

Submit as Exhibit VIII.B.9.b. the Applicant’s marketing plans for the proposed Gaming Facility with specific reference to pre-opening marketing and opening celebrations. Include the minimum annual dollar amounts, kinds and types of general promotion and advertising campaigns that will likely be undertaken, and the proposed market to be reached; the number of visitors who are projected to stay overnight at the Gaming Facility; and other examples of joint marketing ventures, if any, undertaken by the Applicant in other jurisdictions.





Overview of Marketing Plan and Strategy

Tioga Downs has two marketing advantages that will contribute to a successful roll out of the expansion of the resort property:

1. **A well established brand identity.** People in the region and beyond know what Tioga Downs is and about the top-notch entertainment experience at the property.
2. **A robust player database.** An established, continually growing database of nearly 250,000 gaming customers, with key information about those customers.

With these two sustainable competitive marketing advantages, Tioga Downs is uniquely positioned to hit the ground running with a shovel-ready casino expansion. These advantages will allow for a successful, near term roll out, drive a growth trajectory during the conversion to a full casino and help assured continued long-term success of the expanded facility.

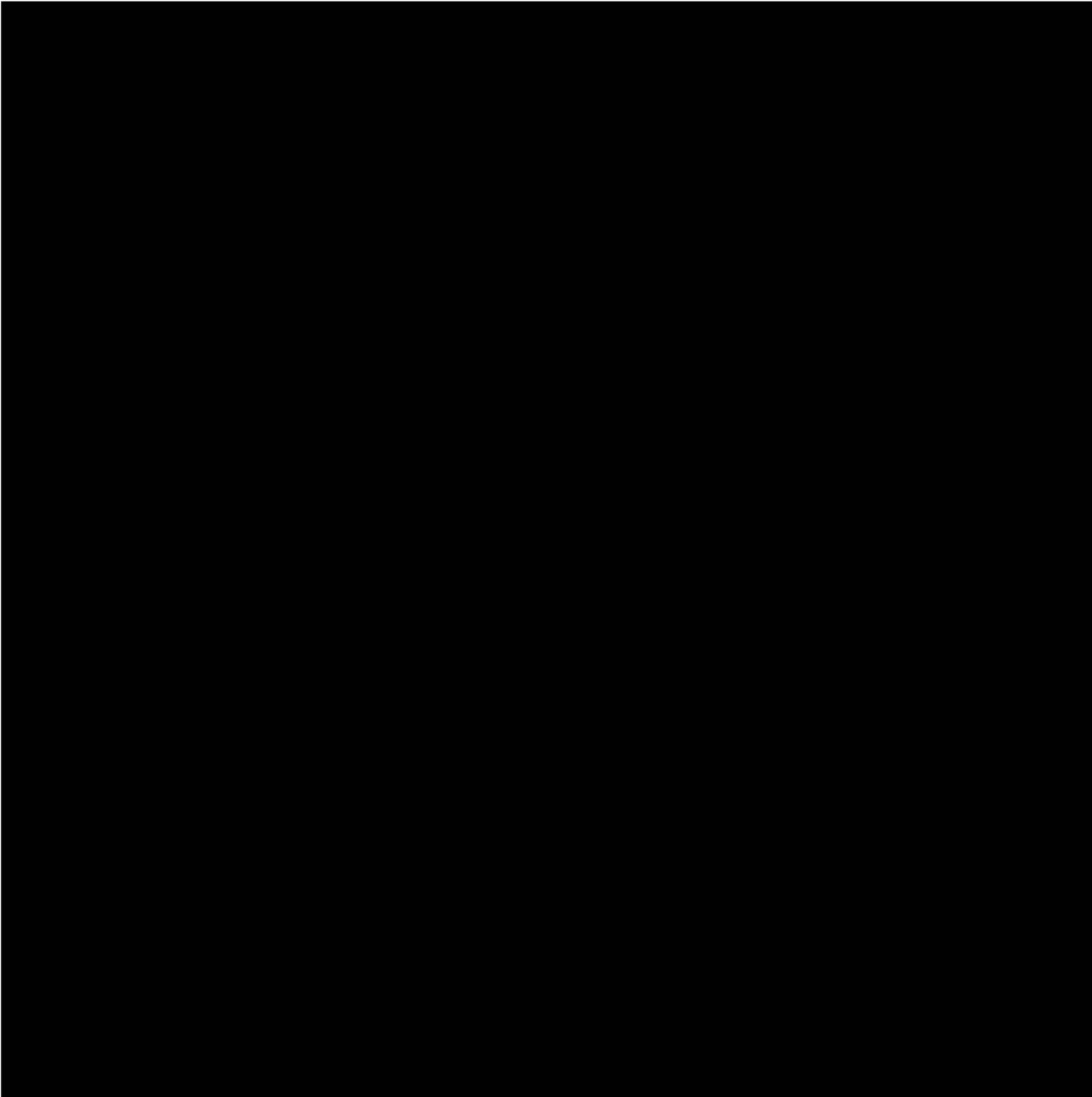
The ideal marketing mix is an integration of resources, efficiencies, and existing strong customer loyalty. This combination maximizes revenue and cost efficiency. Tioga Downs has the proven ability to effectively analyze existing marketing efforts, create new marketing campaigns, and improve upon existing business to drive sales growth and productivity in the many ways, such as:

