



BRADY HALL
LAW PLLC

June 5, 2026

VIA EMAIL

Shemia Fagan
HKM Employment Attorneys LLP
999 West Main Street, Suite 100
Boise, ID 83702

Re: Notice of Tort Claim - Rex Ingram

Dear Ms. Fagan,

The Idaho Counties Risk Management Program ("ICRMP") has retained this firm to represent the City of Caldwell in connection with the claims referenced in your May 28, 2026, Notice of Claim. Please accept this letter as an unconditional denial of Mr. Ingram's claims.

The Notice of Claim fails to identify any facts to establish liability against the City of Caldwell or any of its elected officials, officers, or employees. Although the notice broadly alleges "retaliation, defamation, threats, and harassment," it does not identify any specific conduct, statements, or actions that would support such claims. Nor does it identify any adverse employment action taken against Mr. Ingram who remains employed as the Chief of Police.

Should Mr. Ingram elect to file suit, the City of Caldwell and ICRMP are fully prepared to defend against his claims through trial. The City rejects the assertion that lawful personnel decisions, workplace expectations, or efforts to ensure government accountability constitute retaliation or otherwise give rise to liability. Nothing in Mr. Ingram's Notice of Claim relieves him of the obligation to comply with established policies, performance expectations, and professional standards. The City will continue to manage its workforce and conduct its operations in the best interests of the residents it serves.

Sincerely,

Brady Hall