

# Exhibit B

(Declaration of Leila Amirhamzeh)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

LAKELAND BANK,

*Defendant.*

Civil Action No. 2:22-cv-5746-CCC

**DECLARATION OF LEILA AMIRHAMZEH**

1. My name is Leila Amirhamzeh. I am Director of Community Reinvestment at New Jersey Citizen Action Education Fund (“Citizen Action”), a non-profit organization headquartered in Newark, New Jersey. I have worked at Citizen Action and/or our sister organization, for twenty-six years.

2. The mission of Citizen Action is to achieve social, racial and economic justice for all. Citizen Action empowers families and individuals by providing education, outreach, free direct services, and by connecting them to other supportive programs and information about their rights. Citizen Action also engages in public policy research and advocacy addressing the needs of low-and moderate-income New Jersey families and individuals. This is a unique approach, combining free direct services, such as HUD-certified housing counseling, fair housing investigations, and free tax preparation, with the policy advocacy that naturally grows out of those direct services.

3. For more than 40 years, Citizen Action has fought against redlining and discrimination, advocating for long-term solutions that build healthy and secure communities, families, and individuals. That effort has included work to increase access to credit and basic financial services for low- and moderate-income and communities of color, and to advocate for fair and affordable housing, as well as consumer protection. Over the years, Citizen Action has negotiated 45 community benefits agreements, leading to billions of dollars’ worth of

investments in lending, economic development, affordable housing, small business products, and more.

4. At Citizen Action, we know the needs of the greater Newark community, and the ways the Consent Order entered into between the United States and Lakeland Bank (now Provident Bank) has benefitted the people of greater Newark. We also therefore know the risk faced by that community should the requirements of the Consent Order terminate more than two years before their completion, with no guarantee that they continue.

5. For example, I am aware that the Consent Order requires Lakeland/Provident to open and maintain a full-service bank branch in Newark. *See* Consent Order ¶¶ 19–22. This will fill a critical need in Newark, a traditionally redlined community where people of color have too often been denied access to credit.

6. The Consent Order called for Lakeland/Provident to attempt to open the Newark branch within eighteen months of the Consent Order, or by April 2024. *See* Consent Order ¶ 20. The branch opening did not occur within that time period, but it is finally happening now. Just last week, Lakeland/Provident’s Community Development Officer (also required by the Consent Order) invited us to the grand opening of that bank branch, in the Ironbound neighborhood of Newark, known for having a high population of people of color and immigrants. *See* Ex. B-1. The grand opening is scheduled for Tuesday, June 3rd. Without the Consent Order in place there is no assurance that this critical branch will be supported by Lakeland/Provident and remain open in the future particularly given that New Jersey has had some of the highest rates of bank branch closures in the nation.

7. We have worked closely with Lakeland/Provident since the entry of the Consent Order, including receiving modest grants pursuant to the Consent Order’s Community Development Partnership Program. *See* Consent Order ¶¶ 27–29. We have prepared at least one short report on our activities under that grant. *See* Ex. B-2. As that report explains, from July 2023 to June 2024, we provided services promoting affordable housing, wealth creation, and asset preservation to 3,801 New Jerseyans, funded by the Community Development Partnership Program. Similar levels of work have continued since that time.

8. I am familiar with the loan subsidy fund required by the Consent Order. Consent Order ¶¶ 23–26. The loan subsidy fund is critical to remediate the



harms of historic redlining, particularly in a housing market as expensive as ours. The fund makes homeownership affordable for those who could not otherwise buy.

9. We have helped homebuyers apply for the subsidized loan product, working with the loan officers also required by the Consent Order. *See* Consent Order ¶ 22. Specifically, we provide free HUD-certified housing counseling services for potential applicants, while Lakeland/Provident then educates those residents about the fund, and their ability to apply. Lakeland/Provident has informed us that residents who applied for the subsidized loan product through our outreach efforts have successfully received mortgages.

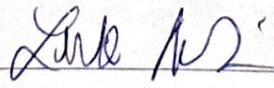
10. I understand that money from the loan subsidy fund remains to be distributed. For example, as recently as last week we completed work related to the Consent Order, including a homebuyer education and outreach program to low and moderate-income homebuyers in partnership with Lakeland/Provident and the African-American Chamber of Commerce. One goal of that joint outreach was to find additional applicants for the loan subsidy program. Yet without the Consent Decree there is no guarantee that the loan subsidy program will continue.

11. I am aware that the Consent Order calls for Lakeland/Provident to conduct affirmative advertising and outreach. *See* Consent Order ¶¶ 33-37. I have seen this advertising in action, which encourages the Newark-area community to apply for the subsidized loan program.

12. These are all critical programs and steps to remediate the impact of redlining. I am therefore greatly concerned about the termination of the Consent Order. Since the entry of the Consent Order, Lakeland/Provident has begun to increase housing opportunities for low to moderate income people, as well as for people of color. Without the programs required by the Consent Order, these underserved communities will have even less access to fair and affordable housing opportunities and which a long history of redlining has denied to them.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 6/1/2025

  
Leila Amirhamzeh, J.D.

# Exhibit B-1

**From:** [CAMEJO, ROXANNE](#)  
**To:** [Bonita Holmes](#); [Leila Amirhamzeh](#)  
**Subject:** Provident Bank VIP Celebration-Newark [Customer]  
**Date:** Tuesday, May 27, 2025 12:32:41 PM

---

Dear Bonita and Leila ,

On behalf of Provident Bank, we are thrilled to announce the grand opening of our [Newark Edison Place](#) branch – and we would be honored to have you join us for a [VIP celebration](#) to toast to our continued commitment to the Newark community! Enjoy views from the 7<sup>th</sup> floor City view Terrace at [Ironside Newark](#) (while partaking in the best of Portuguese tapas from our friends at [Mompou](#)) as we mark the occasion with our banking team, esteemed customers, and Newark dignitaries and community partners!

