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**United States Senate**  
COMMITTEE ON BANKING, HOUSING, AND  
URBAN AFFAIRS  
WASHINGTON, DC 20510-6075

September 8, 2025

David M. Solomon  
Chairman & Chief Executive Officer  
Goldman Sachs & Co.  
200 West Street  
New York, NY 1028

Dear Mr. Solomon:

We are writing to request information on Goldman Sachs's decision to increase its dividend by 33 percent and authorize a new \$40 billion share repurchase program.<sup>1</sup> These actions directly contradict the rhetoric your lobbyists and trade associations are deploying in Washington to sell policymakers on Wall Street deregulation.<sup>2</sup> Instead of responding to lower capital requirements with commitments to increase lending to, or lowering interest rates and fees for, businesses and households, Goldman Sachs is rewarding its wealthy shareholders and boosting executive compensation at the expense of financial stability and economic growth.

As you know, severely undercapitalized Wall Street banks contributed to the 2008 financial crisis and worst economic recession since the Great Depression. Millions of people lost their jobs, depleted their life savings, and were thrown out of their homes. Your bank received \$10 billion in direct bailouts through the Troubled Asset Relief Program and substantially more indirect government assistance through myriad emergency lending programs and other support.<sup>3</sup>

In response to the crash, policymakers strengthened Wall Street safeguards, including by increasing capital requirements and establishing a stress testing framework to ensure big banks were resilient and could serve as a source of strength to the economy. During the first Trump

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<sup>1</sup> Financial Times, "US banks announce big shareholder payouts as Fed eases stress tests," Akila Quinio and Joshua Franklin, July 1, 2025, <https://www.ft.com/content/081f8752-8022-4c02-9d85-cea6a133ac8f>; Yahoo finance, "Goldman Sachs Group Announces US\$40 Billion Buyback; Reports Increased Q1 Earnings," April 14, 2025, <https://finance.yahoo.com/news/goldman-sachs-group-nyse-gs-173045178.html>.

<sup>2</sup> Bank Policy Institute, "BPI Statement on Federal Reserve SLR Proposal," Tara Payne, June 25, 2025, <https://bpi.com/bpi-statement-on-federal-reserve-slr-proposal/>.

<sup>3</sup> Journal of Financial Crises, "US Capital Purchase Program," Aidan Lawson and Adam Kulam, 2021, p. 826, <https://elischolar.library.yale.edu/cgi/viewcontent.cgi?article=1216&context=journal-of-financial-crises>.

Administration, big banks sought to chip away at this framework.<sup>4</sup> During the Biden Administration, they strongly opposed commonsense reforms to further improve it.<sup>5</sup>

For example, the Bank Policy Institute (BPI) and Financial Services Forum (FSF), two trade associations that include Goldman Sachs as a member, aggressively fought attempts by regulators in 2023 to rectify long-standing deficiencies in the bank capital framework that left our economy vulnerable to future crises. BPI claimed that, despite empirical evidence to the contrary,<sup>6</sup> stronger capital requirements would “limit banks’ capacity to offer things like mortgages, car loans, credit cards and small-business loans” and that it would have “real costs for everyday Americans.”<sup>7</sup>

Under the second Trump Administration, Wall Street is again lobbying to gut these rules. FSF has argued that current capital requirements “limit the financial opportunities for American families, raise costs for consumers, and slow economic growth.”<sup>8</sup> Notwithstanding the increased risks of another economic meltdown, big bank lobbyists want policymakers to believe that lower capital requirements lead to more lending and better pricing for small businesses and households.

The behavior of big banks in 2025 suggests, much like a long body of historical empirical evidence, that this rhetoric is dangerously misleading. The Fed’s weaker 2025 stress tests reduced the stress capital buffer requirement for Goldman Sachs from 6.1 percent to 3.4 percent.<sup>9</sup> Other pending and forthcoming regulatory proposals are expected to further reduce Goldman

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<sup>4</sup> Bank Policy Institute, “Bank Policy Institute Files Comment Letter on Proposed Tailoring of Capital, Stress Testing and Liquidity Requirements,” January 22, 2019, <https://bpi.com/bank-policy-institute-files-comment-letter-on-proposed-tailoring-of-capital-stress-testing-and-liquidity-requirements/>; Letter from American Bankers Association to the Federal Reserve and Office of the Comptroller of the Currency, June 25, 2018, <https://www.regulations.gov/comment/OCC-2018-0002-0024>.

<sup>5</sup> Letter from Bank Policy Institute and American Bankers Association to the Federal Reserve, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, January 16, 2024, <https://bpi.com/wp-content/uploads/2024/01/ABA-BPI-Basel-III-Endgame-Comment-Letter-Final-2024.01.16.pdf>.

