

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. )

VIDEOTAPED DEPOSITION OF DOUGLAS WILSON

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11:10 A.M.  
FRIDAY, FEBRUARY 19, 2016

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POYNER SPRUILL, LLP  
301 FAYETTEVILLE STREET  
SUITE 1900  
RALEIGH, NORTH CAROLINA

By: Tammy Johnson, CVR-CM-M



1 A. All right.

2 Q. And even if you anticipate where I'm going  
3 with a question, please wait for me to finish  
4 the question before you respond, and I, in  
5 turn, will try to wait for you to finish your  
6 answer before I ask you another question.

7 A. Uh-huh.

8 Q. If some time I don't allow you to finish your  
9 answer, just please let me know and I'll --  
10 I'll allow you to finish it before I ask my  
11 next question. And do you understand that you  
12 have an obligation to testify truthfully  
13 today?

14 A. Yes, I do.

15 Q. And is there any reason why you cannot testify  
16 truthfully and completely in response to my  
17 questions today?

18 A. No.

19 Q. Now, Mr. Wilson, what is your current  
20 occupation?

21 A. I'm the Deputy Executive Director for the  
22 North Carolina Democratic Party.

23 Q. How long have you held that position?

24 A. It will be a year in May of this year.

25 Q. And have you worked for the North Carolina

1 Democratic Party before then?

2 A. Yes, I have.

3 Q. And when was that?

4 A. 2012 to 2014.

5 Q. And do you remember what months or --

6 A. I started in April of 2012. I can't give you  
7 the exact day. And I left in March of 2014.

8 Q. And what did you leave to do?

9 A. I took a leave of absence to go work for  
10 Senator Kay Hagan on her campaign as her  
11 political director.

12 Q. Now, from 2012 to 2014, what was your role  
13 with the North Carolina Democratic Party?

14 A. I was the political director.

15 Q. And what was your role with Senator Hagan's  
16 campaign?

17 A. Same -- same capacity, political director.

18 Q. And before you worked for the North Carolina  
19 Democratic Party --

20 A. Uh-huh.

21 Q. -- in 2012, what did you do?

22 A. For a period of time, I was -- I was out of  
23 work, but from 2007 to 2008, I -- I worked for  
24 President Barack Obama on his campaign in  
25 South Carolina. And then after that, I worked

1 Q. And have you had any discussions with  
2 Ms. Sloane about this matter?

3 A. About this case right here?

4 Q. Well, about the -- the case that's known as  
5 Covington versus the State of North Carolina.

6 A. I did contact her. She was one of the  
7 potential plaintiffs that I was asked to  
8 identify in the case.

9 Q. And how did you select Ms. Sloane as a  
10 potential plaintiff?

11 A. There is a -- I'm trying to find the correct  
12 word for it. There is a database called The  
13 Voter File that the Board of Elections  
14 provides the information for registered voters  
15 in this -- in that. It's just something that  
16 is used by both parties. And she -- I  
17 researched her name to see if she resided in  
18 one of the districts that I was asked to  
19 identify potential plaintiffs.

20 Q. And did you discuss Ms. Sloane's participation  
21 in the Covington case with Ms. Dew?

22 A. I don't recall.

23 Q. How did you get Ms. Sloane's contact  
24 information?

25 A. From The Voter File.

1 Q. And do you know how funds were raised to pay  
2 for the attorneys' fees or costs in the  
3 Dickson lawsuit?

4 A. No.

5 Q. Did you ever inquire about that?

6 A. No.

7 Q. And why not?

8 A. I just -- I just didn't. I -- I didn't have  
9 any desire to.

10 Q. To know?

11 A. No.

12 Q. Were you ever concerned that you would have to  
13 pay the costs for your attorneys to represent  
14 you in that lawsuit?

15 A. No.

16 Q. Okay. And why not?

17 A. Because I didn't hear from anybody.

18 Q. Okay.

19 (WHEREUPON, Defendant's Exhibit 3 was  
20 marked for identification.)

21 Q. So, Mr. Wilson, I'm going to hand you another  
22 document now I'm going to mark as Wilson  
23 Exhibit 3. Is Wilson Exhibit 3 a document  
24 that you recognize?

