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4 SELECT COMMITTEE TO INVESTIGATE THE  
5 JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6 U.S. HOUSE OF REPRESENTATIVES,  
7 WASHINGTON, D.C.

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11 DEPOSITION OF: KELLY RUH

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Monday, February 28, 2022

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Washington, D.C.

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The deposition in the above matter was held via Webex, commencing at 2:01 p.m.

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Present: Representative Schiff.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

6 THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8 [REDACTED] STAFF ASSOCIATE

9 [REDACTED], INVESTIGATIVE COUNSEL

10 [REDACTED] PROFESSIONAL STAFF MEMBER

11 [REDACTED] SENIOR INVESTIGATIVE COUNSEL

12 [REDACTED] CHIEF INVESTIGATIVE COUNSEL

13 [REDACTED] CHIEF CLERK

14 [REDACTED] PROFESSIONAL STAFF MEMBER

15

16

17 For the WITNESS:

18

19 MATTHEW FERNHOLZ, ESQ.

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22 Waukesha, WI 53186

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2 [REDACTED] Let's go on the record. It's 2:01 p.m. eastern time.

3 This is a deposition of Kelly Ruh, conducted by the House Select Committee to  
4 Investigate the January 6th Attack on the United States Capitol pursuant to House  
5 Resolution 503.

6 At this time, I'd like the witness to please state her full name and spell her last  
7 name for the record, please.

8 The Witness. Kelly Ruh. Last name is R-u-h.

9 [REDACTED] And, Counsel, can you please state your full name and spell  
10 your last name for the record as well?

11 Mr. Fernholz. Matthew Fernholz, F as in "Frank," e-r-n-h-o-l, z as in "zebra."

12 [REDACTED] Thank you both. My name is [REDACTED] and I serve  
13 as an investigative counsel for the select committee. With me today is senior  
14 investigative counsel [REDACTED] and also [REDACTED], professional staff member.

15 This will be a staff-led deposition. If any members of the select committee join,  
16 they of course may choose to also ask questions. I will try to announce them as I see  
17 them join so you both are aware.

18 Under the House deposition rules, neither committee members nor staff may  
19 discuss the substance of testimony you provide today unless the committee approves  
20 release. You and your attorney will have an opportunity to review the transcript, Ms.  
21 Ruh.

22 Before we begin, I'd like to discuss a few ground rules. We will follow the House  
23 deposition rules that we have provided to you with the subpoena.

24 There is an official reporter transcribing the record of this deposition. Please  
25 wait until each question is completed before you begin your response, and we will try to

1 wait until your response is complete before we ask our next question.

2 I understand, you know, sometimes with the virtual meetings, people can talk on  
3 top of one another, and that's totally fine. Please excuse me if I end up interrupting  
4 you. Please don't take it personally. Sometimes there's a delay in the feedback.

5 The stenographer cannot record nonverbal responses, such as shaking your head  
6 or nodding your head, so please answer each question with an audible, verbal response.

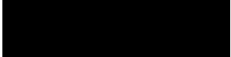
7 We ask that you provide complete answers based on your best recollection. And  
8 if my question is not clear, which it may not be, please, you know, ask me to clarify, and I  
9 will do so. If you do not know the answer, please say so.

10 You may only refuse to answer a question to preserve a privilege recognized by  
11 the select committee. And if you refuse to answer a question based on a privilege, staff  
12 may either proceed with the deposition or seek a ruling from the chairman on the  
13 objection. If the chairman overrules such an objection, you are required to answer the  
14 question.

15 I also want to remind you that it is unlawful to deliberately provide false  
16 information to Congress. This isn't specific to you; we say this to everyone. Since this  
17 deposition is under oath, providing false information could result in criminal penalties for  
18 perjury and/or providing false statements.

19 Do you understand that?

20 The Witness. Yes.

21  Would you please stand and raise your right hand to be sworn,  
22 Ms. Ruh?

23 The Reporter. Do you solemnly declare and affirm under the penalty of perjury  
24 that the testimony you are about to give will be the truth, the whole truth, and nothing  
25 but the truth?

1           The Witness. I do.

2           [REDACTED] And, logistically, please let us know if you need to take a break,  
3 get some water, stretch your legs, or if you would like to discuss anything with your  
4 attorney.

5           Ms. Ruh, typically, what we do -- and I think it's worked pretty well -- is, we'll mute  
6 ourselves, turn off the cameras, and then you can talk to your attorney, and then, you  
7 know, put the camera back on and unmute if you're ready to go, to proceed with the  
8 deposition.

9           Does that sound okay to you both?

10          The Witness. Sounds good.

11          [REDACTED] Great.

12          And I think we are getting a little bit of feedback. I don't know if it's possible,  
13 maybe, Mr. Fernholz, if you could mute yourself, or we can also proceed, but there is,  
14 like, a -- I am hearing the echo I think that you referenced earlier, Mr. Fernholz.

15          Mr. Fernholz. So here's what I'm going to do. I will mute my screen. And if I  
16 need to chime in with an objection, I'll unmute myself. I may have to indicate to the  
17 witness and the committee on the screen that I need to lodge an objection, just because  
18 there's going to be a delay. But I'll put myself on mute and see if that solves the  
19 problem.

20          [REDACTED] Absolutely. And understood. And we'll definitely make sure  
21 that you have an opportunity to state your objections. I don't want to take that away  
22 from you just because you're on mute. Perfect.

23          Okay. With that, anyone have -- do you have any questions, or are you ready to  
24 proceed?

25          The Witness. Sounds good.

1 [REDACTED] Perfect.

2 So let's put up exhibit 1, please, [REDACTED].

3 EXAMINATION

4

BY [REDACTED]

5 Q I believe this is the subpoena that was issued to you, Ms. Ruh. Do you  
6 understand that you are appearing pursuant to the subpoena dated January 28, 2022?

7 A Yes.

8 Q And can you see that okay, the exhibit?

9 A Uh-huh.

10 Q Perfect. And you are the Kelly Ruh listed in the subpoena shown in exhibit  
11 1. Is that right?

12 A That's correct.

13 Q Okay.

14 And so part of the subpoena requires you to produce documents and information,  
15 including electronically stored information. Do you understand that?

16 A Yes.

17 Q Can you briefly describe for us the efforts that you took to comply with the  
18 January 28th subpoena?

19 A Sure. I went through my personal email. I have a couple email accounts,  
20 so I searched all of those accounts, as well as my cell phone, utilizing  
21 keyword-search-type functions for the date range specified in the subpoena. And what  
22 was sent to you is what was recovered in those searches.

23 Q And during the relevant time period, did you only use one cell phone?

24 A Yes.

25 Q Okay. In terms of messaging applications, like Signal, WhatsApp, Telegram,

1 did you search any of those applications, to the extent you used them?

