



November 16, 2014

St. Paul City Council Members
City of St. Paul
15 West Kellogg Boulevard
St. Paul, MN 55102

Dear St. Paul City Council Members:

SUPERAMERICA currently operates 19 convenience stores in the City of St. Paul. We recently learned that the city council will hold a public hearing this week on an ordinance that would ban the sale of numerous flavored tobacco products.

As a responsible retailer of tobacco products, we do not agree with the St. Paul City Council on taking the further step of banning legal tobacco products after already causing many cigar products to be taken off of our store shelves due to the minimum cigar pricing ordinance adopted earlier this year.

At SUPERAMERICA, we take the selling of tobacco products very seriously. In fact, we have a contract with an independent compliance check company to conduct undercover tobacco purchases at each SuperAmerica store every month statewide to ensure that our customer service representatives are complying with the law and preventing the sale of tobacco to underage youth. Our company policy requires our team members to ID every customer who appear under the age of 30. We have achieved a company-wide success rate of 97% in preventing the sale of tobacco to minors.

The result from enacting further market restrictions will continue to create an uneven and unfair playing field between stores located in St. Paul and also with stores in neighboring suburbs. Our customers will simply travel a few miles to the suburbs of St. Paul where they can buy their legal tobacco product. Unfortunately, they may visit the closest store, which may be a competitor of ours. Also consider that we not only lose the sale of the specific tobacco product but the associated snack and drink items as well as fuel purchase.

As a city council, you need to consider that putting current retailers at such a disadvantage to tobacco shops in St. Paul and other retailers in nearby cities will be a major disincentive for any retailer to open a new store in St. Paul. Why would a retailer invest in a new convenience store in St. Paul with the knowledge that an even broader category of legal products is prohibited from being sold in a retail store? The impact for the City of St. Paul will be a lack of future retail economic development.

We would ask that you not adopt the ordinance and, in the alternative, work with local retailers to outline the reasons for such a limitation, obtain retailer feedback, and then decide whether to proceed or not. At the same time, given the seriousness with which retailers take tobacco sales, we do not believe that there is any justification for banning the sale of flavored tobacco products.



Yours sincerely,

Kraig Elliott

Title: Director of Marketing- Category Management
SUPERAMERICA