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IN THE DISTRICT COURT OF THE THIRD JUDICIAL DISTRICT OF THE STATE OF
IDAHO, IN AND FOR THE COUNTY OF PAYETTE

STATE OF IDAHO

Plaintiff,

vs.

STACEY JAMES WONDRA,
Defendant.

Case No. CR38-25-1295

REQUEST FOR DISCOVERY

TO: THE STATE OF IDAHO, Plaintiff, and Payette County Prosecutor:

PLEASE TAKE NOTICE, that the undersigned, pursuant to ICR 16, requests discovery and photocopies of the following information, evidence, and materials:

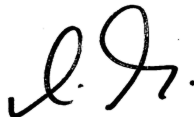
- 1) **PLEASE TAKE NOTICE**, that the undersigned, pursuant to ICR 16, requests discovery and photocopies of the following information, evidence, and materials: **Mandatory Disclosure:** All **unredacted** material or information within the prosecutor's possession or control, or which thereafter comes into his possession or control, which tends to negate the guilt of the accused or tends to reduce the punishment therefore including any material and information in the possession or control of members of the prosecuting Attorney's staff and of any others who have participated in the investigation or evaluation of the case who either regularly report, or have reported in that case, to the office of the prosecuting attorney. ICR 16(a).
- 2) **Statement of Defendant:** Any **unredacted**, relevant written or recorded statements made by the defendant, or copies thereof, within the possession, custody or control of the state, the existence of which is known or is available to the prosecuting attorney by the exercise of due diligence; and also the substance of any relevant, oral statement made by

the defendant whether before or after arrest to a peace officer, prosecuting attorney or the prosecuting attorney's agent; and the recorded testimony of the defendant before a grand jury which relates to the offense charged.

- 3) **Statement of Codefendant:** Any **unredacted** written or recorded statements of a co-defendant and the substance of any relevant oral statement made by a co-defendant, whether before or after arrest, in response to interrogation by any person known by the co-defendant to be a peace officer or agent of the prosecuting attorney;
- 4) **Defendant's Prior Record:** Any prior criminal record of the defendant, if any.
- 5) **Documents and Tangible Objects:** All **unredacted** documents and tangible objects as defined by ICR 16(b)(4) in the possession or control of the prosecutor, which are material to the defense, intended for use by the prosecutor or obtained from or belonging to the defendant.
- 6) **Reports of Examinations and Tests:** All reports of physical or mental examinations and of scientific tests or experiments made in connection with this matter within the possession, control, or knowledge of the prosecutor, the existence of which is known or is available to the prosecutor by the exercise of due diligence.
- 7) **State's Witnesses:** A written list of the names, addresses of all persons having knowledge of relevant facts who may be called by the State as witnesses at the trial together with any records of prior felony convictions, and written or recorded statements of all persons having knowledge of facts of the case known to the prosecutor and his agents or any official involved in the investigatory process of the case.
- 8) **Expert Witnesses:** A written summary or report of any testimony that the state intends to introduce pursuant to rules 702, 703, or 705 of the Idaho Rules of Evidence at trial or hearing; including the witness' opinions, the facts and data for those opinions, and the witness' qualifications. Disclosure of any expert opinions regarding mental health must also comply with the requirements of Idaho Code Section 18-207. All disclosures shall comply with State v. Morin, 158 Idaho 622, 349 P.3d 1213 (Ct.App.2015).
- 9) **Police Reports:** All reports or memoranda made by police officers or investigators in connection with the investigation or prosecution of the case, including what are commonly referred to as "ticket notes."
- 10) **Digital Media Recordings:** Any and all **unredacted** audio and/or video recordings made by law enforcement officials or investigators, or members of the prosecutor's office during the course of their investigation.
 - a. Any **redacted** media must contain a written explanation of the information that was redacted and defense counsel understands that it may allow the defendant to view and retain a copy of any media that is redacted by the prosecuting attorney.

The undersigned further requests written compliance within 14 days of service of the within instrument pursuant to ICR 16.

DATED this 17th day of November, 2025.



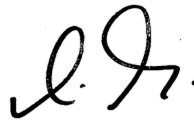
Isaiah L. Govia
Attorney for Defendant

CERTIFICATE OF SERVICE

I certify that on this 18th day of November, 2025, I electronically filed the foregoing REQUEST FOR DISCOVERY with the Clerk of the Court using the iCourt e-file system, which caused the following parties or counsel to be served by electronic means:

Payette County Prosecutor
1115 1st Ave. North
Payette, Idaho 83661
prosecutingattorney@payettecounty.org

☐ U.S. Mail
☐ Facsimile
☐ Hand Delivery
☒ eFile



State Public Defender's Office