$25 in resort amenities to be

⁴⁸ Presentation by Steve Snyder Penn National at Category 3 Public Input Hearing -- Bushkill Group -- Middle Smithfield Township Monroe County Sept 2, 2010 34:00 minutes

⁴⁹ Adjudication, Application of Valley Forge Convention Center Partners, LP Application for Category 3 Slot Machine License filed March 8, 2009 page page 14 & 15

allowed to enter. Despite this barrier, Nemaocolin predicted it would achieve \$34.5 million in revenue with slot win per day of \$189. The PGCB Financial Suitability Task Force estimated that Nemaocolin's 500 slots would achieve \$29.9 million in revenue with \$164 slot win per day. Both estimates took into account the award of a Category 1 license to the existing Washington Meadows racetrack. The Financial Suitability Task Force indicated that it took into consideration competition from the proposed Category 2 Crossroads facility, which the Applicant did not consider.⁵⁰ The \$29.9 million predicted by the Financial Suitability Task Force was based upon a belief that resort guests had to spend at least \$25 each day they wanted to enter the casino, while Nemaocolin was looking for relief such that guests could obtain greater access for having spent \$25 at the resort.⁵¹ Unable to obtain relief on the \$25 entry charge, Nemaocolin withdrew its application in November 2006. A year later, the PGCB relaxed its requirements on amenities purchased and lowered the threshold to ten dollars.⁵²

Teamed with Isle of Capri which will build, operate and finance the Lady Luck Casino at Nemaocolin, Nemaocolin reapplied. Nemaocolin clearly fulfills the intent of the legislation to add a casino to an existing resort. Located in the Laurel Valley, Nemaocolin is one of the nation's premier resorts drawing patronage from around the nation. 60% of its 350,000 annual guests come from outside Pennsylvania to this five star resort. The cream of the crop from Washington, Maryland, Virginia, Ohio, New York and New Jersey come to this resort. Half the revenue is corporate meetings. Nemaocolin plans a \$50 million dollar upgrade to an existing 71,000 square foot facility to bring in 600 slots and 28 table games. Nemaocolin has not published a revenue number but their Local Impact Report indicates that they forecast revenues of over \$60 million, with approximately \$9.7 million from table games and \$51.9 million from slots. The development of this forecast is shown in Table 19. Revenues per Slot per day are \$237 and per Table Game per day \$950. During his presentation on September 9, 2010, Jeff Nobers of Nemaocolin claimed its Gross Gambling Revenues would be \$67.8 million. No explanation was given for this forecast.

Nemaocolin claims 97% of this revenue is new gambling revenue for Pennsylvania, and that only 3% is cannibalized from existing Pennsylvania Casinos. According to the applicant, Nemaocolin will attract 350,000 new visitors to the Laurel region with 30,000 of them staying overnight at the resort. According to the applicant, the resort is located 71 minutes from the Meadows in Washington PA (Google calculates the drive as 76 minutes.) As presented by the applicant, whereas Midwest communities have 63-90 gaming positions per 10,000 adults, the addition of Nemaocolin would bring Southwest PA to only 41. Nemaocolin accepts that it cannot compete for customers who live north and west closer to the Meadows and is targeting wealthy resort visitors, regional tourists, and locals to the south and east.⁵³

⁵⁰ Pennsylvania Gaming Control Board Report of the Financial Suitability Task Force for Category 3 Applicants Woodlands Fayette LLC. 2006

⁵¹ Pennsylvania Gaming Control Board Suitability Hearing, in Re: Woodlands Fayette, October 25, 2006, page 66-69,

⁵² Mike Wereschagin, "Nemaocolin Studies New Bud for Slots at Resort," *The Tribune Review*, April 22, 2009

⁵³ Nemaocolin Resort & Casino, Pennsylvania Gaming Control Board Public Input Hearing, September 8, 2010

Table 19 Nemaocolin Projections

<u>2012 Nemaocolin</u>			<u>Tables</u>	<u>Slots</u>	
State Gaming Fund & Property tax Relief	17,639,857	34%		51,881,932	
Fayette County	1,231,819				
Wharton Township	1,231,819				
Economic Development Fund	2,594,097	5%		51,881,940	
General Revenue Fund	1,359,260	14%	9,709,000		
Total Revenue					61,590,940
Units			28	600	
Revenue per Unit per day			\$ 950	\$ 237	54

In its prior application the PGCB Financial Suitability Task Force projected \$30 million for Nemaocolin. The addition of table games and reduction of entry fees should allow them to do better.

Mechanicsburg offers a stronger suburban urban market for a casino than Mason-Dixon. While some of their revenue would be cannibalized from Grantville, Mechanicsburg would expand gambling on the west side of the Susquehanna by offering a more convenient venue to Mechanicsburg residents as well as those in Carlisle, Shippensburg, Chambersburg and York. About 30,000 adults live within 15 minutes of Mason Dixon, but almost five times as many live that close to Mechanicsburg. The applicant presented a plan that entailed almost \$90 million in revenue. Much of this would come from the west bank of the Susquehanna as adults increase their participation and frequency due to a more convenient location. Even if half of this revenue was cannibalized, Mechanicsburg as a locals casino located in a suburban urban market would vastly exceed what could be done in rural Adams County.

9) Conclusion

Mason-Dixon is neither a resort nor an urban suburban casino. It will generate about 377,864, or half the predicted attendance and \$26.5 million in gross gambling revenue or 30% of Mason-Dixon's forecast. Most of its potential patrons will go to Penn National casinos in Grantville and Charles Town. 55% of the revenue will come from Adams County residents or existing tourists. The displacement of these funds will have a negative impact on local businesses. Pennsylvania has better alternatives. Although other applicants no doubt presented their best case for revenues, they at least presented it. As noted before, Mason-Dixon failed to present its market forecast during the public hearings.

Table 20 compares the four options. Undoubtedly, all of the applicants put forward optimistic scenarios. By far the most optimistic was Mason-Dixon, whose forecast none wanted to utter or defend.

⁵⁴ Local Impact Report, Nemaocolin Woodlands Resort & Spa, March 31, 2010, Page 2, Page 2 reported Slot Machine and Gaming Tax Revenue. Revenues were developed by applying the statutory tax rates to these items. Nemaocolin Resort & Casino, Pennsylvania Gaming Control Board Public Input Hearing, September 8, 2010

Although Mason-Dixon talked of tapping into the Maryland market, two thirds of its patrons are locals. The best chance to tap into out of state gamblers is with the resorts in Fernwood and Nemasolin.

Table 20 PGCB Options

<u>GGR \$ millions</u>	<u>Applicant</u>	<u>Realistic</u>		<u>% Out of State</u>	
		<u>Revenue</u>	<u>New</u>		
Mason-Dixon	\$ 83.1	\$ 26.5	33%		Rural region surrounded by casinos
Fernwood	\$ 86.1	\$ 53.0	81%		Resort tapping into New Jersey
Nemasolin	\$ 61.6	\$ 57.3	70%		5 Star Resort
Mechanicsburg	\$ 89.8	\$ 44.9	nil		Suburban Casino enhancing participation and frequency

At the Mason-Dixon Public Input Hearing on August 31, 2010, 18 community groups and 90 individuals spoke against the casino. Nine community groups and about three dozen individuals spoke for it, and approximately 90 others granted their proxies to procasino speakers. Fernwood had virtually unanimous support at its public input hearing. Nemasolin had the same from local residents and politicians. Opposition to Nemasolin came from the Meadows Las Vegas based casino owner Bill Paulos, and his allies who want to monopolize the market. It is hard to imagine that a significant portion of Nemasolin's wealthy resort guests want to take an hour drive to go to the Meadows. Mechanicsburg faced more opposition but it still fell well short of the controversy in Gettysburg. While there was support for a casino in all four locations, opposition was an order of magnitude greater in Gettysburg compared to any of the other locations.

Pennsylvania and the PGCB have more attractive and less contentious options than Gettysburg for a Resort Casino.

However, even if Gettysburg were the only applicant, would Pennsylvania actually consider placing a casino in this town to extract ten million in gaming taxes in a program that is raising a billion dollars? Would it rebrand Gettysburg for 1% more? Is that the legacy you wish to leave?

Appendix 1 Zip Codes

ZIP Code	County	State	Town	Average Time to Casino from Zip Code				Balti- more	M-D Territory		Adjustments		Adjusted Territory		
				2000 Pop	Mason Dixon	Charles Town	Grant- ville		30	30-60	Disady	Challenged	30	30-60	
17325	Adams	PA	Gettysburg	25,112	11	72.5	63.5	25,112	25,112	-	-	-	-	25,112	-
17320	Adams	PA	Fairfield	6,975	18	68.5	81.5	6,975	6,975	-	-	-	-	6,975	-
17340	Adams	PA	Littlestown	9,822	25	77.5	76	9,822	9,822	-	-	-	-	9,822	-
17372	Adams	PA	York Springs	3,373	27	83.5	49	3,373	3,373	-	-	-	-	3,373	-
17350	Adams	PA	New Oxford	12,111	27	83.5	64.5	12,111	12,111	-	-	-	-	12,111	-
17353	Adams	PA	Orrtanna	3,154	27	84.5	81	3,154	3,154	-	-	-	-	3,154	-
17344	Adams	PA	McSherrystown	3,311	29	86.5	75	3,311	3,311	-	-	-	-	3,311	-
17304	Adams	PA	Aspers	3,212	30	90.5	61.5	3,212	3,212	-	-	-	-	3,212	-
17307	Adams	PA	Biglerville	5,422	35	94	73	5,422	5,422	(5,422)	-	-	-	5,422	5,422
17316	Adams	PA	East Berlin	7,262	35	92	59.5	7,262	7,262	(7,262)	-	-	-	7,262	7,262
17301	Adams/York	PA	Abbotstown	3,396	31	88.5	66	3,396	79,754	(12,684)	-	-	-	67,070	16,080
17301	Adams/York	PA	Abbotstown	3,396	31	88.5	66	3,396	3,396	(3,396)	-	-	-	-	44,039
17331	York	PA	Hanover	44,039	36	-	74.5	44,039	15,404	-	(15,404)	-	-	-	44,039
17019	York	PA	Dillsburg	15,404	37	-	43	15,404	2,897	-	-	-	-	-	2,897
17364	York	PA	Thomasville	2,897	40	-	63.5	2,897	2,403	-	(2,403)	-	-	-	2,403
17365	York	PA	Wellsville	2,403	46	-	51	2,403	20,107	-	-	-	-	-	20,107
17408	York	PA	West York	20,107	47	-	56.5	20,107	2,071	-	-	-	-	-	2,071
17329	York	PA	Glennville	2,071	48	-	79	2,071	12,650	-	-	-	-	-	12,650
17362	York	PA	Spring Grove	12,650	49	-	67.5	12,650	22,664	-	-	-	-	-	22,664
17315	York	PA	Dover	22,664	55	-	51.5	22,664	17,307	-	(22,664)	-	-	-	17,307
17401	York	PA	York	17,307	55	-	51.5	17,307	28,253	-	(17,307)	-	-	-	28,253
17404	York	PA	York	28,253	55	-	47.5	28,253	35,979	-	(28,253)	-	-	-	35,979
17360	York	PA	Seven Valleys	4,801	58	-	65	4,801	203,774	(3,396)	(104,203)	-	-	81,764	
17403	York	PA	York	35,979	60	-	55	35,979	3,396	(3,396)	(17,807)	-	-	-	3,396
17324	Cumberland	PA	Gardners	4,297	36	97	56	4,297	4,297	-	-	-	-	4,297	4,297
17007	Cumberland	PA	Boiling Springs	5,114	45	102	45	5,114	5,114	-	(5,114)	-	-	-	-
17065	Cumberland	PA	Mt Holly	3,714	45	102	50.5	3,714	3,714	-	-	(3,714)	-	-	-
17257	Cumberland	PA	Shippensburg	23,164	53	82.5	57	23,164	23,164	-	(23,164)	-	-	-	-
17266	Cumberland	PA	Walnut Bottom	490	56	85.5	56.5	490	490	-	(490)	-	-	-	-
17015	Cumberland	PA	Carlisle	20,722	52	-	41	20,722	20,722	-	(20,722)	-	-	-	-
17013	Cumberland	PA	Carlisle	31,272	56	106	43	31,272	31,272	-	(31,272)	-	-	-	-
17241	Cumberland	PA	Newville	11,708	68	97.5	56	11,708	11,708	(11,708)	-	-	-	-	-
17055	Cumberland	PA	Mechanicsburg	32,764	44	-	32.5	32,764	100,481	(11,708)	(57,108)	-	(27,368)	-	4,297

Appendix 1 Zip Codes Continued

ZIP Code	County	State	Town	Average Time to Casino from Zip Code				2000 Pop.	Mason Dixon	Charles Town	Grantville	Baltimore	M-D Territory		Adjustments		Adjusted Territory	
				30	30-60	Distance	Challenged						30	30-60				
17214	Franklin	PA	Bluc Ridge Sum	22	67.5	984	22	67.5	984	984	984	8,972	8,972	8,972	8,972	8,972	8,972	
17222	Franklin	PA	Fayetteville	35	78	8,972	35	78	8,972	(8,972)	8,972	8,972	26,823	26,823	26,823	26,823	26,823	
17268	Franklin	PA	Waynesboro	36	69	26,823	36	69	26,823	(26,823)	26,823	26,823	1,122	1,122	1,122	1,122	1,122	
17237	Franklin	PA	Mont Alto	43		1,122	43		1,122		1,122	NA	NA	NA	NA	NA	NA	
17202	Franklin	PA	Chambersburg	49	67	NA	49	67	NA	NA	NA	48,244	48,244	48,244	48,244	48,244	48,244	
17201	Franklin	PA	Chambersburg	50	76.5	48,244	50	76.5	48,244		48,244	16,222	16,222	(16,222)	16,222	16,222	16,222	
17225	Franklin	PA	Greencastle	52	62	16,222	52	62	16,222		16,222	13	13	13	13	13	13	
17246	Franklin	PA	Pleasant Hall	56	86.5	13	56	86.5	13		13	3,433	3,433	3,433	3,433	3,433	3,433	
17252	Franklin	PA	St Thomas	57	82.5	3,433	57	82.5	3,433		3,433	2,590	2,590	2,590	2,590	2,590	2,590	
17244	Franklin	PA	Orrstown	57	88.5	2,590	57	88.5	2,590		2,590	36,779	36,779	(16,222)	36,779	36,779	36,779	
21787	Carroll	MD	Taneytown	22		8,981	22		8,981		8,981	8,981	8,981	8,981	8,981	8,981	8,981	
21757	Carroll	MD	Keymar	27		3,153	27		3,153		3,153	3,153	3,153	3,153	3,153	3,153	3,153	
21158	Carroll	MD	Westminster	37		18,443	37		18,443		18,443	18,443	18,443	18,443	18,443	18,443	18,443	
21157	Carroll	MD	Westminster	40		34,661	40		34,661		34,661	44	44	44	44	44	44	
21776	Carroll	MD	New Windsor	43		5,864	43		5,864		5,864	59	59	59	59	59	59	
21102	Carroll	MD	Manchester	56		9,329	56		9,329		9,329	57	57	57	57	57	57	
21727	Frederick	MD	Emmitsburg	10	57	5,649	10	57	5,649		5,649	5,649	5,649	5,649	5,649	5,649	5,649	
21778	Frederick	MD	Rocky Ridge	19	57	937	19	57	937		937	937	937	937	937	937	937	
21788	Frederick	MD	Thurmont	20	49.5	10,755	20	49.5	10,755		10,755	10,755	10,755	10,755	10,755	10,755	10,755	
21798	Frederick	MD	Woodshoro	32	48.5	1,888	32	48.5	1,888		1,888	(1,888)	(1,888)	(1,888)	(1,888)	(1,888)	(1,888)	
21702	Frederick	MD	Frederick	35	40	30,983	35	40	30,983		30,983	30,983	30,983	(30,983)	30,983	30,983	30,983	
21793	Frederick	MD	Walkersville	35	40	9,414	35	40	9,414		9,414	(9,414)	(9,414)	(9,414)	(9,414)	(9,414)	(9,414)	
21701	Frederick	MD	Frederick	38	39.5	32,042	38	39.5	32,042		32,042	32,042	32,042	(32,042)	32,042	32,042	32,042	
21791	Frederick	MD	Union Bridge	39	61	5,314	39	61	5,314		5,314	5,314	5,314	5,314	5,314	5,314	5,314	
21773	Frederick	MD	Myersville	45	44	4,830	45	44	4,830		4,830	4,830	4,830	4,830	4,830	4,830	4,830	
21770	Frederick	MD	Monrovia	52	47.5	5,375	52	47.5	5,375		5,375	5,375	5,375	5,375	5,375	5,375	5,375	
21767	Frederick	MD	Maugansville	52	51	1,057	52	51	1,057		1,057	(72,439)	(72,439)	(72,439)	(72,439)	(72,439)	(72,439)	
												59,626	59,626	(42,285)	59,626	59,626	59,626	
												12,134	12,134	24,307	12,134	12,134	12,134	
												8,981	8,981	24,307	8,981	8,981	8,981	
												5,649	5,649	24,307	5,649	5,649	5,649	
												937	937	24,307	937	937	937	
												10,755	10,755	24,307	10,755	10,755	10,755	
												1,888	1,888	24,307	1,888	1,888	1,888	
												30,983	30,983	24,307	30,983	30,983	30,983	
												9,414	9,414	24,307	9,414	9,414	9,414	
												32,042	32,042	24,307	32,042	32,042	32,042	
												5,314	5,314	24,307	5,314	5,314	5,314	
												4,830	4,830	24,307	4,830	4,830	4,830	
												5,375	5,375	24,307	5,375	5,375	5,375	
												1,057	1,057	24,307	1,057	1,057	1,057	
												17,341	17,341	24,307	17,341	17,341	17,341	
												7,202	7,202	24,307	7,202	7,202	7,202	

Appendix 1 Zip Codes Continued

ZIP Code	County	State	Town	Average Time to Casino from Zip Code					M-D Territory			Adjustments			Adjusted Territory			
				2000 Pop	Mason Dixon	Charles Town	Grant- ville	Balti- more	30	30-60	Distance	Disadv	Challenged	30	30-60			
																1,604	1,604	(1,604)
21780	Washington	MD	Sabillasville	25	61	61	1,604	1,604	(1,604)									
21719	Washington	MD		26	63	63	1,583	1,583	(1,583)									
21783	Washington	MD	Smithsburg	31	52.5	52.5	9,644	9,644										9,644
21742	Washington	MD	Hagerstown	45	53	53	23,566	23,566										
21740	Washington	MD	Hagerstown	52	44.5	44.5	56,314	56,314		(56,314)								
							92,711	92,711	(3,187)	(3,187)	(23,566)	3,187	3,187	(23,566)	3,187			9,644

