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U.S. COURTS

OCT 11 2023

Rcvd _____ Filed _____ Time _____
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CLERK, DISTRICT OF IDAHO

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WASHINGTON, DISTRICT OF COLUMBIA 20530

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN A. BENDAWALD,

Defendant.

Case No.

CR 23-0281 :S DCN

INDICTMENT

18 U.S.C. § 242

18 U.S.C. § 666(a)(1)(B)

The Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. RYAN A. BENDAWALD was a Police Officer employed by the City of Caldwell Police Department (“CPD”) in Caldwell, Idaho. BENDAWALD was a member of CPD’s Street Crimes Unit. In or about 2019, CPD promoted BENDAWALD to the rank of Sergeant.
2. As a CPD officer, BENDAWALD was an agent of the City of Caldwell.
3. During the calendar years of 2018, 2019, 2020, and 2021, the City of Caldwell received more than \$10,000 annually in benefits from the United States government under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other forms of assistance.
4. Under Idaho state law, Heroin is a Schedule I narcotic, and Methamphetamine is a Schedule II narcotic. A conviction under Idaho state law for possession of a Schedule I or Schedule II narcotic has a maximum fine penalty of \$15,000.
5. Under Idaho state law, a conviction for Unlawful Possession of a Firearm has a maximum fine penalty of \$5,000. Under federal law, a conviction for Unlawful Possession of a Firearm or Ammunition has a maximum fine penalty of \$250,000.
6. From at least in or about 2017 through in or about 2021, BENDAWALD abused his position as a law enforcement officer to engage in unlawful sexual conduct with at least seven (7) members of the public through bribery and sexual assault.

COUNT ONE
(Deprivation of Rights Under Color of Law)
18 U.S.C. § 242

7. The factual allegations in paragraphs 1 through 6 are incorporated herein.
8. In or about July 2017, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while acting under color of law, used his fingers to penetrate Victim 1’s vagina following a traffic stop, willfully depriving her of the rights, secured and protected by the Constitution and

laws of the United States, specifically the Fourteenth and Fourth Amendments to the Constitution of the United States, to be free from sexually motivated physical assaults and unreasonable intrusions on ones bodily integrity. The offense involved aggravated sexual abuse and attempted aggravated sexual abuse.

All of which is in violation of Title 18 United States Code, Section 242.

COUNT TWO
(Federal Program Bribery)
18 U.S.C. § 666(a)(1)(B)

9. The factual allegations in paragraphs 1 through 6 are incorporated herein.
10. On or about December 3, 2018, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while a CPD Police Officer, and being an agent of Caldwell, Idaho, did knowingly and corruptly solicit, demand, accept, and agree to accept anything of value from Victim 2, that is sex and sexual favors, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of the City of Caldwell involving something of value of \$5,000 or more, that is, the arrest of and recommendation to criminally charge Victim 2 for possession of heroin and methamphetamine.

All of which is in violation of Title 18 United States Code, Section 666.

COUNT THREE
(Deprivation of Rights Under Color of Law)
18 U.S.C. § 242

11. The factual allegations in paragraphs 1 through 6 are incorporated herein.
12. On or about June 28, 2019, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while acting under color of law, touched Victim 3's genitals under her clothing without Victim 3's consent and without a legitimate law enforcement purpose, willfully depriving her of the rights, secured and protected by the Constitution and laws of the United

States, specifically the Fourth Amendment to the Constitution of the United States, to be free from unreasonable intrusions on ones bodily integrity.

All of which is in violation of Title 18 United States Code, Section 242.

COUNT FOUR
(Federal Program Bribery)
18 U.S.C. § 666(a)(1)(B)

13. The factual allegations in paragraphs 1 through 6 are incorporated herein.
14. On or about February 15, 2020, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while a CPD Police Officer, and being an agent of Caldwell, Idaho, did knowingly and corruptly solicit and demand anything of value from Victim 4, that is sex and sexual favors, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of the City of Caldwell involving something of value of \$5,000 or more, that is, the arrest of and recommendation to criminally charge Victim 4 for unlawful possession of ammunition.

All of which is in violation of Title 18 United States Code, Section 666.

COUNT FIVE
(Federal Program Bribery)
18 U.S.C. § 666(a)(1)(B)

15. The factual allegations in paragraphs 1 through 6 are incorporated herein.
16. On or about March 12, 2021, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while a CPD Police Officer, and being an agent of Caldwell, Idaho, did knowingly and corruptly solicit and demand anything of value from Victim 5, that is sex and sexual favors, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of the City of Caldwell involving something of value of

\$5,000 or more, that is, the recommendation to criminally charge Victim 5 for possession of heroin.

COUNT SIX
(Federal Program Bribery)
18 U.S.C. § 666(a)(1)(B)

17. The factual allegations in paragraphs 1 through 6 are incorporated herein.

18. On or about April 16, 2021, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while a CPD Police Officer, and being an agent of Caldwell, Idaho, did knowingly and corruptly solicit, demand, accept, and agree to accept anything of value from Victim 6, that is sex and sexual favors, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of the City of Caldwell involving something of value of \$5,000 or more, that is, the recommendation to criminally charge Victim 6 for possession of methamphetamine and unlawful possession of a firearm.

All of which is in violation of Title 18 United States Code, Section 666.

COUNT SEVEN
(Federal Program Bribery)
18 U.S.C. § 666(a)(1)(B)

19. The factual allegations in paragraphs 1 through 6 are incorporated herein.

20. On or about March 11, 2021, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while a CPD Police Officer, and being an agent of Caldwell, Idaho, did knowingly and corruptly solicit and demand anything of value from Victim 7, that is sex and sexual favors, intending to be influenced and rewarded in connection with any business, transaction, and series of transactions of the City of Caldwell involving something of value of \$5,000 or more, that is, the arrest of and recommendation to criminally charge Victim 7 for possession of methamphetamine.

COUNT EIGHT
(Deprivation of Rights Under Color of Law)
18 U.S.C. § 242

21. The factual allegations in paragraphs 1 through 6 are incorporated herein.
22. On or about March 11, 2021, in the District of Idaho, the defendant, RYAN A. BENDAWALD, while acting under color of law, used his penis to penetrate Victim 7's anus following a traffic stop, willfully depriving her of the rights, secured and protected by the Constitution and laws of the United States, specifically the Fourteenth and Fourth Amendments to the Constitution of the United States, to be free from sexually motivated physical assaults and unreasonable intrusions on ones bodily integrity. The offense involved aggravated sexual abuse and attempted aggravated sexual abuse and resulted in bodily injury to Victim 7.

All of which is in violation of Title 18 United States Code, Section 242.

Dated this 11th day of October, 2023.

A TRUE BILL

/s/ [signature on reverse]

FOREPERSON

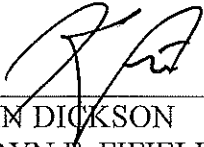
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10/11/23
U.S. DEPARTMENT OF JUSTICE
PUBLIC INTEGRITY SECTION