



**FINANCIAL  
SERVICES  
FORUM**

---

# **The Value and Strength of America's Largest Banks**

September 2025

# | About the Financial Services Forum

The Financial Services Forum is an economic policy and advocacy organization whose members are the eight largest and most diversified financial institutions headquartered in the United States. Forum member institutions are a primary source of lending and investment in the United States and serve millions of consumers, businesses, investors, and communities throughout the country. The Forum promotes policies that support savings and investment, financial inclusion, deep and liquid capital markets, a competitive global marketplace, and a sound financial system.

## OUR MEMBERS

**BANK OF AMERICA** 

 **BNY**

 **citi**

 **Goldman  
Sachs**

**JPMorganChase**

**Morgan Stanley**

 **STATE  
STREET**

 **WELLS  
FARGO**



# Our value to the economy

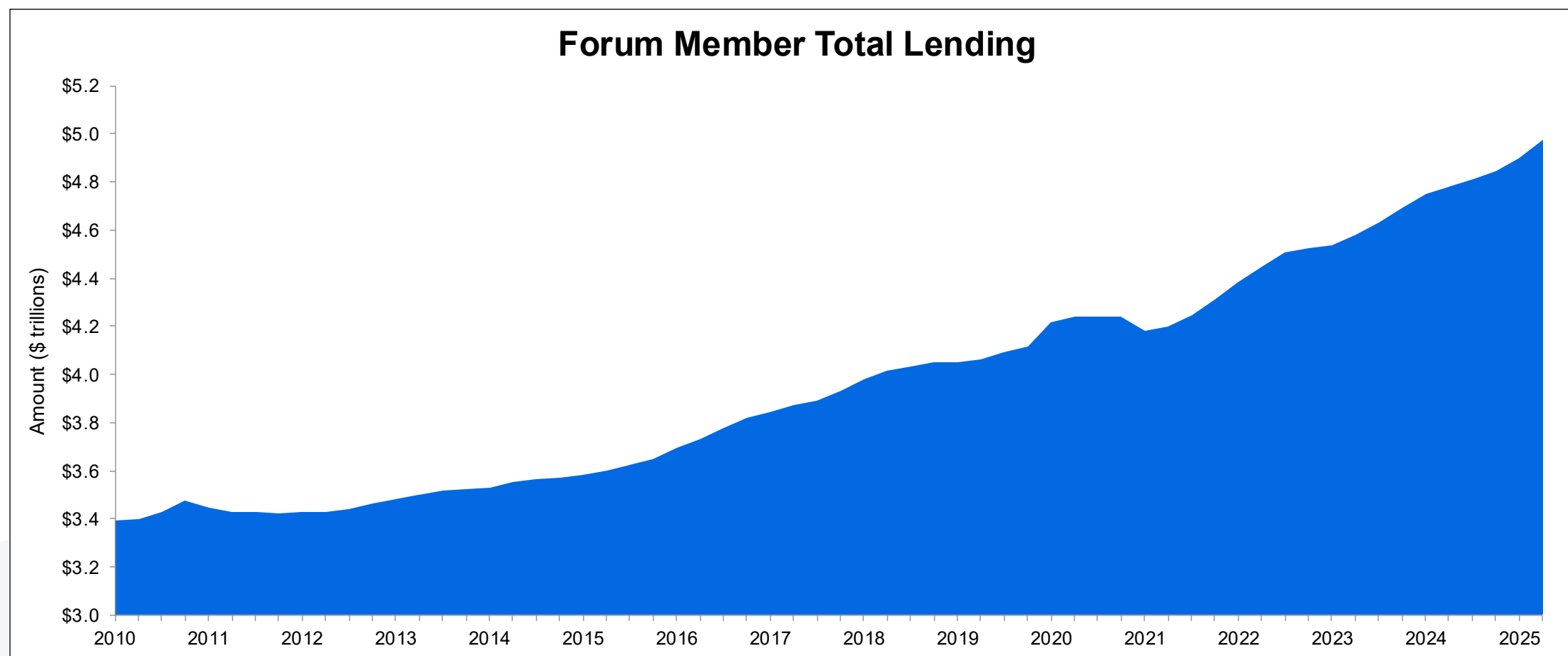
We support economic growth by lending to consumers, businesses, and other financial institutions, and foster deep and liquid capital markets that allow the U.S. government and private institutions to finance public spending and investment



**FINANCIAL  
SERVICES  
FORUM**

# | Total Lending

Forum members hold **\$4.98 trillion in loans** to businesses and households.

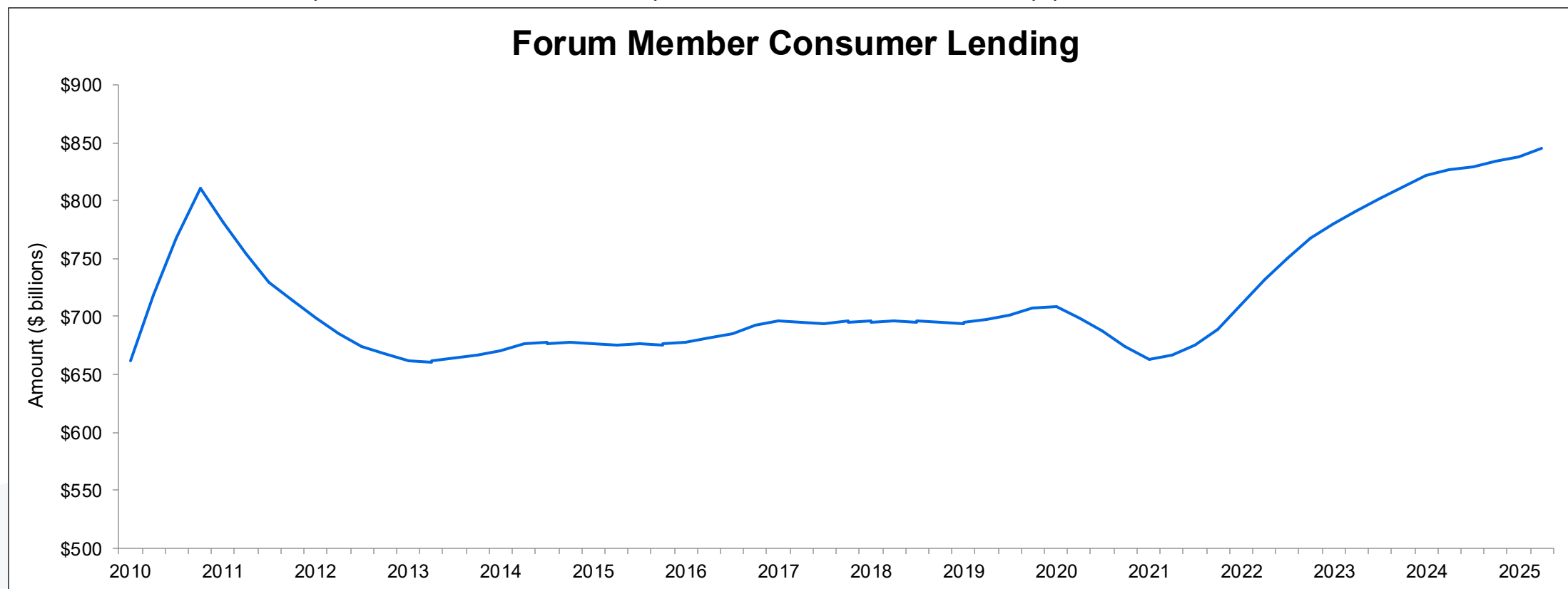


Sources: Federal Reserve data, Assets and Liabilities of Commercial Banks in the United States – H.8, available at <https://www.federalreserve.gov/releases/h8/default.htm>; FR Y-9C data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>

Note: Chart represents a rolling four-quarter average

# Lending to Consumers

**Forum members provide \$845 billion in consumer loans, accounting for nearly half of all consumer loans by banks in the United States.** Consumer lending supports loans for a variety of household needs, such as the purchase of a car or replacement of a kitchen appliance.