Appendix 2 Drive Time By Route

ZIP Code	County	State	Town	Traffic Coming From																
				Google					Map Quest					Average						
				15 North	15 South	Emmits N	B-G	Emmits S	15 North	15 South	Emmits N	B-G	Emmits S	15 North	15 South	Emmits N	B-G	Emmits S		
17325	Adams	PA	Gettysburg	16	11	17	12	16.5	11.5											
17320	Adams	PA	Fairfield		19															
17340	Adams	PA	Littlestown	26		20	16	23.0	17.5											
17372	Adams	PA	York Springs	25	26	25	28	25.0	27.0											
17350	Adams	PA	New Oxford	27	28	26	28	26.5	28.0											
17353	Adams	PA	Orrtanna	37	27	32	27	34.5	27.0											
17344	Adams	PA	McSherrystown	28		29		28.5												
17304	Adams	PA	Aspers	31	30	39	29	35.0	29.5											
17307	Adams	PA	Biglerville	46	40	31	29	38.5	34.5											
17316	Adams	PA	East Berlin	37	37	33	36	35.0	36.5											
17301	Adams/York	PA	Abbotstown	30	30	32	32	31.0	31.0											
17301	Adams/York	PA	Abbotstown																	
17331	York	PA	Hanover	36				36.0												
17019	York	PA	Dillsburg	36	36	36	38	36.0	37.0											
17364	York	PA	Thomasville	38	39	35	38	36.5	38.5											
17365	York	PA	Wellsville	46	46	43	45	44.5	45.5											
17408	York	PA	West York	45	46	46	48	45.5	47.0											
17329	York	PA	Glennville	45		49		47.0												
17362	York	PA	Spring Grove	48	53	50	52	49.0	52.5											
17315	York	PA	Dover	55	55	50	53	52.5	54.0											
17401	York	PA	York	51	52	56	57	53.5	54.5											
17404	York	PA	York	57	57	52	54	54.5	55.5											
17360	York	PA	Seven Valleys	60	59	57	59	58.5	59.0											
17403	York	PA	York	59	61	61	63	60.0	62.0											
17324	Cumberland	PA	Gardners	38	34	39	38	38.5	36.0											
17007	Cumberland	PA	Boiling Springs	45	46	43	46	44.0	46.0											
17065	Cumberland	PA	Mt Holly	47	48	41	47	44.0	47.5											
17257	Cumberland	PA	Shippensburg	55	49	57	53	56.0	51.0											
17266	Cumberland	PA	Walnut Bottom	61	54	57	56	59.0	55.0											
17015	Cumberland	PA	Carlisle	53	53	51	54	52.0	53.5											
17013	Cumberland	PA	Carlisle	57	57	52	55	54.5	56.0											
17241	Cumberland	PA	Newville	70	70	65	69	67.5	69.5											
17055	Cumberland	PA	Mechanicsburg	40	41	42	45	41.0	43.0											

Appendix 2 Drive Time By Route continued

	Traffic Coming From																	
	Google						Map Quest						Average					
	15 North	15 South	Emmits N	B-G	Emmits S		15 North	15 South	Emmits N	B-G	Emmits S		15 North	15 South	Emmits N	B-G	Emmits S	
17214	Franklin	PA	Blue Ridge Sum															24.5
17222	Franklin	PA	Fayetteville	38	31	28	45	20	37	21		41.5	22.0	34.0				
17268	Franklin	PA	Waynesboro					33					35.5					
17237	Franklin	PA	Mont Alto	48	42	47	47	43	43			47.5	47.0	42.5				
17202	Franklin	PA	Chambersburg	54	48	49	49	45	45			51.5	46.5					
17201	Franklin	PA	Chambersburg	59	53		51	47	47			55.0	50.0					
17225	Franklin	PA	Greencastle		55			52					53.5					
17246	Franklin	PA	Pleasant Hall	62	55		61	56	56			61.5	55.5					
17252	Franklin	PA	St Thomas	63	56		61	57	57			62.0	56.5					
17244	Franklin	PA	Oristown	63	56		61	57	57			62.0	56.5					
21787	Carroll	MD	Taneytown			28		20	20			22.5	24.0					
21757	Carroll	MD	Keymar	31	31			25				28.0						
21158	Carroll	MD	Westminster		39			38	37			37.0	38.0					
21157	Carroll	MD	Westminster		45			40	40			41.0	42.5					
21776	Carroll	MD	New Windsor		43			42	41			42.5	43.0					
21102	Carroll	MD	Manchester	57	57			54				55.5						
21727	Frederick	MD	Emmitsburg	10	14			9	10			9.5	12.0					
21778	Frederick	MD	Rocky Ridge	18	23			19	20			18.5	21.5					
21788	Frederick	MD	Thurmont	22	24			19	20			20.5	22.0					
21798	Frederick	MD	Woodsboro	32	38			31	32			31.5	35.0					
21702	Frederick	MD	Frederick	33	38			36	37			34.5	37.5					
21793	Frederick	MD	Walkersville	36	41			33	34			34.5	37.5					
21701	Frederick	MD	Frederick	40	45			35	36			37.5	40.5					
21791	Frederick	MD	Union Bridge	40	43			38	38			39.0	40.5					
21773	Frederick	MD	Myersville	44	50			45	46			44.5	48.0					
21770	Frederick	MD	Monrovia	51	56			52	53			51.5	54.5					
21767	Frederick	MD	Maugansville	54	59			50	51			52.0	55.0					
21780	Washington	MD	Sabillasville	25	30			25	26			25.0	28.0					
21719	Washington	MD	Washington	26	31			26	27			26.0	29.0					
21783	Washington	MD	Smithsburg	27	32			34	35			30.5	33.5					
21742	Washington	MD	Hagerstown	44	49			45	46			44.5	47.5					
21740	Washington	MD	Hagerstown	50	55			54	55			52.0	55.0					

Appendix 3 Patrons Per Route Mason Dixon Forecast Continued

Mason Dixon Forecast																			
ZIP Code	County	State	Town	2000 Pop	2014 Adult / 2000 Pop	Zone 1			Zone 2										
						15 North	15 North or Emmitsburg	Emmitsburg North	15 South or B-G	15 North	15 North or Emmitsburg	Emmitsburg North	15 South or B-G						
17214	Franklin	PA	Blue Ridge Sum	984	89%														
17222	Franklin	PA	Fayetteville	8,972	89%			21,501	2,358										
17268	Franklin	PA	Waymsthoro	26,823	89%				64,279										
17237	Franklin	PA	Mont Alto	1,122	89%														
17202	Franklin	PA	Chambersburg	NA	89%														
17201	Franklin	PA	Chambersburg	48,244	89%														
17225	Franklin	PA	Greencastle	16,222	89%														
17246	Franklin	PA	Pleasant Hill	13	89%														
17252	Franklin	PA	St Thomas	3,433	89%														
17244	Franklin	PA	Orrstown	2,590	89%			21,501	66,637										
21787	Carroll	MD	Tanycytown	8,981	85%														
21757	Carroll	MD	Kcymar	3,153	85%														
21158	Carroll	MD	Westminster	18,443	85%														
21157	Carroll	MD	Westminster	34,661	85%														
21776	Carroll	MD	New Windsor	5,864	85%														
21727	Frederick	MD	Emmitsburg	5,649	90%														
21778	Frederick	MD	Rocky Ridge	937	90%														
21788	Frederick	MD	Thurmont	10,755	90%														
21798	Frederick	MD	Woodboro	1,888	90%														
21702	Frederick	MD	Frederick	30,983	90%														
21793	Frederick	MD	Walkersville	9,414	90%														
21701	Frederick	MD	Frederick	32,042	90%														
21791	Frederick	MD	Union Bridge	5,314	90%														
21780	Washington	MD	Sabillasville	1,604	86%														
21719	Washington	MD	Smithsburg	1,583	86%														
21783	Washington	MD	Hagerstown	23,566	86%														
21742	Washington	MD	Hagerstown	56,314	86%														
21740	Washington	MD	Hagerstown																

Appendix 4 Patrons Per Route Adjusted Forecast

ZIP Code	County	State	Town	2000 Pop	2014 Adult / 2000 Pop	Adjusted Forecast														
						Zone 1					Zone 2									
						15 North	15 North of Emmittsburg	Emmittsburg North	15 South or B-G	15 North	15 North of Emmittsburg	Emmittsburg North	15 South or B-G	15 North	15 North of Emmittsburg	Emmittsburg North	15 South or B-G			
17325	Adams	PA	Gettysburg	25,112	84%	-	-	57,138	-	-	-	-	-	-	-	-	-	-	-	-
17320	Adams	PA	Fairfield	6,975	84%	-	-	-	-	-	15,871	-	-	-	-	-	-	-	-	-
17340	Adams	PA	Littlestown	9,822	84%	22,348	-	-	-	-	-	-	-	-	-	-	-	-	-	
17372	Adams	PA	York Springs	3,373	84%	-	7,675	-	-	-	-	-	-	-	-	-	-	-	-	
17350	Adams	PA	New Oxford	12,111	84%	-	27,557	-	-	-	-	-	-	-	-	-	-	-	-	
17353	Adams	PA	Ortanna	3,154	84%	-	-	7,176	-	-	-	-	-	-	-	-	-	-	-	
17344	Adams	PA	McSherrystown	3,311	84%	7,534	-	-	-	-	-	-	-	-	-	-	-	-	-	
17304	Adams	PA	Aspers	3,712	84%	-	-	7,308	-	-	-	-	-	-	-	-	-	-	-	
17307	Adams	PA	Biglerville	5,422	84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17316	Adams	PA	East Berlin	7,262	84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17301	Adams/York	PA	Abbotstown	3,386	84%	29,882	35,231	71,623	15,871	1,431	1,431	3,060	3,060	2,285	2,285	-	-	-	-	
17301	Adams/York	PA	Abbotstown	3,396	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17331	York	PA	Hanover	44,039	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17019	York	PA	Dillsburg	15,404	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17364	York	PA	Thomasville	2,897	85%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17365	York	PA	Wellsville	2,403	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17408	York	PA	West York	20,107	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17329	York	PA	Glenville	2,071	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17362	York	PA	Spring Grove	12,650	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17315	York	PA	Dover	22,664	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17401	York	PA	York	17,307	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17404	York	PA	York	28,253	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17360	York	PA	Seven Valleys	4,801	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17403	York	PA	York	35,979	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17324	Cumberland	PA	Gardners	4,297	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17007	Cumberland	PA	Boiling Springs	5,114	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17065	Cumberland	PA	Mt Holly	3,714	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17257	Cumberland	PA	Shippensburg	23,164	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17266	Cumberland	PA	Walnut Bottom	490	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17015	Cumberland	PA	Carlisle	20,722	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17013	Cumberland	PA	Carlisle	31,272	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17241	Cumberland	PA	Newville	11,708	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17055	Cumberland	PA	Mechanicsburg	32,764	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Appendix 4 Patrons Per Route Adjusted Forecast Continued

ZIP Code	County	State	Town	2000 Pop	2014 Adult /2000 Pop.	Adjusted Forecast									
						Zone 1			Zone 2						
						15 North Emmitsburg	15 North or Emmitsburg	Emmitsburg North	15 South or B-G	15 North Emmitsburg	15 North or Emmitsburg	Emmitsburg North	15 South or B-G		
17214	Franklin	PA	Blue Ridge Sum	984	89%				2,358						
17222	Franklin	PA	Fayetteville	8,972	89%							3,982			
17268	Franklin	PA	Waynesboro	26,823	89%									11,903	
17237	Franklin	PA	Mont Alto	1,122	89%							498			
17202	Franklin	PA	Chambersburg	NA	89%										
17201	Franklin	PA	Chambersburg	48,244	89%							21,410			
17225	Franklin	PA	Greencastle	16,222	89%										
17246	Franklin	PA	Pleasant Hill	13	89%										6
17252	Franklin	PA	St Thomas	3,433	89%							1,523			
17244	Franklin	PA	Orrstown	2,590	89%							1,149			
									2,358			28,568			11,903
21787	Carroll	MD	Taneytown	8,981	85%										
21757	Carroll	MD	Keymar	3,153	85%				7,207		20,530				7,807
21158	Carroll	MD	Westminster	18,443	85%										
21157	Carroll	MD	Westminster	34,661	85%										2,482
21776	Carroll	MD	New Windsor	5,864	85%				7,207		20,530				10,289
21727	Frederick	MD	Emmitsburg	5,619	90%										
21778	Frederick	MD	Rocky Ridge	937	90%				13,760						
21788	Frederick	MD	Thurmont	10,755	90%				2,282						
21798	Frederick	MD	Woodboro	1,888	90%				26,197						852
21702	Frederick	MD	Frederick	30,983	90%										
21793	Frederick	MD	Walkersville	9,414	90%										
21701	Frederick	MD	Frederick	32,042	90%										
21791	Frederick	MD	Union Bridge	5,314	90%				42,240		#				2,397
															3,249
21780	Washington	MD	Sabillasville	1,604	86%										
21719	Washington	MD		1,583	86%				3,714						
21783	Washington	MD	Smithsburg	9,614	86%				3,665						4,135
21742	Washington	MD	Hagerstown	23,566	86%										
21740	Washington	MD	Hagerstown	56,314	86%										
									7,379		#				4,135

Appendix 5 PennDOT Letter

OS-2 (10-08)



pennsylvania
DEPARTMENT OF TRANSPORTATION
www.dot.state.pa.us

March 19, 2010

RECEIVED

MAR 24 2010

TRG

Daniel J. Thornton, P. E.
Transportation Resource Group, Inc.
204 North George Street
Suite 110
York, PA 17401-1108

Adams Co.-Cumberland Twp.
Emmitsburg Rd. (SR 3001)/(Bus 15), Seg.: 0080
Mason-Dixon Resort & Casino
Scope of Study

Dear Mr. Thornton:

We have received your letter regarding the locations you have chosen to study for the proposed development at the subject location.

We concur with the locations you have chosen. However, you may need to modify the scope of traffic impact study to include all intersections where the proposed development is projected to generate 100 or more new trips during the peak hour. Scope must include the driveway(s) for possible turn lanes.

If you have any further questions regarding this matter, please contact Eric Kinard of the District Traffic Unit at 717-787-9237.

Very truly yours,

for: Tucker Ferguson, P. E.
District Executive

CHT/sab
(chr03191)

cc: Office of Planning & Zoning, Cumberland Township

Appendix 3 Patrons Per Route Mason Dixon Forecast

ZIP Code	County	State	Town	2000 Pop	2014 Adult /2000 Pop	Zone 1				Zone 2					
						15 North	15 North or Emmitsburg	15 South or B-G	15 South	15 North	15 North or Emmitsburg	15 South	15 South or B-G		
						Emmitsburg	North	Emmitsburg	North	Emmitsburg	North	Emmitsburg	North		
17325	Adams	PA	Gertysburg	25,112	84%	-	57,138	-	-	-	-	-	-	-	-
17320	Adams	PA	Fairfield	6,975	84%	-	-	-	15,871	-	-	-	-	-	-
17340	Adams	PA	Littletown	9,822	84%	22,348	-	-	-	-	-	-	-	-	-
17372	Adams	PA	York Springs	3,373	84%	-	7,675	-	-	-	-	-	-	-	-
17350	Adams	PA	New Oxford	12,111	84%	-	27,557	-	-	-	-	-	-	-	-
17353	Adams	PA	Ortanna	3,154	84%	7,534	-	-	7,176	-	-	-	-	-	-
17344	Adams	PA	McSherrystown	3,311	84%	-	-	-	7,308	-	-	-	-	-	-
17304	Adams	PA	Aspers	3,212	84%	-	-	-	12,337	-	-	-	-	-	-
17307	Adams	PA	Biglerville	5,422	84%	-	-	-	-	-	-	-	-	-	-
17316	Adams	PA	East Berlin	7,262	84%	-	16,524	-	-	-	-	-	-	-	-
17301	Adams/York	PA	Abbststown	3,396	84%	-	-	29,882	83,960	51,755	15,871	-	-	-	-
17301	Adams/York	PA	Abbststown	3,396	86%	7,903	-	-	-	-	18,981	-	-	-	-
17331	York	PA	Hanover	44,039	86%	-	-	-	-	-	-	-	-	-	-
17019	York	PA	Dillsburg	15,404	86%	-	-	-	-	-	-	-	-	-	-
17364	York	PA	Thomasville	2,897	86%	-	-	-	-	-	-	-	-	-	-
17365	York	PA	Wellsville	2,403	86%	-	-	-	-	-	-	-	-	-	-
17408	York	PA	West York	20,107	86%	-	-	-	-	-	-	-	-	-	-
17329	York	PA	Glenville	2,071	86%	-	-	-	-	-	893	-	-	-	-
17362	York	PA	Spring Grove	12,650	86%	-	-	-	-	-	-	-	-	-	-
17315	York	PA	Dover	22,664	86%	-	-	-	-	-	-	-	-	-	-
17401	York	PA	York	17,307	86%	-	-	-	-	-	-	-	-	-	-
17404	York	PA	York	28,253	86%	-	-	-	-	-	-	-	-	-	-
17403	York	PA	York	35,979	86%	-	-	7,903	-	-	19,874	-	-	-	-
17324	Cumberland	PA	Gardners	4,297	80%	-	-	-	-	-	-	-	-	1,711	-
17007	Cumberland	PA	Bolling Springs	5,114	80%	-	-	-	-	-	-	-	2,037	-	-
17065	Cumberland	PA	Mt Holly	3,714	80%	-	-	-	-	-	1,479	-	-	-	-
17257	Cumberland	PA	Shippensburg	23,164	80%	-	-	-	-	-	-	-	-	9,226	-
17266	Cumberland	PA	Walnut Bottom	490	80%	-	-	-	-	-	-	-	-	195	-
17015	Cumberland	PA	Carlisle	20,722	80%	-	-	-	-	-	-	-	-	8,253	-
17013	Cumberland	PA	Carlisle	31,272	80%	-	-	-	-	-	-	-	-	12,455	-
17241	Cumberland	PA	Newville	11,708	80%	-	-	-	-	-	1,479	-	-	4,663	-
									83,960	51,755	15,871			27,409	11,133