2 A I don't recall that I had any of those at that time.

3 Q Okay. What about social media, such as Facebook, Twitter, Instagram,  
4 Parler? Did you use any of those types of social media during the relevant time period?

5 A I did look through what messages might have been -- or were in Facebook,  
6 but that didn't -- anything that was found in there was submitted.

7 Q Okay. And what about electronically stored documents, such as  
8 documents saved on a computer or iPad? Did you search that too?

9 A I believe so.

10 Q Okay. And to the extent you had any hard-copy documents, hard-copy  
11 notes, did you search for that?

12 A I did look through files, yes.

13 Q Okay.

14 Did you coordinate with any members of President Trump's 2020 campaign,  
15 President Trump's lawyers, anyone at the RNC or the Wisconsin GOP in connection with  
16 your testimony today?

17 A No.

18 Q Okay. How about in connection with responding to any of the document  
19 requests listed in the subpoena?

20 A No.

21 Q Okay. And have you produced to the select committee all of the  
22 documents and communications in your possession, custody, or control that are  
23 responsive to the request in the subpoena?

24 A Yes.

25 Q Okay.

1 So let's just start a bit with your background. Where do you currently live?

2 A I live in De Pere, Wisconsin.

3 Q And do you want to spell it, maybe, for the record?

4 A Sure. It's D-e, space, P-e-r-e.

5 Q Thank you. How long have you lived in Wisconsin?

6 A About 41 years.

7 Q Okay. Lifelong -- what's -- is it Wisconsinian or Wisconsinite?

8 A Almost lifelong.

9 Q Okay.

10 And can you just give us a brief overview of your professional background?

11 A Sure. I am an accountant. So, out of college, I was a tax accountant for a  
12 public accounting firm; and then progressed into industry, so manufacturing, as staff  
13 accountant, senior accountant, controller, assistant controller. Now I'm a corporate  
14 controller.

15 Q Okay.

16 And I think I read that you currently work for BayView Industries. Is that  
17 accurate?

18 A That is not correct.

19 Q Okay. So where do you currently work?

20 A It's a company by the name of SD Wheel, S as in "Sam," D as in "dog," Wheel.

21 Q Did you ever work for BayView Industries?

22 A Yes.

23 Q Okay. So when did you work there?

24 A That employment ceased in July of 2021.

25 Q Got it. Okay.



1           And are you currently a member of the De Pere City Council?

2           A    Yes.

3           Q    Okay.

4           You were a Republican Party elector for the 2020 Presidential election.  Is that  
5 right?

6           A    Correct.

7           Q    Okay.  Was that your first time serving as an elector in a Presidential  
8 election?

9           A    Yes.

10          Q    Do you recall how you were selected?

11          A    Yes.

12          Q    Okay.  Can you please tell us how you recall -- what you recall about how  
13 you were selected to be a Republican Party elector for the 2020 election?

14          A    Sure.  So, as the, you know, election cycle was in swing and the time for  
15 selecting electors was happening, the State party informed district chairmen, really, how  
16 that process worked.

17                So, in the State of Wisconsin, obviously, with 10 electoral votes, the way  
18 they -- my understanding and what they explained to us was that they would take one  
19 representative or, really, the district chairman from each of the eight congressional  
20 districts.  So Wisconsin is divided into eight congressional districts.  I am one of the  
21 chairmen of those districts.

22                And so they take the eight congressional districts, plus then most likely the party  
23 chairman, and then either an RNC Committeeman or Committeewoman.  And that  
24 group of 10 makes up the slate of electors.

25          Q    And which congressional district do you chair?

1 A The Eighth District.

2 Q Okay.

3 Prior to election day, what was your understanding of your role as a Republican  
4 Party elector?

5 A That there would be a date specified to attend a signing of documents at the  
6 State capitol.

7 Q And did you have an understanding as to what date -- what the date was?

8 A December 14th.

9 Q Did you have an understanding that you may not have to sign documents on  
10 December 14th?

11 A Yes.

12 [REDACTED] Mr. Fernholz?

13 Mr. Fernholz. Sorry, this is clunky. I just want to object to form on the last  
14 question.

15 [REDACTED] Okay. I'll rephrase the question.

16 BY [REDACTED]

17 Q Did you understand that there would be an instance where you would not  
18 have to sign documents on December 14th in your role as a Republican Party elector?

19 A Yes.

20 Q Okay. What instances could that be?

21 A If Donald Trump did not win the State of Wisconsin.

22 Q Okay.

23 Prior to election day, was it your understanding that you would only cast your  
24 electoral vote if President Trump won the popular vote of Wisconsin?

25 A Yes.

1 Q Do you recall the basis of your understanding?

2 A How so?

3 Q Do you recall where you understood that you would only cast your electoral  
4 vote if President Trump won the popular vote of Wisconsin?

5 Mr. Fernholz. And I'll just object to form on the question.

6 [REDACTED] Okay.

7 BY [REDACTED]

8 Q Ms. Ruh, do you understand my question?

9 A Yes.

10 Q Okay. Do you recall where your understanding came from as to that you  
11 would only cast an electoral vote if President Trump won the popular vote of Wisconsin  
12 on December 14th?

13 A I would say that that would just be an understanding acquired over many  
14 years volunteering in politics or understanding just the process in general.

15 Q Okay.

16 Are you familiar with a news publication called The Atlantic?

17 A Not that I recall.

18 Q Okay.

19 Before election day, do you remember hearing an idea that the Trump campaign  
20 may try to have Republican Party electors chosen in a State even if President Trump had  
21 not won the popular vote in that State?

22 A Can you repeat that?

23 Q Absolutely. Before election day, do you remember hearing an idea that the  
24 Trump campaign for 2020 may try to have the Republican Party electors chosen in a State  
25 even if President Trump had not won the popular vote in that State?

1 A No.

2 Q Okay.

3 Before election day, do you remember hearing any discussions within the  
4 Wisconsin Republican Party or elsewhere that the Trump campaign in 2020 may try to  
5 have the Republican Party electors appointed through the legislature even if President  
6 Trump had not won the popular vote in that State?

7 A No.

8 Q Okay.

9 Prior to election day, had you heard that there could be rival, or what I'll call  
10 alternate, slates of electors that could cast electoral votes and send those to the  
11 president of the Senate, where it would be up to the president of the Senate to decide  
12 which electoral votes to count?

13 Mr. Fernholz. Counselor, if I can just jump in real quick.

14 [REDACTED] Yes.

15 Mr. Fernholz. For these questions, are you referring to Wisconsin specifically or  
16 across the country?

17 [REDACTED] It's a general question, just if she had heard of the concept.