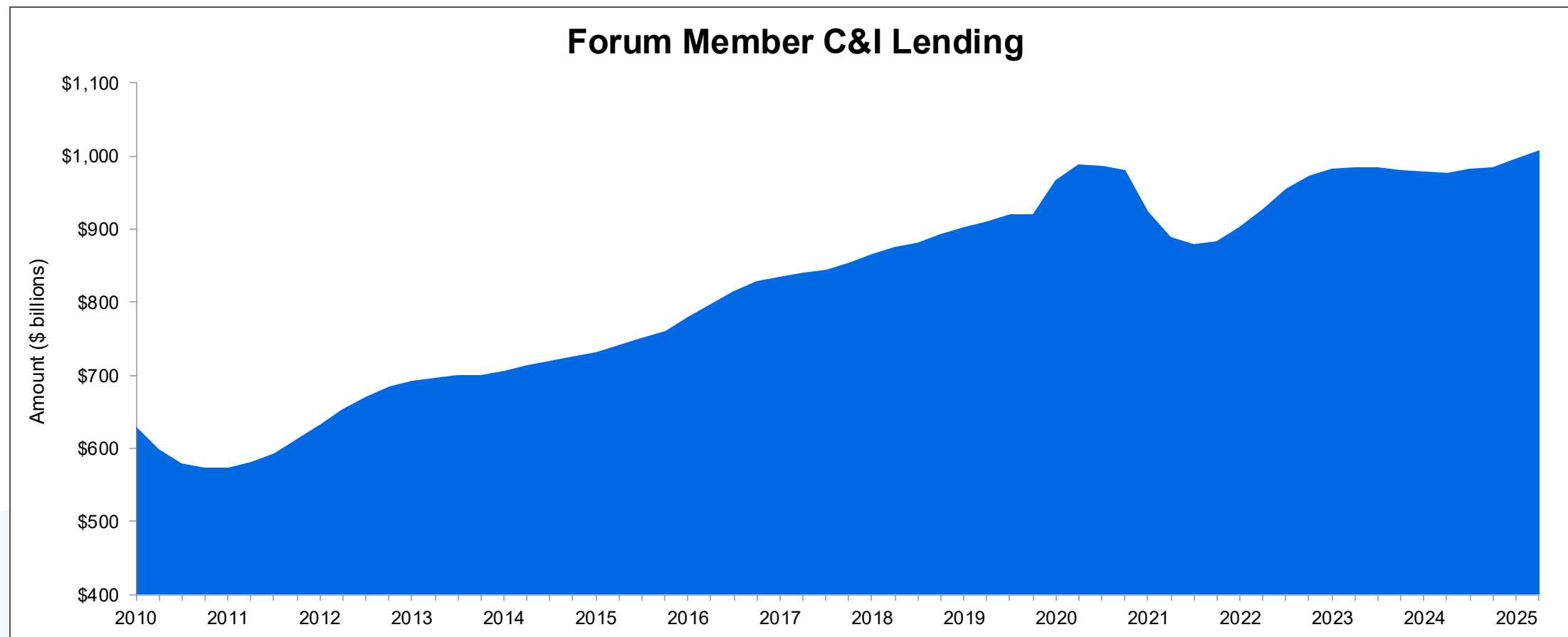


Sources: Federal Reserve data, Assets and Liabilities of Commercial Banks in the United States – H.8, available at <https://www.federalreserve.gov/releases/h8/default.htm>; FR Y-9C data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>

Note: Consumer lending defined as credit cards, other revolving credit plans, automobile loans, and other personal loans held for trading

# Commercial and Industrial (C&I) Lending

Our C&I lending has increased from \$630 billion to **\$1.0 trillion** since 2010, helping businesses grow and contribute to the economy.

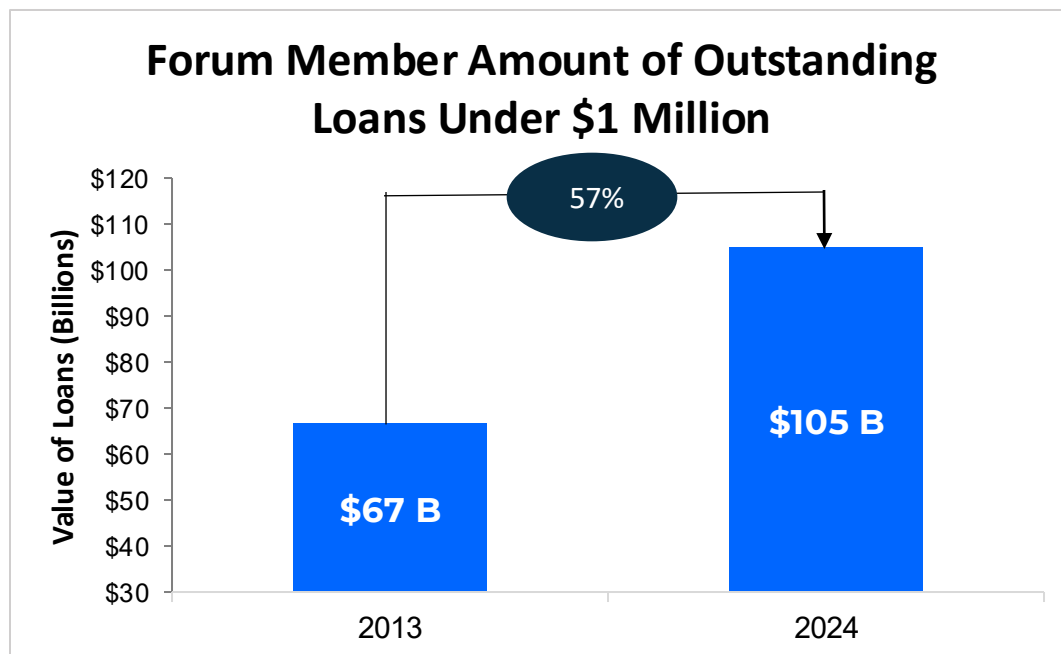


Sources: Federal Reserve data, Assets and Liabilities of Commercial Banks in the United States – H.8, available at <https://www.federalreserve.gov/releases/h8/default.htm>; FR Y-9C data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>

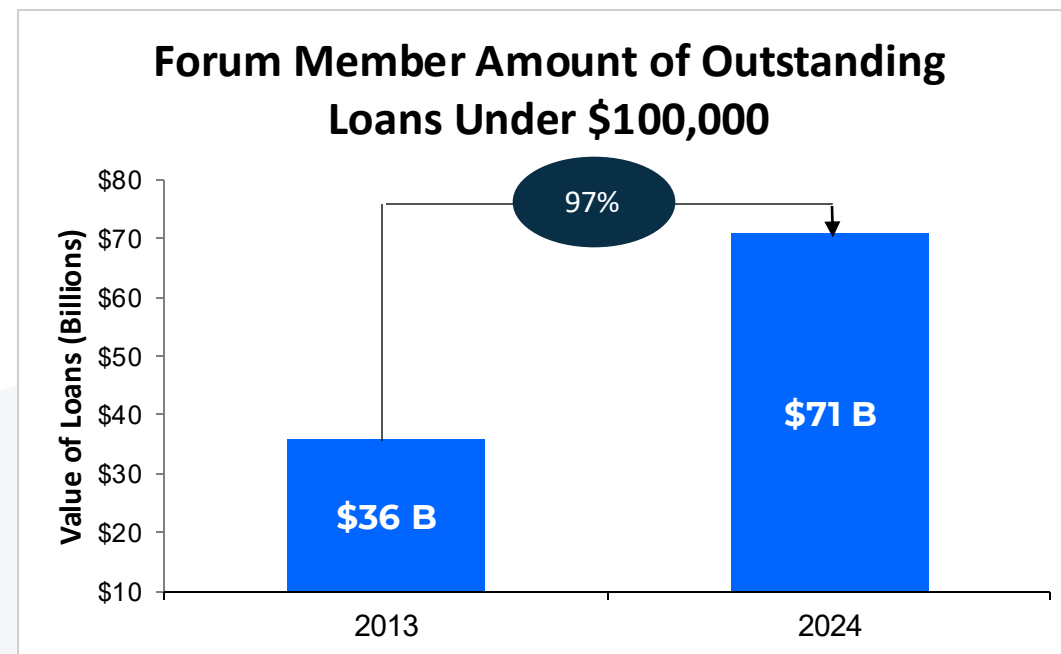
Note: Chart represents a rolling four-quarter average