Please view our event via the link below to RSVP for you and a guest to join us in celebration!

### [Provident Bank Newark Edison Place VIP Celebration](#)

#### **Roxanne Camejo**

Senior Vice President | Community Development Officer  
NMLS #466570

9 Polifly Road Hackensack, NJ 07601

m:

[@provident.bank](#)



**Act with Integrity - Be Accountable - Promote Teamwork –  
Pursue Excellence - Build for the Future**

*Electronic communications, including but not limited to, approved systems for email, file transfers, communication, transactional platforms and any attachments to such communications, may contain proprietary, confidential, or privileged information. If you are not the intended recipient, you are hereby notified that you have received this electronic communication in error and that any review, disclosure, dissemination, distribution or copying of it or its contents is strictly prohibited. The sender does not waive confidentiality or any privilege by the accidental transmission of the communication and any attachment to you. If you have received this electronic communication in error, please notify the sender immediately, delete the electronic communication completely from your systems, and destroy all copies and any attachments.*

*Employees of Provident Bank, Beacon Trust, and Provident Protection Plus are required to conduct all business-related written communication through approved platforms, applications, websites, and technology systems. This includes, but is not limited to, [provident.bank](#), [beacontrust.com](#), and [providentprotectionplus.com](#) email addresses and employees' corporate issued phone numbers.*

*Please do not communicate through an employee's personal phone number, personal email addresses, instant messaging applications, social media, websites, additional forums, or other third-party messaging applications with Provident Bank, Beacon Trust, or Provident Protection Plus employees.*

# Exhibit B-2



**NJCAEF 2023 Impact Statement: Lakeland Bank Community Development Partnership Program**  
**July 2023 – June 2024**

In keeping with the goal of Lakeland Bank's Community Development Partnership Program to make a difference in local communities served by the Bank and helping residents of majority-Black and Hispanic census tracts gain access to residential mortgage credit, during the 2023-2024 grant term, the New Jersey Citizen Action Education Fund (NJCAEF) coordinated free direct programs and services that **promoted access to safe and affordable housing, wealth creation, and asset preservation among 3,801 low- and moderate-income (LMI) and Black, Indigenous, and other People of Color (BIPOC) New Jersey families**. Specifically, these free programs and services were coordinated as part of NJCAEF's HUD-certified housing counseling program and HUD-designated fair housing program, and included: one-on-one first-time homebuyer, rental, and foreclosure prevention counseling; first-time homebuyer education and outreach; and fair housing education, outreach, counseling and assistance. Together, these services provided New Jerseyans with information on accessing fair and affordable housing and mortgage lending, and helped to increase the housing security of program participants. Lastly, as part of our first-time homebuyer education and outreach, NJCAEF partners with Lakeland Bank to coordinate four first-time homebuyer workshops, including two in-person events held in Newark and Plainfield, as well as two virtual first-time homebuyer events. *See attached flyer and registration lists with participant information.* **We are pleased to report that these events with Lakeland Bank alone provided first-time homebuyer education and outreach to 334 LMI and BIPOC New Jersey homebuyers.**

The overall goal of NJCAEF's HUD-certified housing counseling and fair housing programs is to promote fair and affordable housing and mortgage lending, and increase the housing security of low- and moderate-income and BIPOC New Jerseyans in areas served by Lakeland Bank.

**Highlights of project activities during the 2023 grant term include the following:**

- Promoting access to safe and affordable housing, wealth creation, and asset preservation among 3,801 low- and moderate-income and BIPOC New Jerseyans through NJCAEF's HUD-certified housing counseling and fair housing programs;
- Providing one-on-one HUD-certified first-time homebuyer counseling and group education and outreach to LMI and BIPOC homebuyers across the state;
- Providing one-on-one HUD-certified rental counseling and/or assistance to 400 LMI and BIPOC renters across the state;
- Providing one-on-one HUD-certified foreclosure prevention counseling to 540 LMI and BIPOC homeowners across the state; and
- Providing fair housing education, outreach, counseling and assistance to 1,361 LMI and BIPOC homeseekers across the state.

As an approved housing counseling agency for the State of New Jersey Housing and Mortgage Finance Agency's New Jersey Emergency Rescue Mortgage Assistance (NJ ERMA) Program for distressed homeowners impacted by the Coronavirus pandemic, NJCAEF connected more than 2,390 homeowners to over \$11 million in foreclosure prevention assistance. This work could not have been achieved without the support of partners like Lakeland Bank.

**NJCAEF 2023 Impact Statement: Lakeland Bank Community Development Partnership Program**  
***July 2023 – June 2024***

**Demographic Data of Individuals Served:**

Of the individuals served, 94% were low- to moderate-income, with 41% below 50% of Area Median Income (AMI), 53% that were 50-79% of Area Median Income, and 6% that were reported as being at or above 80% of Area Median Income. With regard to race and ethnicity, 81% of those served self-identified as people of color (i.e., 35% were Hispanic/LatinX, 37% were Black/African American, 4% were Asian American-Pacific Islander (AAPI), and 5% identified as 'Other' and/or Multi-racial minorities). 19% of participants served were white/Caucasian. Without the support from Lakeland's Community Development Partnership Program, NJCAEF would not have had the capacity to provide much-needed counseling, education and assistance to underserved families across the state.