



Joy Goeben

STATE REPRESENTATIVE • 5th ASSEMBLY DISTRICT

Assembly Committee on Jobs and Economy

Assembly Bill 230

Representative Goeben

June 10, 2025

Good Morning Chairman Gundrum, Vice Chair Neylon, and members of the committee.

Thank you for the opportunity to testify on Assembly Bill 230. I believe there are various reasons why this legislation is helpful for our state. One of those reasons might surprise you.

Assembly Bill 230 (AB 230) would require retail sellers to accept cash as a legal form of payment. Consumers are not prohibited by any measure in this legislation from conducting transactions via card, check, mobile payment system, virtual currency, or digital wallet. AB 230 simply states that retail sellers must not disallow cash as a valid form of payment for goods or services rendered.

One of the main reasons in drafting this legislation was for those individuals and families who are “underbanked.” While I understood the concept, this was a new term to me. The term “underbanked” is used to describe a situation where **neither** an individual **or** their spouse/partner have a checking, savings, or money market account. According to the Federal Reserve, six percent of adults were “unbanked” in 2023. Unbanked rates remained far higher among low-income adults. Twenty-three percent of adults with income below \$25,000 were unbanked compared with 1 percent of adults with income of \$100,000 or more. Unbanked rates were also higher among younger adults, Black and Hispanic adults, and adults with a disability.¹ The Federal Deposit Insurance Corporation (FDIC) presented a study conducted in 2023 reporting similar numbers.²

Many people do not have the necessary credit to obtain a credit or debit card. Cashless policies discriminate against these people. Additionally, individuals who choose to pay their debts/bills in cash have the right to do so, whatever their reason.

There are a handful of states that already have this requirement in place including Massachusetts, New Jersey, Rhode Island, Colorado, and the District of Columbia.

¹ <https://www.federalreserve.gov/publications/2024-economic-well-being-of-us-households-in-2023-banking-credit.htm>

² <https://www.fdic.gov/household-survey/2023-fdic-national-survey-unbanked-and-underbanked-households-executive-summary>

Additionally, all United States paper currency carries the statement “This note is legal tender for all debts, public and private.” This alone makes cash acceptable, and arbitrary restrictions should not be imposed by vendors, retailers, or service providers. However, as technology continues to develop and is integrated in our daily lives, an increasing number of retailers are moving to a cashless transaction model. Often, retailers are faced with a surcharge, which they are passing on to consumers, driving up the costs of goods and services.

The bill before us today would simply codify that cash must be accepted if presented, allowing consumers the freedom to bypass concerns such as credit checks, identity theft, banking fees, compounding interest, and swipe fees.

Some changes have been made to the bill this session, recognizing concerns that were expressed in committee last session. The language of this bill does account for large scale venues (ie Lambeau Field, American Family Field, Summerfest), where not every vendor at the location would have to accept cash. Rather, at least one vendor on premise would have to accept cash, but not every vendor.

I appreciate the committee considering this legislation and I hope we can work together to find a solution for all our Wisconsin residents. Thank you!



RACHAEL A. CABRAL-GUEVARA

STATE SENATOR • 19TH SENATE DISTRICT

Testimony before the Assembly Committee on Jobs and Economy

Senator Rachael Cabral-Guevara

June 10, 2025

Hello, members of the Assembly Committee on Jobs and Economy. Thank you for allowing me to provide testimony on Assembly Bill 230, a bill that will ensure equitable access to goods and services for all Wisconsin residents.

Despite the increasing use of digital payment methods, a significant segment of our population relies on cash as their payment source. According to the Federal Reserve, approximately 18% of Americans do not have a bank account or are “underbanked,” meaning they lack a bank account or have limited access to banking services. For these people, cash remains the primary, if not only, means of conducting transactions. By requiring the acceptance of legal tender cash, Assembly Bill 230 ensures that these individuals are not marginalized or excluded from our economy.

Additionally, cash transactions can offer a level of privacy and security. Not all consumers are comfortable with data collection practices associated with electronic payments. By protecting the option to pay with cash, we can uphold the right of individuals to make purchases without unnecessary intrusion on their personal information. In times of crisis or technological failures, cash serves as a reliable fallback, ensuring our economy can continue even when systems are down.

Many other states and municipalities have enacted similar laws on cash acceptance, ranging from Colorado to cities in our neighboring state, Michigan. These measures reflect the growing recognition of the importance of maintaining cash as a viable payment option. Wisconsin has the opportunity to join these other states, committing ourselves to consumer rights.

Assembly Bill 230 is a straightforward yet impactful piece of legislation that protects vulnerable populations, respects consumer privacy, and strengthens our economic infrastructure. I am hopeful you will be able to support this bill as it moves through the legislative process. Thank you for your time.