# Small Business Lending

We are a major source of lending to small businesses, helping the economy grow at both a community and national level. Our members hold **\$105 billion in small business loans**.



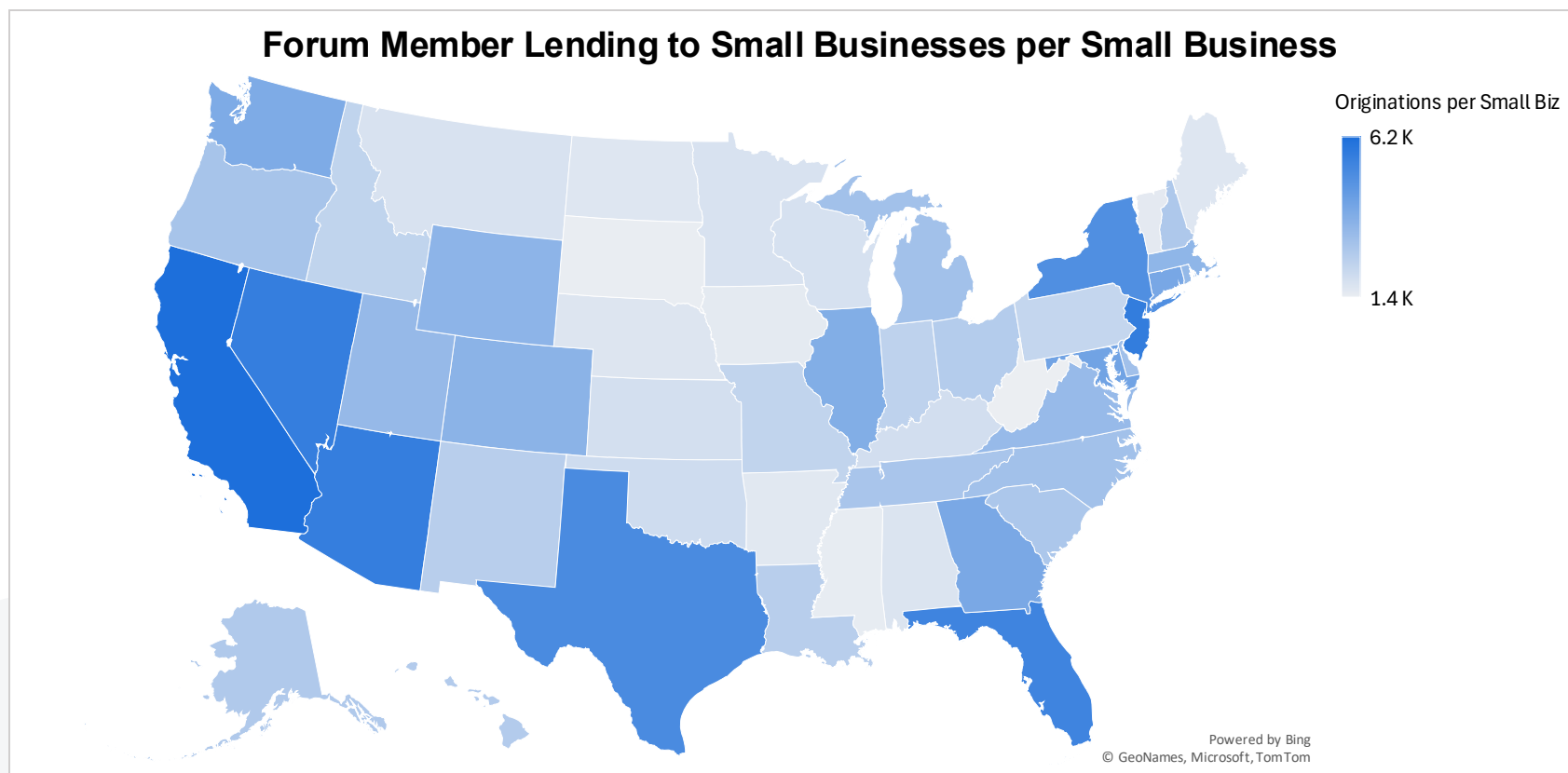
- We hold \$105 billion in business loans less than \$1 million



- We also hold \$71 billion in business loans less than \$100,000

# Forum members lend to small businesses across the United States

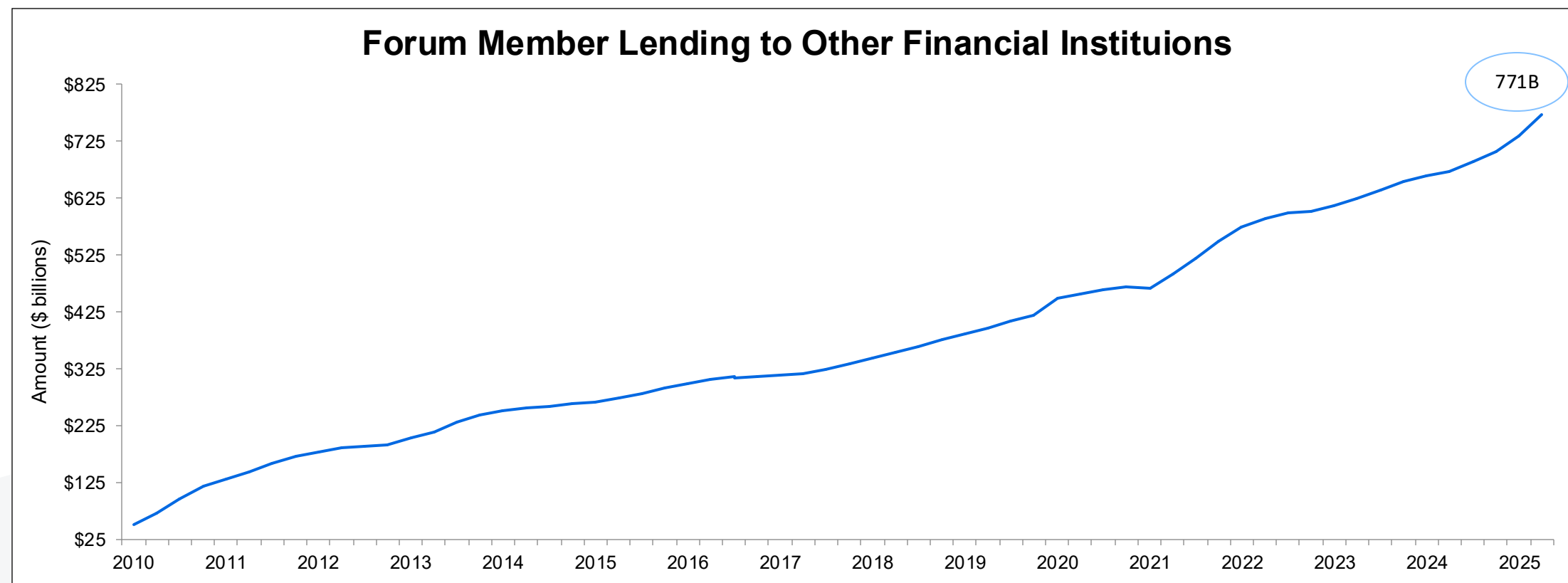
Forum member small business lending supports entrepreneurship across the nation and in a wide array of communities.