18 Mr. Fernholz. You're muted. I'm not -- I think you're muted on Ms. Ruh's. I'm  
19 sorry, we're -- we were going back and forth and I didn't hear. You were muted on that,  
20 in your response.

21 [REDACTED] Oh, apologies. It was not specific to Wisconsin. It was a  
22 general question, if she had heard of the idea anywhere prior to election day.

23 Mr. Fernholz. Thank you.

24 The Witness. No.

25 BY [REDACTED]

1 Q Okay.

2 I understand that it's been a while, but when do you recall first hearing discussions  
3 about a potential meeting to cast electoral votes for the Republican Party candidates for  
4 President and Vice President in Wisconsin?

5 A Like, when we were -- can you repeat that?

6 Q Yep. When do you first recall hearing discussions about a potential  
7 meeting to cast electoral votes for the Republican Party candidates for President  
8 Trump -- for President and Vice President, in this case Donald Trump and Mike Pence?

9 Mr. Fernholz. If I can just make a request for clarification. Are you asking how  
10 the general process worked before election day, or are you being specific, after election  
11 day?

12 [REDACTED] Well, the question is just when she heard the first -- for the first  
13 time. I think it would be after election day, but my question is, for the first time you  
14 ever recalled hearing discussions about a potential meeting to cast electoral votes for the  
15 Republican -- let me rephrase for clarity.

16

BY [REDACTED]

17 Q So, after election day, Ms. Ruh, when did you first hear discussions about a  
18 potential meeting in Wisconsin to cast electoral votes for the Republican Party candidates  
19 for President and Vice President?

20 A I believe that was in early December.

21 Q Okay. What do you recall about those discussions?

22 A That was a text message, I believe, that I had received that was putting me  
23 on notice that I may still need to attend the meeting on December 14th in the event that  
24 Donald Trump would be declared the winner of Wisconsin after going through various  
25 court processes.

1 Q So we can pull up exhibit 2, which -- this is a compilation of text messages  
2 that you've produced to us, Ms. Ruh. It doesn't have a Bates number.

3 And let's go to page 23, and I'll give you some time to review it.

4 If you can go up a bit?

5 So this is a text message chain with Mark Jefferson from December 3, 2020.

6 Can you see that, Ms. Ruh? I don't know --

7 A Yes.

8 Q -- how clear it is.

9 A Nope, I can see it.

10 Q Okay. If you want to take a second to review it to refresh your recollection.

11 A Okay.

12 Q Is this the text message that you were referring to as a potential meeting --

13 A Yes.

14 Q -- of the Republican Party electors?

15 A Yes.

16 Q And who is Mark Jefferson?

17 A Mark Jefferson is the executive director of the Republican Party of  
18 Wisconsin.

19 Q Do you know why Mr. Jefferson was telling you about this potential meeting  
20 on December 14th?

21 A I assume it was because his role as executive director is really to  
22 communicate on the key issues of the party. It's not atypical for him -- I should say, it's  
23 very typical for him to communicate directly with district chairmen. So this just seemed  
24 to follow his normal course.

25 Q Okay.

1           If you read that first message from Mr. Jefferson on December 3rd, I think at 12:35  
2 p.m., he says, "Given all of the court cases pending we were advised to reach out to the  
3 electors over that possibility."

4           Do you see that?

5           A    Yes.

6           Q    Do you know who the "we" is in that sentence?

7           A    I don't.

8           Q    Okay. Do you know -- he references "we were advised." Do you know  
9 who advised them?

10          A    I do not.

11          Q    Okay. Do you know what the advice was?

12          Mr. Fernholz. Objection. Calls for speculation to another witness receiving  
13 advice from a third party.

14          If you can answer, Ms. Ruh, go ahead and do so.

15          BY [REDACTED]

16          Q    Yeah, I'm just asking if you knew, whether or not you knew what the advice  
17 was, not to speculate. You can answer "yes" or "no."

18          A    No.

19          Q    Okay.

20          Mr. Jefferson says at the end of his message, "Confidentially." Do you know  
21 what he meant by "confidentially"?

22          Mr. Fernholz. Same objection. Calls for her to speculate about another  
23 witness's state of mind.

24          If you can answer, go ahead.

25          The Witness. I assume, like -- I assume that was strictly security-related.

1

BY [REDACTED]

2

Q Can you explain what you mean by "security-related"?

3

A I knew from talking to people who had served as 2016 electors that they had

4

received many threatening -- perhaps not threatening -- whether it was harassing,

5

threatening, you know, not-so-friendly emails, letters in the mail, things like that -- that

6

there were security concerns about traveling to and from the capitol on December 14th.

7

So I believe at the time my assumption on that was purely security-related.

8

Q Okay.

9

You respond to that message, "I figured. It's still on the calendar." Do you see

10

that?

11

A Yes.

12

Q What did you mean by "it's still on the calendar"?

13

A I believe I had put in for a day off, scheduled a personal time-off day through

14

my employer, and I had not canceled that request as of yet, at that time.

15

Q Do you recall whether there was any other reason why you thought that you

16

might still need to meet on December 14th?

17

A No.

18

Q Okay.

19

Around the date -- around the time of these text messages, which is December

20

3rd, did you have any understanding as to what the status of any litigation was in

21

Wisconsin?

22

A I knew there were cases that were ongoing, but I was not in the -- aware of

23

the details surrounding that.

24

Q Did you have any understanding as to whether any -- whether President

25

Trump or Joe Biden had been certified as the winners of the State of Wisconsin?



1 A I don't recall.

2 Q Okay.

3 Let's go to -- this is the same exhibit, but let's go to -- oh, actually, keep on page  
4 23. If you look a little bit further down -- it's a little hard for me to see -- I believe it's  
5 from December 11th, and you write, "Are we truly going to Madison monday?"

6 Do you see that?

7 A Yes.

8 Q Okay. Do you recall why you were asking whether you were truly going to  
9 Madison Monday?

10 A There had been no communication to confirm that our presence was still  
11 needed on December 14th, so I sent this text to try to understand if I was still needed in  
12 Madison. If not, I was going to, obviously, report to work that day.

13 Q Had you had any communications with the other Republican Party electors  
14 up to December 11, 2020, the day of this text?

15 A Regarding?

16 Q The meeting on December 14th.

17 A Possibly? Possibly.

18 Q And you said you had not received any communications up to this point.  
19 Had you been told anything about, like, logistical planning for December 14th?

20 A Not that I recall.

21 Q Okay.

22 Do you recall who provided you with information about where to meet on  
23 December 14th?

24 A I believe it was Mark Jefferson.

25 Q And did Mr. Jefferson ever tell you about how the meeting on December

1 14th would proceed?

