

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
NO. 1:15-CV-00399

SANDRA LITTLE COVINGTON,)
et al.,)
)
Plaintiffs,)
)
vs.)
)
)
THE STATE OF NORTH CAROLINA,)
et al.,)
)
Defendants.)
_____)

DEPOSITION OF ANTOINETTE MINGO

(Taken by Defendants)

Charlotte, North Carolina

Friday, February 5, 2016



1 Democratic Party?

2 A. Yes, I do.

3 Q. Tell me how that is.

4 A. Let me say this: I am known for fighting
5 for what is right. So a lot of people know me. And
6 I will fight at issue to the last iota.

7 And I've had the opportunity I think last
8 year -- he wasn't always an employee, if he's an
9 employee now, and I've called him for advice or
10 whatever in the past about precinct information, et
11 cetera.

12 Q. Now, what is your involvement in the
13 Democratic Party?

14 A. I am, first of all, a registered Democrat,
15 and I vote. Secondly, I am a member of the state
16 executive committee, which comprises three or 400
17 people and I'm also a precinct chair.

18 Q. And you're the chair of your precinct?

19 A. Absolutely.

20 Q. And when Mr. Wilson called you, what did he
21 say?

22 A. He just asked me if I would -- he said that
23 there was a suit that would be filed and would I want
24 to be a part of it, and I said "most certainly,"
25 about redistricting. He did say that.

1 responsible for the payment of any attorneys' fees?

2 A. No, I have not.

3 Q. And have you signed any sort of engagement
4 agreement with Mr. O'Hale or his law firm, to your
5 knowledge?

6 A. No. He sent me something, but I -- I think
7 I did sign something to say that I would be a part --
8 right. It was an agreement to be a part of the
9 lawsuit.

10 Q. Do you remember when you would have signed
11 that agreement?

12 A. No. It was an e-mail. Sent to me via
13 e-mail, and I don't remember.

14 Q. But you had to print it out and sign it and
15 return it?

16 A. I'm 70. I don't remember that either.
17 Maybe so. I really don't know. I don't remember.
18 It was just, to me, a minor thing.

19 Q. When Mr. Wilson talked to you about the
20 lawsuit, did he tell you what he thought the suit was
21 intended to accomplish?

22 A. No. No, he did not. My guess is he just
23 assumed that I would know, but he did not. Because
24 I'm involved, you know, so I don't think he gave it
25 another thought that I wouldn't know.

1 Q. Most African Americans, though, are
2 registered Democrats; are they not?

3 A. No. I can see Republicans, African
4 Americans and unaffiliates. So I know that most of
5 the people in my precinct are African American.

6 Q. How about House District 99? Do you
7 believe there are too many African American voters in
8 House District 99?

9 A. Yes, I do.

10 Q. Why is that?

11 A. For the same reason that I just mentioned
12 before. We're all -- right. Same reason. I can
13 see, and that's it.

14 Q. And do you know what the percentage of
15 African American voters in House District 99 is?

16 A. I do not know. Go ahead. But I have
17 looked at records. I don't know off the top of my
18 head, but I go and, as I said, I look at data.

19 Q. Well, do you have any idea of what you
20 would like the percentage of African Americans in
21 House District 99 to be?

22 A. Well, no, I can't say that. What I do know
23 is that I don't like the idea of lines, so to speak,
24 being drawn that engineers a movement of a lot of
25 black people in one district.

1 It just doesn't sit well with me, and I
2 don't like being discriminated against, and it is
3 discrimination.

4 Q. Why do you believe that that occurred?

5 A. Why do I believe it occurred?

6 Q. Yes.

7 A. That is something that your -- well, I
8 don't know why it occurred. My guess is so that
9 another party could win seats and that would deprive
10 African Americans of the opportunity for running for
11 offices in a wider area.

12 Q. So you think politics was behind the
13 district lines?

14 A. Certainly. Politics, which translates into
15 discrimination.

16 Q. How is that?

17 A. Because once again, once you bring a lot of
18 African Americans or any other ethnicity together in
19 one district, it means they can't run for office in
20 another district.

21 You know, when I say "one district," I mean
22 when you just put them all together. So you only
23 have an opportunity to win one seat. It dilutes your
24 ability to run and expect to win in another area.

25 Q. But in the districts you live in, Senate