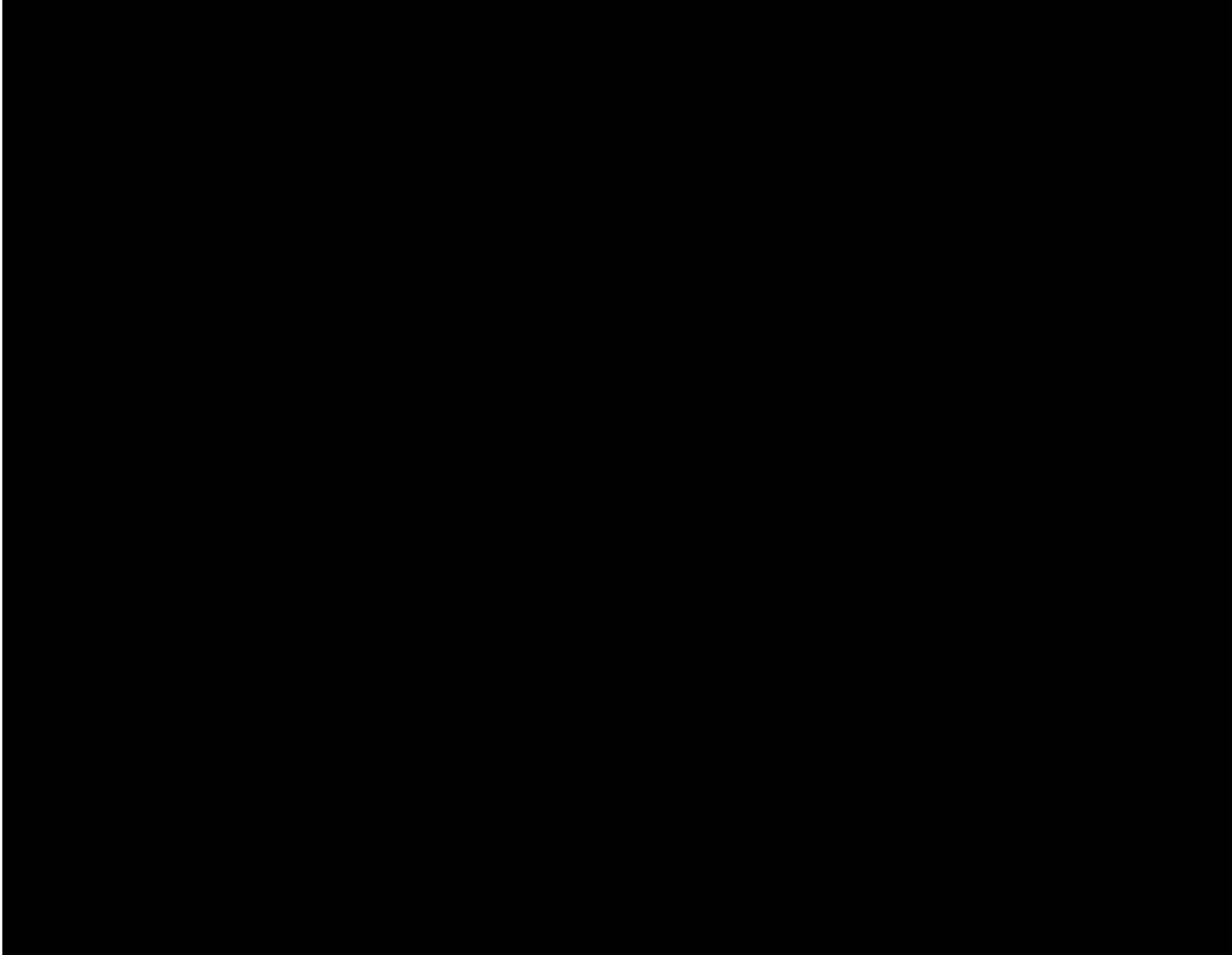
- Increase patronage from the current Tioga Downs database
- Attract customers who are currently patronizing properties in bordering states
- Increase tourism and leisure travel to the Southern Tier region
- Enhance local business partners from increased consumer traffic into the area

Tioga Downs marketing strategy will:

- (1) Position and maintain awareness of the property as the premier entertainment destination of New York's Southern Tier.
- (2) Enhance the player loyalty club, elevating it to "best in class" status within the industry.
- (3) Refine marketing messages and incentives to focus on needs and wants of target audiences.
- (4) Develop additional cross-marketing opportunities with regional tourism and business establishments.

Tioga Downs Works For The Southern Tier





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Phase 1: Pre-Casino Opening Marketing Plan

Multi Channel Marketing Campaign:

1: Media Objectives:

As the advertising agency for Tioga Downs since 2008, Rosanne Sall Advertising (a NYS registered WBE business), has been tasked with increasing public awareness of Tioga Downs and positioning it as the area's premier entertainment destination/center.

Working closely with Rosanne Sall Advertising to meet the challenge of promoting the property's expansion to a full gaming casino and resort facility, a renewed objective will be to build upon the current, strong public-awareness of Tioga Downs, convey the excitement of the expanded offerings and reach out the entire market area with our new message: **Tioga Downs Casino Resort - the place to "Find Your Fun!"**

A major component of this strategy is to target Pennsylvania markets to bring back players and entertainment seekers to New York State and repatriate gaming dollars lost to Pennsylvania casinos since the legalization of tables games there. The media plan will also be crafted to drive awareness and trial among "downstate New Yorkers."

Creation of targeted marketing communications aimed at specific demographics within the core and outer markets will highlight the new venues and offerings such as table games, the poker room, 1000 new slots, hotel/spa, multipurpose banquet rooms, indoor/outdoor pools with water slide, live entertainment, golf course, restaurants, and an outdoor adventure area. Live harness racing, an outdoor concert series, gaming promotions, festivals and special events will continue to be included in advertising messages based on seasonality.

2: Target Group Categories

In past and current marketing of Tioga Downs has employed a successful "totality" approach, combining several property elements, such as gaming, dining, entertainment and racing, to position the property as the area's premier entertainment destination.

Tioga Downs expects to utilize the following channels going forward:

- Broadcast Television/Regional Cable
- Radio
- Print
- Digital/Social Media
- Billboard/Outdoor
- Transit/Airport

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At present, gaming is an integral part of the advertising approach in the core market, defined as within a 50-mile radius of Nichols, NY (the “Core Market Area”).

