

**BEFORE THE COMMITTEE ON ETHICS
UNITED STATES HOUSE OF REPRESENTATIVES**

In the Matter of
REPRESENTATIVE LAUREN OPAL BOEBERT
Member, U.S. House of Representatives (CO-4)

COMPLAINT PURSUANT TO COMMITTEE RULE 15

I. COMPLAINANT

David B. Wheeler, [REDACTED];
[REDACTED]. Complainant is not a Member, officer, or employee of the House.

II. RESPONDENT

Representative Lauren Opal Boebert, Member of the U.S. House of Representatives for the Fourth District of Colorado (previously the Third District of Colorado, 2021–2025).

Current House employee involved: Raven Finegan, District Chief of Staff, Office of Rep. Boebert. Former House employees involved: Clarice Navarro Ratzlaff, former District Director; Jeffrey D. Small, former Chief of Staff.

III. STATEMENT OF FACTS

1. Complainant David B. Wheeler is a journalist. The allegations herein are based on (a) publicly available official records, including quarterly Statements of Disbursements of the U.S. House of Representatives, disbursement records filed with the Federal Election Commission by Lauren Boebert for Congress (FEC Committee ID C00728238), the Congressional Directory, Colorado state court records, and published news reporting; and (b) on-the-record information provided to Complainant by sources with direct knowledge of the conduct described, including persons identified in Part V below, as reflected in Complainant's contemporaneous notes.
2. At all relevant times, Respondent Rep. Lauren Opal Boebert was a Member of the U.S. House of Representatives representing Colorado's Third (2021–2025) and Fourth (2025–present) Congressional Districts.
3. From on or about January 4, 2021, through on or about January 31, 2025, Clarice Navarro Ratzlaff (also appearing in official records as "Clarice Ratzlaff" and in FEC records as "Clarice Navarro") was employed in Respondent's congressional office as District Director, a position under Respondent's direct supervision. House Statements of Disbursements reflect total compensation to Ms. Navarro Ratzlaff of \$449,391.63 over this period. (Exhibits A, B.)

4. Beginning in or about 2021 and continuing at various times through January 2025, Respondent and Ms. Navarro Ratzlaff engaged in a romantic and sexual relationship while Ms. Navarro Ratzlaff was a House employee under Respondent's supervision.
5. Sexual encounters between Respondent and Ms. Navarro Ratzlaff occurred during official office hours, after hours, and on weekends; in Colorado and outside Colorado; in Respondent's district office in Colorado; in a vehicle for which Ms. Navarro Ratzlaff received mileage reimbursements; and in hotel rooms paid for by Respondent's campaign committee.
6. Public reporting documents joint travel by Respondent and Ms. Navarro Ratzlaff. In late October 2022, Ms. Navarro Ratzlaff accompanied Respondent to Mar-a-Lago in Palm Beach, Florida, for what press reports described as a campaign fundraising visit with former President Trump attended by approximately twenty people; the Colorado Times Recorder published a photograph captioned "Boebert (center) at Mar-A-Lago with Clarice Navarro-Ratzlaff (left) and Maggie Silvers." FEC records of Respondent's campaign committee reflect Palm Beach-area spending in the same window, including a meal at Flanigan's, West Palm Beach (\$222.93, October 26, 2022), event catering at Singer Island (\$4,148.20, October 28, 2022), and lodging at the Courtyard by Marriott, West Palm Beach (\$789.40, October 31, 2022). (Exhibits B, D.)
7. [REDACTED], then the husband of Ms. Navarro Ratzlaff, learned of the relationship between Respondent and his wife, and the marriage ended in divorce.
8. House Statements of Disbursements reflect that Ms. Navarro Ratzlaff's fourth-quarter compensation exceeded her third-quarter baseline in each year of her employment, in amounts consistent with year-end bonuses paid from official funds: approximately \$6,150 (Q4 2021), \$11,500 (Q4 2022), \$8,000 (Q4 2023), and \$5,000 (Q4 2024), totaling approximately \$30,650. (Exhibit B.) These year-end payments were made to Ms. Navarro Ratzlaff by Respondent on account of the personal relationship described above and not solely as compensation commensurate with official duties performed.
9. FEC disbursement records of Lauren Boebert for Congress reflect nine payments to "Clarice Navarro" totaling \$12,169.17 between August 2021 and August 2023, of which eight are described as mileage, travel, or expense reimbursements. The ninth is a payment of \$5,000.00 dated July 8, 2022, described as "Fundraising Consulting." (Exhibit B.)
10. Ms. Navarro Ratzlaff performed no fundraising consulting services corresponding to the July 8, 2022, payment. The payment was made to secure her silence regarding the relationship described above, and its purpose was falsely described in the committee's FEC reports.
11. Ms. Navarro Ratzlaff performed work on Respondent's re-election campaigns during periods in which she was being compensated by the U.S. House of Representatives.

12. Following the end of her House employment, Ms. Navarro Ratzlaff communicated to Respondent that she intended to file an ethics complaint against Respondent. Thereafter, in or about March 2025, a payment of approximately \$200,000 was made to Ms. Navarro Ratzlaff to secure her silence and forestall the threatened complaint. The source of the funds is presently unknown to Complainant. [REDACTED] of approximately \$200,000 into that account in or about March 2025.
13. Raven Finegan was employed in Respondent's congressional office from on or about September 6, 2022, to the present, serving successively as Western Slope Field Representative, Western Colorado Regional Director, District Director, and District Chief of Staff, with total House compensation of \$456,013.93 through June 30, 2026; FEC records additionally reflect \$32,216.64 paid to Ms. Finegan by Respondent's campaign committee for consulting between November 2023 and November 2024. (Exhibit A.) Respondent and Ms. Finegan engaged in a romantic and sexual relationship while Ms. Finegan was a House employee under Respondent's supervision. Publicly posted photographs document their extensive personal association, including joint travel and personal social events. (Exhibit E.)
14. Jeffrey D. Small served as Respondent's Chief of Staff from on or about January 3, 2021, to on or about January 30, 2025, with total House compensation of \$767,892.42; FEC records additionally reflect a \$10,000 payment to Mr. Small from Respondent's campaign committee on January 14, 2025. (Exhibit A.) Respondent and Mr. Small engaged in a sexual relationship during his tenure as her Chief of Staff, while he was a House employee under Respondent's supervision.

IV. VIOLATIONS ALLEGED

COUNT I — House Rule XXIII, clause 18(a)

Respondent, a Member of the House, engaged in sexual relationships with employees of the House who worked under her supervision — Ms. Navarro Ratzlaff, Ms. Finegan, and Mr. Small — in violation of clause 18(a) of Rule XXIII. Consent is not a defense to this rule. (Facts ¶¶ 4–5, 13–14.)