Appendix 3 Patrons Per Route Mason Dixon Forecast Continued

Mason Dixon Forecast														
ZIP Code	County	State	Town	2000 Pop.	2014 Adult / 2000 Pop.	Zone 1			Zone 2					
						15 North	15 North or Emmitsburg	Emmitsburg North	15 South or B-G	15 North Emmitsburg	Emmitsburg North	15 South or B-G		
17214	Franklin	PA	Blue Ridge Sum	984	89%			21,501	2,358					
17222	Franklin	PA	Fayetteville	8,972	89%									
17268	Franklin	PA	Waynesboro	26,823	89%				64,279					
17237	Franklin	PA	Mont Alto	1,122	89%								498	
17202	Franklin	PA	Chambersburg	NA	89%									
17201	Franklin	PA	Chambersburg	48,244	89%									
17225	Franklin	PA	Greencastle	16,222	89%								7,199	
17246	Franklin	PA	Pleasant Hall	13	89%								6	
17252	Franklin	PA	St Thomas	3,433	89%								1,523	
17244	Franklin	PA	Oristown	2,590	89%								1,149	
								21,501	66,637				24,586	7,199
21787	Carroll	MD	Taneytown	8,981	85%									
21757	Carroll	MD	Keymar	3,153	85%					20,530				
21158	Carroll	MD	Westminster	18,443	85%					7,207				7,807
21157	Carroll	MD	Westminster	34,661	85%									2,482
21776	Carroll	MD	New Windsor	5,864	85%					7,207				10,289
21727	Frederick	MD	Emmitsburg	5,649	90%									
21778	Frederick	MD	Rocky Ridge	937	90%					13,760				
21788	Frederick	MD	Thurmont	10,755	90%					2,282				
21798	Frederick	MD	Woodboro	1,888	90%					26,197				
21702	Frederick	MD	Frederick	30,983	90%					4,599				
21793	Frederick	MD	Walkersville	9,414	90%					75,469				
21701	Frederick	MD	Frederick	32,042	90%					22,931				14,453
21791	Frederick	MD	Union Bridge	5,314	90%									2,397
										145,238				16,850
21780	Washington	MD	Sabillasville	1,604	86%									688
21719	Washington	MD		1,583	86%									679
21783	Washington	MD	Smithsburg	9,644	86%									4,135
21742	Washington	MD	Hagerstown	23,566	86%									10,104
21740	Washington	MD	Hagerstown	56,314	86%									24,144
														39,749

Appendix 4 Patrons Per Route Adjusted Forecast

ZIP Code	County	State	Town	2000 Pop	2014 Adult / 2000 Pop	Adjusted Forecast															
						Zone 1					Zone 2										
						15 North	15 North or Emmitsburg	Emmitsburg North	15 South or B-G	15 North	15 North or Emmitsburg	Emmitsburg North	15 South or B-G	15 North	15 North or Emmitsburg	Emmitsburg North	15 South or B-G				
17325	Adams	PA	Gettysburg	25,112	84%	-	-	57,138	-	-	-	-	-	-	-	-	-	-	-	-	
17320	Adams	PA	Fairfield	6,975	84%	-	-	-	-	15,871	-	-	-	-	-	-	-	-	-	-	
17340	Adams	PA	Littlestown	9,822	84%	22,348	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17372	Adams	PA	York Springs	3,373	84%	-	7,675	-	-	-	-	-	-	-	-	-	-	-	-	-	
17350	Adams	PA	New Oxford	12,111	84%	-	27,557	-	-	-	-	-	-	-	-	-	-	-	-	-	
17353	Adams	PA	Orrtanna	3,154	84%	-	-	7,176	-	-	-	-	-	-	-	-	-	-	-	-	
17344	Adams	PA	McSherrystown	3,311	84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17304	Adams	PA	Aspers	3,212	84%	-	7,534	-	-	-	-	-	-	-	-	-	-	-	-	2,285	
17307	Adams	PA	Biglerville	5,422	84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17316	Adams	PA	East Berlin	7,262	84%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17301	Adams/York	PA	Abbotstown	3,396	84%	29,882	35,231	71,623	-	15,871	-	-	1,431	1,431	3,060	3,060	-	-	-	2,285	
17301	Adams/York	PA	Abbotstown	3,396	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17331	York	PA	Hanover	44,039	86%	-	-	-	-	-	-	-	-	18,981	-	-	-	-	-	-	-
17019	York	PA	Dillsburg	15,404	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17364	York	PA	Thomasville	2,897	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,249
17365	York	PA	Wellsville	2,403	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17408	York	PA	West York	20,107	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,666
17329	York	PA	Glenville	2,071	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	893
17362	York	PA	Spring Grove	12,650	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,452
17315	York	PA	Dover	22,664	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17401	York	PA	York	17,307	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17404	York	PA	York	28,253	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17360	York	PA	Seven Valleys	4,801	86%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17403	York	PA	York	35,979	86%	-	-	-	-	-	-	-	-	18,981	16,260	-	-	-	-	-	-
17324	Cumberland	PA	Gardners	4,297	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,711
17007	Cumberland	PA	Boiling Springs	5,114	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17065	Cumberland	PA	Mt Holly	3,714	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17257	Cumberland	PA	Shippensburg	23,164	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17266	Cumberland	PA	Walnut Bottom	490	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17015	Cumberland	PA	Carlisle	20,722	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17013	Cumberland	PA	Carlisle	31,272	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17241	Cumberland	PA	Newville	11,708	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17055	Cumberland	PA	Mechanicsburg	32,764	80%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,711

Appendix 4 Patrons Per Route Adjusted Forecast Continued

Adjusted Forecast												
Zone 1												
ZIP Code	County	State	Town	2000 Pop	2014 Adult /2000 Pop.	15 North		15 South or B-G		15 North or B-G		15 South or B-G
						Emmitsburg	North	Emmitsburg	North	Emmitsburg	North	
17214	Franklin	PA	Blun Ridge Sum	984	89%			2,358				
17222	Franklin	PA	Fayetteville	8,972	89%					3,982		
17268	Franklin	PA	Waynesboro	26,823	89%						11,903	
17237	Franklin	PA	Mont Alto	1,122	89%					498		
17202	Franklin	PA	Chambersburg	NA	89%							
17201	Franklin	PA	Chambersburg	48,244	89%					21,410		
17225	Franklin	PA	Greencastle	16,222	89%							
17246	Franklin	PA	Pleasant Hill	13	89%					6		
17252	Franklin	PA	St Thomas	3,433	89%					1,523		
17244	Franklin	PA	Orrstown	2,590	89%			2,358		28,568	11,903	
21787	Carroll	MD	Taneytown	8,981	85%				20,530			
21757	Carroll	MD	Keymar	3,153	85%			7,207				7,807
21158	Carroll	MD	Westminster	18,443	85%							
21157	Carroll	MD	Westminster	34,661	85%							2,482
21776	Carroll	MD	New Windsor	5,864	85%			7,207	20,530			10,289
21727	Frederick	MD	Emmitsburg	5,649	90%			13,760				
21778	Frederick	MD	Rocky Ridge	937	90%			2,282				
21788	Frederick	MD	Thurmont	10,755	90%			26,197				852
21798	Frederick	MD	Woodboro	1,888	90%							
21702	Frederick	MD	Frederick	30,983	90%							
21793	Frederick	MD	Walkersville	9,414	90%							
21701	Frederick	MD	Frederick	32,042	90%							
21791	Frederick	MD	Union Bridge	5,314	90%			42,240	#			2,397
												3,249
21780	Washington	MD	Sabillasville	1,604	86%			3,714				
21719	Washington	MD	Washington	1,583	86%			3,665				
21783	Washington	MD	Smithsburg	9,644	86%							4,135
21742	Washington	MD	Hagerstown	23,566	86%							
21740	Washington	MD	Hagerstown	56,314	86%			7,379	#			4,135

Appendix 5 PennDOT Letter

OS-2 (10-08)



pennsylvania
DEPARTMENT OF TRANSPORTATION
www.dot.state.pa.us

March 19, 2010

RECEIVED

MAR 24 2010

TRG

Daniel J. Thornton, P. E.
Transportation Resource Group, Inc.
204 North George Street
Suite 110
York, PA 17401-1108

Adams Co.-Cumberland Twp.
Emmitsburg Rd. (SR 3001)/(Bus 15), Seg.: 0080
Mason-Dixon Resort & Casino
Scope of Study

Dear Mr. Thornton:

We have received your letter regarding the locations you have chosen to study for the proposed development at the subject location.

We concur with the locations you have chosen. However, you may need to modify the scope of traffic impact study to include all intersections where the proposed development is projected to generate 100 or more new trips during the peak hour. Scope must include the driveway(s) for possible turn lanes.

If you have any further questions regarding this matter, please contact Eric Kinard of the District Traffic Unit at 717-787-9237.

Very truly yours,

for: Tucker Ferguson, P. E.
District Executive

CHT/sab
(eh0319)

cc: Office of Planning & Zoning, Cumberland Township

Sept 16, 2010

Chairman Gregory C. Fajt
Pennsylvania Gaming Control Board

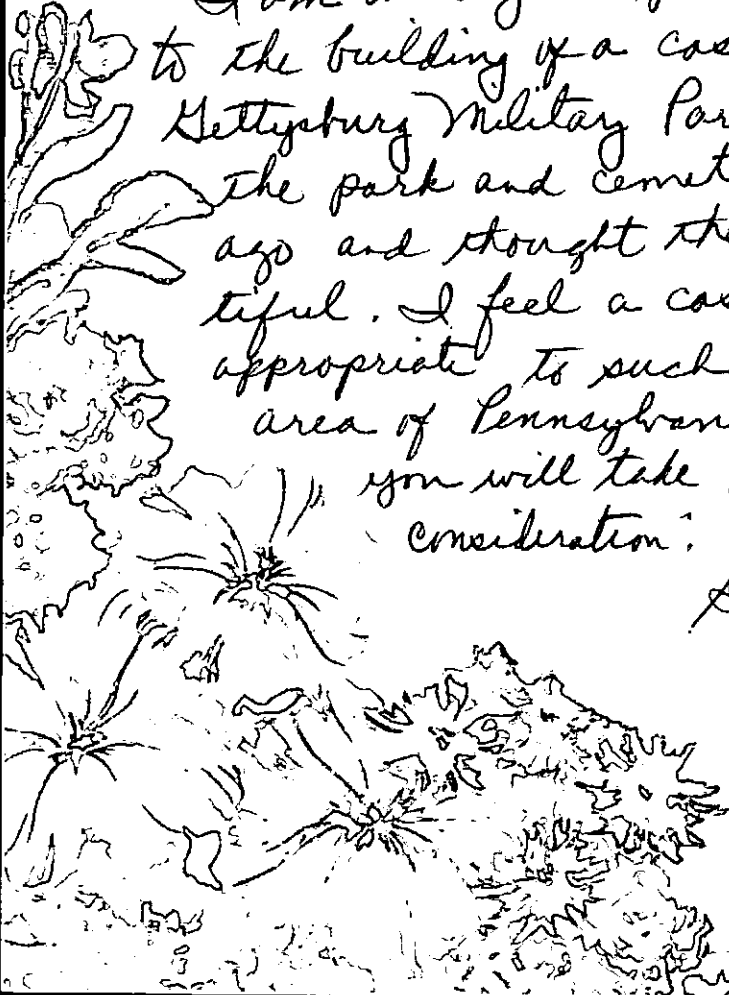
Sir:
years ago my family
visited Gettysburg and were
so impressed with the site.
It disturbs me to hear about
a Casino being built close
to this site. I implore you
to cancel this plan if you
have influence for the
building of the proposed Casino.

Sincerely,

Jean M. Bohmbach

Sept. 13, 2010

Gregory C. Fajt, Chairman
Penn. Gaming Control Board
Dear Sir,



I am writing to express my opposition to the building of a casino near the Gettysburg Military Park. I visited the park and cemetery a few years ago and thought the area beautiful. I feel a casino is not appropriate to such a revered area of Pennsylvania. I hope you will take my view into consideration.

Sincerely,
Dorci K. Poane

Dear Sir.

I am against the building of the Casino in Gettysburg, I come to your town to get away from Casinos, your town is very Rustic and has a lot of History there...A Casino would only take all of that and Ruin it ...Besides Gettysburg does not need another Casino built in PA. there are Enough of them in NJ. and PA for people to go and gamble....!

Why Ruin a Great area and Down grade your Town...with the Low life Elements of life. the scum bags, Hookers, Crime elements....would drive people away! The area would become a pool of CRIME! MY Vote is NO CASINO IN GETTYSBURG!


J.R. Piergross



Two votes for
NO Casino

Teresa K Tracy

Leola Tracy

Donald L. McCanta

August 19, 2010

PENNSYLVANIA GAMING CONTROL BOARD
P.O. Box 69060
HARRISBURG, PA 17106-9060

DEAR SIR:

I LEARNED TODAY THAT YOUR BOARD IS SERIOUSLY CONSIDERING GRANTING PERMISSION TO ALLOW THE CONSTRUCTION OF THE BUILDING OF A GAMBLING CASINO NEAR THE GETTYSBURG NATIONAL MILITARY PARK. I AM MOST DEEPLY OFFENDED BY THIS, AS THE GETTYSBURG NATIONAL MILITARY PARK IS THE MOST SACRED GROUND IN THE UNITED STATES.

PLEASE DO NOT ALLOW THE CONSTRUCTION OF A GAMBLING CASINO THAT WILL VESECRATE THE MEMORIES OF ALL THE SOLDIERS WHO DIED AT THE BATTLE OF GETTYSBURG.

I AM

SINCERELY YOURS,

Donald L. McCanta

Gentlemen & Ladies:

I am a citizen of the United States,
a resident of California and a
senior citizen ^{of history} and participant
of the U.S. Civil War. I have visited
the Gettysburg battle ground, walked
its circumference and soaked-in its
history. It is the best preserved
battle field from that great defining
struggle. It is hallowed ground
and needs to be preserved for
future generations without the

distracting negative influence of a
gambling casino sited within close
proximity. I implore the Pennsylvania
Gaming Control Board to vote against
and to otherwise disallow the siting
of a gaming casino anywhere near
this historic town.

Thank you for your consideration
in this matter.

Sincerely,

Robert M. Hausen

Gentlefolk

Please consider the effects of allowing "gambling" at the entrance to the Gettysburg National Park. If you permit it to take place there, why not allow it to the opportunity to take place at the end of the drive to the National Civil War Museum in Harrisburg! It's the same difference.

Respectfully Submitted

Al Stone



Mr. Al Stone

To Whom It may Concern:

I am a NY resident who recently visited Gettysburg PA for 4th of July. It is such a beautiful, historic town and it would be a shame to put a casino 1/2 mile outside of town. There are many places to locate a casino it should not be where men died fighting for our country! Keep Gettysburg historic, traditional, honorable, family oriented, and most of all respectful towards those that passed. It is one of the most historic places in the US. Please keep it that way. Find ~~some~~ land outside the immediate area. You will still get people 20 miles away and still create jobs but please keep it out of Gettysburg's backyard! Preserve our history for the men that fought and for our future to see and learn!

Thank you,
Patricia Stanko-Madigno



July 18th 2010

To whom it may concern:

I am writing this letter to ask you to reject the proposed casino at the Eisenhower Inn located 1/2 mile south of the GNMP.

As a frequent visitor to Gettysburg and a member of various preservation groups; I'm concerned that this casino will forever change the bucolic, family friendly nature of Gettysburg.

I don't believe it is a symbiotic business model for the area, and strongly feel it dishonors the memory of the men who fought in the Battle of Gettysburg.

I respect that for many, this is a local issue. However, I feel Gettysburg is a truly unique town in America and our collective heritage.

- PLEASE SAY NO TO THE CASINO -

Sincerely
Matthew Loewenstein

MATTHEW LOEWENSTEIN



Ms. Margaret E. Ramirez

I strongly oppose a Casino
Any where near the Gettysburg
Battlefield.

People come to see this
"Hallowed Ground" of our
brave Civil War warriors and
to pay tribute. Please find
another site. Margaret Ramirez

May 2010

Pennsylvania Gaming Control Board

Please - once again - no casino! Gettysburg is so important, it draws us back every year to stand on Little Round Top and look out over the fields below and then off to the raise of land on the horizon. My ancestor saw this view and I want it for my grandchildren as well. Nothing matches this experience and the sense of wonder & awe of what took place there. Save it for those who treasure history.

Marie Cialf



Mr. John M. Eldt

PA Gaming Control Board,

I am writing asking you NOT
to put a casino any where near the
Gettysburg National Park. This is not
a local issue, it is a national issue.

As an ex-Pennsylvania resident
who has descendants who fought and
were killed at Gettysburg, I have
very strong feelings about this.

Pennsylvania is a large-enough
state to have many other sites to choose
from. Please do not disgrace this
national park.

Sincerely,
Barbara J. Schwartz



Mrs. Schwartz

Shawn J. Riley

06-12-2010

Umeå, Sweden

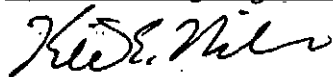
RE: Casinos in Gettysburg

I am on sabbatical leave in Sweden, but felt compelled to write when I learned that proposals have resurfaced for placement of casinos in Gettysburg, PA - again!

If I have learned one thing while travelling throughout Europe it is how important it is to conserve our heritage. And, that means conserving the esthetic appeal - restoration of our past - without the glitz of current race to get richer. Economic sustainability is only achieved through thoughtful development. Casinos, violate places such as Gettysburg with the ephemeral desires of today. What would Lincoln think?

Please, no Casinos - anywhere near Gettysburg!

From: Keith Miller



To: Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-9060

Re: Mason-Dixon Casino False Advertising

Date: October 13, 2010

Mason-Dixon has promoted its proposed casino with false advertising. Such practices raise two questions: 1) is the alleged local support based on an understanding of reality? and 2) if Mason-Dixon and its supporters have blatantly misrepresented Mason-Dixon's case, will Mason-Dixon be a suitable operator of a casino which must balance a desire to produce a profit and taxes with the need to protect the public from addictive gambling behavior? Below are just three examples of false promotion by Mason-Dixon and its promoters. These examples are not exhaustive.