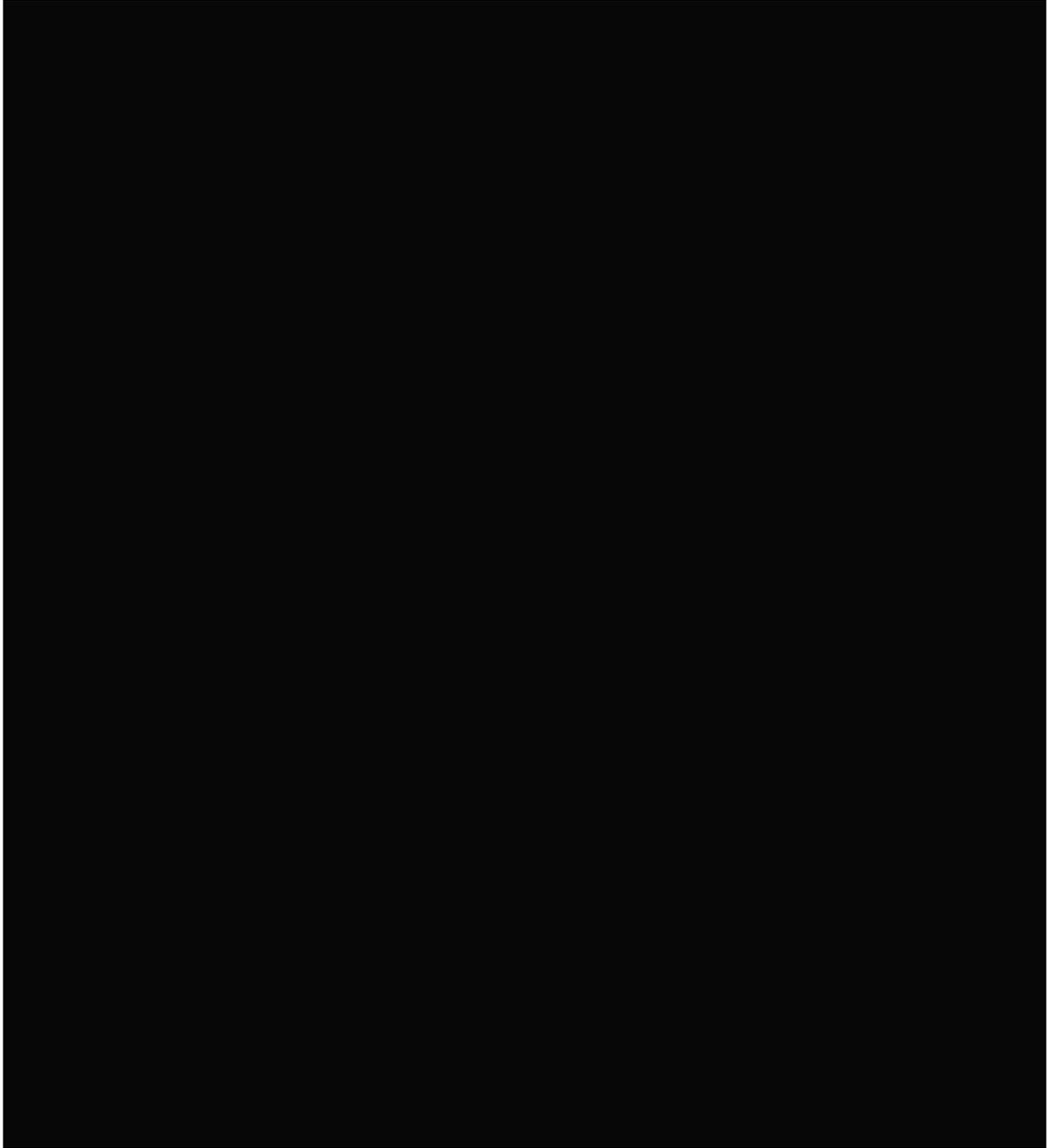
The new full scale property will be promoted within our “Expanded Market Area.” That area will expand the current radius by an additional 50 to 100 miles. The new radius will include multiple counties in New York and Pennsylvania and will include billboards on key highways such as I-81, NY-17/ I-86, NY 13, 14 and 414, I-390, I-88 PA-15 PA-220 and US-6. This campaign will also utilize zoned cable reaching specific markets and regional print.

The new Hotel/Spa will be promoted in the Core and Expanded Market Area by creating special packages and “Stay-cations.” These packages will combine with dining, golfing, concerts, special entertainment, and other events. Packages will be promoted on social media and targeted cable networks such as Food Network, Travel Channel and other cable channels depending on the specific elements.

The Hotel/Spa also will be promoted in the Core and Expanded Market Areas as a venue for Weddings, Banquets, Spa Getaways and other events. in specialty publications, bridal guides, and bridal websites such as theknot.com.

Billboards will be placed at strategic locations on key interstate highway corridors, as mentioned above, to attract the attention of travelers and inform potential visitors of our Hotel/Spa and special events (i.e., Derbyfest, Oktoberfest, Winterfest, etc.).

The targeted male audience for harness racing will be reached throughout the Core and Expanded market areas with a use of male-oriented broadcast programs (i.e. sports, news and business programs and on sports radio and zoned cable using sports networks such as ESPN, MSG, SPIKE, YES, FOX, Golf Channel.





Evolving into the Premier Group Sales Local within the Region:

Tioga Downs Group Sales will expand its group sales effort outside the local community into the Southern Tier and Northeastern Pennsylvania.

To complement the well-appointed hotel, the multi-purpose rooms, trackside terraces and current banquet spaces, Tioga Downs group sales will produce a full and year-round calendar of events.

Sales packages will incorporate visits to local attractions throughout the Southern Tier region, including:

- Wineries • Museums • Gorges • Shopping • Craft Beer Tours • Historical Sites
- Restaurants • Sporting events • Outdoor Recreation - Fishing, skiing, hiking, and boating

Tioga Downs has already established alliances with most of the area's tourism entities. (See Exhibits IX.B.1, IX.B.3 and IX.B.4 for full listing).

Media Press Conferences and Hard Hat Tours

An important component of brand awareness will be media coverage. Tioga Downs will conduct several media events throughout the resort building process, including hard hat tours of the construction.

