



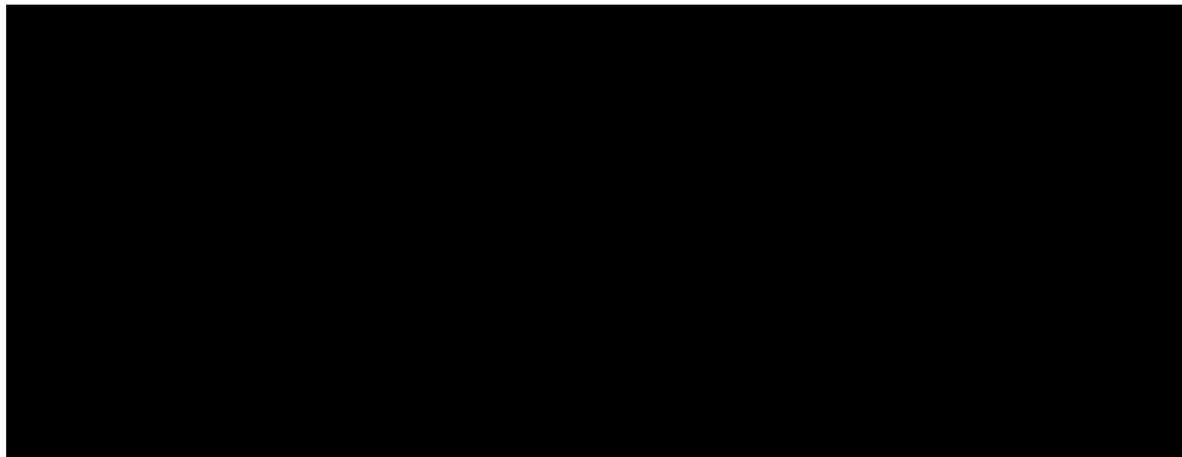
Exhibit VIII.B.9.c. – Strategy to Ensure Maximum Use

Submit as Exhibit VIII.B.9.c. a description of the strategies to be used by the Applicant to deal with the cyclical/seasonal nature of tourism demand and ensure maximum use of the Gaming Facility project throughout the entire calendar year.

Tioga Downs has roughly a decade of historical data and analytics on which to make strategic decisions regarding the cyclical nature of the Southern Tier gaming market revenues. Key relationships with various regional tourism partners have allowed Tioga Downs to develop a keen insight into regional trends.

Tioga Downs strategic approaches, listed here, have proven successful thus far and will only improve as a full scale casino resort:

1. **Tioga Downs Player Database Analytics** - Tioga Downs' database gaming customers have established visitation patterns, with known and measured impacts due to seasonality. In addition to regular monthly direct mailings, events and promotions are planned to mediate the low seasonality trending as well as to maximize the potential of the high seasonality.



4. **Food and Beverage Strategy** - Food and beverage specials will be featured throughout the year
5. **Year-Round Special Event Strategy** - Special events created around holidays and seasonal activities will be featured throughout the year. Particular emphasis on the low visitation months of November, December, January and February.



Sample Special Events Calendar

Fall

- Foliage tours
- Vino at the Casino
- Oktoberfest/Pokapolluza
- Veterans Day F&B specials
- Pro football game/pep rallies
- Hunting packages
- Thanksgiving Turkey Giveaway
- Indoor Entertainment through Spring
- Football Chicken Wing Contest

Winter

- Winterfest
- Ice Bar/Ice Sculpture Contest
- Ski packages
- Holiday get-away packages
- Holiday craft fairs, parties and promotions
- New Year's Gala
- Holiday Lights Festival
- Super Bowl
- Valentine's sweetheart packages
- Snowmobile enthusiast packages
- Comic Book Show

Spring

- Derby Day
- Mardi Gras-NY style
- St. Patrick's Day events
- Mother's Day
- Car and Motor Cycle Shows
- Bridal Showcase

Summer

- Racing
- Outdoor concerts
- All About Beer Magazine's Beer Festival
- Farmer's, Antique and Flea Markets
- Memorial Day Car Giveaway
- July 4th Fireworks
- Spedi/Hot Dog Eating contest
- Burger Brawl Competition

In addition, events will be featured on 3-day holiday weekends throughout the calendar year:

- Spa weekends
- Gaming tournaments (slots, tables, poker)
- Concerts/Major Entertainment
- Golf
- Festivals
- Regional Tours and Event packages

Tioga Downs Works For The Southern Tier