MEMORANDUM

To: Members of Assembly Committee on Jobs and Economy

From: Kelly Kirsch

Manager, Parthenon Gyros

Erin Vranas

Co-Owner, Parthenon Gyros

Chair, Wisconsin Restaurant Association Board of Directors

Date: June 10, 2025

Re: Oppose Assembly Bill 230 relating to: requiring retail sellers to accept cash and providing a penalty.

Overview

Parthenon Gyros is a 3rd generation family restaurant that has proudly served Madison since 1972. During COVID and the June 2020 riots on State Street, and after extensive internal review and community consideration, our restaurant transitioned to a **cashless payment system**—a decision rooted in employee safety, public health and operational efficiency.

Before going cashless 5 years ago, **over 90% of our transactions were already credit card**. Following the transition, our transactions have continued seamlessly using card or digital payment, with **overwhelming customer support**.

However, proposed legislation to prohibit cashless businesses in Wisconsin threatens to **undermine not only our right as private businesses** to determine how we transact, but also **compromises hard-won gains—primarily in the safety of our employees**, but also in efficiency.

This memo is a request to **oppose any mandate requiring private businesses to accept cash** and preserve the freedom for each business to choose how it operates best.

Why We Went Cashless

1. Employee Safety

No cash on site means we're no longer a target for robbery or theft, which is a very real risk. **Protecting our team from violence is our number one, non-negotiable priority**—and this policy significantly reduces risk.

2. Sanitation & Food Safety

Cash is known to carry pathogens, and passing physical bills and coins increases the risk of contamination—especially in food service. **With contactless payments, guests tap, we cook**. It's faster, cleaner, and safer.

3. Operational Efficiency

Counting money, dealing with change drawers, and managing armored cash pickups so our team doesn't have to take the risk of transporting cash to the bank creates a lot of extra labor and expense. Additionally, our bank and many banks have handling fees associated with depositing cash. **Eliminating cash has allowed us to better use our limited resources.**

4. Financial Transparency

A cashless model **guarantees traceable, auditable transactions**, reducing fraud, easing reconciliation, and strengthening tax compliance.

5. Trends and Alignment

Major venues across Wisconsin have adopted cashless policies—including Lambeau Field, UW Madison dining halls and stadiums, Fiserv Forum, Summerfest, Kalahari Resort and innumerable small businesses. Parthenon aligns with this **widespread shift toward modern, secure, efficient commerce.**

Legal Context

There is a common misconception that businesses are *required* to accept cash because U.S. currency is legal tender. In truth, the **Federal Reserve** has clarified:

“There is no federal statute mandating that a private business, a person, or an organization must accept currency or coins as payment for goods or services.”

Even though cash is a legal currency, that does not mean we are legally required to accept it at the federal level.

Wisconsin currently respects this right. Past attempts to legislate mandatory cash acceptance have not advanced—indicating a continued appreciation for **business autonomy** and **free market principles** in our state.

But What About Accessibility?

Some opponents of cashless policies argue that businesses who do not accept cash discriminate against individuals who are unbanked, homeless, or who lack legal immigration status. At Parthenon Gyros, we're deeply empathetic to those facing various barriers. We also recognize that **small businesses should not be forced to shoulder significant burdens** in order to accommodate customers who only carry cash.

Some legislative proposals have suggested "reverse ATMs" as a workaround, where individuals deposit cash into a machine and receive a prepaid debit card to use at the establishment. While this may be feasible for large stadiums or corporate venues, it is financially unworkable for small, independently owned businesses like ours.

The least expensive reverse ATM machines on the market cost \$750 per month—in addition to a \$3 per card transaction fee. For a business of our size, these costs are prohibitive and unsustainable. Not only would this wipe out savings we gain from going cashless, it would also divert funds from wages, benefits, training, and infrastructure improvements that directly impact our team and guest experience.

There are practical alternatives for customers who may not have a card. For example, convenience stores, such as Kwik Trip, sell reloadable prepaid VISA cards for cash. Guests can quickly and easily purchase one of these cards and use it at cashless establishments.

Furthermore, it's important to note that government programs like SNAP (Supplemental Nutrition Assistance Program) and EBT (Electronic Benefits Transfer), which assist low-income individuals, do not provide a cash option. Instead, they issue benefits via an EBT card. **Even government programs do not provide a cash alternative,** and private businesses should not be forced to do so either.

We are committed to being part of an inclusive, modern economy—but we believe that inclusion should not come at the cost of small business viability.

Our Position

We believe **private businesses**—like Parthenon Gyros—**should retain the right to choose how to accept payment.** If we choose to accept Venmo, gold pirate coins, live chickens, or cowpies, we still pay the taxes, follow labor laws, and comply with all codes.

We are not seeking to restrict consumer choice. We are asking to preserve our own.