25 A. Yes.

1           That's not what he said he did.

2           A.    No, I didn't.

3           Q.    Well -- well, did Mr. Falmlen tell you who  
4           else was involved in the lawsuit?

5           A.    I don't remember him telling me that.

6           Q.    I've already given you a copy of the --

7           A.    Of, Exhibit 3, yes.

8           Q.    Yes, sir.

9           A.    Uh-huh.

10          Q.    And why don't we start on page 5?

11          A.    Okay. I'm there.

12          Q.    And there's a list of names under the heading  
13          "Parties" on page 5. Do you see that?

14          A.    Yes, I do.

15          Q.    All right.

16          A.    Uh-huh.

17          Q.    Why don't we go person-by-person here and --  
18          and you let me know if you know any of these  
19          individuals?

20          A.    Okay.

21          Q.    Okay. The first --

22          A.    I -- I'm sorry.

23          Q.    Go ahead. The -- go ahead.

24          A.    Okay, yeah. I do not know Sandra Covington.

25          Q.    And how about Mr. Arrington?

1 A. Yes, I do.

2 Q. How do you know him?

3 A. I know him as the former county chair for -- I  
4 can't remember the county right now. I'm --  
5 drew -- draw a blank on that, but I know him  
6 as being a former county chair.

7 Q. And when you say someone is a county chair,  
8 you mean with the Democratic Party?

9 A. Correct.

10 Q. And is Mr. Arrington someone that you  
11 discussed this lawsuit with?

12 A. Yes.

13 Q. And when did you have a discussion with  
14 Mr. Arrington about this lawsuit?

15 A. I can't remember the date.

16 Q. Do you remember what you said to him about the  
17 lawsuit?

18 A. He was one of the potential plaintiffs that I  
19 -- I -- that I was -- that I identified, and I  
20 just told him that there was a potential case  
21 being filed and if he was interested in being  
22 a plaintiff, an a- -- an attorney would  
23 contact him.

24 Q. Well, did he tell you he was interested in  
25 being a plaintiff?

1 lawsuit?

2 A. I don't know.

3 Q. You don't remember whether you had a meeting  
4 with -- about any -- with -- with any group of  
5 people about finding plaintiffs to be involved  
6 in a lawsuit other than the meeting you  
7 already described --

8 A. Yeah. That was -- that was the only meeting  
9 I've had.

10 Q. All right. And did you start looking for  
11 plaintiffs right after you met with  
12 Mr. Falmlen?

13 A. I can't -- I can't recall if it was exactly  
14 after. I just know that there was a time  
15 where I started doing it, but I don't know  
16 what the -- if it was exactly after. Yeah, I  
17 don't remember.

18 Q. Do you remember when you completed that  
19 process?

20 A. I can't remember.

21 Q. Well, looking back at page 5 --

22 A. Uh-huh.

23 Q. -- of Exhibit 3, the next name is Herman  
24 Lewis. Is that a name that you're familiar  
25 with?



1 A. No.

2 Q. How about Viola Figueroa?

3 A. Yes.

4 Q. How do you know Ms. Figueroa?

5 A. She is a member of the African-American Caucus  
6 in Wayne County.

7 Q. And do you remember the first time that you  
8 had a conversation with Ms. Figueroa about  
9 this lawsuit?

10 A. I can't recall the exact time, but I remember  
11 contacting her as a potential plaintiff.

12 Q. How did you know Ms. Figueroa?

13 A. As I stated, she was a member of the  
14 African-American Caucus.

15 Q. Did you work with her on the Kay Hagan  
16 campaign?

17 A. No, I did not. She -- I didn't work with her  
18 directly. I -- I heard that she helped out in  
19 the -- in her area, but I didn't work with  
20 her. She wasn't an employee of the campaign.

21 Q. And did Ms. Figueroa tell you that she would  
22 agree to be a plaintiff in a lawsuit?

23 A. Yes.

24 Q. And do you remember how she agreed to do that?  
25 Was it over e-mail or telephone or in person?

1 A. I can't remember the exact type of  
2 communication.

3 Q. The next person listed is Crystal Graham  
4 Johnson, paragraph 14.

5 A. This is not a name that I -- I recognize.

6 Q. How about Marcus Walter Mayo in paragraph 15?

7 A. No. I don't recognize that name.

8 Q. Julian Charles Pridgen, Sr.?

9 A. Not a name I recognize.

10 Q. Page 17, there's Gregory Keith Tucker.

11 A. I don't recognize that name.

12 Q. Do you know someone named Betsy Leach?

13 A. Yes.

14 Q. And how do you know Ms. Leach?

15 A. Ms. Leach is the -- she used to be the county  
16 chair for -- for Pitt County.

17 Q. Did you talk with Ms. Leach --

18 A. I don't --

19 Q. -- about --

20 A. I don't recall talking to her.

21 Q. Do you think it's possible you could have?

22 A. I -- I -- honestly, I -- I don't -- I don't  
23 remember if I did.

24 Q. Now, did you send out a blanket e-mail to  
25 county chairs asking them if they knew

1 potential plaintiffs? Or did you send out  
2 e-mails to certain leaders in the party? What  
3 -- what contact did you have with people in  
4 the party apparatus, if you will, about  
5 looking for plaintiffs?