COUNT II — House Rule XXIII, clause 8

Respondent retained and compensated employees, including through year-end bonus payments from official funds, other than in amounts commensurate with the duties actually performed for the House. (Facts ¶¶ 8, 11, 13.)

COUNT III — House Rule XXIII, clause 1

The conduct described herein does not reflect creditably on the House, in violation of clause 1 of Rule XXIII. (Facts ¶¶ 3–14.)

COUNT IV — Misuse of official funds and false certification; 18 U.S.C. §§ 641, 1001, 1343, 1346

Official funds were paid to Ms. Navarro Ratzlaff for reasons other than official services rendered, including bonuses paid on account of a personal relationship; such payments constitute conversion of federal funds and false certification of official payroll, and implicate the wire fraud and honest-services fraud statutes. (Facts ¶¶ 3, 8, 11.)

COUNT V — Personal use of campaign funds and false reporting; 52 U.S.C. §§ 30114, 30104

The \$5,000 payment of July 8, 2022, made to secure silence regarding a personal relationship, constituted conversion of campaign funds to personal use, and its description as "Fundraising Consulting" rendered the committee's FEC reports false or misleading. Campaign payment of hotel rooms used for personal encounters constitutes additional personal use. To the extent the March 2025 payment of approximately \$200,000 originated in whole or in part from campaign funds, it constitutes further personal use and, if unreported or misreported, further reporting violations. (Facts ¶¶ 5–6, 9–10, 12.)

COUNT VI — Congressional Accountability Act; 2 U.S.C. § 1301 et seq.

Supervisor-subordinate sexual relationships of the kind described, together with payments conditioned on silence, implicate the prohibitions on workplace harassment and retaliation applicable to congressional employing offices, for which Members bear personal liability for awards and settlements arising from their own conduct. (Facts ¶¶ 4–14.)

COUNT VII — 18 U.S.C. § 1512

The payment of approximately \$200,000 in or about March 2025, made after Ms. Navarro Ratzlaff communicated her intention to file an ethics complaint, was made with intent to prevent her communication to the Committee on Ethics and to hinder, delay, or prevent an official proceeding, and constitutes witness tampering. The July 8, 2022, payment further evidences the same course of conduct. (Facts ¶¶ 10, 12.)

V. WITNESSES

The following persons are believed to possess knowledge relevant to the allegations herein:

1. Rep. Lauren Opal Boebert, Respondent.
2. Jayson Boebert, former spouse of Respondent, (970) 274-2569.
3. [REDACTED], [REDACTED], [REDACTED].

4. Clarice Navarro Ratzlaff, former District Director, (719) 469-3484.
5. Tabitha Rosenthal, former Deputy Chief of Staff / Legislative Director to Respondent, now Senior Advisor to the Director, U.S. General Services Administration.
6. Jeff Small, former Chief of Staff to Respondent, (720) 420-4250.
7. Maggie Silvers, campaign staff to Respondent, (970) 379-3392.
8. Jeanie Marie Davidovich, former Scheduler and campaign staff for Respondent, (970) 405-3197.

VI. EXHIBITS

Exhibit A — Staff roster and payment analysis (attached: Boebert_Staff_Roster.xlsx), Office of Rep. Lauren Boebert and affiliated campaign committees, compiled from House Statements of Disbursements (Q1 2021–Q2 2026) and FEC bulk disbursement data (cycles 2020–2026).

Exhibit B — Payments to Clarice Navarro Ratzlaff (attached: Navarro_Ratzlaff_Payments.pdf): U.S. House payroll by quarter with implied year-end bonuses totaling approximately \$30,650, and itemized campaign disbursements including the July 8, 2022, payment of \$5,000 described as "Fundraising Consulting."

Exhibit C — Complainant's contemporaneous notes and source communications supporting Facts ¶¶ 4–5, 7, 10, and 12–14. Provided upon request.

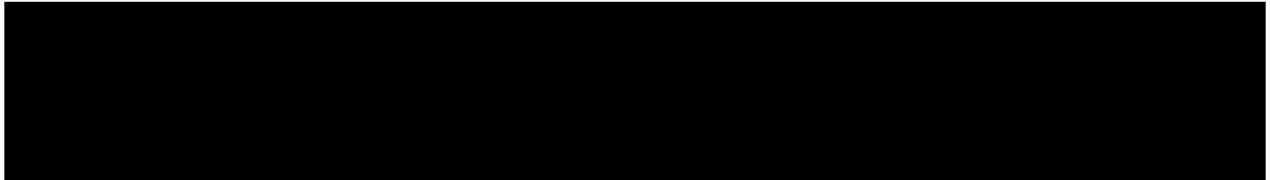
Exhibit D — Public documentation of joint appearances and employment (copies of items 3 and 6 attached):

1. Lauren Boebert for Congress press release, "Lauren Boebert Announces Senior Congressional Staff," Dec. 21, 2020, announcing Clarice Navarro as District Director (laurenforcolorado.com).
2. Associated Press / Grand Junction Daily Sentinel, "Boebert taps Trump administration, Gardner staff for congressional office," Dec. 23, 2020 (also carried by The Journal, Post Independent, Houston Chronicle).
3. Colorado Times Recorder, "As Her Race Tightens in CO, Boebert Takes Friends & Family to Mar-A-Lago," Oct. 27, 2022, with photograph of Respondent and Ms. Navarro-Ratzlaff together at Mar-a-Lago (coloradotimesrecorder.com/2022/10/.../49910/). ATTACHED.
4. Real Vail, "As campaign winds down, Boebert heads back to Mar-A-Lago to be with Trump," Oct. 31, 2022, reporting Ms. Navarro-Ratzlaff joined Respondent in Florida (realvail.com).

5. Congressional Directory (U.S. GPO, Oct. 26, 2022), official listing: "District Director.—Clarice Navarro," 503 N. Main St., Suite 426, Pueblo, CO (govinfo.gov).

6. Colorado Times Recorder, "Long Holiday Break? Boebert's Pueblo Office Closed for Over 3 Weeks Around Thanksgiving & Christmas," Jan. 18, 2024, reporting Ms. Navarro-Ratzlaff answered the district office telephone on Jan. 10, 2024, as Respondent's district director. ATTACHED.

Exhibit E — Compilation of publicly posted photographs of Respondent and Ms. Finegan together, including birthday tributes posted by Ms. Finegan, joint travel, and social events (attached: Exhibit_E_Finegan_Boebert_Photos.pdf).