<sup>6</sup> Bank for International Settlements, “Why bank capital matters for monetary policy,” Leonardo Gambacorta and Hyun Song Shin, April 7, 2016, <https://www.bis.org/publ/work558.htm>; Federal Reserve Bank of Minneapolis, “The Minneapolis Plan To End Too Big To Fail,” December 2017, <https://www.minneapolisfed.org/-/media/files/publications/studies/endingtbtft/the-minneapolis-plan/the-minneapolis-plan-to-end-too-big-to-fail-final.pdf>; Brookings, “The Credit Crunch,” Ben S. Bernanke and Cara S. Lown, 1991, [https://www.brookings.edu/wp-content/uploads/1991/06/1991b\\_bpea\\_bernanke\\_low\\_n\\_friedman.pdf](https://www.brookings.edu/wp-content/uploads/1991/06/1991b_bpea_bernanke_low_n_friedman.pdf); Federal Reserve Bank of San Francisco, “Capital Regulation and Bank Lending,” 1992, Frederick Furlong, <https://www.fedinprint.org/item/fedfer/23251>; Real Estate Economics, “Bank Capital and the Credit Crunch: The Roles of Risk-Weighted and Unweighted Capital Regulations,” Diana Hancock and James Wilcox, March 1994, <https://onlinelibrary.wiley.com/doi/10.1111/1540-6229.00626>; Federal Reserve Board, “Capital Ratios and Bank Lending: A Matched Bank Approach,” Mark Carlson et al, 2011, <https://www.federalreserve.gov/pubs/feds/2011/201134/201134pap.pdf>; Journal of Financial Stability, “Benefits and Costs of a Higher Bank Leverage Ratio,” James R. Barth and Stephen Matteo Miller, July 10, 2018, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=2913734](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2913734).

<sup>7</sup> Bank Policy Institute, “Stop Basel Endgame,” <https://stopbaselendgame.com/>.

<sup>8</sup> Financial Services Forum, “Strengthening the American Economy by Modernizing Capital Rules for the Largest U.S. Banks,” <https://web.archive.org/web/20250808140947/https://fsforum.com/a/media/capital-reform-for-the-largest-u.s.-banks.pdf>.

<sup>9</sup> Federal Reserve, “Large Bank Capital Requirements,” August 2024, p. 4, <https://www.federalreserve.gov/publications/files/large-bank-capital-requirements-20240828.pdf>; Goldman Sachs, “Goldman Sachs Statement on Stress Capital Buffer,” July 1, 2025, <https://www.goldmansachs.com/pressroom/press-releases/2025/goldman-sachs-statement-on-stress-capital-buffer>.

Sachs's capital requirements. In response to these recent and future reductions, Goldman Sachs decided to increase its dividend by 33 percent on top of a previously announced new \$40 billion share repurchase program.<sup>10</sup> You stated, "And we'll continue to return capital. That continues to be our mantra around this," and Goldman Sachs's CFO Dennis Coleman even stated, "[w]e can also use return of capital through buybacks, etcetera, to reduce some of that buffer."<sup>11</sup>

When Goldman Sachs's capital declines, its susceptibility to economic shocks and likelihood of failure increases. Yet, contrary to the rhetoric of your lobbyists, you have not used the full amount of your reduced capital buffer requirements to increase lending or improve pricing for customers. The lower capital requirements, instead, clearly allowed Goldman Sachs to boost buybacks and dividends. Goldman Sachs's lobbying, directly and through its trade associations, and the Trump Administration's willingness to grant your wishlist, therefore puts the entire economy at risk. It invites yet another financial crash and a fresh round of taxpayer bailouts.

To help us better understand the disparity between Goldman Sachs's actions and some of the claims supporting its lobbying efforts, please respond to the following questions by September 22, 2025:

1. The Fed's 2025 stress tests reduced Goldman Sachs's capital requirements. Why did Goldman Sachs increase dividends and share buybacks instead of using all of this "excess capital" to increase lending to, or reduce interest rates and fees for, small businesses and households?
2. How much lending capacity could be supported if Goldman Sachs kept its dividend flat and did not authorize a new share buyback program?
3. How much U.S. Treasury securities purchasing capacity could be supported if Goldman Sachs kept its dividend flat and did not authorize a new share buyback program?
4. How much could Goldman Sachs have reduced loan interest rates and fees for small businesses and households if it kept its dividend flat and did not authorize a new share buyback program?
5. Given that Goldman Sachs has proven that it will increase dividends and share buybacks in response to reductions in regulatory capital requirements, will Goldman Sachs instruct BPI and FSF to amend their lobbying materials?
6. Does Goldman Sachs intend to increase C-Suite bonuses this year?

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<sup>10</sup> Financial Times, "US banks announce big shareholder payouts as Fed eases stress tests," Akila Quinio and Joshua Franklin, July 1, 2025, <https://www.ft.com/content/081f8752-8022-4c02-9d85-cea6a133ac8f>; Yahoo finance, "Goldman Sachs Group Announces US\$40 Billion Buyback; Reports Increased Q1 Earnings," April 14, 2025, <https://finance.yahoo.com/news/goldman-sachs-group-nyse-gs-173045178.html>.

<sup>11</sup> Motley Fool, "Goldman Sachs GS Q2 2025 Earnings Call Transcript," July 16, 2025, <https://www.fool.com/earnings/call-transcripts/2025/07/16/goldman-sachs-gs-q2-2025-earnings-call-transcript/>.

Sincerely,

A handwritten signature in blue ink, reading "Elizabeth Warren".

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Elizabeth Warren  
Ranking Member  
Committee on Banking,  
Housing, and Urban Affairs

A handwritten signature in blue ink, reading "Bernard Sanders".

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Bernard Sanders  
United States Senator