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Chairman Sherrod Brown
503 Hart Senate Office Bldg.
Washington, DC 20510

Ranking Member Patrick J. Toomey
455 Dirksen Senate Office Bldg.
Washington DC 20510

Majority Leader Charles Schumer
322 Hart Senate Office Bldg.
Washington, DC 20510

Minority Leader Mitch McConnell
317 Russell Senate Office Bldg.
Washington, DC 20510

Dear Congressional Leaders:

I write to express my strong opposition to President Biden's nomination of Professor Saule Omarova to serve as the next Comptroller of the Currency. I voice my concern in an attempt to protect America's free-market economy from interference, particularly from those such as this nominee who would seek to constrain competitiveness in the marketplace and limit individual sovereignty in financial decision-making. Unfortunately, Professor Omarova has expressed a clear intention to impose central planning and nationalization of the country's banking system. She appears to oppose most, if not all, aspects of the existing banking and financial system, including the current structure of national banks, community banks and fintech businesses. She fundamentally lacks the ability to lead the Office of the Comptroller of the Currency (OCC) with the objectivity and impartiality required of its administrator.

If confirmed to head the OCC, Professor Omarova would be granted immense oversight of our nearly 1,200 federal banks and associations. This, despite Professor Omarova's prior statements indicating her sentiments for an all-powerful Federal Reserve that effectively eliminates the role of our private banking institutions.

Our country is founded on the rule of law and the principles of federalism, allowing for freedom and competitiveness in the marketplace – an ideal that has long received bipartisan support. Yet Professor Omarova would seek to overhaul our system in the name of central planning. To grant

the Federal Reserve or any other specially created national monetary system with unilateral authority to serve, as Professor Omarova has called for, as “the ultimate public platform for generating, modulating, and allocating financial resources,” represents a complete divergence from our free-market economy. Decision-making authority on the part of the consumer encourages greater economic competitiveness in our banking sector. Currently, consumers are afforded the right to choose which financial institution best meets their needs based on credit options that are driven by the basics of supply and demand. The concept of a nationalized monetary system, as proposed by Professor Omarova, leaves to question how any citizen or private financial system is supposed to abide by applicable laws and regulations and enjoy certainty in the marketplace when Professor Omarova, if confirmed, would create complete uncertainty. Our community banks play an important role in our state and local economies – a role that should be of great importance to the Comptroller of Currency. Instead, Professor Omarova has written that she would rather allow only a select few to make financial decisions for the greater good.

In her own words, Professor Omarova seeks to "end banking as we know it." Her clearly stated agenda focuses largely on circumventing the private banking industry to, among other actions, redirect all commercial deposits to be held by the Federal Reserve itself. Were her so-called “FedAccounts” to become a reality, commercial deposits would be replaced by “universally available deposit accounts” held with the Federal Reserve, causing our community banks to suffer immensely in terms of their ability to lend at a reasonable rate, if at all.

To bypass community banks altogether, Professor Omarova advocates for an all-encompassing Central Bank Digital Currency, "whereby central bank accounts fully replace – rather than compete with – private bank deposits." This, particularly when coupled with FedAccounts, would severely harm a community bank’s ability to back the very loans that drive economic growth for our local communities. The days of relational transactions – that serve as the very foundation for our community banking industry – would effectively be gone.

Even more, Professor Omarova seeks to limit the very technological functions that provide consumers with real-time access to facilitate financial transactions and investments. Her distrust of the fintech sector appears to be based solely on the industry’s separation from government authority. This, in her view, “will make it increasingly difficult, if not impossible, for the public to control, or even track, new technology-driven proliferation of risk in the financial system.” Her extensive writings miss the true risk in its entirety. Professor Omarova’s preference for government control of private financial transactions sets a dangerous precedent. Her support for restricting fintech would, at the least, stymie an industry that continues to provide enhancements to the financial sector. Her “solutions” to the purported challenges of fintech “disruption” would cause substantial harm to the financial sector.

Professor Omarova's utter disdain for the financial services industry was made crystal clear in a video clip in which she refers to the industry as a "quintessential a--hole industry" full of "systematically a--hole-type behavior." Yet her disdain for the private sector does not stop with the financial industry. In an interview in February at a "Social Wealth Seminar," Professor Omarova stated that part of the solution on climate change is for the smaller coal, oil and gas companies to go bankrupt, adding that "at least, we want them to go bankrupt if we want to tackle climate change."

Professor Omarova's reckless comments regarding the private sector and specifically the very system she has since been nominated to lead should in itself cause worry for our federal leaders. Were Professor Omarova given the authority to explore or, at worst, implement these proposals, it would risk the vitality of our local, state and national economies and greatly harm our financial sector.

For the above reasons, I urge you to reject this nomination.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christopher Carr".

Christopher M. Carr
Georgia Attorney General