Submit as Exhibit VIII. B.2. the following:

a. describe any loyalty, reward or similar frequent player program (a “Program”) maintained by the Applicant or, if applicable, the Manager for any casino the Applicant or Manager owns, operates or manages;

b. state whether the Applicant or, if applicable, the Manager maintains a casino customer relationship management system and database (a “Database”) that tracks the play of its Program members;

c. indicate whether the Program and Database will be available for the marketing, promotion and advertising of the Gaming Facility and whether they are “exclusive” to the Applicant and/or, if applicable, the Manager;

d. indicate the number of “active” (those who have played within the past 12 months) and “inactive” (those who have played over 12 months ago) members in the Database;

e. indicate the number of rated players included in the Database that are located within 50-, 100-, 150- and 200-miles of the proposed Gaming Facility; and

f. describe how the Database and Program will be used to market, promote and advertise the Gaming Facility.

Section A – Description of Loyalty Program.

Tioga Downs has an existing player database of nearly 250,000 customers which has been established over the past nine years. Typically, it takes a new property twelve months to compile enough customer data to implement an effective customer loyalty program. Even then, a program will have limited data, making it difficult to target customers appropriately. Thus, Tioga Downs can use its existing program to drive rated play immediately.

Tioga Downs has used its customer loyalty program to continually produce year-over-year gains in rated play. The loyalty program will be expanded in scope as Tioga Downs’ gaming space and amenity offerings expand.

Importantly, and as described further in Exhibit X.B.4, all database information and promotions are screened to ensure that no excluded patron is included in any promotion or mailing.

Program Strategy Overview