2 A No.

3 Q Did anyone ever tell you how the meeting on December 14th would  
4 proceed?

5 A I believe I had talked to some people who had served as electors in 2016 to  
6 get that question answered.

7 Q Do you recall who you spoke to?

8 A I believe it was Bill Berglund. His last name is B-e-r-g-l-u-n-d. He's the  
9 vice chair of the Eighth Congressional District. And he had served on that role -- or in  
10 that role. And, obviously, we work together, or volunteer together, quite a bit. And so  
11 I believe I had asked him what his experience was from doing that in 2016.

12 Q Do you recall what Mr. Berglund told you about his experience being in  
13 2016?

14 A You go to the capitol and you sign papers. You just sign your name.

15 Q Okay.

16 Do you recall speaking to any other prior electors in connection with the  
17 December 14th meeting?

18 A No.

19 Q Okay.

20 Did you end up meeting with other Republican Party electors on December 14th  
21 to cast purported electoral votes for President Trump and Vice President Pence?

22 A Yes.

23 Q Did you rely on any advice in connection with your decision to meet with and  
24 cast purported electoral college votes on December 14th?

25 Mr. Fernholz. And, Counsel, if you can specify what you mean and maybe be a

1 little more specific in the question.

2 [REDACTED] Okay.

3

BY [REDACTED]

4

Q Did anyone provide you any advice in connection with the -- in connection

5

with the December 14th meeting in Wisconsin at the capitol?

6

A All I really had was what you showed in the exhibit from Mark Jefferson.

7

There was nothing more than that.

8

Q At the time that you met on December 14th with the other Republican Party

9

electors, were you aware of any other similar meetings that were occurring in other

10

States involving Republican Party electors, such as Arizona, Georgia, Michigan, Nevada,

11

New Mexico, or Pennsylvania?

12

A No.

13

Q Did you have any concerns about meeting on December 14th to cast

14

purported electoral votes in connection with the 2020 election?

15

Mr. Fernholz. Objection. Overbroad, Counselor. What do you mean?

16

Concerns about what?

17

[REDACTED] Any concerns about meeting, specifically meeting and casting

18

purported electoral votes.

19

Mr. Fernholz. And I'll have the same objection. A concern about what?

20

BY [REDACTED]

21

Q Just any sort of -- I think it's pretty -- I think I'm pretty clear, Ms. Ruh, if you

22

understand what "concern" means.

23

A I had concerns for my physical safety.

24

Q Okay.

25

A That was the only concern I had.

1 Q Okay. And can you explain what you mean by "physical safety"?

2 A Sure. Simply, you know, it's a very divisive -- or was a very divided election  
3 with a lot of emotion. And based on what we had seen just in the time from election  
4 day to, you know, getting up to December 14th, I was just concerned about, as a female  
5 especially, traveling to and from the capitol, getting in and out of the building safely,  
6 et cetera, et cetera.

7 Q Prior to the meeting on December 14, 2020, did any other Republican Party  
8 electors ever express any concerns that they had about the meeting, about security or  
9 otherwise?

10 A I recall one.

11 Q Okay. And what do you recall?

12 A Similar concerns. She had served in 2016 as an elector and had expressed  
13 concerns for physical safety, about getting to and from the capitol, in and out of the  
14 building without issue.

15 Q And do you recall who expressed those concerns to you about physical  
16 safety?

17 A Kathy, K-a-t-h-y, Kiernan, K-i-e-r-n-a-n.

18 Q Prior to the December 14th meeting, to your knowledge, did you talk to  
19 anyone associated with the Trump campaign about the December 14th meeting?

20 A No.

21 Q Prior to the December 14th meeting, to your knowledge, did you  
22 communicate with anyone in the White House about the December 14 meeting?

23 A No.

24 Q I'm going to turn to exhibit 4. And, Ms. Ruh, this is not a document that  
25 you produced to us, so you can take a second to review it.

1           And I'm not going to ask you detailed questions about it, because I'm not sure  
2           you've even seen this document before. So I guess my first question is, do you  
3           recognize this document?

4           A     No, I do not.

5           Q     Okay. Do you recall ever reviewing this document in connection with the  
6           December 14th meeting?

7           A     No.

8           Q     Okay. This is a memorandum. It says it's from someone named Kenneth  
9           Chesebro. Do you see that?

10          A     I do.

11          Q     Okay. And do you know who Kenneth Chesebro is?

12          A     I do not.

13          Q     Okay. Do you know -- in the "TO" line, it says "James R. Troupis." Do you  
14          know who James R. Troupis is?

15          A     I do today. I did not then.

16          Q     Okay. Do you know whether Mr. Chesebro or Mr. Troupis had any  
17          involvement in the December 14th electoral college meeting in Wisconsin?

18          A     I don't know.

19          Q     Okay.

20          I'm going to turn to exhibit --

21          BY [REDACTED]

22          Q     Before we turn off of that, you say you now know who Mr. Troupis is. How  
23          did you learn about Mr. Troupis?

24          A     His name I believe was in the subpoena.

25          Q     Okay. You haven't -- have you talked to him since December 14, 2020?

1 A No.

2 Q Okay. Have you talked to any other alternate electors about Mr. Troupis or  
3 Mr. Chesebro since that meeting on December 14th?

4 A No.

5

BY [REDACTED]

6 Q Okay. We'll turn to exhibit 5, and there will be a similar question.

7 Oh, is this exhibit 5? Okay, great.

8 So take a second, Ms. Ruh, to review it. This is another memorandum. This  
9 one is dated November 18, 2020.

10 Do you recognize this memorandum?

11 A No.

12 Q Do you recall reviewing this memorandum in connection with the December  
13 14th meeting?

14 A No.

15 Q Okay.

16 Do you recall ever hearing anyone reference a memorandum from a  
17 Mr. Chesebro --

18 A No --

19 Q -- in connection with the December 14th meeting?

20 A I'm sorry. No, I do not.

21 Q Okay.

22 Going into December 14th, did you have any expectations about how the day  
23 would proceed?

24 A I was told everybody was meeting at the Republican Party of Wisconsin  
25 office in Madison, and, from there, we would be taken to the capitol. And that's really

1 all I knew. So my goal was to get to the office on time, and then, from there, the  
2 rest -- transportation, where to park -- was handled by the party.

3 Q Okay.

4 A That was my understanding and expectation for the day.

5 Q Okay.

6 We'll go back to exhibit 2, the compilation of text messages you produced. Page  
7 21.

8 Can you see this, Ms. Ruh, what's on the screen?

9 A Yes.

10 Q Okay.

11 And if you go up a little bit, [REDACTED], I believe it says "Marian Krumberger,"  
12 December 14, 2020. Do you see that?