- These data reflect originations of small business loans by Forum members in 2023, the period of most recent data.
- Small business lending is spread throughout the United States.

# Lending to Other Financial Institutions

**We meet more than half of the bank funding needs of other financial institutions.** Lending to financial institutions supports the needs of community banks, insurance companies, and mortgage finance companies, which provide important services to businesses and households.



Sources: Federal Reserve data, Assets and Liabilities of Commercial Banks in the United States – H.8, available at <https://www.federalreserve.gov/releases/h8/default.htm>; FR Y-9C data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>

Note: Chart represents a rolling four-quarter average

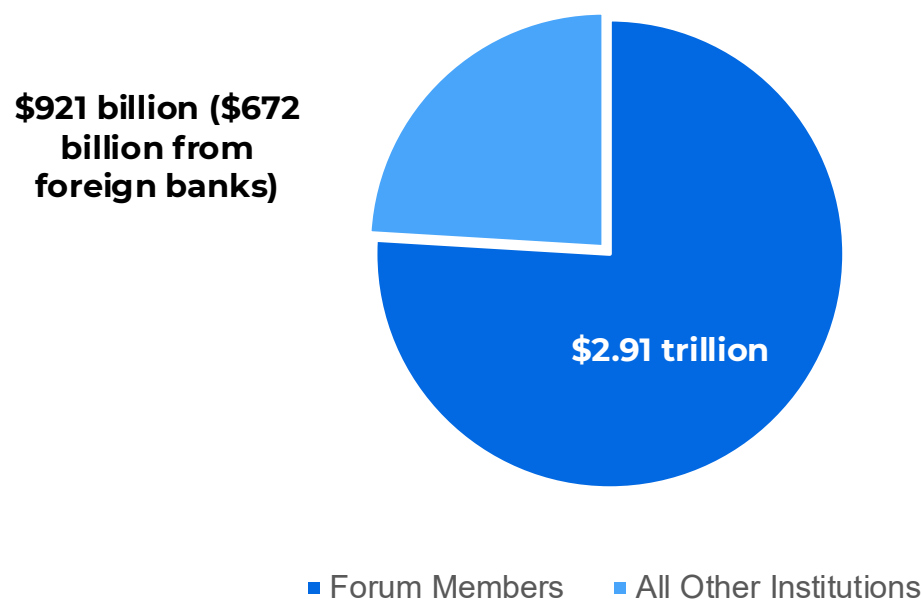


# | Supporting Deep and Liquid Capital Markets

# | Total Debt and Equity Underwriting Activity

**Our members underwrite three-quarters of debt and equity transactions**—such as initial public offerings—among large institutions in the U.S., providing a critical service that other U.S. institutions cannot offer on a similar scale.

**Four-quarter average for periods ending Q2  
2024 and Q2 2025**



Our underwriting activities:

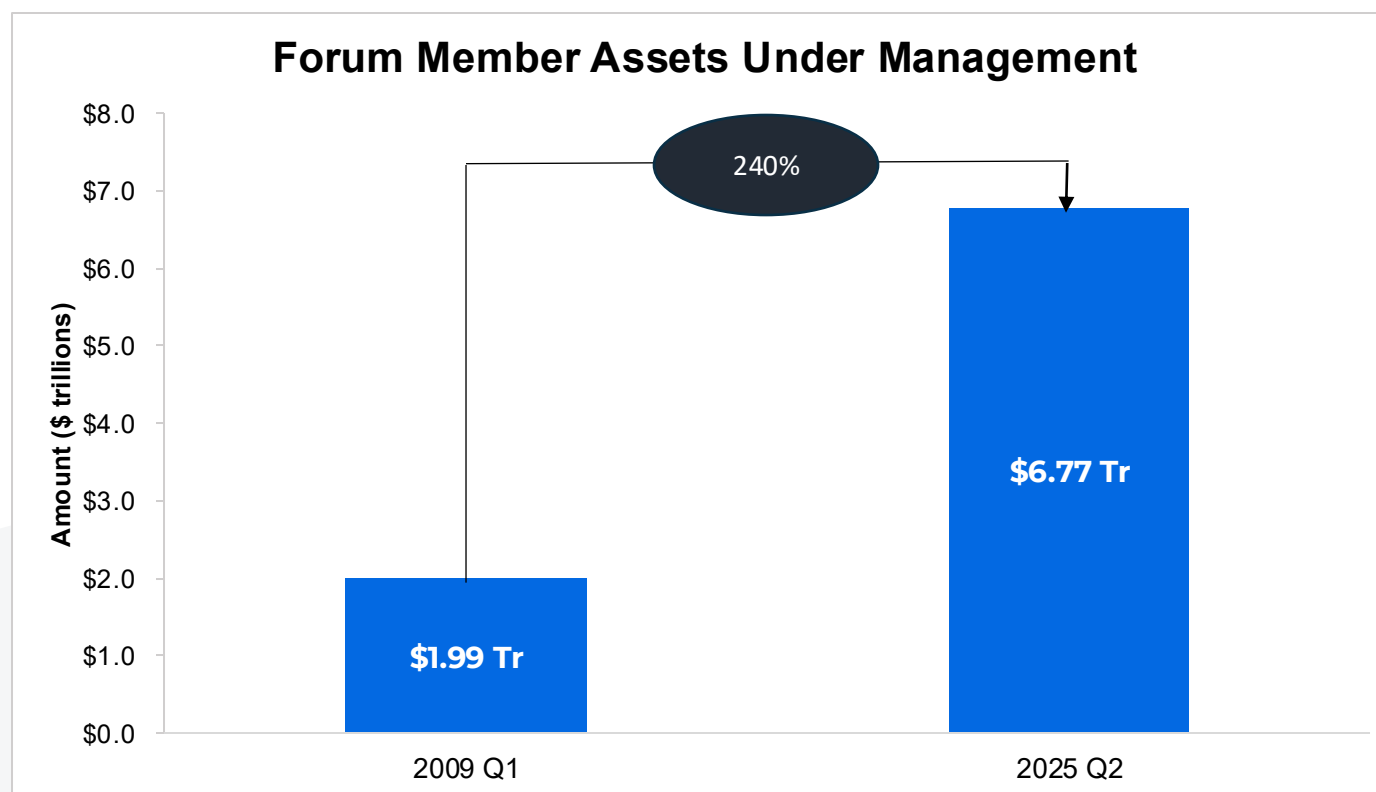
- foster deep and liquid capital markets
- support corporate investment in the real economy

Source: FR Y-15 data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>

Note: The data cover debt and equity underwriting for all holding companies with total consolidated assets in excess of \$50 billion

# Mutual Funds and Annuities

We manage **\$6.77 trillion in mutual funds and annuities**, a threefold increase since 2009, to support retirement and other savings needs.



