UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	**CRIMINAL NO: 14-105**
v.	*	**SECTION: "H"**
	*	
LINDSEY DOOLEY	*	

* * *

FACTUAL BASIS

If this case were to proceed to trial, the Government would prove the Defendant, **LINDSEY DOOLEY**, guilty beyond a reasonable doubt. The Government would establish the following through reliable and competent evidence:

On May 8, 2013, at approximately 8:00pm, Jefferson Parish Sheriff's Office (JPSO) detectives conducted surveillance of Stephen Farrell who was driving a Chevrolet Suburban on Veteran Memorial Blvd. in Metairie, Louisiana. Detectives observed that the vehicle did not have a brake tag on the windshield. Detectives activated their emergency lights and siren to stop the vehicle for the traffic violation, but Farrell did not pull over. While driving behind Farrell, a detective observed him throw an unknown object out of the driver's side window. Farrell continued eastbound to the next U-turn and attempted to head westbound. Farrell then pulled over in the 3700 block of Veterans Memorial Blvd.

Due to Farrell's refusal to immediately stop and throwing the object out of the window, detectives removed him from the vehicle. At this time, detectives observed, in plain view, a piece of foil, consistent with the packaging of heroin, on the driver's seat. Farrell was handcuffed and advised of his *Miranda* rights. Farrell acknowledged that he understood his

rights. Detectives retrieved and opened the foil which contained an unknown tan substance which field-tested positive for heroin.

Detectives asked Farrell what he threw out of the vehicle. Farrell admitted that he had two (2) foils of heroin and thought he had thrown both foils out of the window. Detectives searched, but were unable to locate the other foil. Farrell was then placed under arrest. A search of the vehicle, incident to the arrest, revealed a black iPhone with a screensaver showing two handguns. Farrell later signed a form consented to the search of the cell phone. A criminal history check revealed that Farrell had been convicted of attempted armed robbery and purse snatching in 2007. Detectives asked Farrell if he would consent to search a search of his apartment for additional narcotics. Farrell advised that he would consent to a search of his apartment. Farrell was given a consent form which he read and signed.

JPSO detectives relocated to 705 Central Ave., Apt. 206, Metairie, Louisiana, and were greeted by Lindsey Dooley. Dooley advised detectives that she was Farrell's girlfriend and invited detectives inside the apartment. Detectives advised Dooley of the investigation and asked if she would consent to a search of apartment. Dooley consented to the search. Dooley then read and signed the consent form.

Detectives conducted a search of the apartment and found a digital scale and razorblade on the dresser in the bedroom. Detectives also found a Sentry Security Safe under the bed in the bedroom. Using a key from Farrell's keychain, detectives opened the safe and found: (1) a chrome and white Taurus International .380 caliber firearm, Model PT738, serial number DSH1291, loaded with six (6) Hornaday .380 caliber cartridges; (2) a box of Hornaday Critical Defense ammunition containing thirteen (13) .380 cartridges; and (3) a social security card in the name of Stephen Farrell. The firearm appeared to be similar to one of the firearms seen on

Farrell's iPhone screensaver. Detectives also searched the kitchen and found numerous pre-cut squares of aluminum foil hidden inside a cardboard roll of aluminum foil. The pre-cut aluminum foil squares were similar to the heroin-filled aluminum foil square that was found in Farrell's vehicle. Detectives questioned Farrell about the Taurus International .380 caliber firearm found under his bed and he admitted that he handled the firearm in the past. The contents of the foil found in Farrell's vehicle were tested by the Jefferson Parish Sherriff's Office Laboratory and tested positive for heroin. Further investigation revealed that the firearm had previously travelled in interstate commerce.

Lindsay Dooley admits that she actively concealed Farrell's distribution of a controlled substance from law enforcement by hiding the squares of aluminum foil inside the cardboard roll of aluminum foil. Lindsey Dooley admits that on or about May 8, 2013, she knew that Stephen Farrell was a heroin distributor. Dooley also admits that she knew that Farrell packaged heroin in the apartment located at 705 Central Ave. Dooley further knew that Farrell used the digital scale, razor blade and aluminum foil found in 705 Central Ave. as a part of his trade as a heroin distributor. Additionally, Dooley admits that Farrell regularly gave her heroin and she knew that Farrell sold heroin to other individuals. Furthermore, Lindsey Dooley admits that she did not report this felony offense to any person in civil or military authority of the United States.

11/20/14

NOLAN D. PAIGE (Date)
Assistant United States Attorney

11/20/14

SAMUEL J. SCILLITANI, JR. (Date)
Attorney for Defendant Dooley

11/20/14

LINDSEY DOOLEY (Date)
Defendant