13 A Yes.

14 Q Okay. Who's Ms. Krumberger?

15 A Marian is the former chairman of the Brown County Republican Party.

16 Q And Brown County, is that in -- excuse me for my ignorance -- is that in  
17 Wisconsin?

18 A Correct.

19 Q Okay.

20 And if you can read that, it says, "I'm being sent to do the electoral vote. What a  
21 waste of a day off. I'm so pissed."

22 Can you explain your message to Ms. Krumberger?

23 A Yes. I was -- you know, for a long time, obviously, had planned to  
24 potentially be in Madison on the 14th, and then, after Biden had won the State, was not  
25 planning to do that. It was a very stressful season at work, which I believed she was well

1 aware of.

2 And so, with, you know, many court cases and things being contested after the  
3 election, after election day, it was looking like, yes, we would be signing these papers as a  
4 backup, you know, on the remote chance that Donald Trump would be declared the  
5 winner in Wisconsin.

6 And that was, you know, really -- I was not expecting that to prevail in the courts  
7 and was obviously pissed that I would be using a personal day off to go and complete that  
8 process.

9 Q And you mentioned something about a remote chance. Can you explain  
10 what you meant by it was a remote chance?

11 A Yeah. Well, I mean, the best outcome would've been for Donald Trump to  
12 have won the popular vote, right, just as a normal election would've happened. And so,  
13 when you get into arguing these things in the courts, my experience, whether it was  
14 business or otherwise, family court, whatever, is just that you don't -- you hope you don't  
15 have to go there.

16 And with some, you know, issues of fraud being unresolved and things like that,  
17 my personal belief at the time was that the court would not rule to overturn Biden being  
18 declared the winner in Wisconsin.

19 Q Okay. So the reference -- your mentioning of "remote chance" is in  
20 reference to the court litigation?

21 A That's what I intended, yes.

22 Q Okay.

23 In the message below, if you can see that, it says, "Don't mention to anyone - it's  
24 hush hush."

25 Do you recall why you said "it's hush hush"?



1           A    Yes.  Because I was concerned about physical safety.  And that is  
2 something that, I mean, we talked about in previous conversations, you know, even  
3 pre-election-day, just that if I was an elector, you know, physical safety would certainly be  
4 a concern.

5           Q    Okay.

6           You've already mentioned this a bit, but can you just walk us through December  
7 14th, you know, starting with where you met and how the day proceeded?

8           A    Sure.

9           So I left my home in the morning, I would think probably 7, 8 o'clock, to get to  
10 Madison.  We were all told to meet at the Republican Party of Wisconsin's  
11 headquarters, that parking could be an issue, the parking there is not easy, and so to  
12 make sure we allowed ample time to get our vehicles parked and situated.

13           So I did that, walked into the office.  Some of the other electors were there;  
14 some were still arriving.  And when everybody was there, they had SUVs for us to get in.  
15 And, from there, they drove us to the capitol.

16           Q    And do you recall approximately what time you arrived to the capitol  
17 building?

18           A    I don't recall specifically, no.

19           Q    Okay.  Is it fair to say it was before noon --

20           A    Yes.

21           Q    -- most likely?

22           A    Yes.

23           Q    Okay.  Do you remember if you had any issues getting into the capitol  
24 building?

25           A    Yes.

1 Q Okay. What issues do you recall having getting into the building?

2 A So the building was locked. The building was closed to the public because  
3 of COVID, was my understanding. And so we were -- they dropped us at a couple of  
4 different entrances to see if we could gain access, if there was someone we could talk to  
5 to get in the building. I remained in the vehicle while others tried to arrange for  
6 entrance.

7 I believe we were taken to the capitol once and could not get in, and so they drove  
8 us back to the Republican Party of Wisconsin office. We unloaded, got out of the cars,  
9 sat in a conference room, and then, shortly after, repeated the process of going back to  
10 the capitol.

11 And then I believe it was a GOP staffer or someone who had let us in or somehow  
12 got access for us to enter the State capitol. And so, on our second trip, we were able to  
13 get into the building.

14 Q Do you recall if you saw press when you arrived at the building on December  
15 14th?

16 A I did not see press.

17 Q At any point on December 14th at the capitol, did you, to your knowledge,  
18 see any of the Democratic Party electors?

19 A I don't believe so.

20 Q Okay.

21 Where did you and the other Republican Party electors go once you got into the  
22 capitol building?

23 A It was just a conference room.

24 Q And do you recall who was in the conference room with you on December  
25 14th?

1           A    It was the nine others that were chosen to do this, as well as some various  
2           staffers, or at least I presumed they were Republican Party of Wisconsin staff.  And then  
3           I think there were a few security guards.

4           Q    Do you recall, to your knowledge, whether there was anyone from the  
5           Trump campaign in that conference room on December 14th?

6           A    There was not.

7           Q    I understand that you were a secretary for purposes of that December 14th  
8           meeting.  Is that right?

9           A    That's correct.

10          Q    Okay.  Did you have any responsibilities as secretary of that meeting?

11          A    No.

12          Q    Okay.  Did you fill out any paperwork, to the best of your recollection,  
13          during that meeting on December 14th?

14          A    There was a document that needed to be signed, because one of the original  
15          electors that was chosen was unable to attend that day for family reasons, and so there  
16          was a change in that -- in appointing a new elector to fill that void.

17          Q    And was that called something like a vacancy certificate, to the best of your  
18          knowledge?

19          A    Perhaps.

20          Q    I'm going to pull up exhibit 6.  I believe this is also something that you  
21          produced to us, Ms. Ruh.

22                Are you able to see that?

23          A    Yes.

24          Q    So this is entitled "Certificate of the Votes of the 2020 Electors from  
25          Wisconsin."  And if you go to page 2 a bit, the second page has all these signatures.

1 Do you recall signing this document on December 14th?

2 A Yes.

3 Q Okay.

4 If you go to page 1, you can see this language. The first paragraph says, "We, the  
5 undersigned, being the duly elected and qualified Electors for President and Vice  
6 President of the United States of America from the State of Wisconsin, do hereby certify  
7 the following."

8 Do you recall whether you had any discussions about changing this language of  
9 the Certificate of the Votes of the 2020 Electors from Wisconsin?

10 A No.

11 Q Okay. Are you aware that in -- other States who had similar certificates of  
12 the votes changed that language?

13 A No.

14 Q Can you walk us through what happened after the meeting on December  
15 14th?

16 Mr. Fernholz. Counsel, I'll object, as to overbroad.

17 [REDACTED] Yes.

18 Mr. Fernholz. Can you be a little --

19 [REDACTED] Absolutely.

20 Mr. Fernholz. -- more specific as to what you're referring to?

21 [REDACTED] Sure.

