

## **Exhibit VIII.C.7.d (Usage and Allotment of Hotel Rooms):**

*Submit as Exhibit VIII.C.7.d. a forecast of the number of hotel rooms that will be used for casino and other forms of marketing or reserved for gaming establishment promotions and substantiate the basis of such forecast, for example, by comparison to comparable facilities.*

Projecting the split of casino versus non-casino rooms is difficult prior to opening, especially given that there are no local casino benchmarks. In destination markets, casino rooms can be as low as 10% and as high as 60% of inventory. For regional casinos with hotels, the percentage of casino guests tends to be higher than for hotels in destination markets. With our significant banquet/conference/event business, we believe that there will be significant cash demand in Newburgh, particularly when there are local events in the area, and that the majority of rooms will be for non-casino guests. We project that our hotel will be one of the nicer properties in the area – current options include a Sheraton and Double Tree but are otherwise two and three star properties such as Courtyard by Marriott and Hilton Garden Inn. As a result, it will attract a more upscale consumer and will be a significant draw for tourist visitors as well.

We plan to manage our mix through our cash rate, casino rate, and criteria for comped rooms but driven by the cash demand, so that we ensure that any comped rooms are providing incremental revenue to the casino and, thus, the State. We also will provide an excellent suite product for high-value gaming customers.