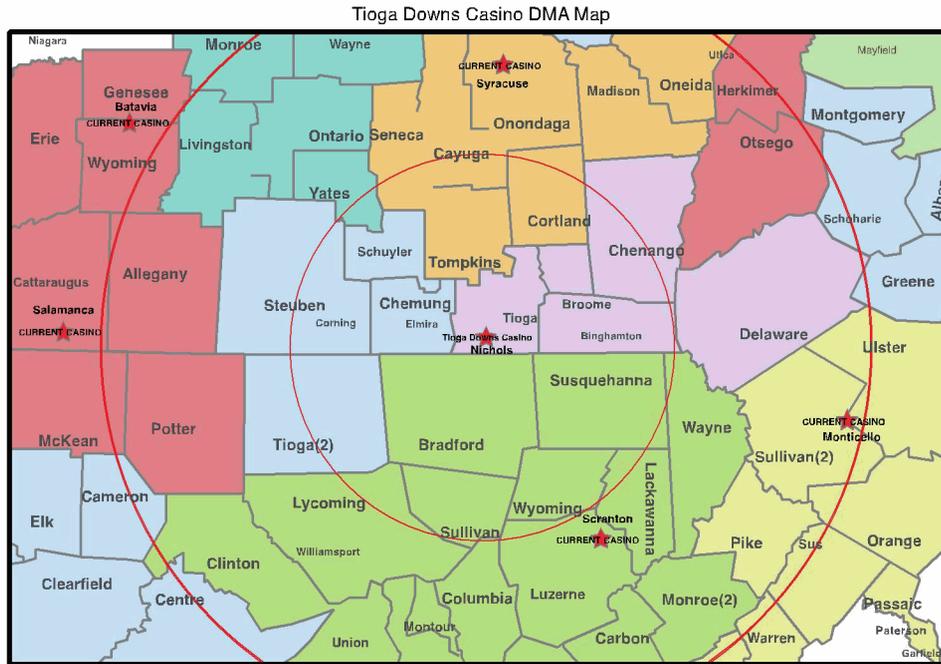
Monthly Newsletter

Tioga Downs' current loyal customers are and will remain a top priority. Tioga Downs will make sure current customers are "in the know" about the expansion by featuring news stories in the already existing monthly newsletters.

3: Geography

Tioga Downs is centrally located between four markets as defined by Nielsen: North Eastern Pennsylvania, Ithaca, Binghamton and Elmira/Corning. It is in a region bordered by Oneonta/Cooperstown to the east, Bath/Hornell to the west, Cortland to the north, the Wilkes Barre/Scranton Nielsen Market area to the south and Williamsport to the southwest.

Tioga Downs' convenient location near Exit 62 of NY-17/I-86 uniquely positions the facility to offer an easy commute from any segment of the marketing area.



The Binghamton, NY market is ranked 159th and Elmira, NY market is ranked 175th in providing network affiliated programming and local news coverage.

The analysis below illustrates the two primary markets (Binghamton and Elmira/Corning) in terms of total households in a county-by-county breakdown that shows the wide geographic population base within an easy drive to the new facility. The analysis also reviews the other areas covered in our Expanded Market Area.

Binghamton, NY (Broome County)

Television market DMA ranked 159th as defined by the Nielsen Research. This market segment includes a 4 County DMA and comprises 13 counties in New York State and Pennsylvania.

350,000 Total Households and approximately

Elmira / Corning, NY

Television market DMA ranked 175th as defined by Nielsen Research. The Elmira/Corning market segment services a 4 County DMA and includes a 10 County NSI servicing 7 counties in New York and 3 counties in Pennsylvania.

216,680 Total Households and approximately



632,000 adults ages 18 and over

Counties:	# Households
Broome, NY	77,760
Chemung, NY	34,520
Chenango, NY	19,450
Cortland, NY	17,760
Delaware, NY	18,660
Otsego, NY	23,330
Schuyler, NY	7,350
Steuben, NY	38,650
Tioga, NY	19,360
Tompkins, NY	36,510
Bradford, PA	24,500
Susquehanna, PA	16,700
Tioga, PA	16,340

390,000 adults ages 18 and over

Counties	# Households
Chemung, NY	34,520
Livingston, NY	23,390
Schuyler, NY	7,350
Steuben, NY	38,680
Tioga, NY	19,360
Tompkins, NY	36,510
Yates, NY	9,070
Bradford, PA	24,500
Potter, PA	6,960
Tioga, PA	16,340

Binghamton, NY Designated Market Area:

129,990 Homes / 232,000 Adults ages 18 and over. Includes: Broome, Chenango, Delaware, Tioga, and certain Pennsylvania counties.

Elmira / Corning, NY Designated Market Area

92,230 Homes / 173,000 Adults ages 18 and over. Includes Chemung, Schuyler, Steuben, Tioga, and certain Pennsylvania counties.

Tioga Downs has the location and ability to help repatriate NY gaming dollars currently being lost to PA by aggressively marketing to Northeastern Pennsylvania, specifically to Great Bend, New Milford, Clarks Summit and Scranton’s northern suburbs.



Wilkes Barre/Scranton, PA Designated Marketing Area

563,540 Homes/ 1,455,000 Adults 18 and over. Includes Lackawanna, Lucerne, Wyoming, Bradford, Carbon, Clinton, Columbia, Lycoming, Monroe, Montour, North Cumberland, Schuylkill, Snyder, Sullivan, Susquehanna, Union and Wayne.

This is the 55th ranked television market in the country and presents a great opportunity for Tioga Downs to attract people back to Tioga Downs who might otherwise be spending gaming dollars in Pennsylvania.

Waverly / Sayre - not a Nielsen Ranked Market

Population: 9,918. Served by Regional Cable, Radio and Newspapers.

Corning / Hornell / Bath - not a Nielsen Ranked Market

Population: 25,261. Corning Inc. provides stability & growth opportunities in this market. There are strong newspapers and radio groups providing coverage in this area.

Ithaca / Watkins Glen/Geneva - not a Nielsen Ranked Market

Population: 45,000. Cornell University and Ithaca College are anchors in a growing Tompkins County. Gannett newspaper and local radio outlets, along with cable provide coverage. Watkins Glen provides tourism opportunities and proximity to wineries along Seneca Lake. Hobart and William Smith Colleges in Geneva also offer excellent target demographics.