Conclusion

Wisconsin's economy thrives on innovation and entrepreneurial freedom. Mandating cash acceptance undermines both. We ask you to **OPPOSE AB230, relating to: requiring retail sellers to accept cash and providing a penalty,** that limits payment autonomy, and to champion policies that let small businesses make smart, safe, and modern decisions in alignment with their values and operations.

If you'd like to visit our restaurant or speak further, we'd be honored to host you or come to your office to discuss how vitally important this is and how our systems work in practice.

Thank you for your time, consideration, and service.



2801 Fish Hatchery Road | Madison, WI 53713 | 608.270.9950 | wirerestaurant.org

June 10, 2025

TO: Members of the Assembly Committee on Jobs and the Economy
Representative Gundrum, Chair

FR: Susan Quam, Executive Vice President

RE: AB 230 relating to: requiring retail sellers to accept cash and providing a penalty

Thank you, Chair Gundrum and committee members, for hearing our testimony today on AB 230, requiring retail sellers to accept cash and providing a penalty.

The Wisconsin Restaurant Association (WRA) represents over 7,000 restaurant locations statewide and represents all segments of the restaurant and hospitality industry. Our membership includes food establishments of all types and sizes, such as seasonal drive-ins, supper clubs, diners, bars, locally owned franchisees, fine-dining, and hotels/resorts. The majority of our members have alcohol licenses. Over 75 percent of our membership are independent restaurants or restaurant groups. Regardless of ownership type, all restaurants are the cornerstones of their neighborhoods and communities. Restaurants not only provide great food, drink, and hospitality, they support schools, teams, charities and churches with fundraising and donations. They provide meeting places to celebrate, mourn and organize, or just provide a safe, tasty meal for a busy family.

The WRA opposes AB 230.

The right to choose payment methods is a natural extension of a business owner's right to define how their business operates. For some, this may mean operating as credit or debit card-only. For others, it may mean staying cash-friendly to better serve a particular customer base. What truly matters is that the decision belongs to the business owner. Ultimately, the consumer has the ultimate input by choosing where to spend their money.

For years, many businesses have stopped accepting checks, to avoid bank fees and checks with non-sufficient funds in their accounts. This business practice has been widely accepted and not questioned or considered discriminatory. Some businesses have also decided not to accept credit and/or debit cards, a practice which has not been targeted as needing legislation to require its use.

Why now is legislation required to tell a business how it must conduct its financial transactions?

In recent years, many restaurants, both large and small, have decided not to accept cash. In most cases, this decision was based on two crucial reasons: improving employee safety and preventing employee theft.

Retail businesses can be the target for armed robbery when there is cash present. This is especially true in high density traffic areas where there is a lot of merchant activity. Some employers have made the decision to no longer accept cash to eliminate the risk of someone with a weapon threatening their employees and customers. Think about tipped employees in restaurants and bars; they are no longer targets for robbery as they head home from work. These business

owners have not made this decision lightly, but they have made the conscious decision to do what they feel is the most appropriate for the safety of their employees and property.

Other businesses no longer accept cash to curb the temptation of employee theft. When all transactions are electronic, there is financial transparency in the business, and it is difficult for fraud or theft to take place. In the case of businesses where tipping is involved, all tips earned are properly reported as income.

We have also heard restaurants are going cashless because of the difficulty and risk of transporting cash to the bank or the high prices of using an armored courier.

While not every person can qualify to have a banked debit or credit card, the ability to use cash to get refillable debit cards is possible and easy to access at many locations. In addition, many businesses have made the decision to encourage cash transactions, and those businesses have the right to do so, if they feel that is what is best for them.

Many large venues have also made reverse ATMs available to take cash and convert it to a debit card. While those types of machines are cost effective for places like American Family Field, they are cost prohibitive for small business since they have high monthly fees and per card costs.

We understand that accepting only credit or debit cards is not without its own costs. The electronic payment ecosystem, dominated by a small number of credit card companies, presents an unfair business model. However, our position on payment issues is consistent: when the market is unbiased, businesses and consumers will be empowered to make decisions that positively impact the marketplace and the economy.

Every business owner needs to be able to make the right financial transaction decision for their own business situation – AB 230 takes that decision away.



To: Assembly Committee on Jobs and Economy
Representative Rick Gundrum, Chair

From: Brandon McConnell
WHLA Past Board Chair & Corporate Executive at Delavan Lake Management LLC

Date: June 10, 2025

Re: Opposition to AB 230 - Relating to: requiring retail sellers to accept cash and providing a penalty.

Thank you for the opportunity to provide testimony on AB 230, which would require hoteliers and other retailers to accept cash as a form of payment from guests. On behalf of the Wisconsin Hotel & Lodging Association, I urge you to oppose this legislation.