6 A. I -- I did not send out a blanket e-mail to  
7 county chairs, nor did I send it out to party  
8 leaders in the party.

9 Q. Well, did you contact anybody in the party  
10 other than people who ended up being  
11 plaintiffs about --

12 A. No. It --

13 Q. -- the lawsuit?

14 A. No, I did not.

15 Q. And so your testimony is you don't remember  
16 talking to Mr. Tucker?

17 A. Yeah. I -- I don't remember --

18 Q. Okay.

19 A. -- talking to him.

20 Q. Now, if Mr. Tucker testified at his deposition  
21 that he believed that he talked to you about  
22 the lawsuit --

23 A. Uh-huh.

24 Q. -- do you think he would be mistaken?

25 A. Like I said, I -- I don't remember. Honestly,

1 I don't remember.

2 Q. How about paragraph 18, Cynthia Martin?

3 A. I -- I honestly don't remember talking to her.

4 Q. How about John Raymond Verdejo?

5 A. Yes. I do recall talking to him.

6 Q. When did you talk to Mr. Verdejo?

7 A. As I stated earlier, asking if he was  
8 interested in being a plaintiff in this  
9 potential case.

10 Q. How did you go about doing that?

11 A. It was -- I believe it was a phone call.

12 Q. Do you remember when?

13 A. I don't.

14 Q. Do you remember how many phone calls that you  
15 had with Mr. Verdejo?

16 A. I do remember it was just one call.

17 Q. Do you remember what you told Mr. Verdejo  
18 about the lawsuit?

19 A. Just that there was -- that there's a  
20 potential lawsuit coming up and if he was  
21 interested in being a plaintiff, that an  
22 attorney would -- would contact him.

23 Q. And did he tell you at that time he was  
24 interested?

25 A. Yes, he did.

1 Q. How about paragraph 20, Dedreana Irene  
2 Freeman?

3 A. Yes.

4 Q. Do you --

5 A. I con- --

6 Q. -- know her?

7 A. I do know her. She was a classmate of mine in  
8 IOPL, the Institute of Political Leadership,  
9 and I remember contacting her through phone,  
10 and I left her a -- a -- I left her a  
11 voicemail, and I had -- and I didn't hear from  
12 her from -- from then.

13 Q. Do you know if anyone else later contacted  
14 her?

15 A. I -- I don't know.

16 Q. Did you have anyone else at the North Carolina  
17 Democratic Party who was working with you to  
18 identify potential plaintiffs for this  
19 lawsuit?

20 A. No. It was just me.

21 Q. Do you have an outreach coordinator or  
22 coalitions director or something like that at  
23 party headquarters?

24 A. Huh-uh. No. No, we don't. I'm sorry. No,  
25 we don't.

1 Q. Is there someone with the last name Fellman  
2 who works at the party?

3 A. Sarah Fellman, yes.

4 Q. Okay. What is her --

5 A. Now, when you -- when you mentioned in your  
6 previous question the title, the title is  
7 completely -- that's why I said, no, I don't  
8 recognize that title. But she -- she is with  
9 the party.

10 Q. What is her title?

11 A. She is the campus coordinator and campus --  
12 campus coordinator and voter protection  
13 outreach. It's -- it's a long title. I can't  
14 get it -- get it correct.

15 Q. Do you know if she contacted any prospective  
16 plaintiffs about this lawsuit?

17 A. No. Like I said, I was the one that was doing  
18 -- that was contacting potential plaintiffs.

19 Q. Was your answer, no, she did not, or that you  
20 don't know if she did?

21 A. No, she did not.

22 Q. Do you know if Ms. Keever contacted any  
23 potential plaintiffs in the lawsuit?

24 A. No.

25 Q. How about paragraph 21?

1 A. M- -- Milo P- -- Pyne? That's not a name that  
2 I rec- -- that I recognize.

3 Q. How about Juanita Rogers?

4 A. Rogers. I don't know that. I -- I don't -- I  
5 don't know her.

6 Q. How about Valencia Applewhite?

7 A. I do know of her.

8 Q. Is she someone that you contacted about this  
9 lawsuit?

10 A. No. I -- I don't remember contacting her.  
11 The only thing I know about her is that she  
12 lives in Fayetteville and I think she was -- I  
13 think she ran for mayor. But I -- I didn't  
14 contact her.