Sources: Federal Reserve data, Assets and Liabilities of Commercial Banks in the United States – H.8, available at <https://www.federalreserve.gov/releases/h8/default.htm>; FR Y-9C data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>  
 Note: Chart represents a rolling four-quarter average

# | Municipal Securities Holdings

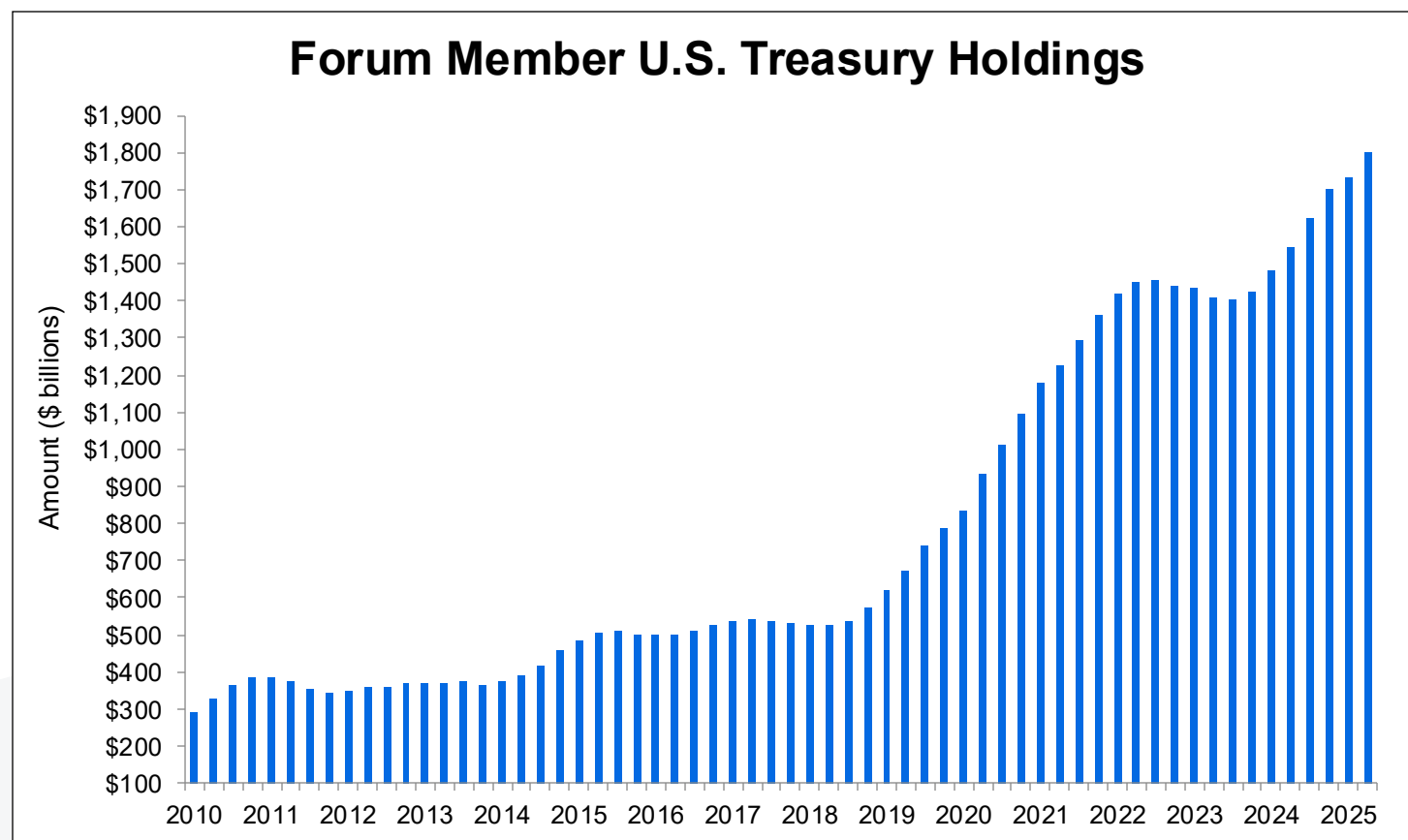
With **\$82 billion in municipal securities holdings**, we finance a significant portion of state and local government expenditures for vital projects, such as hospitals, roads, bridges, and schools. Examples:

- **JPMorganChase and Wells Fargo** in 2024 underwrote \$112.2 million in municipal bonds for Polk County, Iowa, to fund various improvements at the Des Moines International Airport. The construction includes a main terminal, six airline gates, and a car rental facility.
- **Morgan Stanley** in 2024 underwrote \$290 million in municipal bonds to fund Delaware's public education, social services, correctional system, and road and highway maintenance.
- **BNY** in 2024 underwrote \$6 million in municipal bonds for the Town of Southbridge, Massachusetts, to finance a fire station, road paving, and its West Main Street sewer and water improvements.

- Our holdings of municipal securities also foster liquid secondary markets, thus improving the ease and cost with which state and local governments can access capital markets and finance public spending and investment.

# | U.S. Treasury Securities

With over **\$1.8 trillion in U.S. Treasury securities holdings**, we also finance a significant portion of federal government expenditures.



- Our holdings of U.S. Treasury securities also foster liquid secondary markets, improving the ease and cost with which the U.S. government can access capital markets and finance public spending and investment

Sources: Federal Reserve data, Financial Accounts of the United States - Z.1, available at <https://www.federalreserve.gov/releases/Z1/current/default.htm>; FR Y-9C data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>

Note: Chart represents a rolling four-quarter average



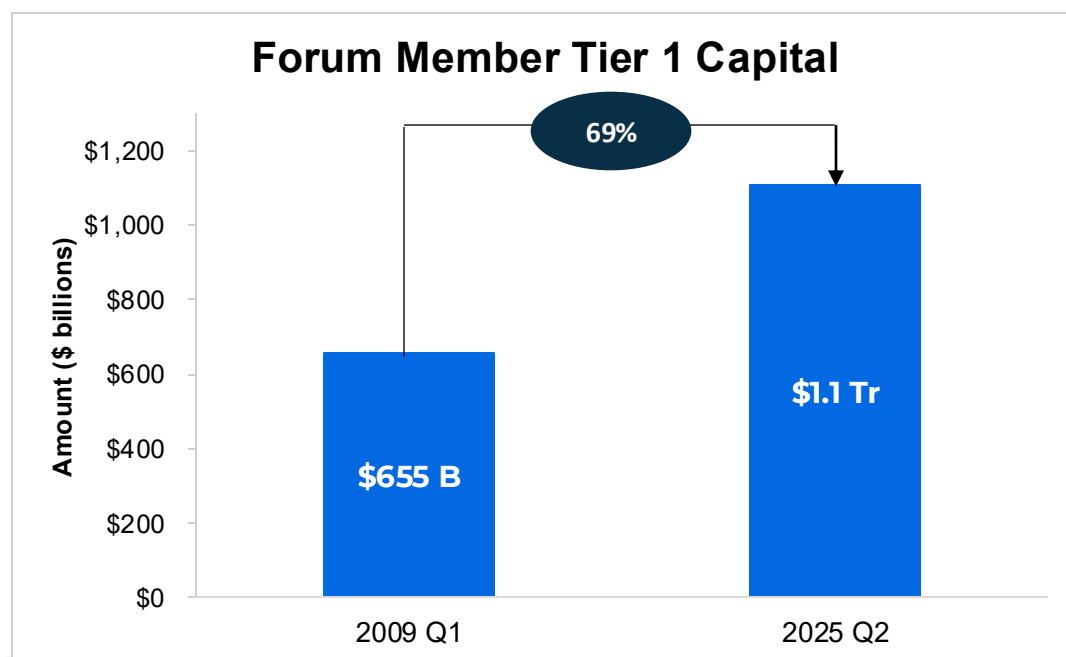
# Improvements in Capital and Liquidity and Other Regulation