VII. RELIEF REQUESTED

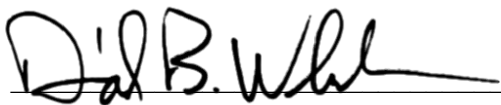
Complainant respectfully requests that the Committee accept this Complaint, establish an Investigative Subcommittee pursuant to Committee Rule 19, investigate the allegations herein, refer any evidence of criminal conduct to the Department of Justice and the Federal Election Commission as appropriate, and impose such sanctions as the Committee deems warranted.

VIII. CERTIFICATION AND VERIFICATION UNDER 28 U.S.C. § 1746

I certify that this Complaint is submitted in good faith and warrants the review and consideration of the Committee. I understand that knowingly making false statements to the Committee may violate federal law, including 18 U.S.C. § 1001.

Pursuant to 28 U.S.C. § 1746, I declare, certify, verify, and state under penalty of perjury under the laws of the United States of America that the foregoing Complaint, including each factual allegation set forth in Part III, is true and correct to the best of my knowledge, information, and belief. I intend this unsworn declaration to have the same force and effect as a sworn affidavit or statement made under oath.

Executed on the 17th day of September 2026, at Spruce Pine, North Carolina.



David B. Wheeler, Complainant

EXHIBIT A
Staff Roster and Payment Analysis

Name	Title(s) Held	Start Date	End Date	Status	Total Comp Paid	Quarters on
Zams Kelly L	SHARED EMPLOYEE / SHARED EMPLOYEE	2021-01-03	2021-06-30	Former	12,861.09	2
Small Jeffrey D.	CHIEF OF STAFF / CHIEF OF STAFF	2021-01-03	2025-01-30	Former	767,892.42	17
Rosenthal Tabitha	LEGISLATIVE ASSISTANT / LEGISLATIVE ASSISTANT / SENIOR P	2021-01-04	2026-06-30	Current (thru Q2 2026)	674,194.54	22
Ratzlaff Clarice	DISTRICT DIRECTOR / DISTRICT DIRECTOR	2021-01-04	2025-01-31	Former	449,391.63	17
Peterson Hogan M.	WESTERN CO REGIONAL DIRECTOR / WESTERN CO REGIONAL	2021-01-04	2022-01-02	Former	63,444.41	5
Kirkpatrick Kristi L.	PART-TIME EMPLOYEE / PART-TIME EMPLOYEE	2021-01-04	2022-08-19	Former	56,263.90	7
Higgins Ashley B.	LEGISLATIVE ASSISTANT / LEGISLATIVE ASSISTANT	2021-01-04	2021-05-07	Former	21,416.67	2
Garcia Catherina A.	SOUTHERN COL REGIONAL DIR / SOUTHERN COL REGIONAL D	2021-01-04	2024-06-30	Former	273,430.61	14
Davidovich Jeanie M.	SCHEDULER / SCHEDULER / SCHEDULER AND FINANCE MANA	2021-01-04	2021-07-31	Former	49,383.32	3
Agostin Erin P.	LEGISLATIVE DIRECTOR / LEGISLATIVE DIRECTOR	2021-01-04	2022-04-27	Former	153,708.38	6
Camacho Devin M.	SW COLORADO REGIONAL DIRECTOR / SW COLORADO REGIO	2021-01-04	2021-06-18	Former	25,958.32	2
Imer Weston D.	PAID INTERN - HOUSE PROGRAM	2021-01-10	2021-01-30	Former	105.00	1
Goldey Benjamin H	COMMUNICATIONS DIR/SR. ADVISOR	2021-01-14	2021-01-30	Former	3,666.67	1
Bauman Kaeden W.	PAID INTERN - HOUSE PROGRAM	2021-01-15	2021-04-23	Former	1,815.00	2
Ehrlin Elena C.	LEGISLATIVE CORRESPONDENT / LEGISLATIVE CORRESPOND	2021-01-18	2021-05-14	Former	13,749.99	2
Stout Benjamin A	COMMUNICATIONS DIRECTOR / DEPUTY CHIEF OF STAFF / DEF	2021-01-25	2023-06-01	Former	269,577.11	10
Farley McKenna E.	CASEWORKER / CASEWORKER / WESTERN SLOPE FIELD REP	2021-02-01	2026-06-30	Current (thru Q2 2026)	390,238.81	22
Ritter Michael E.	DISTRICT OFFICE PAID INTERN -	2021-02-08	2021-06-04	Former	2,145.00	2
Settle Jacob S.	PRESS SECRETARY / PRESS SECRETARY / SR. COMMS ADVISC	2021-02-15	2023-08-18	Former	200,622.21	11
Popovich Zachary M.	PAID INTERN - HOUSE PROGRAM	2021-02-23	2021-03-05	Former	238.34	1
Cleckner Noah D.	PAID INTERN - HOUSE PROGRAM	2021-03-15	2021-05-14	Former	1,100.00	2
Ouimette Justin S	SHARED EMPLOYEE	2021-04-01	2021-04-30	Former	5,000.00	1
Uhrick Eli M.	PAID INTERN - HOUSE PROGRAM	2021-05-17	2021-08-10	Former	1,540.00	2
Curto Michael A.	GENERAL COUNSEL / GENERAL COUNSEL	2021-06-01	2022-04-14	Former	69,027.79	4
Giddings Lauren M.	PAID INTERN - HOUSE PROGRAM	2021-06-02	2021-08-13	Former	1,200.00	2
Gibson Cole H.	PAID INTERN - HOUSE PROGRAM	2021-06-07	2021-07-31	Former	900.00	2
Dobbs Naomi E.	SOUTHWESTERN COLORADO REGIONAL	2021-07-26	2025-01-02	Former	250,458.35	15
Nichols Kristine B.	SCHEDULER AND FINANCE MANAGER	2021-08-09	2022-04-17	Former	64,791.64	4
Hungerford Daniel J.	PAID INTERN - HOUSE PROGRAM / PAID INTERN - HOUSE PROC	2021-08-23	2023-08-27	Former	159,127.97	9
Ross Samuel E.	PAID INTERN - HOUSE PROGRAM / PAID INTERN - HOUSE PROC	2021-09-03	2021-12-31	Former	3,403.33	2
Heiple Calvin R.	PAID INTERN - HOUSE PROGRAM	2021-09-17	2021-11-06	Former	1,166.67	2
Wilson Sam F.	PAID INTERN - HOUSE PROGRAM / PAID INTERN - HOUSE PROC	2022-01-10	2022-04-30	Former	3,903.33	2
Bohling John	PAID INTERN - HOUSE PROGRAM / PAID INTERN - HOUSE PROC	2022-02-10	2022-06-03	Former	3,523.56	2
Wade Melissa E.	SHARED EMPLOYEE / SHARED EMPLOYEE	2022-03-01	2026-06-30	Current (thru Q2 2026)	123,063.73	18
Brown Melissa L.	COMMUNICATIONS DIRECTOR	2022-03-01	2022-03-01	Former	7,500.00	1
Drummy Erin S.	SCHEDULER	2022-04-11	2023-01-02	Former	53,888.91	4
Lake Bernadette M.	WESTERN COLORADO FIELD REP	2022-05-02	2022-08-31	Former	23,138.88	2
Mckay Kyle J	SENIOR LEGISLATIVE ASSISTANT	2022-05-04	2023-01-02	Former	63,111.13	4
Fernandez Christopher A	LEGISLATIVE DIRECTOR	2022-05-16	2023-01-02	Former	79,055.54	4
Hazard Charlotte M.	PAID INTERN - HOUSE PROGRAM	2022-05-16	2022-07-31	Former	1,750.00	2
King Sophia A.	PAID INTERN - HOUSE PROGRAM	2022-06-07	2022-08-05	Former	1,376.67	2
Porter Joseph	LEGISLATIVE CORRESPONDENT	2022-08-03	2023-05-31	Former	40,250.00	4

