

EXHIBIT K

1 had with your attorney under the attorney-client
2 privilege -- but did that review help refresh your
3 recollection as to the events that you will testify to
4 here today?

5 A Not really refresh. I'm very aware of
6 what's going on. So, no.

7 Q And do you have any documents or notes with
8 you today?

9 A No, I do not.

10 Q And shifting gears again, Mr. Rueckert,
11 could you please state your full name for the record.

12 A Jens Wolfgang Rueckert.

13 Q And, Mr. Rueckert, what is your current
14 address?

15 A [REDACTED] Powder
16 Springs, Georgia [REDACTED]

17 Q And what county is that in?

18 A Cobb County. West Cobb.

19 Q And how long have you lived at that address?

20 A We moved in in December of 2014.

21 Q And have you lived anywhere else in the past
22 two years?

23 A In the past how many years?

24 Q Two years.

25 A No, sir, I have not.

1 Q And where did you live before moving to the
2 address that you just described?

3 A We lived approximately six months in Canton,
4 Georgia, Cherokee County, while the house was being
5 built. I was a schoolteacher at Cherokee High School
6 after I retired out of the United States Air Force.

7 Q And how long have you lived in Cobb County?

8 A Since December of 2014.

9 Q And have you ever resided in any other
10 county in Georgia?

11 A No.

12 Q You mentioned this -- or may have alluded to
13 this a little bit earlier, but why did you move to
14 Cobb County?

15 A I retired out of the Air Force and my eldest
16 daughter lived in Georgia, so we decided to retire
17 closer to her.

18 Q And I'm going to presume based on your
19 experience serving in the Air Force, but have you ever
20 resided in any other state?

21 A Yes, sir.

22 Q And -- and what are all those, to the best
23 of your recollection?

24 A Well, let's see. I was born in Germany. I
25 moved to North Carolina when I was almost five years

1 old, and I continued in North Carolina until 1991 when
2 I graduated high school. In August of 1991 I shipped
3 off to Lackland Air Force Base in San Antonio, Texas,
4 and I was there for basic military training. And then
5 I went to Sheppard Air Force Base, Texas, in Wichita
6 Falls, and I was there for about five months for
7 pharmacy training. And then I went to Fort Worth,
8 Texas, for my first assignment for about a year and a
9 half at Carswell Air Force Base.

10 I moved to Shaw Air Force Base in South
11 Carolina in 1993, and I stayed at Shaw Air Force Base
12 until 1999, and then I went back to San Antonio,
13 Texas, at Lackland Air Force Base and was a military
14 training instructor, drill sergeant. And then I went
15 to Wright-Patterson Air Force Base in Ohio from 2003
16 to 2007. And then we went back to Lackland Air Force
17 Base in San Antonio, Texas, where I was superintendent
18 of the pharmacy at Wilford Hall Medical Center. And
19 then in 2012 I went to Alaska, Elmendorf Air Force
20 Base, Anchorage, Alaska, and I was there until June of
21 2014 when I retired. And I was the Pacific Air Force
22 functional manager of pharmacy there, where I managed
23 pharmacies in Alaska, Hawaii, Guam, Japan, and Korea.

24 Q And we will get into your work experience a
25 little bit, but thank you so much for that background.

1 That will be very helpful for my later questions.

2 But real quickly, since this deposition is
3 occurring virtually, can you provide the address that
4 you are testifying from.

5 A [REDACTED] Powder Springs, Georgia

6 [REDACTED]

7 Q So that would be the home address that you
8 provided previously; correct?

9 A Correct. I am in my office.

10 Q Okay. And is your lawyer physically present
11 with you right now?

12 A No, he is not. He is virtually present.

13 Q And is anyone else physically present with
14 you in the room?

15 A Not in the room, no. But in the home, yes.

16 Q And do you own, either partially or full,
17 any other properties?

18 A No, I do not.

19 Q Do you rent anywhere else?

20 A No, I do not.

21 Q And have you owned any other rental
22 properties in the last two years?

23 A No, I have not.

24 Q So it would be fair to say that the
25 residence that you've identified in Cobb County is

1 your sole residence?

2 A That is correct.

3 Q And now we will shift gears a little bit and
4 talk about your education. Mr. Rueckert, what was the
5 highest level of education that you've completed?

6 A I have a master's in health administration.

7 Q And when did you receive that?

8 A 2009.

9 Q And where did you receive that from?

10 A University of Phoenix.

11 Q And aside from the master's in health
12 administration, what is the next level -- next highest
13 level of education that you've completed?

14 A I have a bachelor's in Health and Human
15 Services.

16 Q And when did you receive that?

17 A 2006.

18 Q And where did you receive that from?

19 A Wilberforce University in Ohio.

20 Q And have you -- strike that.

21 Have you completed any other university or
22 graduate-level schooling with institutions other than
23 those that we've described?

24 A Yes. I have an associate's degree in
25 pharmacy technology from the Community College of the

1 Q Ohio?

2 A I don't recall voting in Ohio either.

3 Q And then how about back when you first
4 registered in North Carolina, did you vote in North
5 Carolina?

6 A No, actually I wasn't there long enough.

7 Q Understandable. And now we will shift along
8 to political affiliations. Do you consider yourself
9 to be a member of the Democratic Party?

10 A Yes.

11 Q And for how long have you considered
12 yourself to be a member of the Democratic Party?

13 A Since I was old enough to vote, 18.

14 Q And have you ever held any leadership
15 position in the Democratic Party?

16 A No, I have not.

17 Q Have you ever held any position or served on
18 any committee in the Democratic Party?

19 A No, I have not.

20 Q Have you participated in any activities in
21 the Democratic Party?

22 A Yes.

23 Q And to the best of your recollection, can
24 you describe what those activities were.

25 A I remember a few summers ago when

1 Representative Wilkerson hosted a barbecue fun day at
2 a local park. I don't recall the name of the park.
3 And then most recently when Representative Wilkerson
4 had Candidate Marcus Flowers over at his house prior
5 to the election.

6 Q And so would that have been for the
7 November 2022 election that that event was associated
8 with?

9 A Yes.

10 Q And I think you probably touched on this
11 prior, but have you ever considered yourself to be a
12 member of the Republican Party?

13 A No.

14 Q So would it be fair to say that you
15 generally support Democratic candidates for election
16 in Georgia?

17 A Yes.

18 Q And have you ever voted for a Republican
19 candidate?

20 A I don't recall ever voting for a Republican.

21 Q And have you ever been a member or held a
22 position in any other political party?

23 A No, I have not.

24 Q And aside from what you described previously
25 with Representative Wilkerson, have you worked on any