



KIRTLAN G. NAYLOR

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Of Counsel
Kirtlan G. Naylor
Roger J. Hales

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Robert G. Hamlin

October 26, 2023

Sent Via Email: Carl Ericson (carlton.ericson@canyoncounty.id.gov)

Carlton Ericson
Chief Deputy – Civil Division
Canyon County Prosecuting Attorney's Office
1115 Albany Street
Caldwell, Idaho 83605

Re: Investigation Engagement Letter – Canyon County

THIS COMMUNICATION IS PROTECTED BY ATTORNEY WORK PRODUCT

Dear Carl:

By signing and dating below, this letter serves as the engagement Kirtlan Naylor of the law firm of Naylor & Hales, P.C. to conduct a fact-finding investigation on behalf of Canyon County ("the County"). No retainer payment will be required in this regard. The scope of investigation includes all matters relating to certain Canyon County employment issues as to the working environment as identified by the County, as well as additional investigative services, if requested by it.

The County will be billed at an hourly rate of \$250 for all work conducted, including but not limited to, preparing and conducting interviews and reports, participating in meetings relating to the investigation and its findings, preparing responses to discovery, and testifying on matters relating to the investigation. The County will also be billed for reimbursement of all reasonable and necessary business expenses incurred as a result of the work performed, including but not limited to mileage, hotel, meals, parking fees, postage, printing costs and expert fees. My travel time will be charged at the hourly rate, plus expenses.

The investigation will be subject to the Attorney Work Product Privilege in that the Civil Chief Deputy Carlton Ericson, on behalf of the Canyon County Prosecuting Attorney and as attorney for the Canyon County Board of County Commissioners, will be the direct contact for me

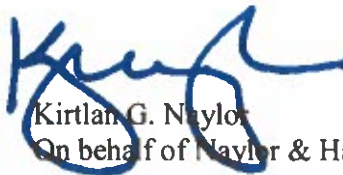
Carlton Ericson
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on behalf of the County concerning the scope of the investigation. Any report provided by this firm, together with supporting documentation or interviews, will be kept confidential by this firm, except as directed or authorized by Mr. Ericson or his designee, to the extent such direction is consistent with applicable law, rules, or court order.

Billing for services and reimbursement as described above will be submitted via email to Mr. Ericson on a monthly basis, generally by the 5th day of each month. Payment in full is due within thirty (30) days of receipt of invoice.

Please sign and date below and return to the undersigned via email.

Sincerely,



Kirtlan G. Naylor
On behalf of Naylor & Hales, P.C.

Dated:

October 27, 2023

Signed:





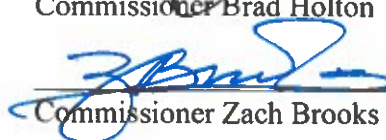
Carlton R. Ericson, Chief Civil Deputy
Canyon County Prosecuting Attorney's Office

ACCEPTANCE OF INVESTIGATIVE ENGAGEMENT LETTER
WITH KIRTLAN NAYLOR


DATED this 30 day of Oct., 2023.

CANYON COUNTY BOARD OF COMMISSIONERS

- ☒ Motion Carried Unanimously
☐ Motion Carried/Split Vote Below
☐ Motion Defeated/Split Vote Below

		Yes	No	Did Not Vote
 Commissioner Leslie Van Beek	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Commissioner Brad Holton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
 Commissioner Zach Brooks	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ATTEST: CHRIS YAMAMOTO, CLERK

By: 
Deputy Clerk