15 Q. And have you had any conversations with her  
16 about this lawsuit?

17 A. No.

18 Q. Looking on page 7 --

19 A. Uh-huh.

20 Q. -- David Lee Mann?

21 A. It's not a name that I recognize.

22 Q. What about Mary Evelyn Thomas?

23 A. The name looks familiar, but I don't know her.  
24 It just looks familiar to me. That's all.

25 Q. Well, Ms. Thomas testified in her deposition

1           that she received a phone call --

2           A.    Uh-huh.

3           Q.    -- about a year ago from a man who worked for  
4           the North Carolina Democratic Party.

5           A.    Uh-huh.

6           Q.    So if she received a phone call like that,  
7           would --

8           A.    Uh-huh.

9           Q.    -- the only man that would have been calling  
10          her would have been you?

11          A.    I honestly can't remember. Like I said, it's  
12          a name that I recognize, but I can't honestly  
13          say to you that I called her because I just  
14          can't remember.

15          Q.    But you're not aware of any other man working  
16          for the North Carolina Democratic --

17          A.    Yeah. I --

18          Q.    -- Party?

19          A.    I'm not aware of that, of anybody else that  
20          would -- would call her.

21          Q.    How about paragraph 26, Jamal Trevon Fox?

22          A.    I know Mr. Fox as a county -- excuse me --  
23          city council member of -- in Greensboro. I  
24          did not -- I -- well, from what I remember, I  
25          did not contact Mr. Fox.



1 Q. Have you discussed this case with Mr. Fox?

2 A. No, I haven't.

3 Q. How about Channelle Darlene James?

4 A. That name does not look familiar to me.

5 Q. How about Catherine Wilson Kimel?

6 A. I recognize the last name, but I don't  
7 recognize -- I don't know a Catherine Kimel.

8 Q. Do you know someone with the last name Kimel?

9 A. I think there's a -- I think I -- I recognize  
10 -- I remember -- I know somebody that's on the  
11 Board of Elections in Greensboro with the last  
12 name Kimel.

13 Q. Is the person male or female?

14 A. He is, of course, male, yeah.

15 Q. Now, Ms. Kimel also testified that she got a  
16 phone call from a man with the Democratic  
17 Party.

18 A. Uh-huh. Yeah. As I stated earlier, it's not  
19 a name I remember and I don't recall calling  
20 her.

21 Q. How about Vanessa Vivian Martin?

22 A. I don't -- I don't recall that name.

23 Q. Is there any other man who works for the North  
24 Carolina Democratic Party or was working there  
25 last year in the April or May timeframe?

1 A. Mr. Jesse Presnell.

2 Q. How do you spell his first name?

3 A. Jesse?

4 Q. Yes.

5 A. J-E-S-S-E.

6 Q. What's -- how do you spell the last name?

7 A. P-R-E-S, like Sam, N as in Nancy, E as in  
8 Edward, L as in Larry, L as in Larry.

9 Q. Jesse Presnell.

10 A. Uh-huh.

11 Q. Okay. What is his role with the party?

12 A. He is the data director.

13 Q. How long has he worked there?

14 A. It will be a year next month, I believe.

15 Q. How about Ms. Fellman? I don't think I asked  
16 you how long she had been there.

17 A. Ms. Fellman has been with us now since January  
18 of this year. Last year she was just an  
19 intern.

20 Q. She was in the building?

21 A. What, last year?

22 Q. Yes.

23 A. She was per- -- periodically. She was an  
24 intern.

25 Q. Do you recall when her internship started?

1 A. I don't remember when it started.

2 Q. Now, how about in paragraph 30, page 7 --

3 A. Uh-huh.

4 Q. -- a lady named Susan Sandler Campbell?

5 A. Uh-huh. I recognize that name. I know her.

6 Q. Okay. Did you contact her about this lawsuit?

7 A. I did.

8 Q. How did you go about doing that?

9 A. I can't remember the exact way of contacting  
10 her, but I do remember that she did not want  
11 to be a plaintiff in the case.

12 Q. How do you remember that?

13 A. I remember -- I just remember that because she  
14 -- she was very -- she was -- she was very  
15 concerned about -- she just didn't want to do  
16 it, so I just remember that.