Oneonta / Sidney / Cooperstown - not a Nielsen Ranked Market

Population: 19,341. Oneonta State College, Hartwick College, Cooperstown tourism and the Baseball Hall of Fame are key elements in this area. Media opportunities include cable, radio & newspaper.

Montrose, PA / New Milford, PA / Great Bend, PA - not a Nielsen Ranked Market

Population: 3,200. These Pennsylvania counties that likely have customers that would patronize Tioga Downs due to close and easy access. Gas Drilling has provided much success in this rural area. Weekly newspapers serve this area.

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Harford, PA / Clark Summit, PA – not a Nielsen Ranked Market

Population: 6,500+. This rural population is served mostly by zoned cable television and Scranton media..

4: Media Strategy / Tactics

The media strategy takes full advantage of the Binghamton and Elmira/Corning Broadcast stations. These stations provide direct access to Tioga Downs’ core target audience. Broadcast TV in these markets will be supplemented by Time Warner Cable’s zone system, which allows Tioga Downs to reach every market segment with specifically targeted commercials.

Gannett newspapers in Binghamton, Elmira, and Ithaca, NY, provide significant advertising coverage in the core market and will be supplemented by weekly, daily and regional newspapers.

Radio will play a critical role in our strategic plan. In many of our outlying areas that are underserved by broadcast television, radio is a valuable asset that serves as a leading promoter of all types of entertainment, including concerts, gaming, food & beverage, and, of course, racing.

A strong, effective use of billboard advertising within and beyond the core market will increase awareness of the expansion and new tourism opportunities.

Advertising plans also include transit advertising on municipal bus systems in Binghamton, Elmira, and Ithaca. Airport advertising in all regional airports will attract tourism and add to growth, while supporting yet another local government agency.

Tioga Downs will also utilize its strong online and social media presence, building on our current Facebook, Twitter and Instagram base. Other marketing opportunities, such as movie theaters, shopping malls and cross promotions with non-profits and business organizations in the marketplace, will be utilized whenever possible and appropriate. (A more detailed explanation of Social Media Strategy will be found in Section 5-A below)

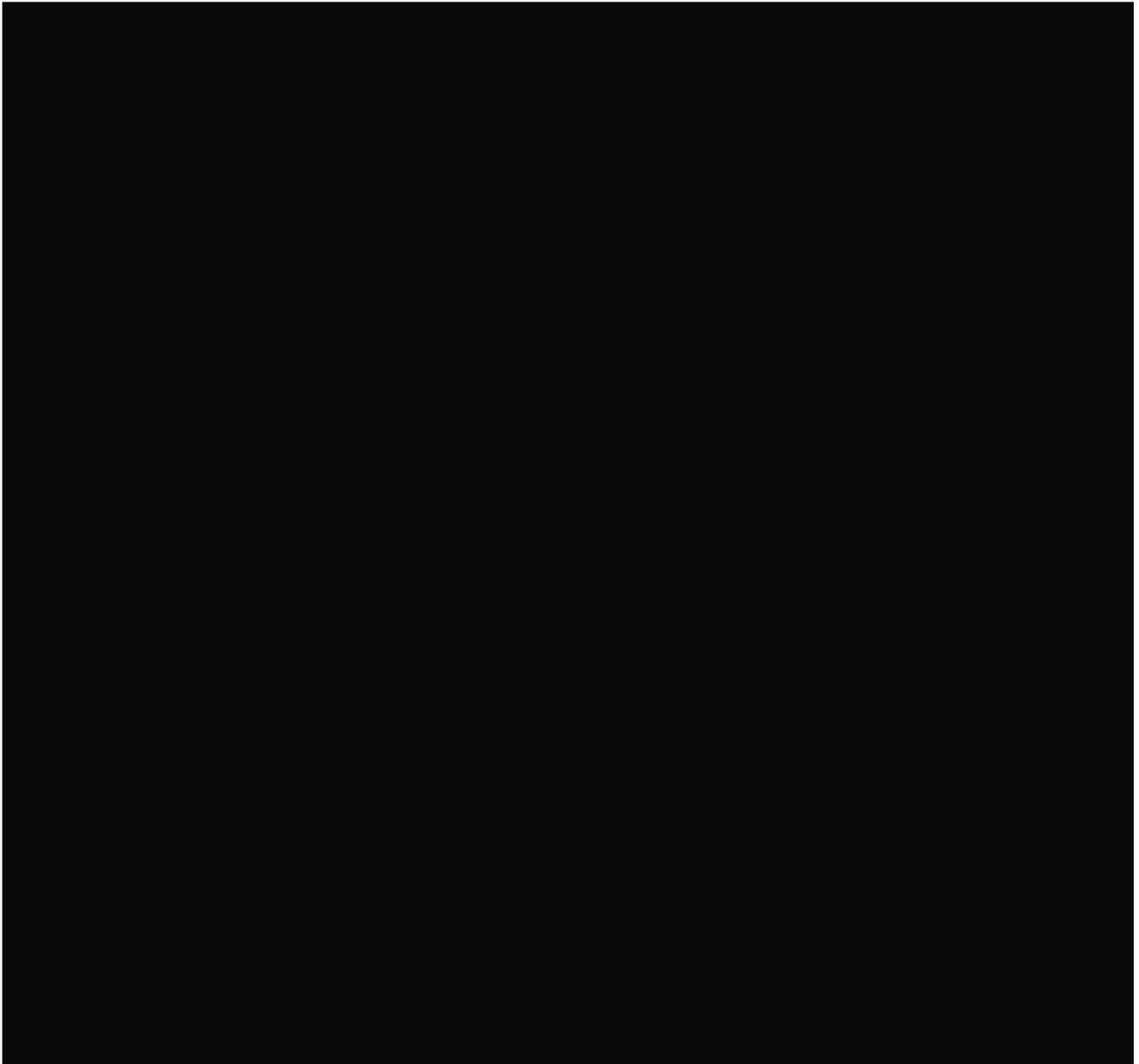
Tioga Downs will keep connected to the community through press conferences announcing all construction, expansion and improvement plans. Additionally, Tioga Downs will engage in community based charitable campaigns and contributions.

