

November 17, 2021

The Honorable Sherrod Brown, Chairman Senate Committee on Banking, Housing and Urban Affairs Washington, D.C. 20510 The Honorable Patrick Toomey, Ranking Member Senate Committee on Banking, Housing and Urban Affairs Washington, D.C. 20510

Dear Chairman Brown and Ranking Member Toomey

On behalf of the National Taxpayers Union, the nation's oldest taxpayer advocacy organization, I write to express our views regarding the upcoming hearing of Saule Omarova, who has been nominated to lead the Office of the Comptroller of the Currency (OCC). In this position, the comptroller has broad authority to regulate, examine, and use supervisory powers on banks and federal savings associations to ensure their regulated entities operate in a safe and sound manner. Unfortunately, given Ms. Omarova's beliefs, positions, and previous statements, we have serious concerns about her ability to lead this important regulatory agency.

The role as comptroller is one of the most important among the prudential banking regulators, so it is paramount that the individual leading this agency be impartial, instill general confidence, and have beliefs that fall within the mainstream of modern contemporary banking thought. These criteria are critical for ensuring financial institutions have long term certainty when making business decisions, and so that the public maintains faith in America's banking system. Unfortunately, Ms. Omarova fails to meet these three standards. Her public statements suggest she would employ a heavy-handed, biased approach to banking regulation that would drastically increase the size and scope of government, impose rules that distort lending decisions, and purposefully add significant new compliance burdens on American businesses and consumers.

She has publicly advocated for American coal, oil, and gas producers to fail, stating "we want them to go bankrupt." In a 2020 paper, she voiced her support for replacing private bank deposits with government-run bank accounts at the Federal Reserve, stating that the "ultimate end-state" is when "FedAccounts fully replace—rather than compete with—private bank deposits." Additionally, she holds the belief that government bureaucrats should dictate asset prices, capital, and wages. In a 2016 paper, Ms. Omarova stated her belief that the federal government of the United States is better able to set prices than the free market, arguing the government should regulate prices of commodities such as "fuels, foodstuffs, and some other raw materials" and "wage or salary indices." The *Wall Street Journal* also notes her desire to develop a government-run digital currency, a new "National Investment Authority" to finance green energy investments, and a "Public Interest Council" of "highly paid" academics with broad subpoena power to supervise financial regulatory agencies.

These statements can be considered nothing less than radical and fundamentally wrong. Using the full power of the OCC to coerce private businesses into achieving a desired policy outcome runs counter to what has enabled American financial markets to be the most prosperous, stable system in the world.

Her positions raise pressing questions that deserve answers before this Committee so that all Americans know whether or not she still stands by these viewpoints.

We have grave concerns about the ability of someone who holds the expressed desire to "effectively end banking as we know it" to serve as a primary regulator of the same industry she wants to end. Despite her impressive academic resume, it appears Ms. Omarova does not fulfill taxpayers' expectations for this important position.

Sincerely,

Thomas Aiello Director of Federal Affairs