- 1) Casino Proximity to Gettysburg National Military Park
- 2) False Advertising of Benefits
- 3) Claims by ProCasinoAdamsCounty that Coca-Cola supports the proposed Mason-Dixon casino

Casino Proximity to Gettysburg National Military Park

From its inception, Mason-Dixon has obfuscated and falsely promoted its location in relation to the Gettysburg National Military park. Mason-Dixon's predecessor, Crossroads, was denied a license due, in part, to proximity to the battlefield. Mason-Dixon has repeatedly tried to deceive the public with respect to its proximity to the Gettysburg National Military Park. Its website makes no mention of the proximity and implies it is further from the battlefield than Crossroads. These misrepresentations resulted in Governor Ed Rendell being misled into believing the proposed Mason-Dixon site was less objectionable than the prior Crossroads location. The governor has since recanted. In surveying Adams County for Mason-Dixon, Terry Madonna, not wanting to include negative information in the survey omitted to mention the proposed casino locations proximity to the GNMP. Such deceptions raise questions as to the integrity of the applicant.

As precedent for an acceptable distance for a casino to be located from the Gettysburg National Military Park, one can look to Crossroads' prior claims. In 2006, David LeVan and Crossroads labored to show that their proposal for a Category 2 license was distant from the battlefield. On December 13, 2006, Mr. LeVan testified during Crossroads Suitability Hearing,

"Now, much has been made of our location to the Gettysburg National Military Park. And as you take a look at this map we have provided [Figure 4], please keep in mind these important facts. Crossroads is not located in the Borough of Gettysburg or on the park. It would be located on land near the intersection of Routes 15 and 30 in Straban Township and just across the street from the new Gateway Gettysburg 100-acre complex.

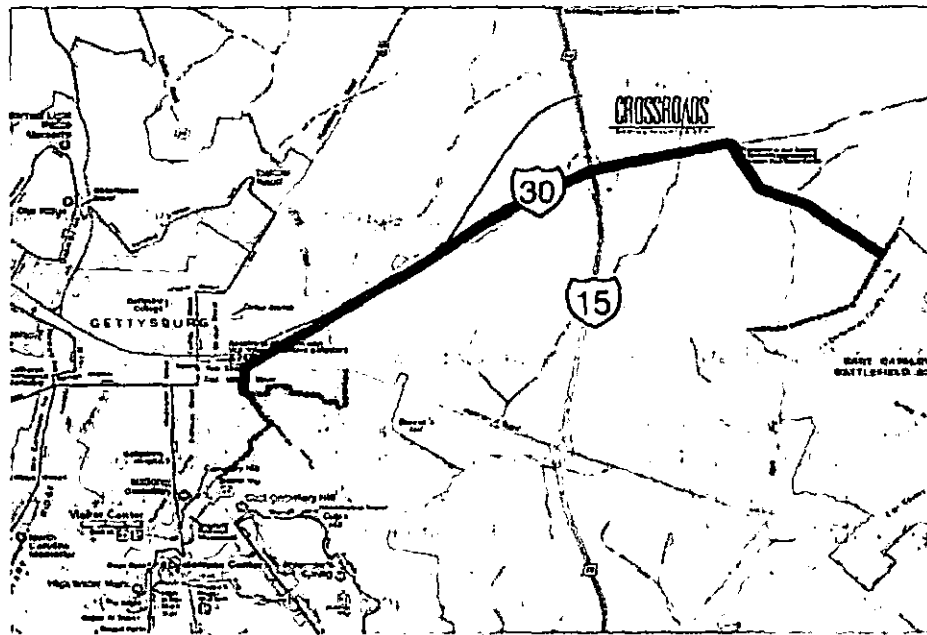
Crossroads is not located on land that has been designated historic. Crossroads will be situated several miles from the most visited parts of the park. And Crossroads is not visible from any point in the park, including its highest points, Cobb's Hill [Culps Hill] and the Round tops.

Our project is, in fact several miles away and not visible from the battlefield."¹

Figure 4

Outstanding Location

- Several miles from the main Battlefield and not visible from any point on the Battlefield
- Not designated as historical land



¹ Testimony of David LeVan,, Pennsylvania Gaming Control Board Suitability Hearings in Re: Crossroads Gaming Resort & Spa, December 13, 2006, page 20-21 and 94

² Crossroads Presentation to the Pennsylvania Gaming Control Board December 13, 2006 Page 10

Although the PGCB accepted Mr. LeVan's claims on these issues, it found that the proposed location, within 2 ½ miles of the battlefield, was a contributing factor to their decision to reject the Crossroads' application. As described in its, "Adjudication of the Pennsylvania Gaming Control Board in the Matters of the Applications for Category 2 Slot Machine Licenses in a Revenue or Tourism Enhanced Location," the Pennsylvania Gaming Control Board found:

- 1) "The [Crossroads] site was situated several miles east of Gettysburg, Pennsylvania."
- 2) "The [Crossroads] property is located approximately 2.5 miles from the historical Gettysburg battlefield and is not visible from the battlefield itself," and
- 3) " We note particularly the opposition to the Crossroads proposal in Gettysburg. During the public input hearings in April and May, 2006 community group representatives and individual members of the community testified overwhelmingly in opposition to the project. Opposition was strongest in relation to the proximity of the casino to the historic Gettysburg battlefield areas and the effect the casino would have on the traditionally rural nature of the community. Section 1102 (10) of the Act instructs that 'the public interest of the citizens of the Commonwealth and social effect of gaming shall be taken into consideration in any decisions or order made.' While the Board duly noted and considered the degree and proportion of public opposition, the Board's decision was not based solely on this factor."³

Mason-Dixon portrays that it has found a better location in the Eisenhower Hotel, explaining that it is two miles from the Maryland border. At no point do they explain that it is but a half mile from the boundary of the Gettysburg National Military Park or that it is located astride the Emmitsburg Road, a critical artery to the battle. Mason-Dixon's misrepresentation of the location tricked even Governor Ed Rendell into saying that the proposed Mason-Dixon location was an acceptable and better site than the Crossroads location.

The last time around, Governor Rendell came out against the proposed casino. During a September 15, 2005 television appearance on PCN, Governor Ed Rendell explained, "if it were my decision, I wouldn't want it [a casino] anywhere close to the historic area of Gettysburg." Subsequent to this, the Governor repeated his opposition to the proposed Gettysburg Casino.⁴

When news that LeVan was pursuing a Category 3 license leaked out last November he gave an interview to the Hanover *Evening Sun*, claiming the proposed Mason-Dixon casino would "is further away from the border of the battlefield than the Crossroads place."

Question: "What is attractive about this new location?"

Answer: "It is distinctly away from the downtown. It is distinctly away from the battlefield. And it is not visible if you drive by it. Other than the signage that you would see out on the frontage of the old Emmitsburg Road, you could drive by there and not be aware that this facility would be there."

³ Pennsylvania Gaming Control Board, "Adjudication of the Pennsylvania Gaming Control Board in the Matters of the Applications for Category 2 Slot Machine Licenses in a Revenue or Tourism Enhanced Location," February 2, 2007, page 42, 81, & 109-110

⁴ Tim Prudente, "Rendell: 'Wrong place for a casino'" *The Evening Sun*, September 18, 2010; Rinker Buck, "The Second Battle of Gettysburg At the Edge of Lincoln's 'Hallowed Ground,' A New Fight Rages -- Not Over Slavery, But Slot Machines., *Hartford Courant*, January 22, 2006; CWPT, "LeVan, Chance Enterprises, Losing Debate Over Slots Parlor at Gettysburg." 3/2/2006;

Question: How do [you] apply lessons learned from your previous proposal to this project?

Answer: "It is six miles - five-plus miles - from downtown Gettysburg. It is further away from the border of the battlefield than the Crossroads place. It's an existing facility compared to the Crossroads place. We think it meets all the necessary tests from what we learned the last time around."⁵

Reporting on LeVan's claims, the Hanover *Evening Sun* contradicted LeVan and noted: "The Eisenhower Center is about 0.8 of a mile by road from the southern boundary of the battlefield, 2.9 miles from the Peach Orchard and 5.3 miles from the center of town. By comparison, LeVan's original site on Route 30 was 1.3 miles from East Cavalry Field and 2.4 miles from Lincoln Square."⁶

Figures 1, 2 & 3 show screenshots taken October 5 & 6, 2010 explaining Mason-Dixon's location relative to the battlefield:

Figure 1



Figure 1 of the website Mason-Dixon explains:

⁵ "Dave LeVan answers questions on gaming resort proposal" *The Evening Sun*, November 25, 2009;

⁶ Erin James, "Casino Proposal Renews Debate," *The Evening Sun*, December 1, 2009

⁷ Mason-Dixon Website screenshot taken 10/5/2010 <http://www.masondixongaming.com/faq.html>

“People have spoken loud and clear that gaming doesn’t belong near the battlefield. That’s why we’ve put together a project that will sit only about 2 miles from Maryland. We want to be isolated from Gettysburg, and this location achieves that. But it still allows southern Adams County residents to benefit from the jobs and millions in revenue generated by gaming.”

Figure 2. shows a description of the location of the proposed Mason-Dixon casino at the Eisenhower Hotel. Nowhere on this map does one see the location of the GNMP

Figure 2



Figure 3. shows a portion of a letter from David LeVan which reads in part,

“People spoke loud and clear that the previous project was too big and too close to Gettysburg, and I didn’t forget.

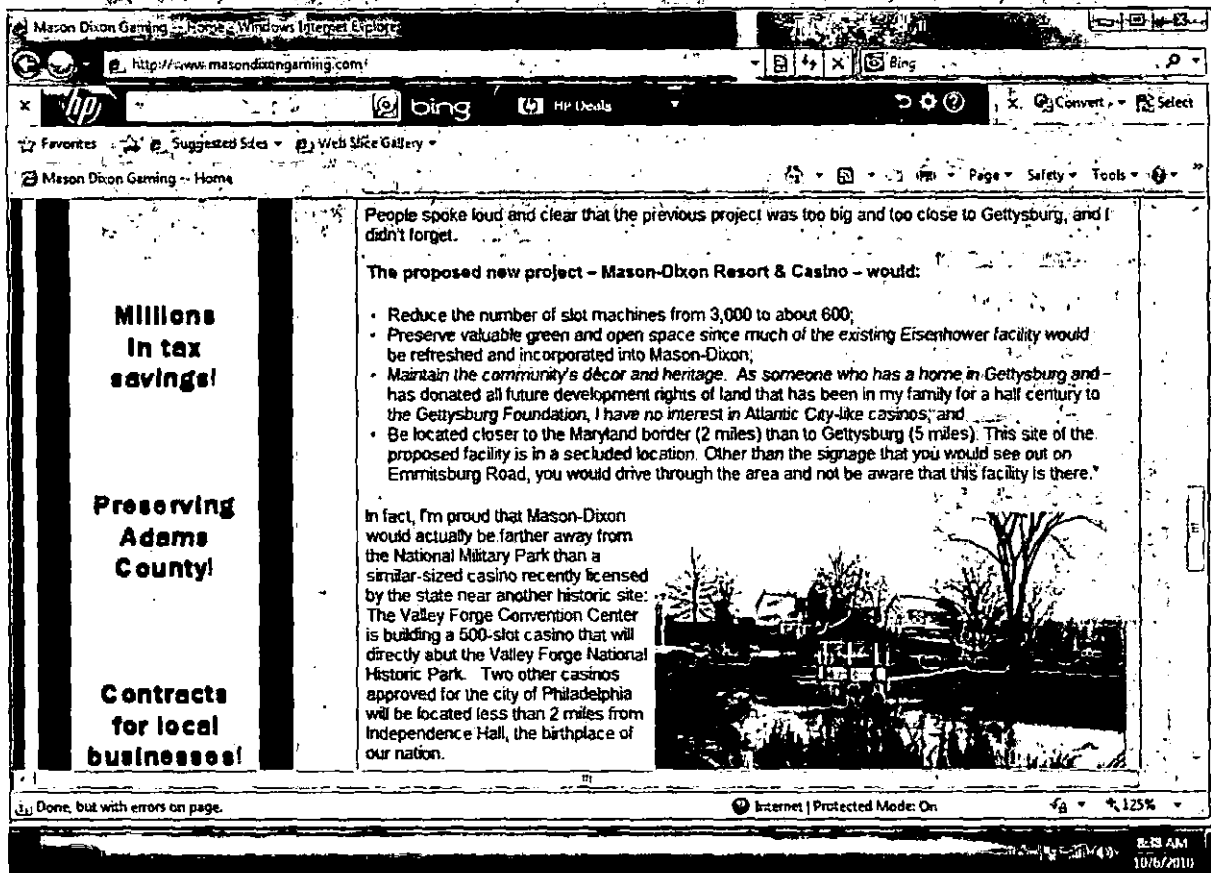
⁸ Mason-Dixon website screenshot taken 10/6/2010 <http://www.masondixongaming.com/>

The proposed new project – Mason-Dixon Resort & Casino – would:

- Be located closer to the Maryland border (2 miles) than to Gettysburg (5 miles). This site of the proposed facility is in a secluded location. Other than the signage that you would see out on Emmitsburg Road, you would drive through the area and not be aware that this facility is there.

In fact, I'm proud that Mason-Dixon would actually be farther away from the National Military Park than a similar-sized casino recently licensed by the state near another historic site: The Valley Forge Convention Center is building a 500-slot casino that will directly abut the Valley Forge National Historic Park. Two other casinos approved for the city of Philadelphia will be located less than 2 miles from Independence Hall, the birthplace of our nation.

Figure 3



⁹ Mason-Dixon website, Screenshot taken 10/6/2010, <http://www.masondixongaming.com/>

On Friday morning March 5, 2010; Governor Ed Rendell came to the Gettysburg Hotel to present his plan to lower the state's sale tax rate from 6 to 4 percent and remove exemptions on 74 goods and services to less than 20 local business owners and community leaders. The question on many people's minds was, what did he think of the proposed casino, since he had opposed Dave LeVan, his friend's 2005 Crossroads proposal. According to the Gettysburg Times, Rendell told the audience,

the proposed Mason Dixon Resort & Casino in Cumberland Township is 'much better' ... because it is 'located farther from Gettysburg and closer to Maryland.'"

'If I were the decision maker, this proposal is better and less objectionable than the last one. ... When the first proposal came out, I said it was too close to the battlefield and too close to our heritage tourism.'

'But I am told this new location is much closer to the Maryland border .. and that would make it less objectionable.'¹⁰

Tim Stonesifer reported for the Evening Sun, the Governor saying,

Rendell said a move south a toward Maryland and away from the battlefield - as well as putting the casino in a pre-existing structure - makes more sense than the previous plan.

"Moving this farther out of town is a good thing," he said, "And while I'm not sure it totally cures my objections, it does mitigate them."

Rendell opposed LeVan's effort in 2005, saying on a call-in program on the Pennsylvania Cable Network, "I wouldn't want a casino two blocks from the Liberty Bell in Philadelphia and if it were my decision, I wouldn't want it anywhere close to the historic area of Gettysburg."¹¹

Dan Siderio had gone to the Gettysburg Hotel hoping to find the Governor and ask the same question. Mr. Siderio arrived as Rendell was concluding an interview with Channel 27 News. When the Governor was done and approached Mr. Siderio, who was standing in the aisle, Dan asked him what he thought of the proposed casino. Rendell said "it's ten miles away." Dan informed him, "it is not ten miles away, it is five miles from the town of Gettysburg, and about half-mile from the Battlefield." The Governor replied "It is?", to which Dan affirmed, "yes it is."¹²

At the conclusion of the conference, the Governor gave an hour-long interview to Pitzer, in which he was again asked about the casino.

SCOT PITZER: "In 2005, there was a proposal to build a gaming facility in Adams County. Now, there is a license available that will probably be applied for by a local businessman. It could generate a lot of dollars in our economically strapped county, but there has been opposition, saying that it doesn't belong five miles from Gettysburg. How would you feel about a gaming facility in Adams County?"

¹⁰ Scot Pitzer, "Governor Talks Taxes and Casino" *The Gettysburg Times*, March 6, 2010

¹¹ Tim Stonesifer "Gov. softens casino opposition," *The Evening Sun*, March 5, 2010

¹² Email from Dan Siderio to Keith Miller, October 7, 2010

GOVERNOR RENDELL: "I said when the proposal first came out (in 2005), I said it was too close to the battlefield and too close to our heritage tourism. But I am told that this new location is much closer to the Maryland border...and that would make it less objectionable. Again it's not my decision, it's the Gaming Control Board, and I do not correspond with them...deliberately. Under the law, it's their decision. If I were the decision-maker, this proposal is better and less objectionable than the last one. And you should know, for the record, that David LeVan was a heavy supporter of mine when I ran for Governor. I haven't taken any money from him since, because he's a potential gaming applicant. But he was a heavy supporter of mine. I'm friends with him."¹³

Subsequent articles by Mr. Pitzer would repeat the Governor's statements "that the Mason-Dixon project is 'less objectionable' than the Crossroads proposal, because it is closer to Maryland and farther away from Gettysburg."¹⁴

In reporting the story of the Governor's visit, Tim Stonesifer, asked No Casino Gettysburg's leader Susan Paddock for comment. Her answers caused Mr. Stonesifer to do a little more research as to the Governor's apparent misunderstanding of the casino's proposed location. *The Evening Sun* reporter wrote:

No Casino Gettysburg chairwoman Susan Star Paddock said she felt the governor was misinformed about the proposed new casino location, which is actually closer to the center of the battlefield than LeVan's previous project.

"In the past the governor said he wouldn't want a casino within a mile from the park, and now this is a half-mile," Paddock said. "I would hope if he knew exactly where the new casino was going, he would probably rethink his statement."

Measurements taken by *The Evening Sun* show the Eisenhower Hotel and Conference Center lies 0.8 miles south of the park boundary and is 2.9 miles from the Peach Orchard, roughly the center of the battlefield. The previous location north of town was about 1.3 miles from East Cavalry Field and 4.8 miles from the Peach Orchard.

During a call to clarify Rendell's position, press secretary Gary Tuma said Rendell finds the new site "less objectionable" because it's proposed to go in an existing structure, and because it's farther south and nearer to Maryland than the previous site along Route 30.

Rendell was not speaking about the two sites' absolute distance from the battlefield, Tuma said.¹⁵

On March 16, 2010, Mason-Dixon proudly proclaimed that a February 21-March 5 survey performed by Terry Madonna Opinion Research proved that 62% of Adams County support the proposed casino. But

¹³ Scot Pitzer, "Rendell talks about casino, budget, health care and future plans during Gettysburg visit," *The Gettysburg Times*, March 5, 2010.

