St. Paul City Council
300 City Hall, 15 Kellogg Boulevard, West
St. Paul, MN 55102
November 11th, 2025

Council President and Members of the Saint Paul City Council:

Thank you for the opportunity to comment on Ordinance 25-76. Our organizations represent retailers, grocers, and employers serving residents throughout Saint Paul and the region. We share the Council's interest in reducing fraud and improving consumer safety.

Our members benefit from having Crypto-Kiosks in our stores. Kiosk operators pay rent to the owners of these stores, which reduces overhead cost for the business with a steady income source. Additionally, having these kiosks in our member's stores drives business that would otherwise go elsewhere. Our members benefit from having the opportunity to attract different consumer types into their place of business.

Minnesota's statewide digital-kiosk regulations are still early in implementation. Commerce's initial enforcement actions show progress, but they also suggest gaps that may require broader coordination. If individual cities enact different, conflicting policies, the overall system will become harder to enforce, and consumers might face inconsistent protections depending on where they live or shop.

A prohibition in Saint Paul will unintentionally reduce the City's visibility into kiosk activity, redirect transactions into neighboring communities with different rules, and make statewide enforcement more complex.

We hope the Council can work with us to consider alternatives to a Saint Paul-only prohibition and to engage with statewide partners, including regulators, legislators, retailers, and community organizations. We want to build a coordinated consumer-protection framework that works for all of Minnesota.

Our organizations stand ready to assist in developing a consistent statewide strategy that strengthens enforcement, supports frontline workers, and increases consumer safety without creating uneven or fragmented rules across Minnesota.

Thank you for your consideration.

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