

December 17, 2025

The Honorable Andy Biggs
Chairman
Committee on the Judiciary,
Subcommittee on Crime & Federal
Government Surveillance
2138 Rayburn House Office Building
Washington, DC 20515

The Honorable Lucy McBath
Ranking Member
Committee on the Judiciary,
Subcommittee on Crime & Federal
Government Surveillance
2142 Rayburn House Office Building
Washington, DC 20515

RE: Subcommittee Hearing: “Protecting Consumers and Businesses: Confronting Organized Retail Crime”

Dear Chairman Biggs and Ranking Member McBath,

On behalf of the National Association of Convenience Stores (NACS), thank you for hosting a hearing to explore the epidemic of organized retail crime and to examine how violent and sophisticated theft rings are harming businesses and communities across the country. NACS members are increasingly concerned not only about the rise in organized theft activity seen in stores, but also about the escalation of violence associated with crime occurring in and around their stores.

The convenience and fuel retailing industry is deeply embedded in the communities it serves, with over 152,000 locations nationwide operating in every neighborhood, town, and Congressional district, representing approximately one-third of the total brick-and-mortar retail universe. In fact, convenience and fuel retailers conduct 160 million transactions each day, the equivalent of about half of the U.S. population. It is also an industry of small businesses. Of the 152,000 convenience stores within the United States, over 60 percent of those are owned by single-store operators, many of whom live and work in the communities they serve.

While organized retail crime (ORC) affects retailers of all sizes, the crime experienced by convenience and fuel retailers often looks different than what is traditionally discussed in ORC cases. NACS members face a wide spectrum of criminal activity, ranging from sophisticated ORC rings stealing fuel from underground storage tanks for financial gain to petty crimes occurring on or near store properties. Rising crime has forced many convenience retailers to divert substantial financial resources toward increased security measures simply to keep their employees and customers safe. For other operators, the risks and costs have become untenable, leaving them with no option but to close stores in high-crime areas.¹ These closures result in both lost jobs and lost state, local, and federal tax revenue estimated at over \$2 million annually per store for sites that sell fuel.²

¹ Brett Dworski, “Wawa closing 2 more c-stores in Philadelphia,” C-Store Dive (April 16, 2025) (citing “crime concerns”)(available at <https://www.cstoredive.com/news/wawa-closing-c-stores-philadelphia/745603/>); Danielle Romano, “Convenience Store Operators Grapple With Rising Crime,” Convenience Store News (Feb. 12, 2024) (noting that, “In the convenience channel today, retail crime, violence and theft are impacting the industry at unprecedented levels”) (available at <https://csnews.com/convenience-store-operators-grapple-rising-crime>).

² NACS *State of the Industry Report of 2024 Data*

Store closures also result in the loss of essential community access points. In many rural and underserved areas, a convenience store may be the only nearby location to purchase groceries or fuel for miles, or they may be the only locations with extended hours allowing customers that work late shifts the ability to buy what they need. When stores close, residents lose convenient access to essential goods and a dependable neighborhood fixture.

In many communities, the lack of enforcement of existing laws related to public camping, vandalism, drug use, or other public nuisances has contributed to rising violent crime and property damage affecting both residents and business owners. As a result, many convenience retailers have been forced to step in themselves by installing fencing, hiring private security, or paying out of pocket to clean up trash or other hazardous materials – services that are typically the responsibility of local governments and funded by taxpayer dollars. The growing public safety challenges facing NACS members reflect increasing frustration with persistent failures to enforce state and local laws already on the books.

In response to these concerns, voters in Arizona approved Proposition 312 in 2024.³ The measure was designed as an accountability mechanism, allowing property owners to seek tax relief when enforcement failures by municipalities impose significant costs. And since Proposition 312's passage, several Arizona cities, such as Tempe and Mesa, have taken concrete steps to address encampments and enforce existing laws, citing the policy as a catalyst for action.⁴ Measures like Proposition 312 underscore the reality that businesses are increasingly being forced to shoulder the consequences of enforcement gaps on their own. NACS encourages the Subcommittee to examine whether similar accountability-focused concepts could inform federal efforts to address crime, violence, and the downstream impacts on retailers and their communities.

Strong federal leadership is also needed to disrupt elaborate ORC networks before they reach the local level and escalate into violence that threatens employees and customers. NACS strongly supports passage of the Combatting Organized Retail Crime Act (CORCA), which would enhance coordination among federal, state, and local law enforcement, strengthen tools to combat organized theft rings, and help prevent the repeat and violent offenses that ultimately push businesses out of communities.

Thank you again for hosting the hearing. NACS and our members stand ready to serve as a resource to the Subcommittee and would welcome the opportunity to provide additional data or testimony on the crime experienced by convenience retailers. We look forward to continuing to work with you to identify meaningful solutions that protect our employees and the communities we serve.

Sincerely,



Margaret Mannion
Director, Government Relations
National Association of Convenience Stores

³ Victor Riches, "Arizona Cities Will Pay a Price for Ignoring Homelessness," Wall Street Journal (Nov. 22, 2024) (available at <https://www.wsj.com/opinion/arizona-cities-will-pay-a-price-for-ignoring-homelessness-crime-proposition-312-d0502a8e?st=u5nFd4>).

⁴ Austin Vanderheyden, "Proof of Concept: Arizona Prop 312 Is Already Forcing Action on Homelessness," Goldwater Institute (Dec. 10, 2024) (available at <https://www.goldwaterinstitute.org/proof-of-concept-arizona-prop-312-is-already-forcing-action-on-homelessness/>).