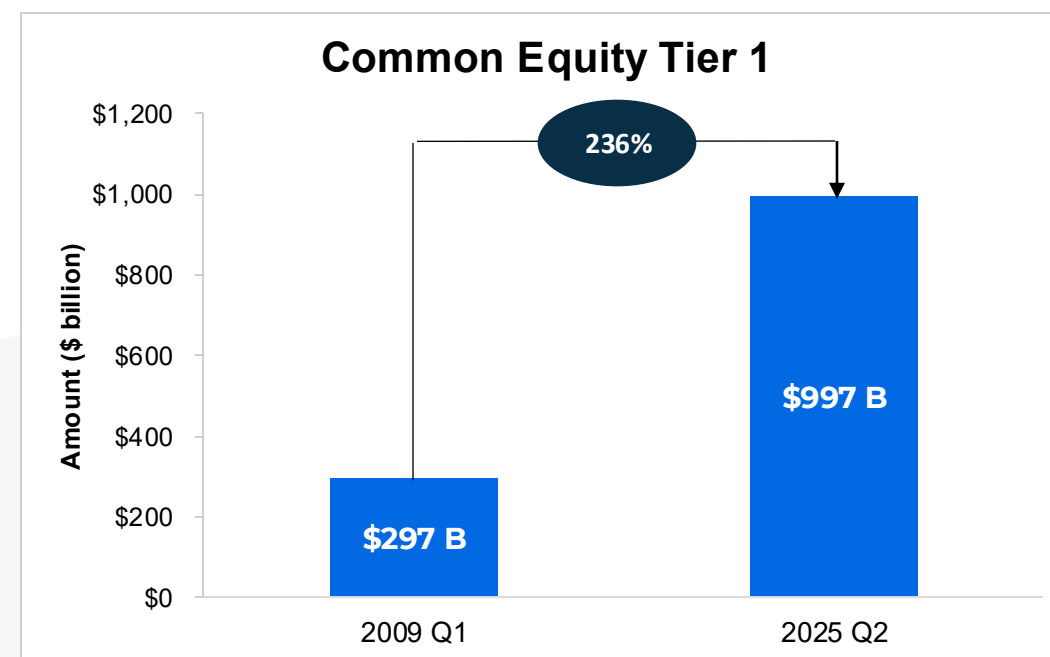
FINANCIAL  
SERVICES  
FORUM

# Improvements in Tier 1 Capital and Resiliency

We have significantly enhanced the quality and quantity of our capital. Since 2009, **Tier 1 capital has increased 69 percent and Common Equity Tier 1 capital has tripled**. Our members currently maintain **over \$1.1 trillion of T1 capital, \$997 billion of which is CET1 capital**.



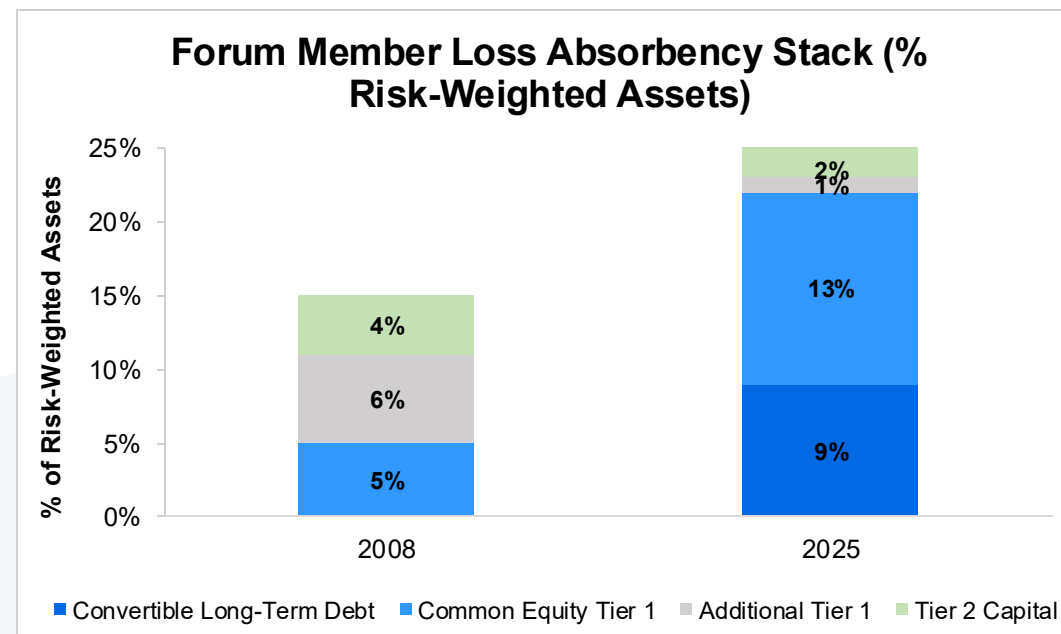
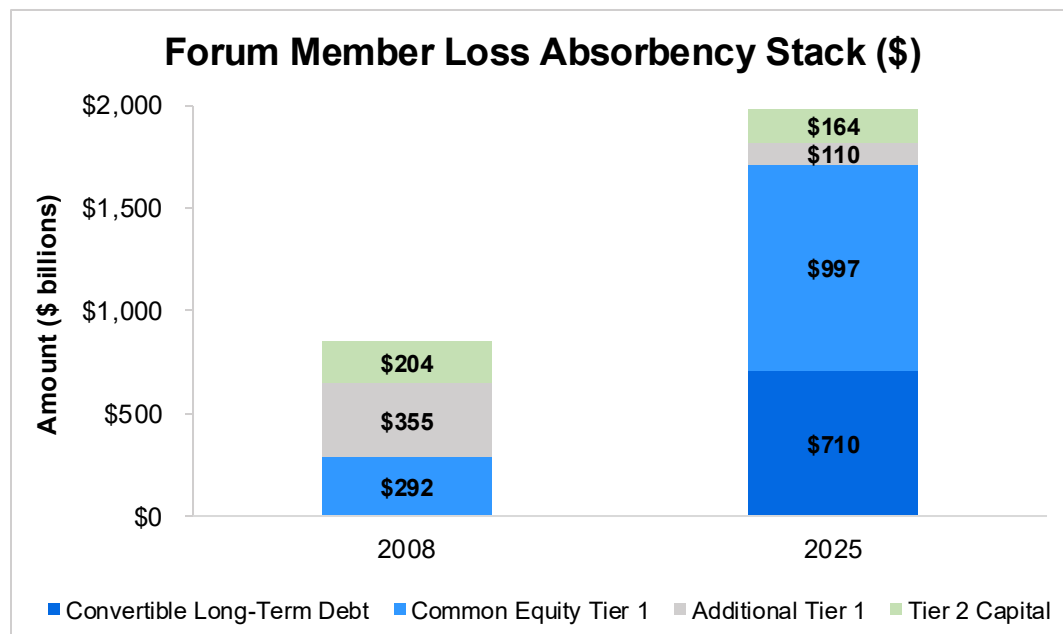
- Both dollar amounts of capital and capital ratios have improved markedly since 2009



- The share of Tier 1 capital accounted for by Common Equity Tier 1 capital has improved markedly

# Forum Member Total Loss Absorbency

Since 2008, **Forum members' total loss absorbency**—measured by convertible long-term debt, common equity Tier 1 and additional Tier 1 capital, Tier 2 capital—**has more than doubled to \$1.9 trillion, substantially improving Forum members' ability to withstand losses.**