Mullins Brock A.	PAID INTERN - HOUSE PROGRAM / PAID INTERN - HOUSE PROC	2022-08-15	2022-12-13	Former	10,073.61	2
Higgs Jasmine B.	PART-TIME EMPLOYEE / PART-TIME EMPLOYEE	2022-08-25	2026-06-30	Current (thru Q2 2026)	282,833.18	16
Finegan Raven R.	WESTERN SLOPE FIELD REP / W CO REGIONAL DIRECTOR / DI	2022-09-06	2026-06-30	Current (thru Q2 2026)	456,013.93	16
Lee Alexandra C.	PAID INTERN - HOUSE PROGRAM	2022-10-25	2023-01-27	Former	9,945.83	2
Richwine Josiah D.	PAID INTERN - HOUSE PROGRAM / PAID INTERN - HOUSE PROC	2022-12-29	2023-03-06	Former	7,850.00	1
Hamilton Mckenna L.	SCHEDULER / DIRECTOR OF OPERATIONS	2023-01-03	2026-06-30	Current (thru Q2 2026)	331,083.42	14
Sanchez Nelson	PAID INTERN - HOUSE PROGRAM	2023-01-09	2023-03-15	Former	3,350.00	1
Reitz Timothy H	SHARED EMPLOYEE	2023-02-01	2023-02-28	Former	6,250.00	1
Rhodes Natalie E.	LEGISLATIVE ASSISTANT / LEGISLATIVE ASSISTANT	2023-03-13	2023-09-15	Former	51,230.00	3
Rall Peyton R.	PAID INTERN - HOUSE PROGRAM / STAFF ASSISTANT / LEGISLA	2023-03-24	2026-06-30	Current (thru Q2 2026)	262,595.84	13
Le Quy S.	LEGISLATIVE CORRESPONDENT	2023-04-24	2024-02-06	Former	44,305.58	4
Fakhoury Anthony K.	PAID INTERN - HOUSE PROGRAM / PRESS ASSIST/STAFF ASSIS	2023-05-25	2024-03-31	Former	45,656.95	4
Fones Harry G.	COMMUNICATIONS DIRECTOR	2023-08-01	2024-04-30	Former	10,208.67	2
Lobaugh Coby W.	DIGITAL DIRECTOR	2023-10-01	2024-04-30	Former	33,638.87	3
Farmer Aubree V.	DISTRICT OFFICE PAID INTERN - / DISTRICT OFFICE PAID INTEF	2023-12-19	2024-01-02	Former	3,422.22	2
Baigorria Sophia G.	PAID INTERN - HOUSE PROGRAM / LEGISLATIVE CORRESPOND	2024-02-01	2026-06-30	Current (thru Q2 2026)	179,725.03	10
Cullen Alexandria J.	PAID INTERN - HOUSE PROGRAM / STAFF ASSISTANT	2024-03-11	2025-01-30	Former	44,458.33	5
Reitz Timothy H.	EXECUTIVE DIRECTOR	2024-04-01	2025-12-31	Former	29,208.00	3
Farmer Aubree J.	PAID INTERN - HOUSE PROGRAM	2024-05-06	2024-08-20	Former	5,250.00	2
Garcia-Winder Catherina A.	SOUTHERN COL REGIONAL DIR	2024-07-01	2025-01-02	Former	45,444.46	3
Wilson John S.	SHARED EMPLOYEE	2024-08-01	2024-08-31	Former	500.00	1
Leiser Brandon W.	PAID INTERN - HOUSE PROGRAM	2024-08-19	2024-12-17	Former	9,800.00	2
Sexton Andrew F.	DEPUTY CHIEF OF STAFF/PRESS SE	2024-09-02	2025-10-03	Former	157,888.86	6
Valdez Joel M.	SR ADVISOR/COMM DIRECTOR	2024-09-09	2025-06-27	Former	93,305.58	4
Burke William C.	CHIEF OF STAFF / CHIEF OF STAFF	2025-01-04	2025-05-03	Former	75,413.33	2
Betts Daniel E.	N COLORADO REGIONAL DIR	2025-01-06	2025-09-30	Former	60,208.33	3
Matchette Dylan	PAID INTERN - HOUSE PROGRAM	2025-01-13	2025-04-14	Former	4,600.00	2
Monk Amanda R.	NE COLORADO FIELD REP / NE COLORADO FIELD REP	2025-02-03	2025-08-14	Former	33,500.00	3
Budd Annette L.	DOUGLAS COUNTY FIELD REP	2025-02-03	2026-02-28	Former	78,666.67	5
Esperne James M.	PAID INTERN - HOUSE PROGRAM / LEGISLATIVE CORRESPOND	2025-04-25	2026-06-30	Current (thru Q2 2026)	70,550.00	5
Jones Jeorgia	DISTRICT OFFICE PAID INTERN - / PAID INTERN - HOUSE PROG	2025-05-15	2025-08-14	Former	9,600.00	2
Sink Charles W.	PAID INTERN - HOUSE PROGRAM	2025-05-19	2025-08-08	Former	4,000.00	2
Voigt Breanna	DISTRICT OFFICE PAID INTERN -	2025-06-23	2025-08-12	Former	2,250.00	1
Tsirlis Madilyn	DISTRICT OFFICE PAID INTERN -	2025-07-01	2025-09-26	Former	5,700.00	1
Montes Saul	PAID INTERN - HOUSE PROGRAM	2025-08-29	2025-12-12	Former	5,200.00	2
Grady Aspen S.	NORTHERN CO FIELD REP	2025-11-03	2026-06-30	Current (thru Q2 2026)	42,972.25	3
Halweg Meredith	AG AND RURAL FIELD REP	2025-12-01	2026-06-30	Current (thru Q2 2026)	37,916.69	3
Arnold Donovan R.	PAID INTERN - HOUSE PROGRAM / TEMPORARY EMPLOYEE	2026-01-27	2026-06-30	Current (thru Q2 2026)	8,266.67	2
Mahe Fred W.	COMMUNICATIONS DIRECTOR	2026-03-30	2026-06-30	Current (thru Q2 2026)	32,861.10	1
Norton James	CHIEF OF STAFF	2026-04-20	2026-06-30	Current (thru Q2 2026)	44,522.92	1
Casebolt Sara	PAID INTERN - HOUSE PROGRAM	2026-06-16	2026-06-30	Current (thru Q2 2026)	750.00	1