22 BY [REDACTED]

23 Q After you signed paperwork, what did you do on December 14th?

24 A We were -- the same vehicles that dropped us off picked us up, and we were  
25 driven back to the Republican Party of Wisconsin headquarters. And from there,

1 everyone returned, I assume, home.

2 Q Did anyone ever tell you what would happen with the papers that were  
3 signed during that December 14th meeting?

4 A No.

5 Q Okay. Do you know where, if anywhere, those papers went, the signed  
6 papers from the December 14th meeting?

7 A I don't know.

8 Q Okay.

9 Do you recall whether you had any meetings or phone calls with the other  
10 Republican Party electors about that meeting after the December 14th meeting?

11 Mr. Fernholz. Did you mean phone calls with them regarding the December 14th  
12 meeting or just phone calls in general?

13 [REDACTED] Regarding the meeting. Regarding what had just taken place.

14 The Witness. No. There -- no.

15 BY [REDACTED]

16 Q Okay.

17 And I'm just going to ask if you've ever heard this. There was a theory that was  
18 reportedly advocated by the Trump campaign whereby Vice President Pence, if presented  
19 with more than one slate of electors, could pick which slate of electoral votes to count on  
20 January 6th.

21 Did you ever hear of that theory?

22 A Not at that time.

23 Q And when did you hear that theory?

24 A I would say, in the weeks leading up to January 6th.

25 Q Do you recall who you heard that -- or where you heard that theory?

1 A Just watching the news.

2 Q Okay. And what exactly do you recall that you heard?

3 A Discussion on whether or not there were any other legal efforts that could  
4 be taken or within the Constitution to resolve election-related issues.

5 Q Back to exhibit 2, page 10. This is the compilation of text messages.  
6 Can you see that, Ms. Ruh?

7 A Yes.

8 Q Okay. I believe this is from Anne Gehl. Who's Ms. Gehl?

9 A She was a middle school teacher that I had.

10 Q And it appears that she sends you a screenshot of a news story entitled  
11 "Trump secures decisive electoral victory: Parallel electors chosen and submitted by  
12 SEVEN states, Trump victory path clear."

13 Do you see that?

14 A Yes.

15 Q She also sends you, "Kelly, do you know if this headline is true? Wisconsin  
16 is one of the states."

17 And I believe you respond, "I was one of the electors who voted yesterday so that  
18 part is true. Not sure about anything else though."

19 Do you see that?

20 And I think we're actually going to have to go down.

21 Mr. Fernholz. Yeah, if you could scroll down.

22 [REDACTED] Yeah, absolutely. I'll give you further down.

23 The Witness. I can see that.

24 [REDACTED] You can go down a little bit.

25 BY [REDACTED]

1 Q Can you see your response?

2 A Yes, now I can.

3 Q Do you recall -- or can you explain for us your message to her, specifically the  
4 portion "not sure about anything else though"?

5 A Quite honestly, I don't -- she was one who seemed to believe in any and all  
6 theory that Trump could be elected or assume power or the Presidency after, you know,  
7 the official dates and things, and I didn't really want to give her the time of day. And so  
8 that is the response, because I at the time probably didn't actually read 100 percent of  
9 what she had sent.

10 Q And if you look to your second response, it's a little bit hard to see. I was  
11 hoping you could explain to us, do you recall what you sent to her? I think it's a  
12 screenshot of an email, but it's hard to read it. Do you want to take a second to review  
13 that?

14 A Yeah. What's showing is the Electoral Count Act, you know, information  
15 that had simply from one -- I couldn't tell you in what text message I had received that,  
16 but it looks like I had copied and pasted that back to her to give her some additional  
17 information.

18 Q And if you go further down, [REDACTED], maybe this will refresh your recollection.  
19 Keep going down. A little bit more.  
20 And you say, "What I sent came from Senator Johnson."  
21 Does that refresh your recollection?

22 A Yes.

23 Q So what did -- what came from Senator Johnson?

24 A I think it's the screenshot that was included in what you referenced above.  
25 Whether that came as a text from someone on -- or, I'm sorry, in an email form or text,

1 I'm not certain, but that is the information I had.

2 Q Okay.

3 And if you look above it, it says -- you write, "I think at this point we are toast."

4 Do you see that?

5 A Yes.

6 Q Do you know what you meant by that?

7 A Yes. As I referenced earlier, I did not -- similar to how I referenced being  
8 upset that I had taken the day off because there was, as I explained, my perception was, a  
9 slim-to-none chance that the courts would overturn the election results in Wisconsin,  
10 that is along those lines.

11 Q And I guess specifically with respect to Mr. Johnson's email, do you recall  
12 whether -- what exactly it said?

13 A I believe it's what you had in the screenshot.

14 Q Okay. Do you recall whether this was a direct email from Senator Johnson  
15 to you?

16 A That was not a -- I don't believe that was a direct email.

17 Q Okay.

18 [REDACTED] Before we leave this, it looks like this is an email. And it looks like  
19 the subject line is "I like this if it is possible."

20 We didn't receive an email in the production from you that includes that subject  
21 matter. So we can follow up with Mr. Fernholz, but if you are able to search for that  
22 around that time with that subject line, that is something that we would ask you to  
23 produce.

24 Mr. Fernholz. Sure. We'll take a look for that. Is this page 11 of the text  
25 string? Is that what page you're on?



1 [REDACTED] That's correct, with Ms. Gehl.

2 Mr. Fernholz. Sure. We'll take a look for that.

3 [REDACTED] Okay, yeah. Great. Thank you.

4

BY [REDACTED]

5 Q If we go to page 13 of this same exhibit 2, you can see that's a text message  
6 thread with John Liesch. I'm not sure if I'm pronouncing that correctly. Do you see  
7 that?

8 A I see Josh Liesch.

9 Q Oh, Josh Liesch. Sorry. Who is Josh Liesch?

10 A My mechanic.

11 Q Oh, okay.

12 It appears on December 15th he sends you a message, "Is this true?" And there's  
13 a second message. It says, "From Trump's Lawyer. Atty. Jenna Ellis," and there's a  
14 message, a long message. Do you see that?

15 A Yes.

16 Q Do you know whether the text that he produced that he sent to you, if that  
17 actually was from Jenna Ellis?

18 A I don't know that.

19 Q Okay.

20 [REDACTED] Do you know if Mr. Liesch was in contact with Jenna Ellis or  
21 anybody from the Trump campaign?

22 Mr. Fernholz. I'll just object. Calls for speculation.

23 But if you know if he was, you can answer.

24 The Witness. He is not involved in party politics. Again, he's my mechanic. So  
25 I can't 100 percent confirm that, but I would highly doubt it.

1 [REDACTED] Do you know why he'd have a long text message that says "From  
2 Trump's Lawyer. Atty. Jenna Ellis"?

