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VIA EMAIL

Secretary of State
State of Idaho
PO Box 83720
Boise, ID 83720-0080
claims@sos.idaho.gov

Oscar Klaas
City Attorney
205 S 6th Ave
Caldwell, ID 83605
oklaas@cityofcaldwell.org

Kristina Buchan
City Clerk
205 S 6th Avenue
Caldwell, ID 83605
kbuchan@cityofcaldwell.org

Re: Ingram v. City of Caldwell

NOTICE OF TORT CLAIM PURSUANT TO TITLE 6, CHAPTER 9, IDAHO CODE

Notice: A claim for damages will be asserted against the City of Caldwell and the below named officers, employees, and agents of the City of Caldwell.

Claimant: Rex Ingram

Date of Injury: January 5th, 2026 through the present, and prior

Time: During business hours and beyond

Location: Caldwell, Idaho

Circumstances: Claimant has been damaged by the unlawful conduct of the City of Caldwell

and its officers and employees as outlined below.

Claimant's Mailing Address: HKM Employment Attorneys LLP
c/o Shemia Fagan
999 West Main Street, Suite 100
Boise, ID 83702

To Whom It May Concern:

This office represents Mr. Rex Ingram, the Chief of Police for the City of Caldwell, Idaho, in connection with claims for money damages he intends to pursue against the City of Caldwell and its officers and employees regarding the ongoing political retaliation, defamation, harassment, threats, interference with his employment rights, right under the Idaho and US. Constitution, §1983 and planned wrongful termination directed against him by city officials.

Mr. Ingram hereby places the City of Caldwell (herein “the City”), and the City’s officers and employees on notice regarding his intent to file claims for money damages, injunctive relief, and equitable remedies, including but not limited to the following legal theories: wrongful termination in violation of Idaho public policy, defamation, intentional infliction of emotional distress, retaliation, and related violations of Idaho and federal law.

Factual Allegations

Mr. Ingram has served as Chief of Police for the City of Caldwell. He has been subjected to an extensive and ongoing campaign of political retaliation, harassment, defamation, and intimidation originating from conflicts with the city mayor and other city officials, with efforts to force his resignation and ultimately to terminate his employment.

In November 2025, a voice memo of Caldwell Mayor-Elect Eric Phillips surfaced in which Phillips discussed plans to terminate Mr. Ingram once Phillips took office on January 5, 2026. The leaked memo was widely reported by local media outlets and prompted public controversy. Mr. Ingram characterized the memo as troubling and stated his intent to continue leading the Caldwell Police Department.

Mr. Ingram has been subjected to a sustained campaign of political harassment, threats, and defamatory conduct by city officials over an extended period. City officials have engaged in efforts to intimidate Mr. Ingram and force his resignation through improper means, including utilizing city resources and positions of authority to orchestrate a coordinated effort against him. Mr. Ingram has filed claims, including claims under the Family and Medical Leave Act, to preserve his rights arising from this conduct.

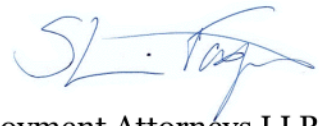
The persons involved in the conduct described herein include, but are not limited to, Mayor Eric Phillips and other officers and employees of the City of Caldwell whose identities are known to the City and are being further identified through ongoing investigation.

The City's unlawful conduct has caused and continues to cause Mr. Ingram to suffer significant economic and noneconomic damages. By orchestrating and permitting a sustained campaign of political retaliation, defamation, threats, and harassment against Mr. Ingram, and by threatening and planning his wrongful termination, the City and its officers have violated Idaho law and federal law. The City's conduct entitles Mr. Ingram to damages, including economic damages for past and future lost wages and benefits, noneconomic damages for emotional distress, reputational harm, humiliation, anxiety, loss of enjoyment of life, pain and suffering, and personal indignity, and attorneys' fees and costs. Mr. Ingram's wages with the City were \$135,404.08 in 2023. The total amount of this claim, including all economic and noneconomic damages and attorneys' fees, exceeds \$500,000 is to be determined based on the full scope of the City's liability; Mr. Ingram reserves the right to supplement this claim as additional facts are developed through investigation.

Statement of Residence

Pursuant to Idaho Code Section 6-907, Mr. Ingram states that his actual residence at the time of presenting and filing this claim, and for a period of six (6) months immediately prior to the time the claims described herein arose, has been [REDACTED]

Shemia Fagan



HKM Employment Attorneys LLP
Attorneys for Rex Ingram

CC: Rex Ingram