New “sponsorship opportunities” with other established organizations, similar to the current Tioga Downs partnerships with the Binghamton Mets, Binghamton Senators, Elmira Jackals,

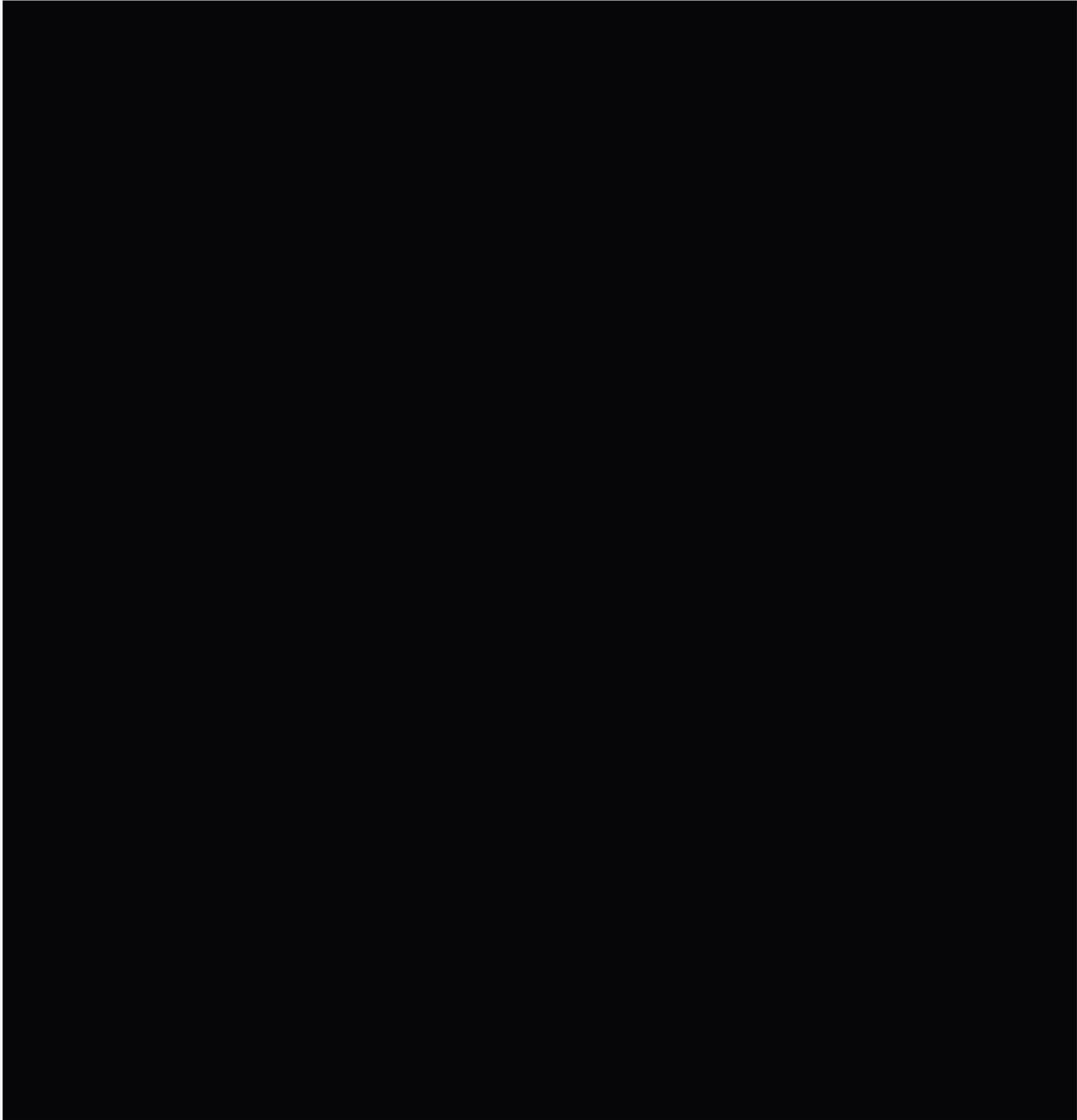
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and Watkins Glen racetrack will also be developed. Partnerships with local theater groups, including our current relationship with the Goodwill Theater will be utilized. Other regional tourist venues such as the Corning Museum of Glass and the Finger Lakes Wineries present great co-promotional opportunities.