3 The Witness. I'm assuming he picked up some information on social media.

4 [REDACTED] Have you ever asked him where this message came from?

5 The Witness. No.

6 BY [REDACTED]

7 Q From election day to January 6th, did you ever communicate with any  
8 members of the Wisconsin State legislature about your December 14th meeting?

9 A No.

10 Q Okay. Between election day in 2020 to January 6, 2021, did you ever  
11 communicate with any Members of Congress about your December 14th meeting?

12 A No.

13 Q Okay. Between election day 2020 and January 6, 2021, did you ever  
14 communicate with Vice President Pence or his staff regarding your December 14th  
15 meeting?

16 A No.

17 Q Going into January 6, 2021, did you have any expectation that the votes that  
18 you had cast on December 14th would be counted during the joint session?

19 A No.

20 Q "No" as in you did not have the expectation?

21 A I did not expect those votes to be counted.

1

2 [2:59 p.m.]

3

BY 

4

Q Okay.

5

Let's go to exhibit 2, page 6. So it's the compilation of text messages again.

6

And are you able to see that, Ms. Ruh?

7

A Yes.

8

Q Okay. So this is a text message chain with someone named Nancy Schmidt

9

on January 6, 2021. Who's Nancy Schmidt?

10

A A personal friend.

11

Q Okay.

12

In your third text message on the right in blue, you write, "Mike Gallagher called

13

me this morning. I would not want to be in his shoes."

14

Then you write, "I think he's right though." "He's not overturning electoral

15

Votes."

16

Can you explain these messages for us?

17

A I believe I was describing a conversation that I had had with Congressman

18

Gallagher that morning, in which he in his frequent communication regarding Eighth

19

District matters at times will call and discuss votes and other issues. And I believe we

20

had talked about the pressure he was receiving from conservatives, from Republicans, in

21

the State to overturn electoral votes, and he explained his rationale for why he didn't

22

support that, and I agreed with him.

23

Q And when you say "overturn electoral votes," are you referring to casting an

24

objection? Was it your understanding he was referring to casting or making an

25

objection during the joint session on January 6th?

1           A    I guess I'm not certain as to the legal language in the official congressional  
2 process. I'm discussing where he's being -- or was being asked to -- I'm trying figure out  
3 how to say it -- do anything that would prevent Biden from being declared the winner in  
4 Wisconsin.

5           Q    Okay.

6           And you reference pressure that he was receiving. Do you recall what he told  
7 you about pressure he was receiving at that time?

8           A    General comments from the public or from leadership of various counties  
9 within the Eighth Congressional District.

10          Q    And, I guess, could you be a little bit more specific than that? What were  
11 the comments that you recall him mentioning?

12          A    They were general comments. It was a very short conversation. General  
13 comments like, "There are" -- or, "There's thinking from some in the party or from some  
14 volunteers that I need to do this, and I don't agree with that thinking." I don't recall any  
15 specific names or details surrounding that.

16          Q    Okay.

17          And the next message, you write, "I don't think I would either."

18          What did you mean by that message?

19          A    That if I were in Mike Gallagher's shoes, I would not have voted to cast  
20 whatever vote would've been favorable towards Trump in that situation.

21          BY [REDACTED]

22          Q    Really quickly, Ms. Ruh, when you spoke to Mr. Gallagher, either at the time  
23 or since then, did he ever tell you about efforts that congressional leadership made to  
24 foster or seek objections from Republican Members during the joint session of Congress?

25          A    No.

1 Q Did he ever talk to you about outreach that he had received from the White  
2 House or President Trump on the issue of the joint session of Congress?

3 A No.

4 Q Did he ever talk to you about outreach or contact that he had received from  
5 members of the Trump campaign regarding the joint session of Congress and objecting to  
6 the electoral college votes?

7 A No.

8 Q Did he ever mention that Rudy Giuliani or Jenna Ellis or anybody else  
9 associated with -- or, excuse me. I'll rephrase that.

10 Did he ever mention that Rudy Giuliani, Jenna Ellis, or any other lawyer who  
11 represented the Trump campaign had contacted him about the joint session of Congress?

12 A No.

13 Q And then the same question from anybody from the RNC, Republican  
14 National Committee. Had he received outreach regarding the joint session from the  
15 RNC?

16 A No.

17 Q Thank you.

18 A Uh-huh.

19 BY 

20 Q Ms. Ruh, where were you on January 6th?

21 A I was at work in Green Bay, Wisconsin.

22 Q And do you have any information for the select committee relating to the  
23 attack on the Capitol on that day?

24 Mr. Fernholz. I'll just put an objection on the record. We responded to the  
25 subpoena. We don't have any further documentation that would be responsive to your

1 request beyond that.

2 [REDACTED] Yeah, I understand documentation. I'm just asking for  
3 information that could've been communicated verbally, orally, you know.

4 Mr. Fernholz. Yeah. And I'll object to being overbroad. I don't know what  
5 you're asking her to answer.

6 [REDACTED] Do you have any information relating to the attack on the  
7 Capitol on January 6th? I think it's kind of self-explanatory.

8 Mr. Fernholz. Well, Counselor, I don't think it is. "Do you have any information  
9 on the attack on January 6th," that could be thousands of bits of information. I'm just  
10 asking you, what do you want her to answer?

11 [REDACTED] Okay.

12

BY [REDACTED]

13 Q Did you ever talk to anyone -- I understand that you weren't in D.C. on  
14 January 6th. Is that right?

15 A That's correct.

16 Q Okay. Did you ever talk to anyone who was at the Capitol on  
17 January -- well, I guess you talked to -- I'll rephrase --

18 [REDACTED] Go ahead.

19

BY [REDACTED]

20 Q Quick followup. Did you ever talk to anybody who was planning to attend a  
21 rally or demonstration at the Capitol on January 6th?

22 A I had conversation -- perhaps one conversation with someone who  
23 attended -- or, I should say, was in D.C. on the 6th, but it was after the 6th.

24 Q Did that person participate in any way with the events at the United States  
25 Capitol on January 6th, meaning breaching barriers, going into the Capitol?

1 A No.

2 Q Do you have any information about planning for such -- planning for the  
3 attack on the Capitol, meaning any foreknowledge about people breaching barriers, going  
4 into the Capitol during the joint session on January 6th?

5 A No.

6 Q Okay.

7 I have a few more followup questions for you.

8 Just setting the scene from the meeting on December 14th when you met and  
9 voted for President Trump and then Vice President Pence, were you allowed to take your  
10 phones into that meeting?

11 A Yes.

12 Q Were you given any instructions about talking to the press or not talking to  
13 the press before or after that meeting?