TOTALS

83 staffers

7,029,397.24

EXHIBIT B

Payments to Clarice Navarro Ratzlaff

Payments to Clarice Navarro Ratzlaff

U.S. House Payroll (Office of Rep. Lauren Boebert) and Campaign Committee Disbursements

Compiled September 17, 2026 from House Statements of Disbursements (disbursements.house.gov) and FEC bulk operating-expenditure data (fec.gov), committees C00728238 / C00824748.

Summary

Source	Period	Total
U.S. House payroll — District Director (paid as Clarice Ratzlaff)	Jan 4, 2021 – Jan 31, 2025	\$449,391.63
Boebert for Congress (C00728238) — paid as Clarice Navarro	Aug 2021 – Aug 2023	\$12,169.17
of which: Fundraising Consulting (Jul 8, 2022)		\$5,000.00
of which: mileage/travel/expense reimbursements		\$7,169.17
Implied year-end bonuses within House pay (Q4 2021–2024)		~\$30,650
Combined total, all sources		\$461,560.80

U.S. House Payroll by Quarter

Quarter	Amount Paid	Implied Bonus vs. Q3 Baseline
2021 Q1	\$22,958.34	
2021 Q2	\$24,750.01	
2021 Q3	\$24,100.00	
2021 Q4	\$30,249.99	~\$6,150
2022 Q1	\$24,249.99	
2022 Q2	\$25,500.00	
2022 Q3	\$26,250.00	
2022 Q4	\$37,750.00	~\$11,500
2023 Q1	\$26,250.00	
2023 Q2	\$26,250.00	
2023 Q3	\$26,250.00	
2023 Q4	\$34,250.00	~\$8,000
2024 Q1	\$28,694.44	
2024 Q2	\$28,749.99	
2024 Q3	\$28,749.99	
2024 Q4	\$33,749.99	~\$5,000
2025 Q1	\$638.89	
Total	\$449,391.63	~\$30,650

Highlighted rows are fourth quarters where pay exceeded that year's Q3 baseline; titles on record: District Director throughout. Quarterly figures are amounts paid in the period per the Statements of Disbursements, not annualized salary.

Campaign Disbursements (Lauren Boebert for Congress, C00728238)

Date	Amount	Purpose (as reported to FEC)
Aug 06, 2021	\$925.44	Travel Expense Reimbursements For Airfare And Other Travel Expenses
Nov 24, 2021	\$656.88	Mileage/Travel: Includes Vendor Not Req. Item.
Mar 31, 2022	\$2,528.10	Expense Reimb- See Memos
Jul 08, 2022	\$5,000.00	Fundraising Consulting
Sep 28, 2022	\$567.99	Mileage
Dec 14, 2022	\$742.12	Mileage
Feb 09, 2023	\$235.44	Mileage
May 08, 2023	\$304.53	Mileage
Aug 02, 2023	\$1,208.67	Expense Reimb- See Memos
Total	\$12,169.17	

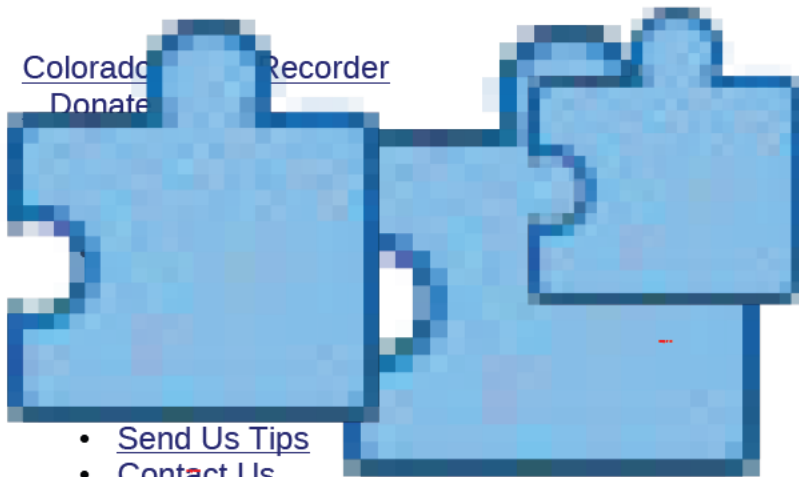
Notes: All payments reported under the name Clarice Navarro at a Highlands Ranch, CO address. The July 8, 2022 payment is the only non-reimbursement item. House records report the same individual as Clarice Ratzlaff. Q4 pay elevations are consistent with year-end bonuses, a routine and lawful House practice; a mid-quarter raise or retroactive adjustment could produce a similar pattern. Source records should be independently verified before publication.

EXHIBIT D

Public Documentation of Joint Appearances
(Items 3 and 6 Attached)



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As Her Race Tightens in CO, Boebert Takes Friends & Family to Mar-A-Lago

by

[Erik Maulbetsch](#)

posted on

October 26, 2022

With less than two weeks to go before Election Day, most candidates are furiously knocking doors, trying to turn out every last voter they can reach. Colorado Congresswoman Lauren Boebert, who [according to recent polls](#), has a dwindling lead in a race that wasn't expected to be close, flew to Mar-A-Lago with her family and friends for a visit — presumably a fundraiser — with former President Donald Trump.