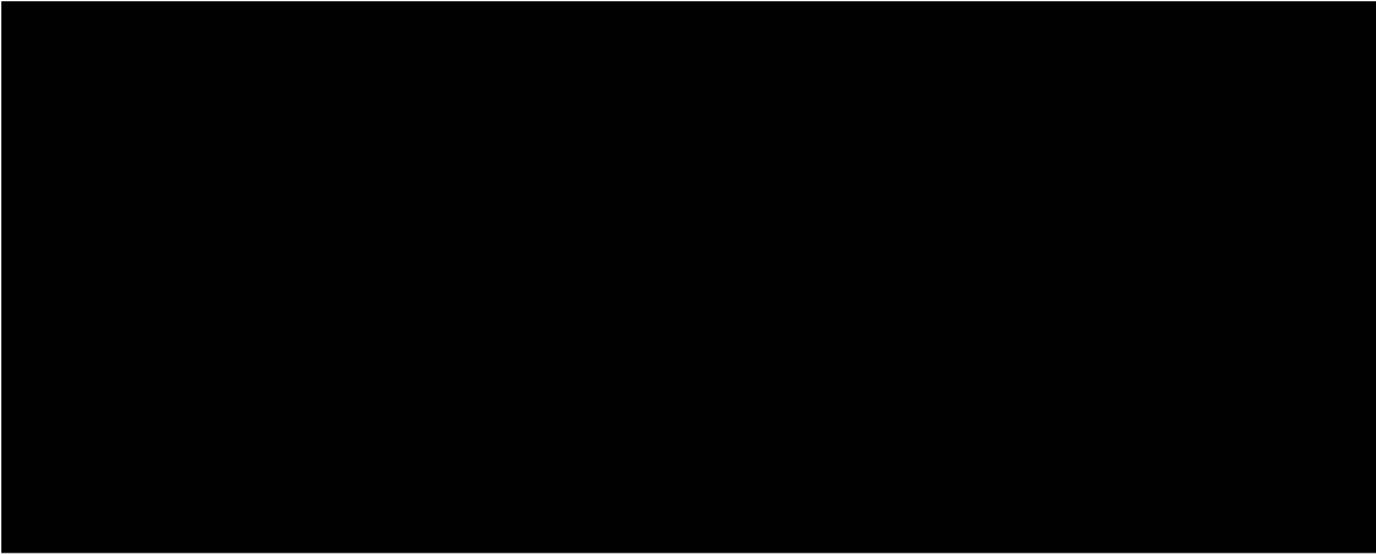
6. Tourism/Regional Business Promotion

Tioga Downs currently partners with chambers of commerce from surrounding counties for advertising, travel shows, and brochure exchanges. With major events such as concerts, festivals, and promotions, Tioga Downs advertises with local travel information sites, chamber newsletters, and by sponsoring local events.

Going forward, Tioga Downs will continue to leverage its Southern Tier location, and promote tourism throughout the year. By holding relationships with the multiple chambers of commerce, conference and visitors bureaus, and regional tourism partners below, Tioga Downs will target individuals and groups seeking the adventure and relaxation that the Southern Tier region has to offer.

Regional and Global Tourism Media Partners include:

- Finger Lakes Wine Country (Corning Enterprises)
- Finger Lakes Tourism Alliance
- Destinations of New York
- I Love New York Marketing Campaign



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8. Website Creation and Marketing – Free Play for Fun Social Gaming

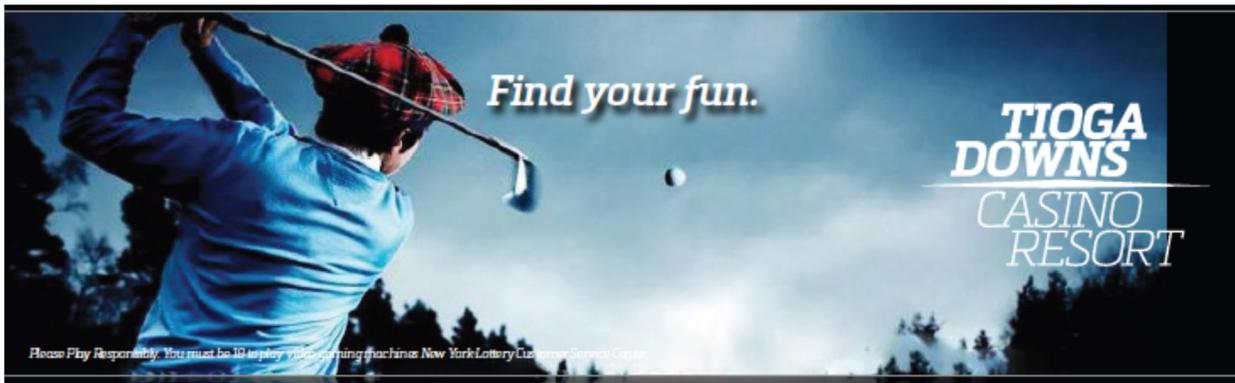
Tioga Downs has posted a website to create awareness of the property expansion. The functionality of this website will be upgraded to generate demographically-targeted, permission-based response leads for players' club membership and property visitation. We have experience with a wide range of premium and upfront incentives that combined with the use of the web-based technology will produce cost-efficient and stable inbound source of business development. We will explore, with the Commission's consent and authorization, Free. Play-for Fun, Social Gaming through our website as a marketing tool. Several gaming device manufacturers offer such play for fun social gaming o products as a marketing tool

9. Events

Tioga Downs Golf Classic

As announced, Tioga Downs has signed a 99-year lease option with Tioga Country Club contingent on securing the casino license. Tioga Downs will mark the start of this joint venture by hosting an annual golf tournament for Country Club Members and Tioga Downs.

Within two years, Tioga Downs will look to develop a large, impactful Celebrity Golfing Event, playing an important role in tourism development and economic impact in the Southern Tier.



WinterFest Celebration

Tioga Downs believes the holiday season is the perfect time of year to let the community know how much we appreciate its patronage and support. The WinterFest Celebration is a “must see” event, featuring a technologically advanced computer lightshow, holiday parades, holiday decorations, live carolers and much more. Winter promotions with an Ice Bar and Ice

Sculturing were huge successes in 2014. This great winter event runs from November through the New Year and is free to the public. Tioga Downs created memories for our Southern Tier families and out of market visitors that joined the celebration.



Tourism Development

Tioga Downs will continue to commit resources to support tourism development in New York State. Tioga Downs will target the following demographic groups or activity interests as defined in the I Love NY Tourism Summit. The following are example activities that may be appealing to our customers and potential customers:

Heritage Tourism: Tours to various historical landmarks throughout the region, hosting Veteran's originations and events, and consideration of staging a Revolutionary War enactment of the Battle of Newtown at the property

Cultural Tourism: Packages and transport offered to hotel guests to arts and cultural attractions such as Corning Museum of Glass, regional production theaters, summer stock, and Glimmerglass Opera



Culinary Tourism: Cross marketing opportunities with regional restaurants as part of the Players' Club Regional Business Club Partnership Program and cooking shows with locally grown ingredients

Sports Tourism: Customer trips to local sports team events, pro team events and The Baseball Hall of Fame

Agri-Tourism: Farm to market events, vineyard tours, harvest festivals and farm show events

Outdoor Tourism: Packages that involve hiking, fishing, boating, skiing, snowmobiling and wildlife watching throughout the Southern Tier region

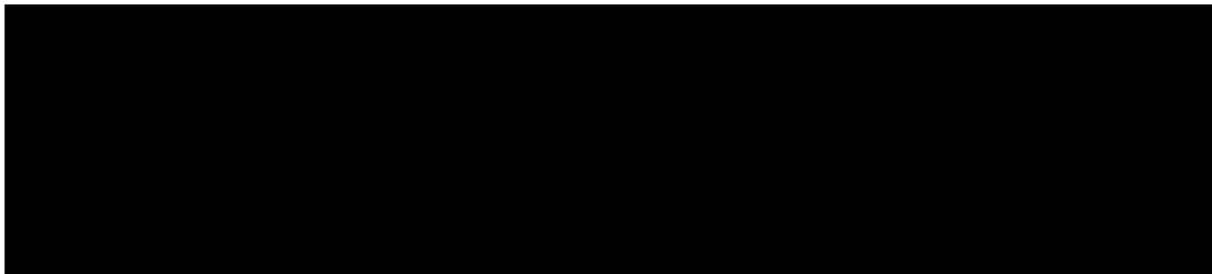
Adventure Tourism: Guided excursions from the Tioga Downs hotel to the Finger Lakes to enjoy outdoor activities such as white water rafting and kayaking.