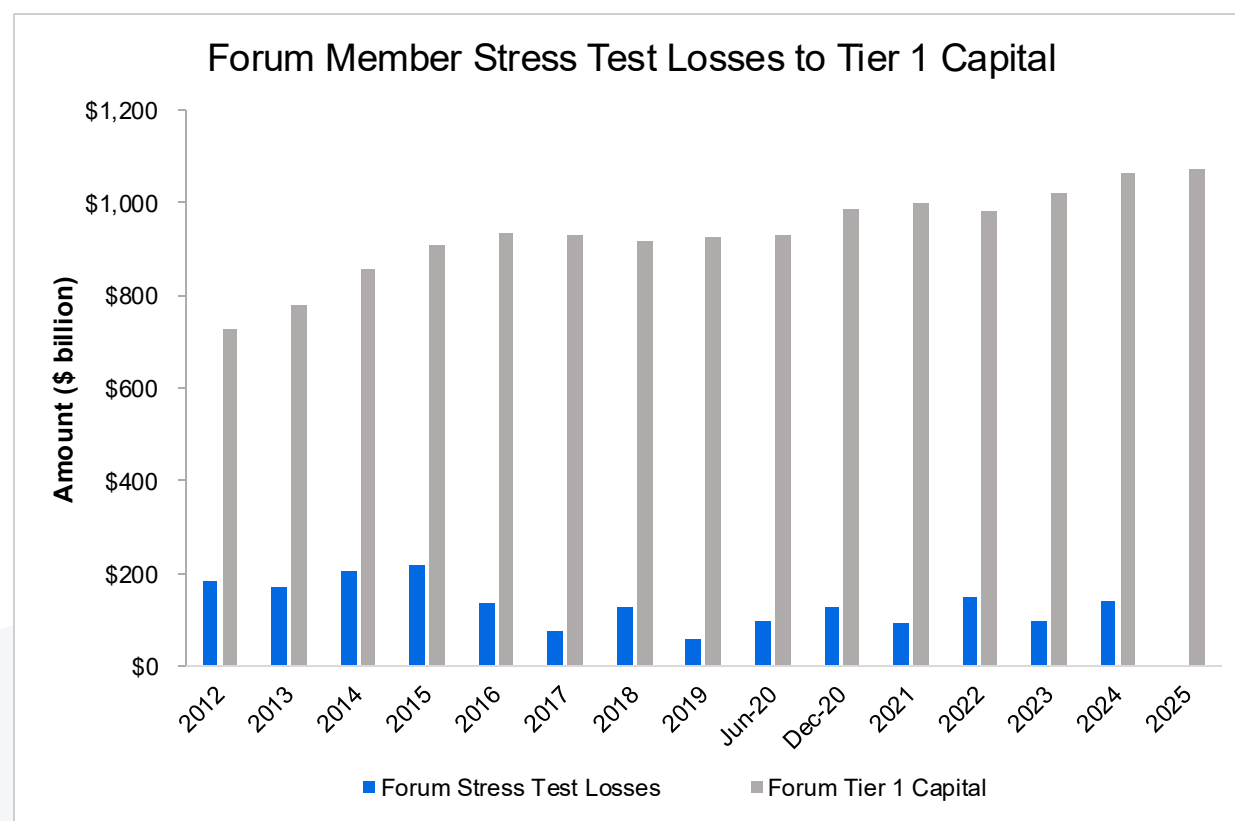


- Common equity Tier 1, the most loss absorbing form of capital, has grown by \$705 billion since 2008, and has increased as a percent of total Tier 1 capital, from 45 percent to 90 percent

- Estimated convertible long-term debt, debt that may be converted into equity to absorb losses

# Forum Capital Resiliency and Stress Tests

Stress tests are an important part of the capital regime for Forum members. While losses sustained from stress tests are significant, they pale in comparison to the amount of Forum member Tier 1 capital.

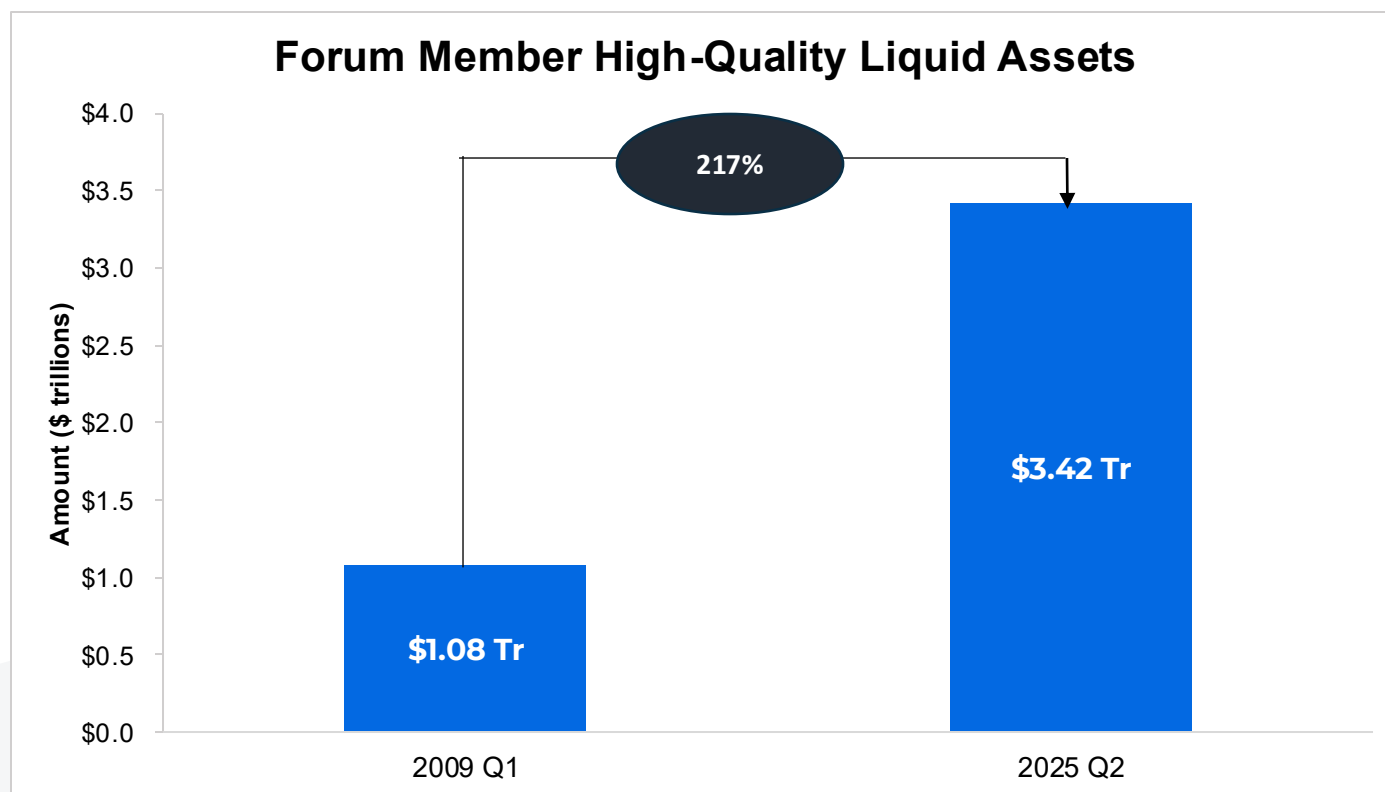


- Forum aggregate stress test losses range from 6.3 percent to 25.0 percent of Forum aggregate Tier 1 capital, demonstrating that Forum members maintain substantial capital to sustain losses as severe as those contemplated in the stress tests
- In addition, stress test losses are significantly more severe than the experience of the financial crisis

*\*In 2025 Stress Test, forum members in sum operating without a loss even under the severely adverse scenario.*

# Improvements to Liquidity Profile

We have also greatly increased our liquidity profiles and now hold **\$3.42 trillion in high-quality liquid assets (HQLA)**. Since 2009, HQLA has tripled.