Colorado Republican National Committeeman Randy Corporon also attended.

“Gorgeous top to bottom,” noted Corporon on Facebook, referring to the Mar-A-Lago compound. “It’s been closed this summer for freshening up, so about twenty of us had it to ourselves along with the owner.”

Boebert (center) at Mar-A-Lago with Clarice Navarro-Ratzlaff (left) and Maggie Silvers

Former Colorado lawmaker turned USDA official during the Trump administration, Clarice Navarro-Ratzlaff, also joined Boebert in Florida.

This is at least Boebert's fourth Mar-A-Lago fundraiser, following one [back in February](#) of this year as well as [last April](#), when her [entire family came along](#). Last February she and U.S. Rep. Matt Gaetz co-headlined a fundraiser at Trump's resort for Sen. Mike Lee (R-Utah). More recently [Trump called Boebert](#) to congratulate her on her primary win.

Florida isn't the only state the congresswoman has visited this month in her pursuit of campaign cash. Last week she flew to Nashville for a [high-dollar dinner](#) with country singer John Rich.

Boebert, a Republican, has been one of the GOP's most prolific fundraisers, but recent contribution reports show her Democratic opponent closing the gap. Today the Frisch campaign announced raising \$890,000 in the most recent FEC filing, raising more between Oct. 1 and Oct. 19 than Boebert did in the three months of the second quarter when she raised \$849,000. Nearly 14,000 donors gave to Frisch in this time period, including over 9,000 first-time donors.

Reached for comment, Democratic candidate Adam Frisch said Boebert "routinely ignores her district as she jet sets across the country."

"I am disappointed but not surprised to hear that Rep. Boebert is once again at Mar-a-Lago rather than focusing on her constituents here in CO-3," said Frisch. "Voters deserve to hear directly from their elected representatives about the issues that impact their families like inflation, the economy, and the ongoing Colorado River drought. Instead, Boebert routinely ignores her district as she jet sets across the country and avoids holding public town halls. I plan to visit every county in the district between now and Election Day because I believe it is my duty to make myself available to voters to answer their questions and hear their concerns before they decide who to send to Congress.

"Boebert blew off September's Club 20 steak fry in September – which she called a 'fancy dinner' – because she was at a conference in Woodland Park that day. Instead of attending the Pueblo Farm Bureau's candidate forum on September 13th, she was campaigning for Karoline Leavitt in New Hampshire. She also missed an Oct. 18 candidate forum in her hometown of Rifle and Action 22's economic development conference last weekend as she attended a fundraiser in Nashville. I don't see how spending so much time outside of the district rather than attending important community events helps anyone in CO-3."

Trump poses with Lauren

Boebert's family and friends

Neither Boebert nor Corporon responded to email requests for comment. This article will be

updated with any response received.

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Erik Maulbetsch

Erik is deputy editor of the Colorado Times Recorder and an investigative reporter. He writes largely on Colorado politics, with a focus on right-wing extremists, hate groups, disinformation, and conspiracy theorists. His reporting has appeared in stories by the New York Times, Washington Post, CNN, NBC, Politico, ESPN, Dow Jones Wire, The Denver Post, Atlanta Journal-Constitution, and the Houston Chronicle. He has also worked as a research analyst for Freedom For All Americans, a national organization working for nondiscrimination protections for LGBT Americans, and as communications director of the ACLU of Colorado. He has also worked as a research and communications consultant and as a magazine editor.

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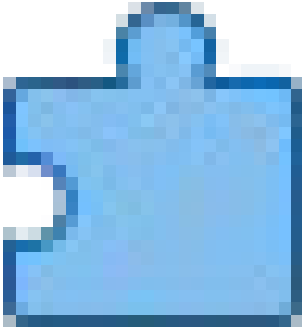
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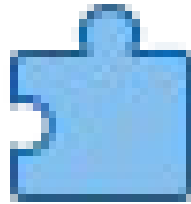
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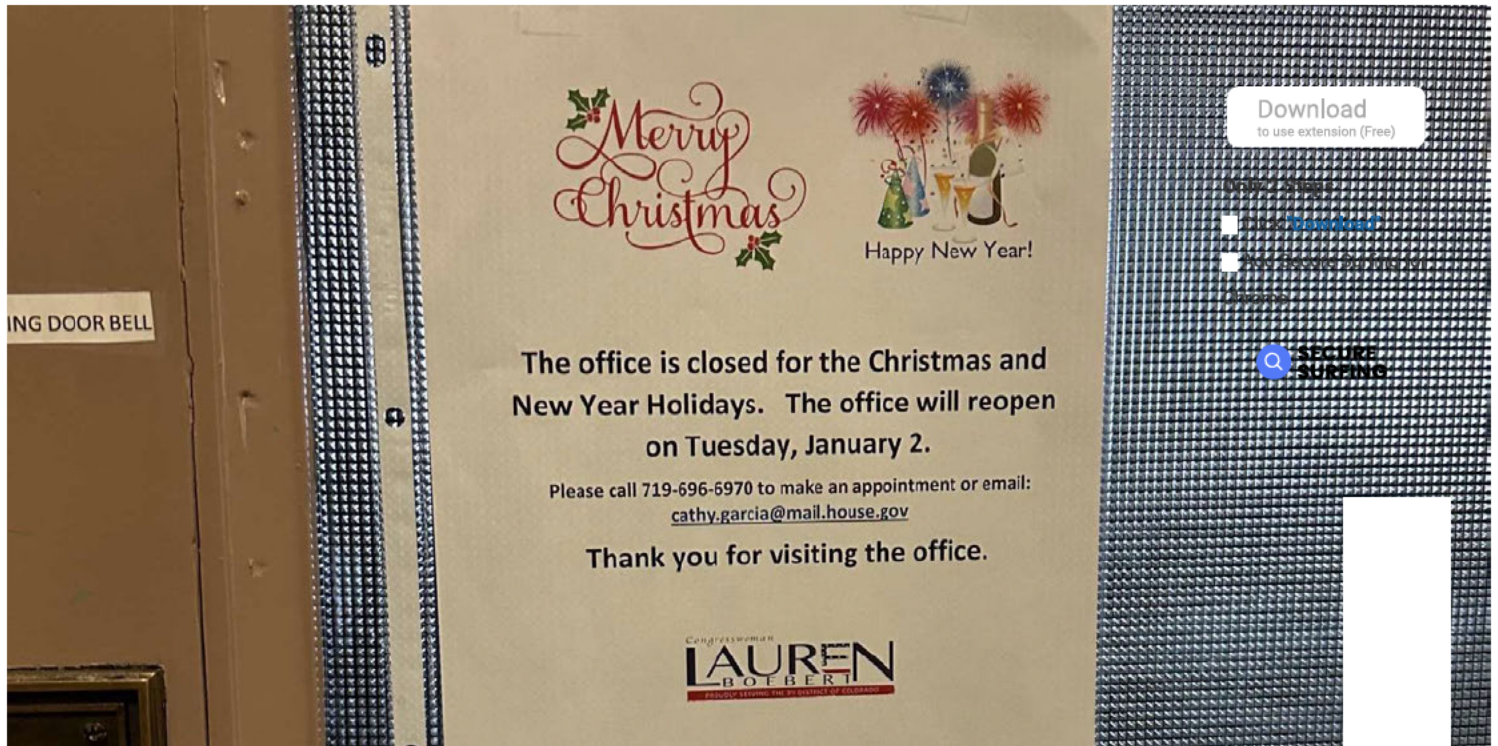