14 A No.

15 Q And you mentioned a couple times that -- or in the text messages that we've  
16 seen, there are references to this being confidential, and I think you mentioned to  
17 Mr. Krumberger that this was hush-hush.

18 I know today you've said that's about physical safety. I will tell you, Ms. Ruh,  
19 that we have information that the campaign and others sought to keep this out of the  
20 public spotlight for reasons other than physical safety.

21 So were there other reasons that you're aware of to keep this meeting on  
22 December 14th confidential or hush-hush other than physical safety?

23 A No.

24 Q What time did you eventually get into the capitol building to meet as  
25 electoral college voters?

1 A I believe it was before noon, but I'm not certain on the time.

2 Q Okay. Did you think it was odd that you couldn't get in the first time you  
3 went?

4 A No, I didn't think it was odd.

5 Q Why not?

6 A Because of the COVID precautions at the capitol at the time.

7 Q Do you know whether the Democratic electors who went and voted for  
8 President Biden -- now-President Biden and Vice President Harris had any issues getting  
9 into the capitol in Wisconsin on December 14th?

10 A I don't know.

11 Q You said earlier -- and some of the messages convey the same idea, I  
12 believe -- that there was a remote chance of success in the courts. And I believe on  
13 page 23 of exhibit 2, you asked Mr. Jefferson, "Do you really think there's going to be a  
14 favorable ruling?" And that was on December the 13th. And he responded with a  
15 thumbs-down emoji to the message.

16 So I guess my question is, on December 13th, you know, if you're thinking there's  
17 a remote chance and Mr. Jefferson thinks there's a low likelihood, why do this in the first  
18 place?

19 A To preserve the right of the electoral votes if the courts would've overturned  
20 the decision and declared Trump the winner. That's it. It's that simple.

21 Q And where did you hear that from, that idea?

22 A I believe it was referenced in the texts earlier that the advice or  
23 recommendation was we still needed to meet. And nobody told me specifically but I  
24 was obviously aware of pending litigation, and the outcome of that was questionable.

25 And from understanding that there was a specified date to meet to sign



1 documents, you know, I guess it was my assumption that that date still -- that benchmark,  
2 the deadline, still needed to be met. And so, remote chance or not, there was still an  
3 obligation to meet and sign, should Donald Trump be declared the winner of Wisconsin.

4 Q And did you ever learn --

5 Mr. Fernholz. Do you mind if we take just a 5-minute break?

6 [REDACTED] Yeah, of course. Absolutely. We'll see you back at 3:16 eastern?

7 Mr. Fernholz. All right. Sounds good. Thank you.

8 [REDACTED] Yep.

9 [Recess.]

10 [REDACTED] Okay, we're back on the record. It is 3:17.

11 Were there any issues, Mr. Fernholz, that you wanted to address before we  
12 continue?

13 Mr. Fernholz. No.

14 [REDACTED] Okay. Very good.

15 BY [REDACTED]

16 Q So I think we left off talking about your understanding for the purpose of the  
17 meetings and the effect of the votes.

18 Did you ever learn that the advice about alternate electors meeting on December  
19 14th to cast electoral college votes for Mr. Trump and Mr. Pence was coming from the  
20 Trump campaign itself?

21 A No.

22 Q You never learned that after the fact, even?

23 A No.

24 Q Earlier, [REDACTED] asked you when you first learned about this theory  
25 that the Vice President could pick from among competing slates of electoral votes. And

1 I believe -- I don't want to put words in your mouth, Ms. Ruh, but I believe you said,  
2 sometime maybe a couple weeks before January 6th.

3 Is that roughly accurate?

4 A Yes. I mean, it could -- the month of December, sure.

5 Q Okay. And do you remember where you heard that from?

6 A I think just watching national news.

7 Q Did you ever hear it from talking to other people who had cast votes,  
8 electoral college votes --

9 A No.

10 Q -- for Mr. Trump or Mr. Pence?

11 A No.

12 Q And it sounds like you were told -- again, I don't want to put words in your  
13 mouth, but it sounds like you were told that there's really no effect of these electoral  
14 college votes unless a court or a State legislature or something else ratifies those votes.

15 Is that correct? Is that your understanding?

16 A That was my understanding.

17 Q So, when you heard this theory that the Vice President could pick them  
18 among competing slates, I mean, that gives kind of an importance or a formality to these  
19 votes that maybe didn't exist before that.

20 Did that -- how did you receive that information? Did that change your mind?  
21 Did it make you upset, to think that these votes were something they weren't?

22 A I assumed based on the outcome of the pending -- at the time, they were  
23 pending court cases in Wisconsin -- that the documents we signed would not be utilized  
24 at all.

25 Q You made that assumption on December 14th when you voted?

1 A No, not on December 14th.

2 Q When did you reach that conclusion?

3 A As the supreme court had, I believe, you know, declared that -- I think there  
4 was -- the outcome in Wisconsin, obviously, Biden remained the winner. So, again, I  
5 assumed it was highly unlikely that there would be any attempt to note Wisconsin's vote  
6 anything different than what had been finalized by the court system.

7 [REDACTED] So, just to clarify real quick, Ms. Ruh, was it your understanding  
8 the Wisconsin Supreme Court had reached a decision, or are you referring to the U.S.  
9 Supreme Court?

10 Ms. Ruh. Wisconsin was what I was just describing.

11

BY [REDACTED]

12 Q So is it your understanding that, then, there was never really any legal  
13 significance to the votes that -- or to the pieces of paper that you and other alternate  
14 electors signed in Wisconsin because no courts or State legislature ratified them, so to  
15 speak?

16 Mr. Fernholz. I'll just object as to time. Do you mean at the time she cast it or  
17 after the fact?

18 [REDACTED] At any point.

19 The Witness. Can you repeat that question?

20

BY [REDACTED]

21 Q Yeah, sure. Is it your understanding that there was never any legal  
22 significance to those electoral college votes or pieces of paper that you and other electors  
23 signed because no court or State legislature ever ratified or adopted them?

24 A That's my understanding.

25 Q Okay. Thank you, Ms. Ruh.

1 [REDACTED] All right. Are you good? Okay.

2 Well, thank you, Ms. Ruh. I think that we're done with our questions today for  
3 purposes of the deposition.

4 I believe -- if you could look to see if you have that one email that we discussed  
5 that I believe was from Senator Ron Johnson, if you have that, if you could produce that  
6 to us, we would appreciate that.

7 Other than that, I think we're done for today. Thank you both for your time.

8 It's 3:22 p.m. eastern time. We'll go off the record at this time.

9 [REDACTED] And the deposition is closed.

10 [REDACTED] And the deposition is closed.

11 [Whereupon, at 3:22 p.m., the deposition was concluded.]

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Certificate of Deponent/Interviewee

I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

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Witness Name

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Date