While the intent to ensure consumer access and choice is understandable, mandating cash acceptance at hotels poses significant operational, safety, and public policy concerns—particularly when it comes to deterring criminal activity and protecting vulnerable individuals.

First and foremost, cash transactions severely hinder our ability to combat human trafficking. The hotel industry works in close partnership with law enforcement and anti-trafficking organizations to identify and stop trafficking operations. Electronic payment methods create an essential digital trail that can be used to detect suspicious behavior, verify identities, and assist in investigations. Cash, on the other hand, offers anonymity that traffickers and other bad actors can exploit. Mandating cash acceptance risks turning hotels into easier targets for those engaged in this horrific practice.

Second, safety concerns are real and serious. Requiring hotels to keep large sums of cash on-site significantly increases the risk of theft, robbery, and violence—both for employees and guests. This is especially problematic for properties with limited staff or those located in areas where police response times may be slower.

Third, operational burdens and liability risks increase. Managing cash introduces accounting complications, increases the risk of fraud, and places undue stress on staff who are not trained to handle large or frequent cash transactions. Hotels—especially smaller, independent properties—should retain the freedom to implement secure, modern, and efficient payment systems without being forced into practices that elevate risk.

Finally, it's worth noting that the vast majority of travelers already use credit cards or digital payments, not only for convenience, but also for the built-in protections, deposits, and identification verification these systems provide. Requiring hotels to accept cash would be a step backward at a time when both businesses and consumers are moving forward with safer, more secure technologies.

For these reasons, we respectfully urge you to oppose this legislation. Let us continue working together on policies that enhance guest safety, support the lodging industry's integrity, and help root out trafficking and other criminal behavior—not inadvertently enable it.

Thank you for your time and consideration.



Testimony of

Michael Semmann

On Behalf of the

Wisconsin Grocers Association (WGA)

Before the

Assembly Committee on Jobs and the Economy

Assembly Bill 230

June 10, 2025

Chair Gundrum and members of the Committee, on behalf of the Wisconsin Grocers Association (WGA), which represents hundreds of grocery retailers, wholesalers, and suppliers across the state, thank you for the opportunity to express our opposition to Assembly Bill 230 / Senate Bill 130, which would require all retail sellers with a physical location to accept cash for face-to-face transactions.

While we understand the intent to ensure equitable access to commerce, this legislation imposes unnecessary burdens on businesses already navigating a rapidly evolving retail landscape.

Empowering Businesses in Financial Transactions

In today's dynamic marketplace, businesses face numerous challenges and opportunities as they strive to meet the evolving needs of their customers. One of the critical decisions they must make is how to engage with customers in financial transactions. The ability to choose the preferred payment methods is not just a matter of convenience; it is fundamental necessity for businesses to optimize their operations, enhance security, and improve customer satisfaction.

This is not to say that accepting only credit/debit cards is without additional costs. Accepting payment via electronic means (credit cards) comes with an unfair business model that is biased towards a small number of credit card companies. Ultimately, we believe that the industry position on payment issues is consistent: when the market is fair and equitable, both businesses and consumers will be empowered to make decisions that will have a positive impact on the marketplace and the economy.

Optimizing Operations

Businesses operate in diverse environments, each with unique demands and constraints. By having the autonomy to select their preferred payment methods, businesses can tailor their operations to best suit their specific needs. This streamlining of operations allows businesses to focus on delivering exceptional products and services, ultimately driving growth and profitability.

Key Concerns:

- **Discriminatory Impact:** The bill targets only physical retailers, exempting online and mobile-only businesses. This creates an uneven playing field and penalizes local retailers who already face stiff competition from digital-first platforms.
- **Operational and Security Risks:** Mandating cash acceptance increases the risk of theft, raises operational costs, and slows down checkout processes—issues that disproportionately affect small stores.
- **Consumer Trends:** Many consumers now prefer digital and contactless payments. Retailers should have the flexibility to align with these preferences without being subject to rigid mandates.

We respectfully urge the committee to oppose this legislation and instead work with stakeholders to find balanced solutions that support both consumer access and business sustainability.

Thank you for your time and consideration.

The Wisconsin Grocers Association (WGA) is a non-profit trade association established in 1900 to represent independent grocers and grocery chains, warehouses & brokers, vendors, suppliers, and manufacturers before all levels of government. The WGA provides educational and networking opportunities, leadership training, public affairs, and compliance information for its membership.

WGA and its membership have a significant Economic Impact in the state of Wisconsin. The WGA represents nearly 350 independent grocers with multiple locations across the state, more than 200 retail grocery chain stores, warehouses and distributors, convenience stores, food brokers and suppliers. Wisconsin grocers employ over 30,000 people with over \$1 billion in payroll and generate more than \$12 billion in annual sales in Wisconsin resulting in approximately \$800 million in state sales tax revenue. (Data provided by The Food Institute).