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NEWS

Long Holiday Break? Boebert's Pueblo Office Closed for Over 3 Weeks Around Thanksgiving & Christmas

by
Karin Zeitvogel and Jason Salzman

posted on
January 18, 2024 (January 18, 2024)

In late November, Rep. Lauren Boebert (R-CO) called Social Security Administration (SSA) staff the equivalent of ne'er-do-well couch-potatoes as she raked a senior Social Security Administration official across the coals during a House Oversight Committee hearing.

SSA officials were "allowing delinquent employees to sit on their sofas at home instead of actually getting to work and doing their jobs," Boebert told Oren "Hank" McKnelly, the executive counselor to the SSA's acting commissioner, at the "Oversight of Federal Agencies' Post-Pandemic Telework Policies" hearing on Nov. 29.

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LAUREN BOEBERT'S
PUEBLO OFFICE CLOSURES
IN NOVEMBER & DECEMBER
 LOCATED AT 503 N MAIN ST #426, PUEBLO, CO 81003

- **Nov. 17**, Friday before Thanksgiving. "Traveling to various meetings and appointments in the 3rd Congressional District."
- **Nov. 18**, Saturday
- **Nov. 19**, Sunday
- **Nov. 20**, Monday. The Colorado Times Recorder didn't visit the office this day.
- **Nov. 21**, Tuesday. "The office is closed for the Thanksgiving Week."
- **Nov. 22**, Wednesday. "The office is closed for the Thanksgiving Week."
- **Nov. 23**, Thursday. Thanksgiving.
- **Nov. 24**, Friday. "The office is closed for the Thanksgiving Week."
- **Nov. 25**, Saturday.
- **Nov. 26**, Sunday.
- **Nov. 27**, Monday. "Staff will be at a Conference Nov. 27-29."
- **Nov. 28**, Tuesday. "Staff will be at a Conference Nov. 27-29."
- **Nov. 29**, Wednesday. "Staff will be at a Conference Nov. 27-29."
- **Nov. 30**, Thursday. Office still closed despite note on door saying office "will reopen" Nov. 30.
- **Dec. 18**, Monday before Christmas. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 19**, Tuesday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 20**, Wednesday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 21**, Thursday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 22**, Friday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 23**, Saturday.
- **Dec. 24**, Sunday.
- **Dec. 25**, Monday, Christmas
- **Dec. 26**, Tuesday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 27**, Wednesday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 28**, Thursday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 29**, Friday. "The office is closed for the Christmas and New Year Holidays."
- **Dec. 30**, Saturday.
- **Dec. 31**, Sunday.
- **Jan. 1**, New Year's Day.

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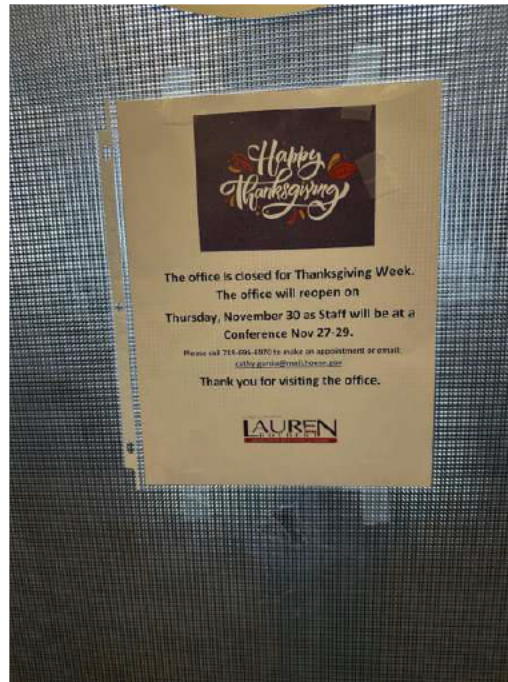


"Every employee, do you have the numbers of the hours that are submitted, are you counting how many times they're logging into their computers and responding to casework?" Boebert continued.

The SSA has "systems in place" that give managers a real-time overview of what staff are doing at any given time, McNelly replied.

"Additionally," he said, "Our employees are required to be accessible to their supervisors, clients, colleagues, and external parties during work hours through a variety of means including instant messaging, video platforms, and telephone. They are connected to the workplace whether they are in the office or at home."

Boebert's Pueblo Office Closed for 13 Days Around Thanksgiving



Boebert's Pueblo office was closed at least 13 days around Thanksgiving.

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The Pueblo office was closed again Nov. 21, the Tuesday before Thanksgiving, but this time a different reason was offered: the office was shuttered for "Thanksgiving Week."

A new note was taped to the door, wishing the reader a "Happy Thanksgiving" and informing them that the office was going to be closed until Thursday, Nov. 30, because — in addition to the extended Thanksgiving holiday — the staff would be attending a conference from Nov. 27-29.

But on Thursday, Nov. 30, a day after the conference had ended — and the day the office was supposed to reopen — it was still closed. It reopened the following day.

So, in total, Boebert's Pueblo office was closed for 13 days around the Thanksgiving holiday — at least four work days, one day for travelling the district, three days at a conference, one day for Thanksgiving, and four weekend days. It opened Dec. 1.



Boebert's Pueblo Office was closed for 15 days for Christmas and New Year.

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"The office is closed for the Christmas and New Year Holidays," read the note on the door, decorated with "Merry Christmas" and "Happy New Year!" art. "The Office will re-open on Tuesday, January 2. Please call 719-696-6970 to make an appointment or email: cathy.garcia@mail.house.gov. Thank you for visiting the office."

