

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

Civil Action No.

BRIANNA BUENTELLO,

Plaintiff,

v.

LAUREN BOEBERT, in her official and individual capacities,

Defendant.

---

**DECLARATION OF BRIANNA BUENTELLO**

---

I, Brianna Buentello, declare under penalty of perjury under the law of Colorado that the following is true and correct to the best of my knowledge and information:

1. My name is Brianna Buentello. I am over the age of twenty-one and am otherwise competent to testify. I make the following statements based upon my personal knowledge.

2. I am a former member of the Colorado House of Representatives. I represented the 47th district, which includes parts of Fremont and Pueblo counties and all of Otero County, for one term. I served on the Rural Affairs and Agriculture Committee, and was the vice-chair of the Education Committee.

3. I am currently a resident of Colorado's Third Congressional District and a constituent of Representative Lauren Boebert.

4. Prior to being banned from Representative Lauren Boebert's Twitter account, @laurenboebert, I was familiar with that account. As of January 6, 2021, the day I was blocked by Rep. Boebert, her Twitter account contained the following information.

5. On the account page of the @laurenboebert page, Rep. Boebert describes herself as the “Congresswoman for CO-03.” This is what @laurenboebert looked like as of January 6, 2021:



6. The @laurenboebert page is generally accessible to the public at large. Any member of the public can view Rep. Boebert’s posts unless they have been blocked. Any Twitter user who wants to follow Rep. Boebert’s page can do so, unless they have been blocked. Her

page has approximately 400,000 followers. Any Twitter user can also reply to Rep. Boebert's tweets unless they have been blocked.

7. Rep. Boebert uses the @laurenboebert account to promote official government business and she uses the account to directly communicate with her constituents in her official capacity as a United States Representative.

8. Rep. Boebert uses the @laurenboebert account to publicize how she votes on legislation. For example, on January 6, 2021, Rep. Boebert tweeted from the @laurenboebert account that she had voted against certifying the Electoral College results:



**Lauren Boebert**   
@laurenboebert

...

1776 is the foundation of our country. Today I signed my name to a document to defend that foundation and our freedom.

The violence we saw today is inexcusable. Pray for America.



2:57 PM · Jan 6, 2021 · Twitter for iPhone

**1.8K** Retweets **473** Quote Tweets **13.3K** Likes



9. Rep. Boebert also uses the @laurenboebert to communicate her political and policy decisions and platforms. For example, on January 4, 2021, Rep. Boebert tweeted from the @laurenboebert account her policy position on electoral integrity:



10. Rep. Boebert, a few days earlier, also tweeted her official policy decision to carry her firearm in the United States Capitol:



**Lauren Boebert** ✓  
@laurenboebert



Let me tell you why I WILL carry my Glock to Congress.

Government does NOT get to tell me or my constituents how we are allowed to keep our families safe.

I promise to always stand strong for our 2nd Amendment rights.

[secure.winred.com/lauren-boebert...](https://secure.winred.com/lauren-boebert...)



From **Benny** ✓

5:33 PM · Jan 3, 2021 · Twitter Media Studio

**15.6K** Retweets   **11.1K** Quote Tweets   **60.2K** Likes



11. Prior to the insurrection at the Capitol on January 6, 2021, I noticed that Rep. Boebert tweeted from the @laurenboebert account “This is 1776” as a signal to those who had gathered outside the Capitol:



12. Later, while the insurrection was ongoing, I observed that Rep. Boebert tweeted from the @laurenboebert account about the location of United States Speaker of the House Nancy Pelosi (and other members of Congress):



13. After seeing these tweets, I began criticizing Rep. Boebert’s actions immediately from my Twitter account, @Bri4CO. The afternoon of the insurrection, I tweeted (tagging @laurenboebert) calling for Rep. Boebert’s recall and her actions seditious:



14. I continued tweeting (and retweeting) criticism of the Senators and Representatives, including Rep. Boebert, who voted against certification, and who fanned the flames of the insurrection.

15. Less than twenty-four hours after my tweet tagging @laurenboebert and criticizing her, Rep. Boebert blocked me from the @laurenboebert account:





16. As a result of Rep. Boebert's actions, I can no longer view the Rep. Boebert's tweets from the @laurenboebert account. I can no longer reply to Rep. Boebert's tweets from the @laurenboebert account. And, I can no longer participate in the discussions in the replies to Rep.

Boebert's tweets. Each new tweet by Rep. Boebert is a piece of information that I am foreclosed from receiving and a potential discussion (in the replies to that tweet) that I cannot participate in.

17. To this day, I am still blocked from the @laurenboebert account.

18. I believe that Rep. Boebert blocked me because I was critical of her.

19. That belief is supported by Rep. Boebert's action in blocking me, the timing of her blocking of me.

20. I am aware that Rep. Boebert has blocked others who have been critical of her on Twitter.

21. I wish to respond to Representative Boebert's authoritarian policies as enunciated on her Twitter account. I believe she is a danger to our country and it is my right to alert the citizenry to that fact.

22. In criticizing Representative Boebert online, I am engaged in petitioning my government for redress of my grievances. When blocked, this option of petitioning is foreclosed to me and I wish to continue to petition in this manner.

I, Brianna Buentello, declare under the penalty of perjury under the law of Colorado that the foregoing is true and correct.

/s/ Brianna Buentello

**Brianna Buentello**