April 27, 2026

Dear Chairman Klein and members of the Senate Commerce and Consumer Protection Committee:

On behalf of Quorum, Minnesota's LGBTQ+ and Allied Chamber of Commerce, I am writing to express our serious concerns regarding HF4138/SF4696. While we share the goal of ensuring a safe digital environment for Minnesota's youth, the mechanisms proposed in this bill present unique and disproportionate risks to the LGBTQ+ business community and the youth we serve.

This perspective reflects concerns raised by small business members navigating digital customer engagement, and it is vital to understand why Quorum is weighing in on this legislation: Quorum represents hundreds of small businesses and professionals whose ability to reach customers and build sustainable enterprises depends on fair and accessible digital platforms.

Many of our members are "micro-influencers" and small business owners who built their livelihoods on the very platforms this bill seeks to restrict. For small businesses, targeted advertising is not a luxury—it is often the only affordable way to reach relevant audiences. By banning "targeted paid commercial advertising" for users under 16, this bill inadvertently severs the connection between LGBTQ-owned businesses and the next generation of consumers.

Whether it is a queer-affirming mental health clinic or a local apparel brand, these businesses rely on specific targeting to find their audience in a crowded digital marketplace. Given the enforcement structure, platforms are likely to take a risk-averse approach that restricts access more broadly than intended, further limiting small business visibility and creating a "compliance chill" that will hit marginalized entrepreneurs first and hardest.

For many LGBTQ+ youth in Greater Minnesota and the Twin Cities, social media is often a life-saving connection to community, identity-affirming resources, and crisis intervention. By mandating "verifiable parental consent" and giving parents a "veto" over a child's digital footprint, HF 4138/SF 4696 creates situations where youth may be required to disclose personal information or identity-related activity before they are ready or safe to do so.

Furthermore, these restrictions are likely to be unevenly experienced, with more resourced families finding workarounds while vulnerable youth face the greatest barriers to community and support.
The "age estimation" requirements create a dangerous incentive for platforms to increase data harvesting. To meet the bill's high confidence thresholds, platforms may rely on increasingly invasive data signals, including biometric or behavioral analysis.

We know from industry data that these AI systems frequently fail transgender and non-binary individuals, whose features or digital patterns may not align with the binary datasets these tools are trained on. This creates a "digital gatekeeper" that risks flagging or excluding our community members simply for existing as they are.

We urge the committee to refine HF 4138/SF 4696 to protect youth without unintentionally limiting economic opportunity, increasing data risks, or isolating the very young people it seeks to support. We believe in a vibrant, inclusive Minnesota economy where everyone can participate safely, and we look forward to working with you to ensure this legislation does not threaten the commercial and digital safe spaces the LGBTQ+ community has fought to build.

Respectfully,

Rebecca Waggoner
Quorum, Minnesota's LGBTQ+ and Allied Chamber of Commerce