Boebert's Pueblo Office Closed Longer Than Offices of Other Colorado U.S. House Members

The offices of all other Colorado U.S. House representatives, Republican and Democrat, were still open on Monday, Dec. 18, after Boebert's Pueblo office had closed for the holidays, according to staff who answered the phones at the seven offices on Dec. 19. All would stay open through Thursday, staffers said. Most would remain open through Friday, with the Castle Rock Office of U.S. Rep. Ken Buck (R-CO) scheduled to close at noon Friday and U.S. Representatives Doug Lamborn (R-CO) Colorado Springs office and Brittany Pettersen's (D-CO) Lakewood office to close all day Friday. All the eight U.S. House congressional offices were

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Often Working in the Community When Office Is Dark, Says Boebert Staffer

Boebert's district director, Clarice Navarro-Ratzlaff, picked up the office phone when the *Colorado Times Recorder* called on Jan. 10, and said that, when the office is dark, she and her colleagues are often out in the community, working on constituent matters.

She said the "conference" referenced on the Pueblo office's closure in November was a Colorado Counties, Inc. (CCI) meeting. A Google search found that the nonprofit Colorado Counties, Inc. held its winter conference from Nov. 27-29. CCI says on its website that its purpose is to assist county commissioners, mayors, and council members, and encourage counties to work together on common issues.

District Offices' Key Role

Like many other members of Congress, Boebert has several district offices and an office in DC. As of Sept. 30, 2023, she had 17 staff members on the books, including Navarro and Garcia, according to [Legistorm](#).

One of the main responsibilities of a congressional staffer is to provide service to people back in the congressional district. They do this by cutting through bureaucracy to help constituents collect Social Security or other benefits; answering questions about government aid, such as student loans; assisting veterans as they deal with the Veterans Administration; keeping constituents informed of their representative's or senator's activities; and more.

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The salaries of congressional staffers are paid for out of the Members' Representational Allowance (MRA), which can also be used to pay for travel, district office rental, stationery, and other office supplies. MRA funds come from the U.S. Treasury, which gets most of its revenue from taxes, including those paid by individuals.✓



Boebert

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Other Republicans competing against Boebert in the June 25 CD4 primary election include talk radio host Deborah Flora, former state lawmaker Ted Harvey, state Representatives Richard Holtorf and Mike Lynch, Justin Schreiber, Logan County Commissioner Jerry Sonnenberg, and businessman Peter Yu. The winner of the primary will almost certainly defeat their Democratic opponent in November's general election, as Republicans have a double-digit advantage in the district.

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LAUREN BOEBERT



Karin Zeitvogel

Karin Zeitvogel started out in journalism at the BBC World Service, back when computers were the size of a small house and you needed to lift weights to carry an audio recorder. She moved on from general news to sports journalism, and has also covered global health, Africa, the Baltics, the U.S. military, international politics, and lifestyle, which is a euphemism for everything. She has a B.A. from Sarah Lawrence College, an M.A. in journalism from the University of Maryland, and a French teaching



Jason Salzman

Jason Salzman is the editor of the Colorado Times Recorder.



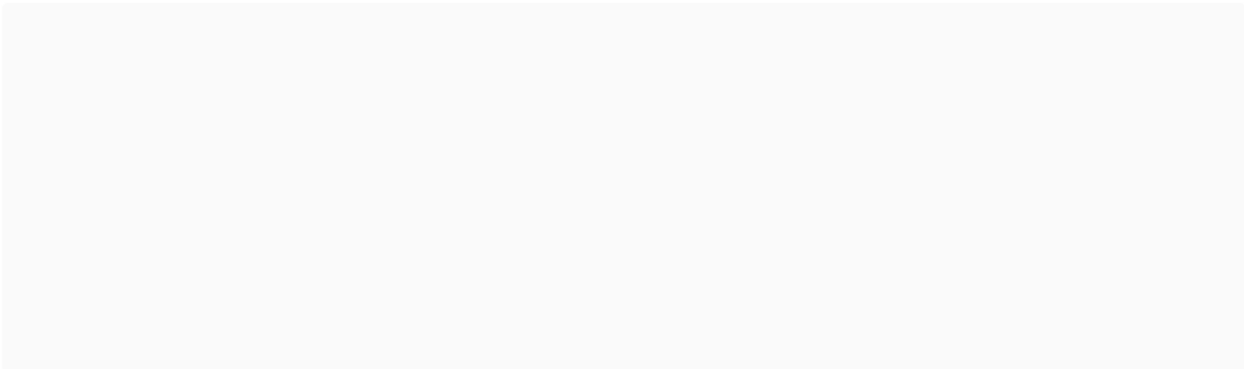


EXHIBIT E

Photographs of Respondent and Ms. Finegan

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Boebert changes stance on congressional...

The Grand Junction Daily Sentinel



8 Times Lauren Boebert's Killer Legs...

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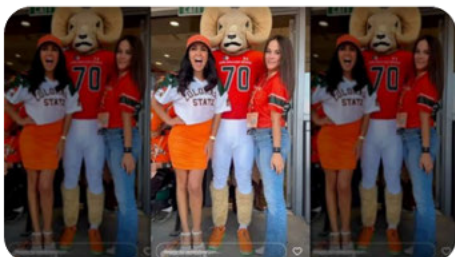
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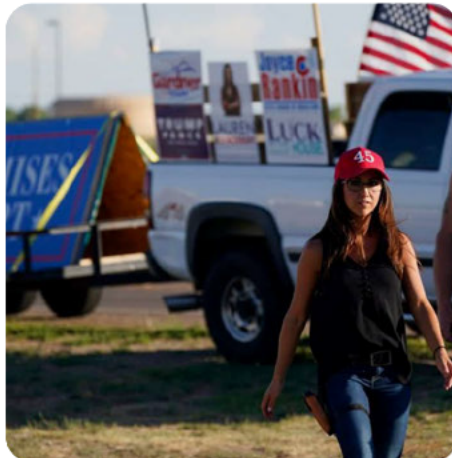
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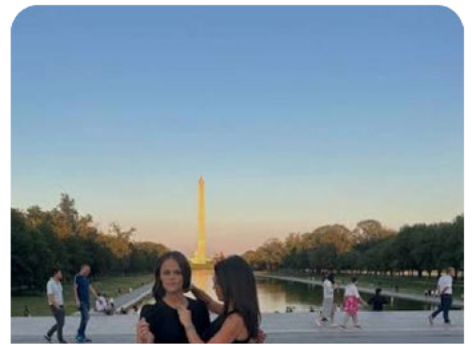
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