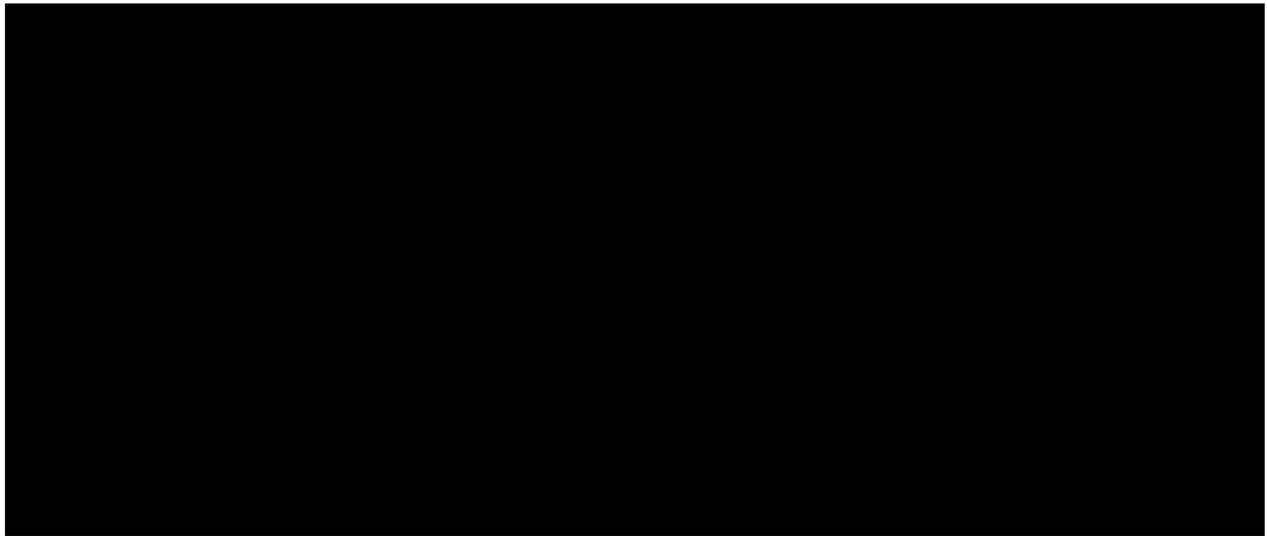
LGBT Tourism: Tioga Downs will seek to host meetings and functions for these special interest groups

Geo-Tourism: Tioga Downs will promote volunteerism opportunities in database mailers and on social media, as well as commit paid staff hours to participate in various volunteer activities

Customer Profile Model Generation

Advanced database analytics have proven that best prospects often “look” and “behave” like best customers. By analyzing our own database, we can effectively create a prospecting profile model. Using this model, we will be able to target the most cost efficient spending of advertising and customer development marketing efforts. This model will also be able to identify inactive customers who can then be targeted with reactivation promotions.





Casino Opening Celebration

Tioga Downs plans to mark the opening of the new casino with a month-long celebration in July 2016. Events will include:

- Ribbon cutting ceremony with local, regional and state dignitaries
- 2 headliner concerts
- Fireworks show every Friday night
- Month-long million dollar sweepstakes (Cash, car, and Free Play prizes)
- Horse show and wine tasting event
- VIP players card launch event

Hotel Soft Opening/New Year's VIP Customer Event

We plan to open the new hotel with a New Year's Celebration with our VIP Customers. The event will include a complimentary hotel stay, themed party and dinner in the new restaurant.

Grand Opening Events:

We plan two resort grand opening events. The first celebration will be held in January 2017, marking the opening of the hotel and its indoor amenities. This event will be gaming centric, primarily catering to our database of casino customers and will aim to attract customers of nearby competing casinos.



The second and larger of the two events will be held in May 2017, marketing the opening of the adventure zone outdoor amenities. The event will take a wider focus, positioning the property as a destination resort.

Events planned for these celebrations are outlined below:

JANUARY 2017

GRAND OPENING OF TIOGA DOWNS HOTEL, PJ CLARKE'S AND AGELESS SPA

The first of two resort grand opening celebrations will be held in January 2016, when the hotel opens to the public. The gala will include:

- Indoor Headliner Concert
- Indoor show of local businesses who are in alliance with the casino players club
- FIND YOUR FUN casino sweepstakes
- FIND YOUR FUN slot and Blackjack tournaments
- Restaurant promotions
- Spa promotions

MAY 2017

GRAND OPENING OF THE TIOGA DOWNS CASINO RESORT

- Outdoor Headliner Concert
- Family Fun Festival (Pool, Waterslide, Batting cages, Putt Putt, Bouncy House, 2K children's race on track, carnival games, face painting and crafts)
- Classic Car Giveaway



Overview of Creative and Branding Strategy Post-Resort Opening

Building the Brand

The brand promise: Find Your Fun at Tioga Downs Casino Resort! will be supported with an emergence of impactful retail promotional events, live entertainment, casino player events, and leisure travel and tourism packages.

Reinforcing the FUN Entertainment Brand

Marketing efforts will recognize and reward patronage to keep customers engaged and drive repeat visitation and analyze data and solicit feedback from all target audiences to determine (i) Ways to improve the experience; (ii) Most effective modes in which to communicate; and (iii) Most effective offers and incentives.

There's always FUN to find at Tioga Downs.