17 Q. Did she tell you that she didn't want to be a  
18 plaintiff, I guess; is that what you're  
19 saying?

20 A. Yeah. She just -- then she -- I can't  
21 remember what the reason that she gave me, but  
22 she said that she -- she didn't -- she didn't  
23 want to be -- be a plaintiff.

24 Q. Did you talk to her again?

25 A. I can't recall talking to her again because

1 after that, she -- after she told me she  
2 wasn't interested, I just didn't, so, yeah.

3 Q. Do you know if anyone else later talked to  
4 her?

5 A. Not that I know of, no.

6 Q. Looking at page 8, paragraph 31, someone named  
7 Marshall Ansin, do you know that person?

8 A. Ansin. No. I don't -- I don't recognize that  
9 name.

10 Q. How about Rosa Mustafa?

11 A. I do rec- -- I do recognize Rosa.

12 Q. Is she someone you contacted about this  
13 lawsuit?

14 A. I don't remember.

15 Q. Do you remember working with Ms. Mustafa on  
16 the Kay Hagan campaign?

17 A. Yes, I do.

18 Q. What was her role with the Kay Hagan campaign?

19 A. She was a field organizer in Charlotte. I  
20 don't know what section of the city, but I  
21 know she was a field organizer.

22 Q. And you can't recall whether you talked to her  
23 about this lawsuit at all?

24 A. Yes. That's correct.

25 Q. How about Antoinette Dennis Mingo, paragraph

1 33?

2 A. Yes. I do recognize her name.

3 Q. Okay. Did you speak with her about this  
4 lawsuit?

5 A. She was somebody that I identified as a  
6 potential plaintiff.

7 Q. Did she agree to -- to be a plaintiff after  
8 you spoke with her?

9 A. Yes, she did. She did.

10 Q. Do you remember what you told Ms. Mingo about  
11 the lawsuit?

12 A. Just -- I just told her, as I stated earlier,  
13 that there was a potential case coming up and  
14 just asked -- asked her if she was interested  
15 in becoming a plaintiff in the case.

16 Q. Did you have any other conversation with  
17 Ms. Mingo other than the one?

18 A. No. After she agreed, that was it.

19 Q. And we talked about Ruth Sloane earlier?

20 A. Yes.

21 Q. And she is somebody else that you contacted to  
22 join the lawsuit; is that right?

23 A. Correct. You want me to go to -- go to 35?

24 Q. Yes.

25 A. All right. I do not recognize the name Claude

1 Harris.

2 Q. How about James Edward Alston?

3 A. Huh-uh. I don't recognize that name.

4 Q. How about Bryan Olshan Perlmutter, paragraph  
5 37?

6 A. Yes, I see. And I don't recognize his name.

7 Q. Page 9, paragraph 38 --

8 A. Uh-huh.

9 Q. -- La'Tanta Denishia McCrimmon.

10 A. I'm surprised you were able to pronounce her  
11 name that well. Yes, I -- I do know her.

12 Q. Okay. And is she someone that you contacted--

13 MR. SPEAS: I'm sorry. Which one  
14 are -- which -- which paragraph?

15 MR. MCKNIGHT: We're -- we're  
16 talking about paragraph 38 on page 9.

17 MR. SPEAS: Okay. Okay. I got you.

18 MR. MCKNIGHT: Sure.

19 MR. SPEAS: Thank you for catching  
20 me up.

21 MR. MCKNIGHT: Sure.

22 BY MR. MCKNIGHT:

23 Q. Ms. McCrimmon, is she someone you contacted  
24 about this lawsuit?

25 A. No.

1 Q. But you said you recognize the name?

2 A. Yes. I -- I know her.

3 Q. And how do you know her?

4 A. I know her from just working with -- I think  
5 she's worked for Larry Kissel.

6 Q. And he was a former Congressman; is that  
7 right?

8 A. Yes, correct. Uh-huh.

9 Q. How about Catherine Medlock-Walton, paragraph  
10 39?

11 A. Huh-uh. I don't recognize that name.

12 Q. How about Mark Englander?

13 A. No, don't recognize that name.

14 MR. MCKNIGHT: Why don't we take a  
15 short break here?

16 MR. SPEAS: Sure. Sure.

17 THE VIDEOGRAPHER: We're off the  
18 record at 12:12.

19 (Brief Recess - 12:12 p.m. to 12:25 p.m.)

20 THE VIDEOGRAPHER: This is tape  
21 number two in the deposition of Douglas A.  
22 Wilson. The time is 12:25.

23 BY MR. MCKNIGHT:

24 Q. Back on the record, Mr. Wilson --

25 A. Okay.