¹⁴ Scot Pitzer "Casino Application arrives in Harrisburg," *The Gettysburg Times*, April 8, 2010

¹⁵ Tim Stonesifer "Gov. softens casino opposition," *The Evening Sun*, March 5, 2010

the results were cast in doubt by the order of the questions, their nature, and the exclusion of critical information with respect to the proximity of the Eisenhower Hotel to the Gettysburg National Military Park. Specifically respondents were asked:

5. In 2006 there was a proposal to build a new casino in Straban Township, Adams County that would have included 5,000 slot machines. Did you favor or oppose the construction of this casino or don't you recall this proposal? Is that strongly or somewhat [favored / opposed]?

- Strongly favor
- Somewhat favor
- Somewhat oppose
- Strongly oppose
- Don't know

6. What is the main reason you [favored / opposed] the 2006 proposal?

FAVORED

- Bring jobs, employment to the area
- Provides tax relief, keeps taxes down
- Keeps money in the state

OPPOSED

- Against it for moral reasons
- Hurt the community, increase crime
- Increases traffic

7. There is currently a proposal to open a resort casino in Cumberland Township at the existing Eisenhower Hotel and Conference Center. This limited casino would have 600 slot machines and 50 table games. Have you heard, read or seen anything about this proposed Casino, or not?

- Yes
- No
- Don't know

8. What have you heard?

- General information – what, when, where
- There is a lot of controversy
- Will bring money to the area
- It is a done deal, already scheduled to open
- Will bring jobs to the area
- Will harm, destroy the area, the landmarks, the history
- Other

Don't know

9. Would you favor or oppose opening a limited casino the Eisenhower Hotel and Conference Center in Cumberland Township? Is that strongly or somewhat [favor / oppose]?

Strongly favor

Somewhat favor

Somewhat oppose

Strongly oppose

Don't know

Do you think that opening a casino at the Eisenhower Hotel and Conference Center in Cumberland Township will...

10. increase crime Yes No Don't Know

11. increase traffic Yes No Don't Know

12. create jobs Yes No Don't Know

13. Hurt other local businesses Yes No Don't Know

14. Harm the historic character of Gettysburg National Park Yes No Don't Know¹⁶

As reported in the *Hanover Evening Sun*, Peter Miller, President of the American Association of Public Opinion Research commented ...

The order of two questions asked early in the poll may have influenced the results.

Before residents were asked if they favored the casino proposal, he pointed out, the poll informed respondents of a previous casino proposal which was to include 5,000 slot machines in Straban Township. Those taking the poll were also told the current proposal called for a "limited casino" with only 600 slot machines and 50 table games.

"Order is very important and people could be favoring the proposal because they're thinking it's smaller and a more limited venture than the earlier one," he said. "They could be answering one question in the context of another."

Melvin Kulbicki, a political science professor at York College also said he would not have included the information regarding the number of slot machines and table games.

"You're predisposing them to a certain answer," commented Auden Thomas, the director of the Center for Survey Research at Penn State-Harrisburg.¹⁷

Both Miller and Kulbicki believed Madonna had included positive information concerning the proposed casino that would predispose respondents to view the current proposal as more favorable than the prior casino proposal. In a March 18, 2010 interview on the Bob Durgin Radio show, Mr. Madonna insisted he

¹⁶ Mason-Dixon, "Poll Shows Overwhelming Adams County Support for Gaming, Mason-Dixon Resort Casino, March 26, 2010.

¹⁷ Tim Prudente, Bias Complaints Plague Casino Poll" *The Hanover Evening Sun*, March 18, 2010

had excluded all information in his survey that was either positive or negative. This included information concerning the location of the proposed casino relative to the Gettysburg National Military Park. Mr. Durgin was never satisfied with the answer. The below transcript includes many incomplete sentences.

Durgin: Well good afternoon everybody, how the heck are you? What a gorgeous day, huh? 540-0580 WHP that is the talk line number. Now political analyst and pollster Terry Madonna joins me here, right Terry. How are you?

Madonna: I am great Bob, how about yourself?

Durgin: Good, good, good. Yesterday, I interviewed, I mean this, ahh, this Gettysburg casino question is getting to be as hot this time around as it was a few years ago. You took a poll on behalf of LeVan right?

Madonna: Mason-Dixon correct. Mason-Dixon the organization that wants to put the casino in the Eisenhower Hotel, yep, that's correct.

Durgin: Now, you reported that nearly two thirds of Adams County residents support the casino near Gettysburg. However, Susan Star Paddock, who I interviewed yesterday, she heads the group NoCasinoGettysburg, she called the poll inherently flawed and purposely designed to lead respondents to the desired result. Now, you've got the floor.

Madonna: Thank You. First of all, let me begin by saying after doing polls for twenty years on all sorts of subjects, my professional judgment is that the people in Adams county support, at this moment, with what they know about the proposal the limited casino to be placed in the Eisenhower Hotel and Conference Center. And, I want to qualify this. Not only do the residents of Adams County as a whole, but one of the things that happened yesterday was there was a continual reference to the fact that we did not interview people who lived in the region where the casino would be located in the Eisenhower Hotel and Conference Center area in Cumberland Township or Gettysburg. That is patently false. I want to make that very clear. One third of the interviews that we did were completed in the zip code which includes Gettysburg as well as Cumberland Township. What we found, and it was surprising to me, the view of the people who live there within a very few miles of the Eisenhower Hotel, and the views of the rest of the citizens in Adams County were almost identical. So I want to put that to rest. There was this reference throughout this conversation to the did not interview people who lived in and around the hotel. They did not interview people who live in Gettysburg proper in and around the battlefield. That is patently false.

Now, let's go to the next point that's worth mentioning. Another big issue had to do with the fact that we didn't indicate the location of the Eisenhower Hotel to the Gettysburg Battlefield, and you had extensive discussion about this. Now look the Eisenhower Hotel, Bob, is not a Motel 6. It is a 300 room convention center that's been around for decades -- for decades. The people who live within three or four or five miles, know where it's located. Know how close it is to the battlefield. Do you

think that the residents of Dauphin County don't know where the Hilton Hotel is, or in York that they don't know where the Yorktown Inn is, or where I live they don't know where the Host is?

Durgin: Yah but the reason this is controversial, this whole casino thing is controversial, is because of the National Park, not some (Madonna tries to break in) ... well let me finish ... not some hotel. So, I was asking the question, why has LeVan or whatever the hell is name is, and the Mason-Dixon people, and in your poll, why is the National Park never mentioned when the casino would be just about only one half mile from the National Park border.

Madonna: Well first of all that's not correct. That's not correct. We asked people in this poll in question 14; before we got into any message testing, "Do you think the opening of a casino at the Eisenhower Hotel and Conference Center in Cumberland Township will harm the historic character of the Gettysburg National Park?" Now now,

Durgin: Yah but the people weren't told, the people weren't told that the casino was going to be only half a mile from the National Park border.

Madonna: Bob, do you think that the people in Dauphin County don't know how close City Island is to the Hilton downtown? Now that's unreasonable. Of course people who live within three or four miles, know where one of the largest convention centers in the area is located in relationship to the National Park. I mean that's that's unreasonable. We didn't ask people in New York or Maryland, we asked people who are in the community, right in the community. In and around the park and the hotel and Gettysburg proper. Now you can't make that assumption, that's not credible. What do you think they don't know where that place is? Of course they do.

Durgin: Well I can make any assumption I want. I still have a question. Why was the National Park ignored?

Madonna: I just told you. It wasn't ignored.

Durgin: Well it was ignored in the fact that, and maybe it's because I'm not familiar with the area down there, and like you say all the people in Adams County know where this hotel is, but the point is, the point is, the hotel isn't the controversy, the National Park is.

Madonna: We asked the question of the people who live in and around the casino the hotel complex and the park. I can't do anything more than that. They know where it is. Now it's unreasonable to assume I've been on that road in the past when I've gone to Gettysburg. I don't even live there. I don't even live in the community.

Durgin: Why do you think that Governor (Madonna interrupts)

Madonna: I want to get through these things. Look that is a reasonable explanation for any of us to conclude that someone would have a reasonable understanding of the

proximity of the hotel to the battlefield when they live in the community. Now
(Durgin interrupts)

Durgin: I can accept that. But, but, but, the National Park is what the controversy is, not that hotel. Why didn't you use the proximity to the National Park border instead of that hotel? I don't understand that.

Madonna: Hold on, hold on. We asked people, we asked people, if putting the casino at the Eisenhower Hotel, you got that, if putting it there, would harm the historic character of Gettysburg National Military Park. We have linked the two together -- inextricably -- not separate -- linked together. Hotel, here it is, Cumberland Township, Gettysburg National Park. If you live in that zip code, you know exactly where we are, and what we are talking about. As even one of your callers, an anti-casino folk yesterday indicated. People know that, and we link them together, and, and 64% of the people said it would not harm the park. Now look I am giving you my professional judgment. We can argue over (Durgin interrupts)

Durgin: Ok, I've got something else here for you. Apparently Governor Ed Rendell on more than one occasion, indicated that he thought the casino was ten miles away from Gettysburg and much closer to the Maryland border. Well he was mistaken. (Madonna interrupts) Well let me finish. Mr. LeVan or somebody with Mason-Dixon said that their slots and table games parlor would be much smaller than their '06 proposal, and it would be in an existing building, and would be farther from town and closer to the Maryland border, again never mentioning the National Park and the fact that it might be farther from town, but it'll be right next door, less than half a mile from the National Park border. Why didn't the guy say that? Why don't they want to talk about the National Park? Why don't they want to talk about the proximity of the National Park? Why? Why do you think that is?

Madonna: Bob, I don't have a clue. Let me just answer the question. I was asked to do this survey of the residents of Adams County and the people who lived around. I have no idea about what Governor Rendell said or why he said it. I have no clue. You're going to have to ask those people who want to put the casino in the Eisenhower Hotel. My job with you today is to talk about this survey, and what the people in Adams County think. I have already told you in my humble professional judgment, the people of the county right now, including the people in and around the park, the Gettysburg Borough, and Cumberland Township, as it stands now support the idea of putting a limited casino in the Eisenhower Hotel. (Durgin interrupts)

Durgin: Ok. But I have questions about, I'm sorry but, Terry, I have questions about this poll. What I want to know is, why didn't you ask the question, something to the effect that, you did ask the question, do you support the locating of the casino near this hotel, or whatever the hell it is, why didn't you ask them if they, the same question, asking them if they support the casino being approximately one half mile from the National Park border? Why didn't you ask that question?

Madonna: Bob, we are going over, we didn't supply people with positive or negative information period. We didn't help them, up through question nine, where that

question appears, in terms of their formulating their responses. We asked all neutral, we didn't indicate, we wanted to know, what they knew and what they thought. It (Durgin interrupts)

Durgin: Well why didn't you tell them? You didn't give them all the information then.

Madonna: No.

Durgin: You didn't give them, you didn't say that the casino would be located about one half mile from the National Park border.

Madonna: You are beating a dead horse. You don't

Durgin: Ok fine. I gotta take a break. Take a breath. We'll be right back.

Durgin: Terry did you get a opportunity to say everything you wanted to?

Madonna: No, no. We don't agree on that. I think that the evidence is clear that people who live in the area would certainly know the proximity, just as the people in any area within a three or four mile radius would know a big hotel and a battlefield, but let's move on to the next one.

.....

Durgin: We've got Dan here. Dan your on WHP, with Terry Madonna. Go ahead Dan.

Caller (Dan Siderio): How you doing Bob?

Durgin: Ok.

Caller: I have a question for Mr. Madonna, and then I would like to make a comment. I heard you ask Mr. Madonna in the last five or ten minutes, three or four times, why the location of the casino was not told to the people that were polled as far as its proximity to the battlefield, and he has answered, that people in that area know where that Eisenhower Inn is, and they don't have to be told. Well I've lived here twenty years, and I know a great many people that don't know, have any idea where the Eisenhower Inn was. Now if we don't know, and we live here, how about people five, ten, fifteen, twenty miles away, who've never heard of the Eisenhower Inn, have no idea where it is, but they weren't told during the poll, it's about half a mile away from the casino, and they could base their answers on that information. Why weren't they given that information if they live outside of the Gettysburg area? That's my question for Mr. Madonna.

Madonna: Well the answer is, we just don't agree with it. We didn't supply information positive or negative about it. We assumed, and you have a point of view on it, I don't agree with your point of view, but (Siderio interrupts)

Caller: Well that's information they need to make an intelligent decision.

Madonna: Well (laughing) I think people understand and know where the Eisenhower center is, because you don't that's fine. Someone else can do a poll and they can point out its proximity and see what that happens to the result. I, I just ahh, we, when we designed it we were not going to supply positive or negative. We just literally asked people what they knew (Durgin interrupts)

Durgin: Well, excuse me just a minute here, are you saying Terry, that if you had mentioned the proximity of the National Park in your question that would be a negative?

Madonna: No. I don't know. We just decided, no, we didn't supply any additional information at all. We didn't try to help or hinder or provide a (Durgin interrupting)

Durgin: Ok, well I accept that, but what's that got to do with not mentioning the National Park?

Madonna: But Bob, we did. The point I am trying to make is that we did ask the question about the National Park. I mean we did ask people, we did mention the Eisenhower center and we did ask about, we did tell 'em about the Park, so, the Park in relationship to the casino. We said, would it harm the character? We can go down this road all we want, but the question was asked the way it is (Durgin interrupting)

Durgin: Yah, well the people of Mason-Dixon (Madonna talking over Durgin)

Madonna: I don't think it would have materially changed people's opinion about it. Look (Durgin interrupts)

Durgin: We don't know that though, do we?

Madonna: Let me make one other point. You can go into Gettysburg on Route 30, and find a ton of commercial and retail activity. All sorts of things. And you can go down, Route 15 between Gettysburg and the exit to get to Eisenhower Hotel, and you find all kinds of retail and commercial establishments. So the fact of the matter is, that, all reasonably close to the battlefield, so I could make the assumption that Gettysburg is already inundated with all sorts of commercial and retail and consumer activities, from ahh from ahh, you know. (Durgin interrupts)

Durgin: I'm lost. I don't know why your'e (Madonna interrupts)

Madonna: Why are you lost. It's an analogy. You're talking about preserving the quality of the battlefield. You have all kinds of retail and commercial activity within a mile and a mile and half of the battlefield. Do you not? So what's (Durgin interrupts)

Durgin: So what's the point?

Madonna: Well the point is, so you have a casino in a conference center (Siderio interrupts)

Caller: Can I break in and ask what happened to my question, about the people five, ten, fifteen, twenty miles away, that have no idea where the Eisenhower Inn is in relationship to the battlefield and were not told.

Madonna: Ok. Here's your answer to your question. The people who live near the battlefield and the hotel; had the same view of whether to put the casino in the hotel half a mile from the battlefield, as the people who live in Adams County as a whole. Now I will repeat that. The people who live within the area code 17325 have the same view of whether to put the casino in the hotel close to the battlefield as the people who live fifteen or twenty miles away. (Durgin interrupting)

Durgin: Hold on Dan.

Caller: But they weren't told.

Durgin: Dan, hold on, hold on.

Madonna: They had the same view.

Caller: Not the same information?

Madonna: Well if anything they would have been maybe more supportive, if that is your point. Cause the further we get away, they would have been more supportive because it's not in their back yard.

Durgin: Terry, I want to go back to the statement, apparently issued by somebody within the Mason-Dixon group. Again, saying that the proposed casino would offer slots and table games and would be much smaller than their proposal in '06, and it would be an existing building, and would be further from town and closer to the Maryland border. What a tortured statement that is? They don't want to talk about the National Park. The National Park is the whole reason for the controversy and they don't want to talk about it. They don't want to remind everybody that it's going to be a half mile away from the National Park border. This is incredible. That's why Governor Rendell thought it was ten miles down the road closer to the Maryland border, hell I thought the same thing.

Madonna: Well, you're going to have to ask them that. (Siderio interrupting)

Caller: Bob, can I read my comment so I can get off. I just have a comment I want to read to try and emphasize the importance of the casino being so close to the battlefield.

On February first of 2007, the Pennsylvania Gaming Control Board issued a 114 page report on the reasons that the Gettysburg casino application was denied. One of the top three reasons was proximity to the battlefield. That is how important that that issue was to the Gaming Board. So Mr. Madonna how could you possibly conduct, what you claim was a scientific fair and unbiased poll, without informing the people being polled of the exact location of a casino in relation to the battlefield.

Madonna: Bob, I've answered this question.

Caller: No you haven't answered that question.

Madonna: I've answered the question ten times. The people who live in and around the battlefield and the hotel are well aware of the proximity. Look, look, you and I can disagree on that, and and that's fine, but that's the answer.¹⁸

...

Consistent with the website, Mason-Dixon's survey failed to disclose the proximity of the Gettysburg National Military Park to the proposed casino at the Eisenhower Hotel. As indicated above, Mr. Madonna excluded negative information he might have been prejudicial to the respondents answer. Further although he claims the questions were worded in a neutral manner, Messrs Miller and Kulbicki, suggest they were designed to provide a positive response.

Finally it is worth noting that Mr. Madonna repeatedly referred to the Eisenhower as a Hotel, never as a resort. This is because the Eisenhower Hotel and Conference Center is not a resort.

On April 29, Susan Paddock, Bill Schneider, Dan and Jean Siderio, Greg Baran, Joyce Wentz, Stephanie Mendenhall and I met with the Governor's Chief of Staff Steve Crawford and Deputy Chief of Staff Steve Niley at the Governor's office to explain the casino location and why this was a worse deal than the last time. The discussion covered topics from how the site was marginal from a revenue potential to how it presented risks to the existing family- oriented heritage tourism industry. The Governor's staff were surprised about the proposed site's proximity to the GNMP, and said they would share the information with the governor.

On September 16, 2010, Dan Siderio succeeded in getting through to the Governor during the PCN Call-in show. With Mason-Dixon's and Dave Levan's deceptions about the location made known to the Governor, he came out strongly against the casino. Here is the text of that encounter:

Dan Siderio:

Governor Rendell, I'd like to ask you a question about the casino that was proposed near the town of Gettysburg and the battlefield in 2006. (Governor looking down scratching his left eye with left finger). At that time the casino was a mile and a quarter from the battlefield, and the Pennsylvania Gaming Control Board denied the license and one of the reasons they gave was it was too close to the battlefield. You made a statement in 2006, that you were opposed to this casino because you said it was too close to a historic site and now another casino is proposed in Gettysburg a half mile from the battlefield and newspaper editorials all over the nation have condemned this location, including three in the past few months from the Philadelphia Inquirer your old home town, and the National Commander of the American Legion which is the largest veterans' organization in the country

PCN interrupts:

caller can you get to your point.

