

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

STEPHEN LAROQUE, ANTHONY CUOMO,)
 JOHN NIX, KLAY NORTHRUP, LEE)
 RAYNOR, and KINSTON CITIZENS FOR)
 NON-PARTISAN VOTING,)
)
 Plaintiffs,)
)
 v.)
)
 ERIC H. HOLDER, JR.)
 ATTORNEY GENERAL OF THE)
 UNITED STATES)
)
 Defendant.)

Civ. No.: 1:10-CV-00561-JDB

DECLARATION OF ANTHONY CUOMO

I, Anthony Cuomo, hereby declare:

1. I am a resident and registered voter of Kinston, North Carolina.
2. I am white.
3. John Nix and Klay Northrup are running for the Kinston City Council in the upcoming election in November of 2011, as candidates unaffiliated with any party. I am supporting their candidacies and I intend to vote for them.
4. I want to be able to vote for the candidate of my choice in municipal elections in Kinston without having to associate with a political party.
5. In the Spring of 2008, Stephen LaRoque, Harry Edwards, B.J. Murphy, Hillary Greene, and Lee Raynor created an informal committee to place the nonpartisan-elections referendum on the ballot. I volunteered to help collect signatures. We were required to collect 1424 signatures to qualify for the ballot. We obtained 1430 signatures by going door to door as well as standing outside polling places during early voting and the primary election. The Board of Elections verified the signatures, and the referendum was placed on the ballot for the 2008 general election in November.

6. I assisted the campaign in favor of the referendum by volunteering at the polls, and I voted in favor of it.

7. I am a member of Kinston Citizens for Non-Partisan Voting ("KCNV"). It is an unincorporated membership association dedicated to eliminating the use of partisan affiliation in Kinston municipal elections. Its members consist of Kinston registered voters who have joined the association because they agree with its objectives and its means for achieving them. These members include Kinston voters who supported and voted for the nonpartisan-elections referendum and prospective candidates for Kinston municipal elections who have a direct interest in running in nonpartisan elections. I periodically receive updates on KCNV-related issues from Stephen LaRoque, the founder of KCNV.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this day, August 14, 2010.



Anthony Cuomo