

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

STEPHEN LAROQUE, et al.,)	
)	
Appellants,)	
)	
v.)	No. 11-5349
)	
ERIC H. HOLDER, JR.)	
ATTORNEY GENERAL OF THE)	
UNITED STATES, et al.)	
)	
Appellees.)	

STATEMENT OF ISSUES TO BE RAISED

Appellants—Stephen LaRoque, Anthony Cuomo, John Nix, Klay Northrup, and Kinston Citizens for Non-Partisan Voting—hereby state that they intend to raise the following issues in this appeal:

Whether Section 5 of the Voting Right Act of 1965, as reauthorized and amended in 2006, 42 U.S.C. § 1973c, exceeds Congress’ enforcement powers under the Constitution’s Reconstruction Amendments and violates the Constitution’s nondiscrimination guarantees; and

Whether Appellants’ standing to bring the two facial constitutional challenges above extends to the “discriminatory purpose” prong of the amended 2006 standard, 42 U.S.C. § 1973c(c).

December 28, 2011

Respectfully submitted

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CERTIFICATE OF SERVICE

I hereby certify that, on December 28, 2011, I electronically filed the original of the foregoing document with the clerk of this Court by using the CM/ECF system.

I further certify that, on December 28, 2011, I caused the foregoing document to be served on the following counsel for Appellees at their designated electronic mail addresses, by using the CM/ECF system (with one exception):

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December 28, 2011

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