¹⁸ Thursday, March 18, 2010, Bob Durgin Show, Terry Madonna Prof at Franklin & Marshal discusses Survey of putting a Casino in Gettysburg. <http://www.whp580.com/podcast/bobdurgin.xml>

Dan Siderio

has called a casino near Gettysburg a national disgrace.

PCN:

Ok Governor do you want to respond?

Governor Rendell:

Well I'm still opposed to it. But, the caller has to understand, and all of our viewers have to understand, I don't have a vote. And we created the Casino control commission in a way that they were immune from the influence of elected officials, including the Governor. I made that statement in '06 publicly and I've made it again a number of times. Ahh ahh, David LeVan (Governor warms and begins to smile) who is the main proponent of this is a good friend of mine was a big contributor to my campaigns, and I love David, but I just think *it's the wrong place for a casino* [emphasis added] for the reasons that the our caller enunciated.

Six days later at a senior center in Harrisburg, the Governor repeated his opposition to the proposed Mason-Dixon casino explaining, "I think the historic area is of such value, and the tourist economy is so important that it would be inappropriate for it to be there."¹⁹ Mason-Dixon's efforts to deceive the Governor and the public with respect to the proposed casinos location failed. Hundreds of historians, veteran groups, and tens of thousands of concerned citizens have come out squarely in agreement that "it's the wrong place for a casino."

¹⁹ Tom Barnes, "Rendell, vet groups opposing Gettysburg casino idea." *The Patriot News*, September 23, 2010

False Advertising of Benefits

Mason-Dixon has built local support for the proposed casino by misrepresenting the opportunity it creates for the community. Figure 4 shows another screen shot of the Mason-Dixon website containing a series of false claims with respect to the project's potential. The website's claims of: millions of dollars in school taxes, millions of unique/new day visitors and a million tourist overnights requiring 1,200 additional hotel rooms are gross exaggerations or simply false. Table 1 shows the magnitude of these distortions through a comparison of these false claims to Mason-Dixon's Local Impact Report. The comparison to Mason-Dixon's LIR is not an endorsement of the LIR which also contains exaggerations. The point is simply that Mason-Dixon is advertising benefits which their own LIR does refute.

Table 1

WEBSITE CLAIM	REALITY AS EXPLAINED IN LIR
Millions of dollars annual real-estate tax contributions to school district	<ul style="list-style-type: none"> • \$225,885 for Gettysburg Area School District²⁰
Millions of unique/new day visitors	<ul style="list-style-type: none"> • Between 93,662 and 162,387 unique visitors will make 673,894 day trip visits to Mason-Dixon.²¹ • 449,000 visits ... are expected to be local -- that is, ... residents within a 30-minute drive time from Mason-Dixon.²² • Of the 449,000 local visits 181,978 are made by Adams residents.²³ • Unique/new day visitors are less than one tenth of the millions claimed.
1 million tourist overnights requiring 1,200 additional hotel rooms	<ul style="list-style-type: none"> • "approximately 93,000 visits...would come from hotel guests at both Mason-Dixon and hotels in the area. Note that the estimates for gaming visits by hotel guests (at Mason-Dixon hotels and nearby hotels) are based on existing market occupancy levels and do not account for any additional hotel room nights generated by the existence or operation of the facility."²⁴

²⁰ Econsult Corporation, "Potential Economic Impacts of the Proposed Category 3, Mason-Dixon Resort & Casino," March 2010 page 18

²¹ "Marketing Plan" Mason-Dixon Update to Appendix 41 (part 1) page 185. Mason-Dixon forecasts that it will capture 75% of the business in zone 1 and 50% of the business in zone 2. If patrons focus their business, e.g. 50% of Zone 2 patrons go to competing facilities and 50% go to Mason-Dixon, then there are 93,662 unique visitors to Mason-Dixon. If patrons split their business, e.g. Zone 2 patrons go half the time to Mason-Dixon and half the time to competing facilities, then there would be 162,387 unique visitors.

²² Econsult Corporation, "Potential Economic Impacts of the Proposed Category 3, Mason-Dixon Resort & Casino," March 2010 page 14

²³ "Marketing Plan" Mason-Dixon Update to Appendix 41 (part 1) page 185.

²⁴ Econsult Corporation, "Potential Economic Impacts of the Proposed Category 3, Mason-Dixon Resort & Casino," March 2010 page 2

Figure 4

Mason Dixon Gaming -- Project Description - Windows Internet Explorer

http://www.masondixongaming.com/product.html

hp bing Convert Select

Favorites Suggested Sites Web Slice Gallery

Mason Dixon Gaming -- Project Description Page Safety Tools

MASON DIXON

RESORT & CASINO

Home

About Mason-Dixon

Project Description

Renderings

Videos

Newsroom

FAQ

Contact

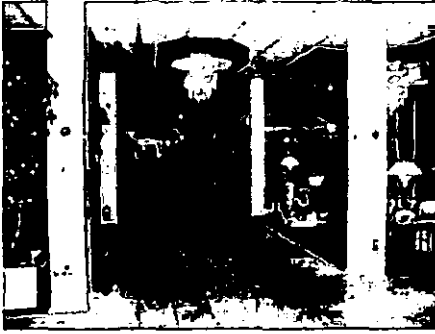
Revenue for local projects

Contracts for local businesses

Product Description


Specific aspects of this important million-dollar project include:

- First-class hotel with 307 rooms
- 600 state-of-the-art slot machines
- 50 table games
- 20,000 square feet of conference and exposition space
- 2,000 parking spaces
- Multiple gourmet and casual restaurants open to the public
- Billiard room
- Virtual Reality Thrill Ride
- Virtual Reality Pebble Beach Golf
- Arcade games and rides
- Indoor and outdoor soccer fields
- Indoor and outdoor pools
- 36 holes of miniature golf
- 14-acre fishing lake with paddle boats
- Batting cages
- Basketball and volleyball courts
- Outdoor pavilion
- Two professionally designed go-kart tracks



Ongoing annual impacts:

- Millions of dollars in new annual economic activity
- Millions of dollars in new local spending as a result of increased business spurred by the facility
- Millions of dollars increase in local personal earnings
- Millions of dollars annual real-estate tax contributions to school district
- Permanent new jobs created
- Percent increase in Adams County annual economic activity
- Millions of unique/new day visitors
- 1 million tourist overnights requiring 1,200 additional hotel rooms



Internet | Protected Mode: On 90%

7:48 AM 10/5/2010

²⁵ Mason-Dixon website, <http://www.masondixongaming.com/product.html>, October 5, 2010

Coca-Cola

According to *The Gettysburg Times* on Friday night April 23, David LeVan rallied his supporters at the Edgewood Bowling Lanes and ProCasinoAdamsCounty announced that Coca-Cola was supporting Mason-Dixon. LeVan explained to supporters that "it would be good for him," to receive the remaining category three license and he would "make it good for the community." Mr. LeVan explained the process he went through selecting Penn National to be the operator and what a great company they are. "They have Grantville, Charlestown, and they will open the first casino in Maryland in Cecil County. If they are successful with us, they will have a stronghold on this region."

In addition to hearing from LeVan, Jeff Klein, the leader of ProCasinoAdamsCounty, proclaimed that Coca-Cola Inc., and Lane Bryant, had "recently signed on to support their fight for the proposed casino"²⁶ "I am proud to announce three companies have just signed up with Pro Casino Adams County. Coca-Cola is now the official soft drink of Pro Casino Adams County. Coca-Cola believes in what we are doing as a grassroots organization. This should send a message to every other business. If Coca-Cola is willing to stand behind a group of folks like us, so should everybody else. ... Lane Bryant, a national company, has signed on with us. And again, when I say us, I'm talking about all of us - Pro Casino Adams County."²⁷ David LeVan who was in attendance made no effort then or later to correct this fraudulent statement. Coca-Cola's trademark was displayed on PCAC's website and used by PCAC and Mason-Dixon to induce other businesses to support the proposed casino.

Several people (samples below), wrote Coca-Cola's Chairman and CEO Muhtar Kent and many more called to ask if it was true that Coca Cola had decided to support the proposed Mason-Dixon Casino.

On May 6th, Coca-Cola responded in writing to those who had written. As they explained

To be clear, the Coca-Cola Company does not have any relationship with Mason-Dixon Gaming nor have we supported or endorsed the casino gaming project located near Gettysburg National Battlefield.

Coca-Cola's responses were sent to *The Gettysburg Times* which had announced Coca-Cola's support without investigating whether or not it was true. As the *Times* reported on May 15, "Coca-Cola, Lane Bryant distance themselves from claims that they support casino"

Mason-Dixon and PCAC had misrepresented a Coca-Cola's bottlers' donation of a small amount of product in support of monument preservation as support for the Mason-Dixon project. Curtis Epherly, Coca-Cola's Mid-Atlantic vice President for Public Affairs and Communications explained to the *Times*, "There was a misunderstanding that the gratis (donated) product was in support of (the casino)." "We absolutely have no position at all with respect to the Casino."²⁸

Mason-Dixon's repeated attempts to mislead the public cast in doubt its suitability for a Category 3 license.

²⁶ Jarrad Hedes, "LeVan rallies Mason-Dixon supporters," *The Gettysburg Times*, April 24, 2010.

²⁷ John Messeder, "Coca-Cola, Lane Bryant distance themselves from claims that they support casino," *The Gettysburg Times*, May 15, 2010.

²⁸ John Messeder, "Coca-Cola, Lane Bryant distance themselves from claims that they support casino," *The Gettysburg Times*, May 15, 2010.

Keith Miller
6 Kendra CT
Ridgefield, CT 06877
203 894 4686

Chairman and CEO Muhtar Kent
The Coca-Cola Company

April 24, 2010

Dear, Chairman and CEO Muhtar Kent

In an April 24 online article published by the Gettysburg Times (Gettysburg, PA) "LeVan rallies Mason Dixon supporters" Jarrad Hedes reported "The group gathered to announce three new business partners - Coca Cola Inc., Lane and Bryant, and Scott's Tire and Auto Repair in Gettysburg - recently signed on to support their fight for the proposed casino."

Is this correct? has Coca Cola Inc., aligned itself to support the construction of a casino within half a mile of the Gettysburg National Military Park. The proposed casino is highly contentious, and it is inconceivable to me that a company as marketing savvy as Coca-Cola would support an effort which many view as a desecration of our history.

Please let me know at your earliest convenience whether this is correct.

Sincerely

Keith Miller

Mr. Muhtar Kent, Chairman and CEO
Coca Cola Company

Dear Mr. Kent:

On April 24, I was appalled and saddened to read a statement in the Gettysburg (PA) Times made by a spokesman for Mason-Dixon Resort and Casino that "Coca-Cola, Lane (sic) and Bryant, and Scott's Tire and Auto Repair in Gettysburg recently signed on to support their (Mason-Dixon's) fight for the proposed casino".

I am hoping that the spokesman was misrepresenting your role, when it may be only that they cut a deal for purchasing beverages with the local distributor. Otherwise, I would be aghast if such an American icon as Coca-Cola would lend itself and its reputation to such an ill-advised venture as this one...to place a venue for frivolous escapist entertainment 3000 feet from the southernmost (and most used) entrance to the revered Gettysburg National Military Park, and right on the "Journey Through Hallowed Ground", a historic "Scenic Byway" which extends from Monticello to Gettysburg. Ironically, the creators of that byway purposely avoided Charlestown WVA, despite its strategic location and significant historic importance, because of the racetracks and slots parlors there, which they deemed incompatible with heritage tourism.

I don't know how much interest you have in American History, but let the record show, I am telling you that the Gettysburg Battlefield, its contextual community, and the 51,000 casualties suffered on July 1, 2, and 3, 1863, represent the essence of what America is all about. Nothing that the word "Gettysburg" conjures up in the national consciousness can abide with a casino with all the tawdriness it represents and attracts.

Abraham Lincoln, in his November 1863 address, beseeched us to be responsible stewards of this Hallowed Ground, where so many fought and died so that the words "all men are created equal" could truly have resonance for each citizen. Have we placed greed over any concern to preserve our historic sites for future generations? These investors tout economic development as their purpose for this travesty, but we have statistics that show indisputably that it will wreak economic and social havoc for this particular community. No one would object to economic development that would be compatible with the unique character of this place. Would we build a go-cart track at Shanksville, the site of the Flight 93 crash on Sept. 11? Would we open an amusement park at the gates of the cemetery in Normandy? A water park at the Arizona Memorial in Pearl Harbor? I think not.

Four years ago, this same individual attempted to open a 5000-machine slots parlor one mile from the battlefield and was turned down due to an outpouring of public fury expressed locally, regionally and nationally. This time there is only one gaming license to be awarded. Interestingly, another entity has entered the competition for a proposed casino 35 miles north of Gettysburg and only ½ mile from my pleasant suburban home. It's the last thing I want in my backyard; however, I would endure it if it meant that Mason-Dixon's license application for a casino on the Gettysburg Battlefield's doorstep would be rejected.

Ron Maxwell, Director of the epic movie "Gettysburg" spoke here recently in impassioned opposition to this casino. He was vilified by casino supporters for stating his opinion that these investors are not altruistic; rather, they were exploiting the international fame of Gettysburg by locating it there. But consider this; if the battle had been fought elsewhere, or not at all, Gettysburg would still be a sleepy farm town in rural Adams County...a location that no greedy investor would ever consider as a venue for a gaming establishment.

We hope you agree that if opening a casino is so important to these investors, and they want to do it in this rural region of South Central Pennsylvania, they should purchase land 5-10 miles in any direction and open one there. If this is truly an altruistic endeavor as the investors say it is, then those who need jobs will travel the short distance to work there and no one will take issue. The tens of thousands of folks who come to Gettysburg each year to learn, to reflect, to grieve for the pain and death suffered there to save our union don't come to gamble. Heritage tourists overwhelmingly say just the thought of a casino is repugnant to them.

If the Times statement that motivated me to write this letter is untrue, you should immediately contact the Gettysburg Times, P.O. Box 3669, Gettysburg, PA, 17325; the Pennsylvania Gaming Control Board, Gregory C. Fajt, Chairman, P.O. Box 69060, Harrisburg, PA 17106, and Mr. Doug Harbach, Director of Communications, Pennsylvania Gaming Control Board, 717-346-8321, and advise them that Coca-Cola is being misrepresented by the Mason-Dixon Resort and Casino Applicant.

Sincerely,

Tanya S. Wagner, R.N., M.Ed.

**Muhtar Kent - Chairman
Coca Cola Corporation**

April 24, 2010

Dear Sir -

I am writing to you concerning the enclosed article which appeared in the Gettysburg Times on Saturday, April 24, 2010.

I cannot believe that a company with your national and international reputation, would ever think of supporting a gambling casino located one-half mile from the Gettysburg Battlefield in historic Gettysburg, Pennsylvania.

I would like to receive a letter of explanation with your assurance that Coca Cola Corporation does not support this proposal.

Sincerely,

Dan & Jean Siderio



May 6, 2010

Sonya Soutus
Senior Vice President
Public Affairs & Communications

Keith Miller

Dear Mr. Miller:

Thank you for your recent letter to our Chairman, Muhtar Kent. We take very seriously your concerns and are grateful for your bringing this matter to our attention.

We have investigated the issue you raise. To be clear, The Coca-Cola Company does not have any relationship with Mason Dixon Gaming nor have we supported or endorsed the casino gaming project located near Gettysburg National Battlefield.

Based upon our initial inquiries, we understand that one of the Company's bottlers donated a small amount of product in response to request from a local organization that was hosting a fund-raising event for monument preservation. It appears that the bottler's product donation was misconstrued as support for the Mason-Dixon gaming project. We are currently taking steps to clarify this issue with Mason-Dixon and all involved. I hope this information helps allay your concerns.

It may interest you to know that The Coca-Cola Company has had a long-standing relationship with the Gettysburg Foundation through our local bottler, Coca-Cola Enterprises, and through The Coca-Cola Foundation, which donated \$1 million to the Gettysburg Foundation. Please feel free to contact me in the future if needed.

Again, thank you for taking the time to express your concerns and for your continued support of Coca-Cola.

Sincerely,


Sonya Soutus



CIVIL WAR PRESERVATION TRUST

SAVING AMERICA'S CIVIL WAR BATTLEFIELDS

www.civilwar.org

James Lighthizer
President

LATEST NEWS ON THE GETTYSBURG CASINO BATTLE!

April 30, 2010

Dear Friend,

This time . . . it could get ugly.

I'm speaking, of course, about the Civil War Preservation Trust's latest effort to prevent a casino from threatening Gettysburg.

And now that the pro-casino group of investors (called "Mason-Dixon Resorts, LLC.") has formally applied for the gaming license that would allow them to move forward with their plans . . .

. . . their gloves have come off.

Four years ago, when we squared off against nearly the same folks (who wanted to build a sprawling 3,000-slot machine gambling complex about a mile from the battlefield), one of the lead pro-casino guys darkly warned, "I hope you [preservationists] have good lawyers."

Now that they are seeking to open a casino about a half-mile from the battlefield, they have already ludicrously attacked the Civil War Preservation Trust – even going so far as to publicly accuse us of engaging in illegal activity simply because we have asked people all across America who care about the future of Gettysburg to write and call elected officials to voice their opposition!

I wonder if those people have ever heard of a little thing called the First Amendment?

Frankly, my friend, with the casino advocates crowd still stinging from the defeat we inflicted upon them a few years ago, I expect this type of strong-arm intimidation campaign is only the beginning, and as I said before . . . it could get ugly.

But in the end, I'm not worried about whatever type of thuggery they might throw at CWPT, or even me personally.

That's because I know you and I are on the right side of this fight . . . the fight to preserve, protect and defend not only one of the most important Civil War battlefields, but also one of the world's most important historic sites.

I thought it might be helpful to quickly jot down exactly what I believe each side is fighting for, and this is what I came up with. See if you agree:

BOARD OF TRUSTEES

John L. Nau, III

Houston, Texas

Chairman

O. James Lighthizer

Crofton, Maryland

President

Henry E. Simpson

Birmingham, Alabama

Vice Chairman

Mary Munsell Abroe

Wilmette, Illinois

Harrison M. Bains

New York, New York

Edwin C. Bears

Arlington, Virginia

Paul W. Bryant, Jr.*

Tuscaloosa, Alabama

Walter W. Buckley, Jr.