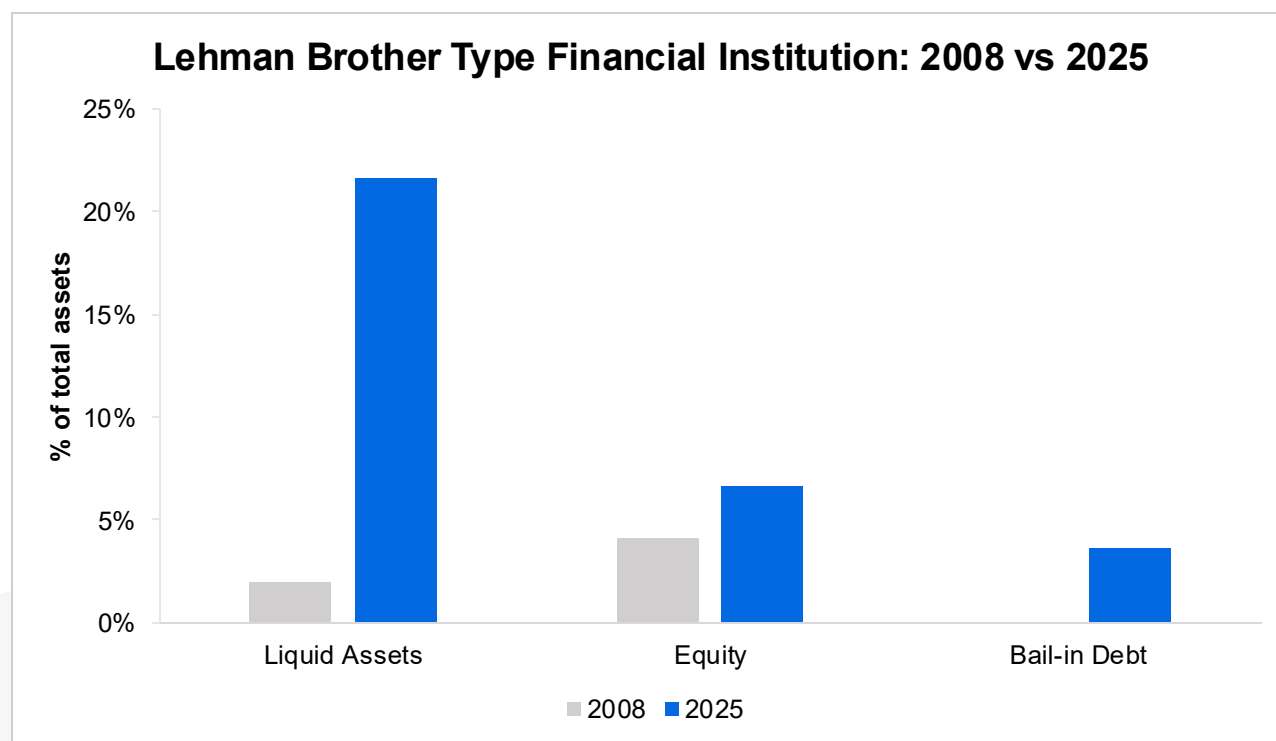
- Increased liquidity complements increased capital and improves resiliency to adverse shocks
- We have substantially increased HQLA, both in dollar amount and relative to total assets

Source: FR Y-9C data, available at <https://www.ffiec.gov/nicpubweb/nicweb/HCSGreaterThan10B.aspx>; Forum Members' LCR disclosures

Note: HQLA is reported according to Basel III at the Bank Holding Company level; Chart represents a rolling four-quarter average; 2022 Q3 HQLA data from firms' LCR disclosures

# Post-Crisis Reforms and Resiliency

The collapse of Lehman Brothers is often regarded as the turning point of the 2007-2009 recession. A similarly sized financial entity subject to today's regulatory standards would be significantly more resilient to large shocks like those experienced during the financial crisis.



- In 2008, Lehman held low levels of cash and liquid resources making it susceptible to adverse shocks. Post-crisis liquidity regulations require much higher levels of liquidity
- Post-crisis capital requirements would result in a near doubling of capital levels relative to 2008
- The largest banks now issue significant amounts of debt that can be “bailed in” to support a resolution event. Such debt was not available in 2008
- A number of additional regulatory and supervisory enhancements have strengthened the resiliency of the financial system

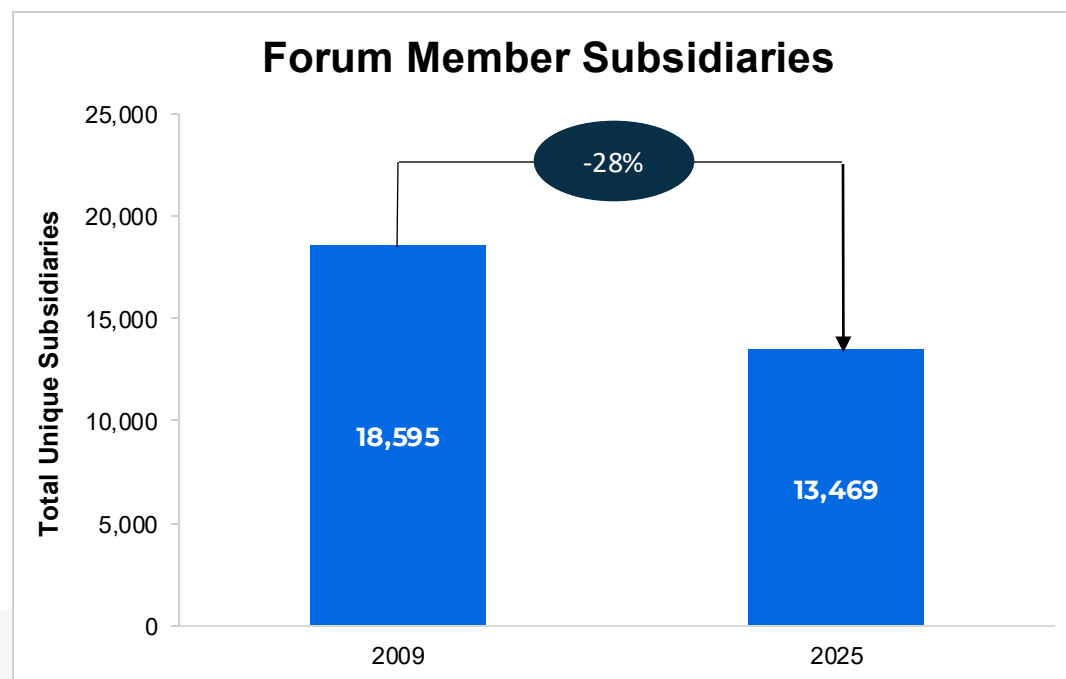
# Additional Regulatory and Supervisory Developments

In conjunction with significantly higher levels of capital and liquidity, several post-crisis reforms have greatly increased the resiliency of the U.S. financial system.

- 1 Title II – OLA** A new legal and structural framework for resolving large banks lowers the cost of resolving a member institution
- 2 Living Wills** Members have undertaken an extensive review and planning process designed to improve their resolvability under bankruptcy
- 3 Total Loss-Absorbing Capacity and Long-Term Debt Requirements** New requirements to issue long-term debt and equity support the Title II resolution process
- 4 Derivative Reforms** Mandates for central clearing, margin, and recognition of stays reduce systemic risks from derivatives

# Resolution: Overview and Improvements

In concert with a regulatory requirement to submit resolution plans (often referred to as “living wills”), U.S. GSIBs have made **significant progress to reduce their organizational complexity and increase their resolvability.**



- Total subsidiaries at U.S. GSIBs have **declined 28%** since 2009, which suggests a significant decrease in organizational complexity

Through the regular submission of resolution plans to the FRB and FDIC, large banks explain how they would undergo a rapid and orderly resolution in the event of material financial distress or failure – decreased organizational complexity would facilitate such a resolution proceeding.