Bethlehem, Pennsylvania

Childs F. Burden

Middleburg, Virginia

Carlton B. Crenshaw

Palmyra, Virginia

Beverly M. DuBose, III

Atlanta, Georgia

James S. Gilliland*

Memphis, Tennessee

Michael Grainger

Franklin, Tennessee

John D. Haynes

Baldwyn, Mississippi

Jeffrey P. McClanathan

St. Petersburg, Florida

Anne H. Miller

Salisbury, Maryland

Libby O'Connell

Lloyd Harbor, New York

Cricket Bauer Pohanka

Alexandria, Virginia

Theodore Sedgwick*

Marshall, Virginia

J. Dennis Sexton

St. Petersburg, Florida

Jeff Shaars

Sarasota, Florida

Guy Miller Struve

New York, New York

William W. Vodra

Alexandria, Virginia

Douglas W. Walker

Seattle, Washington

L. Dudley Walker

Martinsville, Virginia

W. Denman Zirkle

Edinburg, Virginia

* Chairmen Emeritus

What We're Fighting For:

Preserving the sanctified, dignified and reverent atmosphere of Gettysburg, arguably America's best known historic site.

Protecting the existing stores, shops, restaurants, museums and other businesses that depend upon tourism dollars from battlefield visitors.

A safe, family-friendly outdoor classroom, where Americans of all ages can go to learn vital lessons about honor, courage and our Nation's rich history.

To keep the Gettysburg Battlefield as a protected, valued place that gives back far more to visitors than it takes from them, enriching their lives forever.

vs.

What Casino Operators are Fighting For:

The chance to cash in on the "Gettysburg" name, cheapening the sacrifices of those who fought and died there.

vs.

The chance to siphon off limited tourism dollars to their poker and blackjack tables, their hotel rooms, their restaurant and, ultimately, their pockets!

vs.

A tacky, adults-only lair that (evidence indicates) will eventually attract more pawn shops, crime, gambling addiction, check-cashing stores and dead-end jobs.

vs.

Turning Gettysburg into a place that takes far more from visitors than it gives, enriching a handful of speculators.

vs.

With a straight face, the leaders of the pro-casino effort are cruelly trying to exploit the poor economy, by saying that their operation is primarily about "creating jobs" for the local community.

Sure, they may create a handful of low paying jobs, but how many more jobs will they kill in the Gettysburg community, once repeat battlefield visitors decide to avoid the traffic and "Atlantic City" atmosphere that will be evident?

The "Mason-Dixon" folks have always seemed to labor under the delusion that battlefield visitors will make the best gamblers . . . that folks fresh off a day of leaning about Winfield Scott Hancock or George Pickett will abandon their kids for an evening of craps, slots and cards.

Well, that got me thinking, and I came up with a little story I'd like to share with you. With apologies to Charles Dickens, it's called, "A Tale of Two Addicts." One of the characters – while fictional – is perfectly believable; the other character I think you know pretty well:

Hello, my name is Jim Lighthizer, and I'm addicted to Gettysburg.

"Hello, my name is Joe Casino, and I'm addicted to gambling."

I've spent countless hours reading and learning about the battle. I just can't help myself!

"I spend countless hours at the card tables and slot machines. I just can't help myself either!"

I already have so many books on Gettysburg and the Civil War that I sometimes have to sneak them into the house so my wife won't see them.

"I've lost so much money at the casino that I've had to keep the amounts secret from my wife."

I sometimes go to the battlefield for days on end, lost in the study of those fascinating times.

inspiring events and heroic people. My family understands my need to periodically escape into the 19th century, and they even tolerate it and encourage me, because every time I come back from a battlefield, I am a better person.

"I sometimes go to the casino for days on end, lost in the pursuit of an inside straight, the "high" of winning (even though the "house" always wins more), and complimentary drinks. My family just doesn't understand my need to be here. If I could hit a hot streak, I know I could win back the kids' college fund and our retirement account. Boy, that'd sure shut 'em up."

Whenever I go to Gettysburg, I love to eat at one of the local restaurants, maybe visit the cigar shop, perhaps even buy a book or two – I can keep them at the office and my wife will never know!

"When I'm in the casino, I often forget to even eat. Sometimes, if I've really been playing a long time, they'll comp me a club sandwich! Once I'm 'felled,' – that's slang for 'out of chips, and down to the felt-covered table' – I'll finally head home. Whaddya mean 'There's more to do in Gettysburg?' I just dropped \$500 in your casino – what more do you want out of me?"

That's the end of my little story . . . but the final chapters of Gettysburg's future are being written out right now, and it is still undecided which of those two "addicts" will dominate its future.

As elevated as we and the other pro-preservation groups have tried to keep the discourse, the other side has come out swinging, and I expect the invective to only get worse.

But as they spew their vitriol at CWPT and the brave, local volunteers of No Casino Gettysburg, I publicly request that those who would seek to open a casino nearly on the doorstep of the Gettysburg battlefield – in the spirit of honesty and integrity – to truthfully answer these questions:

Would you rather live next door to the protected Gettysburg Battlefield . . . or next door to your own casino?

Where would you want your own grandchildren to be able to run, play and learn? On the hallowed ground of Pickett's Charge, Little Round Top and Devil's Den . . . or in the parking lot of your own casino?

Finally, where would you want to take your own families on vacation? A meaningful tour of a beautiful, compelling historic site . . . or will you take them on a tour of the slot machines, the Texas Hold-'em tables and wind up at the bar?

Well, if you wouldn't take your own children and grandchildren, parents or aged grandparents to your own casino for a vacation, then you have no right to desecrate the place where millions of Americans WILL take their families – with honor, devotion and gratitude.

My friend, to defeat these misguided people once again, I will need to raise a special war chest of funds that will fund our grassroots efforts to counter their attacks and misinformation. (Case in point: As I was wrapping up this letter, they just released their doctored-up economic impact study claiming their casino will generate 900 new jobs!! I guess they're planning on putting in an airplane assembly line, too! If it wasn't so serious an issue, you'd have to laugh!)

But I understand that some CWPT members would prefer that their gifts go exclusively to

purchase land, and not go toward activities like this – I want to honor those wishes. That's why I am asking you today – if you do want to be involved in the crucial fight to prevent a casino at Gettysburg – to make a special gift to this appeal.

Plus, because the Gettysburg battlefield belongs to all Americans, I ask you to immediately sign the enclosed petition, expressing your opinion that Gettysburg is no place for a casino. Please also consider copying it and circulating it among your family, friends and colleagues who share our concern about a gambling den next to America's most hallowed battleground.

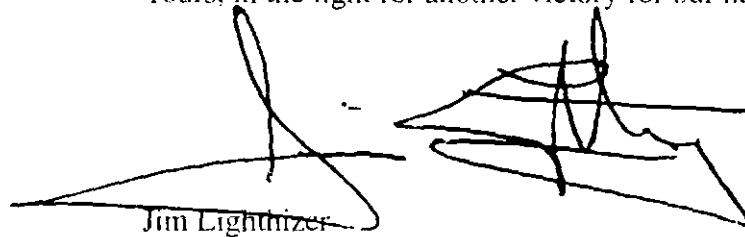
I cannot stress to you how important your signed petition is – we must be able to show that Gettysburg belongs to all Americans, and that citizens from every state want to see it protected.

So please, to help CWPT raise a battle fund of at least \$25,000 to help take on "Mason Dixon Resorts," will you commit to a generous gift of \$25, \$50, \$100, \$250, \$500 or even \$1,000 today?

Please make your generous donation in honor of those who fought there, those who rest there still, those of us who treasure that hallowed ground, but especially for those who have not yet been there. Please help CWPT protect and preserve Gettysburg for all Americans, for all time.

Don't forget . . . sign your petition and return it to me along with your generous donation within the next five to ten days. I cannot thank you enough.

Yours, in the fight for another victory for our nation,



Jim Lightizer
President

P.S. Let's make "Mason Dixon Resorts" regret they ever decided to "Gamble on Gettysburg!" Please let me hear back from you as soon as possible! Thanks again!

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature <u>Jean F. Fory</u>	_____
Printed Name <u>Jean F. Fory</u> City _____	St. <u>Pa</u> Zip _____
Signature <u>J Bruce Fory</u>	_____
Printed Name <u>J Bruce Fory</u> City _____	St. <u>Pa</u> Zip _____
Signature <u>Carolyn Kallage</u>	_____
Printed Name <u>CAROLYN KALLAGE</u> City _____	St. <u>PA</u> Zip _____
Signature <u>Lillian B Kauffman</u>	_____
Printed Name <u>Lillian B Kauffman</u> City _____	St. <u>PA</u> Zip _____
Signature <u>MP Raladge</u>	_____
Printed Name <u>MP Raladge</u> City _____	St. <u>PA</u> Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature <u>George Kokite</u>	_____	_____
Printed Name <u>George Kokite</u>	City _____	St. _____ Zip _____
Signature <u>Pam Talvas</u>	_____	_____
Printed Name <u>PAM TALVAS</u>	City _____	St. <u>PA</u> Zip _____
Signature <u>Carolyn J. Davis</u>	_____	_____
Printed Name <u>Carolyn J. Davis</u>	City _____	St. <u>PA</u> Zip _____
Signature <u>Florence Davis</u>	_____	_____
Printed Name <u>Florence DAVIS</u>	City _____	St. <u>PA</u> Zip _____
Signature <u>Pet McCaffrey</u>	_____	_____
Printed Name <u>Pet McCaffrey</u>	City _____	St. <u>Pa</u> Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Janet Reid

Printed Name JANET REID City _____ St. PA Zip _____

Signature Jean R. Stockdale

Printed Name JEAN R. STOCKDALE City _____ St. PA Zip _____

Signature Carolyn E. Kerr

Printed Name CAROLYN E. KERR City _____ St. PA Zip _____

Signature Doris Brewton

Printed Name DORIS BREWTON City _____ St. _____ Zip _____

Signature Mary Helen Maddigan

Printed Name Mary Helen Maddigan City _____ St. _____ Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Jeanette G. Steffick

Printed Name Jeanette G. Steffick City _____

St. PA Zip _____

Signature Carol H. Smith

Printed Name Carol H. Smith City _____

St. PA Zip _____

Signature Thomas S. Smith

Printed Name Thomas S. Smith City _____

St. PA Zip _____

Signature Bettina B. Brown

Printed Name Bettina B. Brown City _____

St. PA Zip _____

Signature Frank Brown

Printed Name Frank Brown City _____

St. PA Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature	<u>[Handwritten Signature]</u>	_____	_____
Printed Name	<u>John S. Staff</u>	City	St. <u>Pa</u> Zip _____
Signature	<u>[Handwritten Signature]</u>	_____	_____
Printed Name	<u>SARA Matthews</u>	_____	<u>SECOM</u>
Signature	<u>[Handwritten Signature]</u>	_____	_____
Printed Name	<u>Judith J. Benhill</u>	City	St. _____ Zip _____
Signature	<u>[Handwritten Signature]</u>	_____	_____
Printed Name	<u>William D. Koutland</u>	City	St. <u>PA</u> Zip _____
Signature	<u>[Handwritten Signature]</u>	_____	_____
Printed Name	<u>ROSE A MCCARTHY</u>	City	St. <u>PA</u> Zip _____

7

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Shirley N Brown

Printed Name SHIRLEY N BROWN City _____ St. PA Zip _____

Signature Nin McLean

Printed Name NIN McLEAN City _____ St. PA Zip _____

Signature Helen A. McCombs

Printed Name Helen A. McCombs City _____ St. PA Zip _____

Signature Thomas H McCombs

Printed Name Thomas H McCombs City _____ St. PA Zip _____

Signature Randy Chourra

Printed Name RANDY CHOURRA City _____ St. PA Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature	<u>Jean Ewing</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Printed Name	<u>JEAN EWING</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Signature	<u>Carolann Stauffer</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Printed Name	<u>CAROLANN STAUFFER</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Signature	<u>Paul Reiber</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Printed Name	<u>PAUL REIBER</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Signature	<u>Charles M'Carthy</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Printed Name	<u>CHARLES MCCARTHY</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Signature	<u>Antoinette Robinson</u>	City	_____	St.	<u>PA</u>	Zip.	_____
Printed Name	<u>Antoinette Robinson</u>	City	_____	St.	<u>PA</u>	Zip.	_____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature	<u>Betty Abrew</u>	<u>Betty Abrew</u>
Printed Name	<u>Betty Abrew</u> City	St. <u>Pa.</u> Zip
Signature	<u>Adeline Bedwicht</u>	
Printed Name	<u>ADELINE BEDWICHT</u> City	St. <u>PA</u> Zip
Signature	<u>Ursula J. Orphall</u>	
Printed Name	<u>URSULA J. ORPHALL</u> City	St. <u>Pa.</u> Zip
Signature	<u>Brian Matthews</u>	
Printed Name	<u>BRIAN MATHEWS</u> City	St. <u>PA</u> Zip
Signature	<u>Nancy Choura</u>	
Printed Name	<u>Nancy Choura</u> City	St. <u>PA</u> Zip

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature	<u>JOHN DEBLASSIO</u>	_____
Printed Name	<u>John DeBlasio</u>	City _____ St. <u>PA</u> Zip _____
Signature	<u>Kathleen DeBlasio</u>	_____
Printed Name	<u>KATHLEEN DeBLASSIO</u>	City _____ St. <u>PA</u> Zip _____
Signature	<u>Harold Gedney L</u>	_____
Printed Name	<u>HAROLD GEDNEY</u>	City _____ St. <u>PA</u> Zip _____
Signature	<u>Joanne Gedney</u>	_____
Printed Name	<u>Joanne Gedney</u>	City _____ St. <u>PA</u> Zip _____
Signature	<u>Mary J Stewart</u>	_____
Printed Name	<u>MARY J. STEWART</u>	City _____ St. <u>PA</u> Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Peter G Spero

Printed Name Peter G Spero City _____ St. Tn. Zip _____

Signature [Signature]

Printed Name Sue Spero City _____ St. Tn Zip _____

Signature [Signature]

Printed Name Cliff Spero City _____ St. TN Zip _____

Signature Chloe Stenberg

Printed Name Chloe Stenberg City _____ St. TN Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Elizabeth M. Herbert

Printed Name ELIZABETH Herbert City _____

St. NY Zip _____

Signature David F. Herbert

Printed Name DAVID F. HERBERT City _____

St. NY Zip _____

Signature David F. Herbert Jr.

Printed Name DAVID F. HERBERT JR. City _____

St. NY Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Joseph R. Greene

Printed Name Joseph R. GREENE City _____ St. MN Zip _____

Signature J. Greene

Printed Name Lisa J. Greene City _____ St. MN Zip _____

Signature Christine Cool

Printed Name Christine Cool City _____ St. CO Zip _____

Signature Nathan Barsness

Printed Name Nathan Barsness City _____ St. CO Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourist industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature <u>Howard B. Stead</u>	_____
Printed Name <u>HOWARD B. STEAD</u> City _____	St. <u>PA</u> Zip _____
Signature <u>Ron Shull</u>	_____
Printed Name <u>RON SHULL</u> City _____	St. <u>PA</u> Zip _____
Signature <u>Dennis D. Zank</u>	_____
Printed Name <u>DENNIS D. ZANK</u> City _____	St. <u>ME</u> Zip _____
Signature <u>George A. Roux</u>	_____
Printed Name <u>George A. Roux</u> City _____	St. <u>PA</u> Zip _____
Signature <u>Brooke Prieskorn</u>	_____
Printed Name <u>Brooke Prieskorn</u> City _____	St. <u>ME</u> Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourist industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Susan M. Hamlin

Printed Name SUSAN M. HAMLIN City _____

St. MI Zip _____

Signature W. Thomas Hamlin

Printed Name W. Thomas Hamlin City _____

St. MI Zip _____

Signature June K. Lloyd

Printed Name June K. Lloyd City _____

St. MI Zip _____

Not 9

Signature Liz Lloyd

Printed Name LIZ Lloyd City _____

"

St. _____ Zip _____

Signature Heith Thomas

Printed Name HEITH THOMAS City _____

St. MI Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourist industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

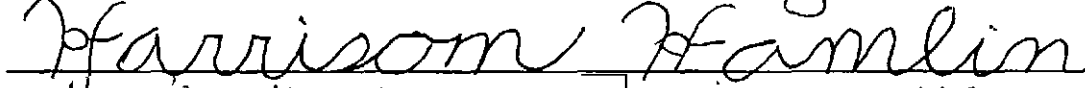
Respectfully submitted by:

Signature 

Printed Name Jeff Hamlin City St. MI Zip

Signature 

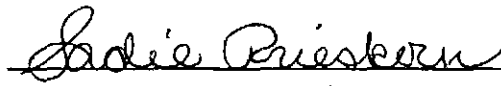
Printed Name Jolee Hamlin City St. MI Zip

Signature 

Printed Name Harrison Hamlin City St. MI Zip

Signature HELEN HAMLIN (Age 51)

Printed Name " City St. MI Zip

Signature 

Printed Name Sadie PRIESKORN City St. MI Zip

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Carolyn Jones

Printed Name CAROLYN JONES City _____ St. IX Zip _____

Signature Clorine Burks

Printed Name Clorine Burks City _____ St. IX Zip _____

Signature Beth Wilkerson

Printed Name BETH WILKERSON City _____ St. IX Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Gerald Cox

Printed Name GERALD COX City _____ St. MA Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Printed Name _____ City _____ St. _____ Zip _____

*MA
SHE
THAT
GREAT
HIS
WAR!
GERALD
COX
FATHER
BLOOD
IN
PLEASE
DON'T
BUILD*

To: Pennsylvania Gaming Control Board

We the undersigned OPPOSE the Mason-Dixon Resort & Casino proposal, located at the Eisenhower Inn/ All Star Complex, 2634 Old Emmitsburg Rd, Gettysburg, PA, 17325, right on the Journey Through Hallowed Ground, about one half mile from the boundary of the Gettysburg National Military Park. The casino is inappropriate in our historic, family-friendly community.

Sincerely yours,

Name: Robert M. Patrick

Address:

Comments:

"We cannot dedicate. . . we cannot consecrate. . . we cannot hallow this ground. The brave men, living and dead, who struggled here have consecrated it, far above our poor power to add or detract. but it can never forget what they did here. It is for us the living, rather, to be dedicated here to the unfinished work which they who fought here have thus far so nobly advanced. It is rather for us to be here dedicated to the great task remaining before us. . . full measure of devotion. . . that we here highly resolve that these dead shall not have died in vain. . . that from these honored dead we take increased devotion to that cause for which they gave the last full measure of devotion. . ."

Abraham Lincoln

These words ring truer today than ever. Were fighting for. TO preserve GETTYSBURG and its true meaning, what happened here. In July 1863 147 years ago.

We don't need a casino and the type of environment it will produce

To: Pennsylvania Gaming Control Board

We the undersigned OPPOSE the Mason-Dixon Resort & Casino proposal, located at the Eisenhower Inn/ All Star Complex, 2634 Old Emmitsburg Rd, Gettysburg, PA, 17325, right on the Journey Through Hallowed Ground, about one half mile from the boundary of the Gettysburg National Military Park. The casino is inappropriate in our historic, family-friendly community.

Sincerely yours,

Name: Anna Patrick

Address:

Comments:

"We cannot dedicate. . . we cannot consecrate. . . we cannot hallow this ground. The brave men, living and dead, who struggled here have consecrated it, far above our poor power to add or detract. but it can never forget what they did here. It is for us the living, rather, to be dedicated here to the unfinished work which they who fought here have thus far so nobly advanced. It is rather for us to be here dedicated to the great task remaining before us. . . full measure of devotion. . . that we here highly resolve that these dead shall not have died in vain. . . that from these honored dead we take increased devotion to that cause for which they gave the last full measure of devotion. . ."

Abraham

These words ring truer today than ever. Were fighting for. TO preserve GETTYSBURG and its true meaning, what happened here. In July 1863 147 years ago.

We don't need a casino and the type of environment it will produce

To: Pennsylvania Gaming Control Board

We the undersigned OPPOSE the Mason-Dixon Resort & Casino proposal, located at the Eisenhower Inn/ All Star Complex, 2634 Old Emmitsburg Rd, Gettysburg, PA, 17325, right on the Journey Through Hallowed Ground, about one half mile from the boundary of the Gettysburg National Military Park. The casino is inappropriate in our historic, family-friendly community.

Sincerely yours,

Name: Lisa Albano

Address:

Comments:

"We cannot dedicate. . . we cannot consecrate. . . we cannot hallow this ground. The brave men, living and dead, who struggled here have consecrated it, far above our poor power to add or detract. but it can never forget what they did here. It is for us the living, rather, to be dedicated here to the unfinished work which they who fought here have thus far so nobly advanced. It is rather for us to be here dedicated to the great task remaining before us. . . full measure of devotion. . . that we here highly resolve that these dead shall not have died in vain. . . that from these honored dead we take increased devotion to that cause for which they gave the last full measure of devotion. . ."

Abraham Lincoln

These words ring truer today than ever. Were fighting for. TO preserve GETTYSBURG and its true meaning, what happened here. In July 1863 147 years ago.

We don't need a casino and the type of environment it will produce

To: Pennsylvania Gaming Control Board

We the undersigned OPPOSE the Mason-Dixon Resort & Casino proposal, located at the Eisenhower Inn/ All Star Complex, 2634 Old Emmitsburg Rd, Gettysburg, PA, 17325, right on the Journey Through Hallowed Ground, about one half mile from the boundary of the Gettysburg National Military Park. The casino is inappropriate in our historic, family-friendly community.

Sincerely yours,

Name: Joan Patrick

Address:

Comments:

"We cannot dedicate. . . we cannot consecrate. . . we cannot hallow this ground. The brave men, living and dead, who struggled here have consecrated it, far above our poor power to add or detract. but it can never forget what they did here. It is for us the living, rather, to be dedicated here to the unfinished work which they who fought here have thus far so nobly advanced. It is rather for us to be here dedicated to the great task remaining before us. . full measure of devotion. . . that we here highly resolve that these dead shall not have died in vain. . . that from these honored dead we take increased devotion to that cause for which they gave the last full measure of devotion. . ."

Abraham Lincoln

These words ring truer today than ever. Were fighting for. TO preserve GETTYSBURG and its true meaning, what happened here. In July 1863 147 years ago.

We don't need a casino and the type of environment it will produce

5/8/2010

To The Pennsylvania Gaming Control Board

Enclosed is our petition opposing the proposed Casino at Gettysburg signed by my son and I

We have spent Time in Gettysburg and find it hard to believe that this proposed gambling place will improve the area of this historic battlefield.

First I question the 900 or so new jobs will enhance the area as it appears to me a good share of the persons hired will have to come from existing area businesses which will ruin some businesses.

The proposed revenue to the Town will not be all to the good with the necessary highway improvements, additional public security and related expenses required will not justify the added traffic burden and potential problems related to casino operators.

Lastly the apparent greed for the so called 400,000 dollar ^{will} _{aspirit} this historic landmark where so much American blood was let by all the states soldiers

Please deny approval of this casino.

Thanks

Ar. Roy MacBaskin

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourist industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature *A. Roy MacAskill*

Printed Name A. Roy MacAskill City _____ St. VA Zip _____

Signature *Timothy A. MacAskill*

Printed Name Timothy A. MacAskill City _____ St. VA Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino ½ mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Lauren E. Baranauskas

Printed Name Lauren E. Baranauskas City _____ St. MD Zip _____

Signature Anthony R. Baranauskas

Printed Name andy Baranauskas City _____ St. MD Zip _____

Signature PATRICK H. BARANAUSKAS PK

Printed Name PATRICK H. BARANAUSKAS City _____ St. MD Zip _____

Signature Troy Hubbard

Printed Name Troy Hubbard City _____ St. MD Zip _____

Signature Karen S. Baranauskas

Printed Name Karen S. Baranauskas City _____ St. MD Zip _____

No Casino at Gettysburg!

To the Pennsylvania Gaming Control Board:

Whereas, Gettysburg National Military Park is a shrine to those who fought and fell during that historic, three-day battle in July 1863 -- arguably the most important battle in American history;

Whereas, heritage tourism contributes significantly to the economic well-being of the Gettysburg community;

Whereas, a gambling casino 1/2 mile from the battlefield would alter the nature of the community, and adversely impact the experience of visitors who travel to Gettysburg to learn more about this singular time in our nation's history, and its meaning;

We, the undersigned, strongly oppose any license to build a casino in or near Gettysburg, the site of this sacred Civil War battlefield.

Please vote "NO!" to the desecration of the hallowed ground where so many American soldiers valiantly fought and courageously died in a war that transformed our nation.

Please vote "No!" in support of protecting Gettysburg's vibrant heritage tourism industry.

Please vote "No!" to the destruction of a national treasure enjoyed by thousands of Adams County residents and by more than one million annual visitors.

Respectfully submitted by:

Signature Walter G. Schroeder

Printed Name Walter G. Schroeder City _____ St. OR Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Signature _____

Printed Name _____ City _____ St. _____ Zip _____

Charles Skopic

PA Gaming Control Board
PO Box 69060
Harrisburg, PA 17106

October 5, 2010

Re: Mason Dixon Resort & Casino License Application

Dear Board Members:

I write to express my concern about the water supply for the referenced casino. I am a resident of Cumberland Township, the site of the proposed casino. I serve as a Director of the Watershed Alliance of Adams County and also as a member of the Water Resources Advisory Committee appointed by the Adams County Commissioners. However, my comments are not on behalf of either organization.

Water is a major concern in Adams County. The enclosed map was prepared by the Susquehanna River Basin Commission (SRBC), which regulates water use in the northeast half of the county, and the Interstate Commission on the Potomac River Basin (ICPRB), which covers the southwest half of the county where the proposed casino would be located. The map shows that the proposed casino site (near Route 15) is a water stressed area and it is in a Critical Water Planning Area. In fact, it is in 1 of only 3 such areas in the State with such a nomination for consideration under the Pennsylvania Water Resources Planning Act (Act 220). Because this is a water stressed area, with Marsh and Rock Creeks at risk of having water demand exceeding supply during dry periods, a major 2 year project to prepare a Watersheds Resources Management Plan for this area was initiated on September 21, 2010 by the ICPRB and the Pennsylvania Department of Environmental Protection (PADEP).

The proposed casino site is where a hotel complex, the Eisenhower Inn, is now located. That site is underlain by diabase geology, hard granite-like rock which typically does not yield much water if wells are drilled; a problem at this site. A contaminated Superfund site is nearby; a source for groundwater pollution problems.

The casino license application included a report by a hydrogeologist on his tests of a nearby existing well that apparently could be used to augment the wells at the proposed casino site. He concluded that there is a "large degree of uncertainty" about the long term capacity of that well, and suggested possibly deepening it or drilling an additional well. Any such new or existing wells to be used for a casino would need to be reconstructed to meet PADEP requirements.

Based on all that is known at this time, the most reasonable assessment is that the water supply for the proposed casino is uncertain. It is obvious that for any casino to be successful it must have a reliable water supply. Therefore, to avoid possible future problems for the Gettysburg area and for Pennsylvania, the water supply situation for the proposed casino should be definitely established before any license is awarded to this applicant.

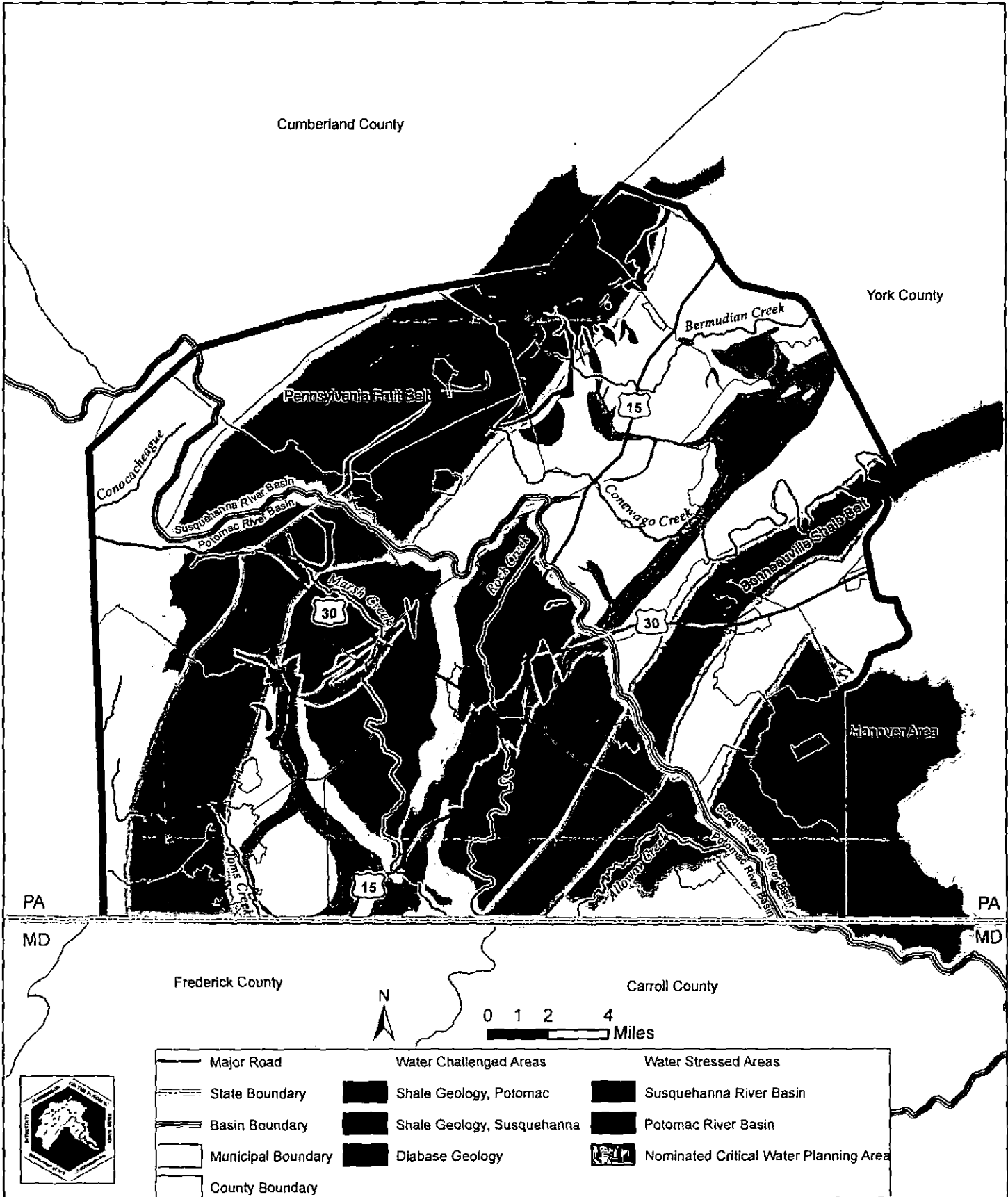
Sincerely yours,

Enclosure

Charles Skopic

Charles Skopic

Adams County, Pennsylvania Potentially Stressed and Water Challenged Areas



March 2010. Intended for educational purposes only. Susquehanna stressed and challenged areas were identified by SRBC utilizing the SRBC Groundwater Management Plan methodology and were extended by ICPRB throughout Adams County utilizing existing geologic mapping with the addition of nominated Critical Water Planning Areas in the Potomac Basin.

Would you grant a license for a gambling casino near any of the following -

ARLINGTON NATIONAL CEMETERY

THE PEARL HARBOR MEMORIAL IN HAWAII

THE LANDING BEACHES AT NORMANDY

THE GETTYSBURG BATTLEFIELD

ARLINGTON, PEARL HARBOR, NORMANDY, GETTYSBURG

Names from America's history that will live forever.

Names that will be remembered and respected forever.

Where brave men will lie in Hallowed Ground forever.

VOTE NO ON A CASINO AT GETTYSBURG

Pennsylvania Gaming Control Board

To whom it may concern:

My wife and I have traveled from Canada to visit Gettysburg for many years, drawn by its fascinating history and powerful spiritual presence. We have always been impressed by the dignity shown to the combatants on both sides, and the attention to detail and preservation.

We understand the sacrifice made in July of 1863. We can sense the energy, the fear, and the pain and death that wreaked havoc on that small community. Some men remain buried on the battlefield to this day I understand.

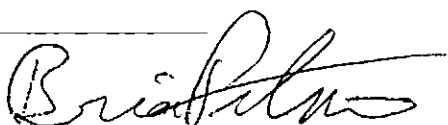
We were shocked this year to hear that once again the memory of these brave Americans could be cheapened by the construction of a casino!

In Niagara Falls Canada there are two casinos and more stimulation than a person can stand, with downtown looking like a little Las Vegas. I have no problem with that as the falls are a natural wonder, and people come from all over the world to experience them , get married and have fun.

Gettysburg however is not Niagara Falls !, and a casino there would obviously be greedily taking advantage of the thousands of tourists and history buffs who visit Gettysburg for a much different, and more Sombre reason. These soldiers did not give their lives for a casino but I am sure they would be pleased to know that people come to learn and keep their memory alive.

My wife and I say absolutely no to a casino in this area!

Brian Pitman Dodi Pitman



A handwritten signature in cursive script, appearing to read "Brian Pitman", is written over a rectangular box that was previously empty.

21AUG10

Mr Gregory C Fajt
Chairman PGCB
P O Box 69060
Harrisburg PA 17106-9060

Dear Mr. Fajt:

I write regarding the proposed Gambling arena for Gettysburg, Adams County. I am told our county commissioners, Moreno and Snyder, have accepted a payment in exchange for their testimony in favor of MD Resorts. This was based upon a "memorandum of understanding" of questionable legal standing that coerces their support in exchange for a fee. I believe such testimony to be a conflict of interest on their part, and consequently should be disallowed. Such testimony may in fact be unlawful, since it involves the exchange of an item of value

If they were to act in their official capacity as commissioners, they should testify free of outside influence. If they were to speak as private citizens, they should not take advantage of their official position to so testify.

Therefore, I respectfully request that any testimony of the commissioners Moreno and Snyder be ruled out of order.

Sincerely,



Burton Sarnoff

October 29, 2010

Mr. Gregory C. Fajt, Chairman
Pennsylvania Gaming Control Board
PO Box 69060
Harrisburg, PA 17106-9060

[by Certified Mail]

Dear Chairman Fajt and Board Members:

A huge gambling casino at Gettysburg would be a terrible mistake for our Commonwealth. The proposal contains three fatal, fundamental flaws.

First, placing a casino at Gettysburg would violate the very reason for gambling in Pennsylvania. A key goal, as explained in act 71, is “to provide broad economic opportunities to the citizens of this Commonwealth.” To pursue that goal faithfully, casinos must be placed where citizens will benefit the most. When we examine Pennsylvania’s communities regarding economic needs, Gettysburg is near the very bottom of the list. It has the lowest unemployment rate in the Commonwealth. It has the highest growth rate, almost overwhelming local efforts to manage and direct it.

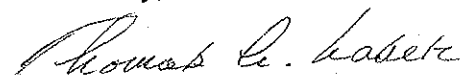
Across our Commonwealth, communities are staggering economically -- steel mills are shuttered, mining employment is down 90%, and good manufacturing jobs are being exported to China and India almost daily. Gettysburg, however, is very fortunate: it has the crown jewel of tourist attractions, two colleges, a seminary, and federal facilities -- all stable and immune to outsourcing. It would violate both the intent and the letter of Act 71 -- and be highly unfair -- to heap more economic growth onto Gettysburg while ignoring our Commonwealth’s communities that are truly struggling.

Second, a huge gambling casino would destroy Gettysburg’s character, personality, and world-wide reputation. Gettysburg is the crown jewel of all tourist attractions in Pennsylvania and perhaps our nation -- wholesome, family-oriented, educational, and patriotic. Our Commonwealth, therefore, should work hard to preserve and build on the authentic history of Gettysburg, not destroy it. Converting Gettysburg into a gambling center would be a tragedy for our Commonwealth ---- and for our nation.

Third, placing the remaining casino at Gettysburg would be economic suicide for our Commonwealth. The promoters’ case is very myopic -- based on a temporary market of gamblers from Maryland, Washington D.C., and Virginia. Long-term, however, the public and governments of these entities -- especially Maryland -- will not stand by idly and watch Pennsylvania reap major gambling revenue from their citizens. Maryland will establish a major facility near the Pennsylvania border -- in the Frederick-Westminster-Emmitsburg area -- to intercept every such gambler destined for Gettysburg.

The end result would be the worst of all worlds: Pennsylvania blundered into sacrificing Gettysburg -- its greatest tourism asset -- for temporary, minor gambling gain.

Sincerely,



Thomas A. Laser

Lt. Colonel, U.S. Air Force - Retired