

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JARED DANIELS,
also known as “Glo” and “Leo Carter,”
CRISTINE SERRANO,
also known as “Red,”
SHERNELL ANDERSON,
also known as “Nelly,”
LARRY LEMON,
also known as “Jason Johnson,” and
JONATHAN COLLINS,
also known as “Short,”

Violations: Title 21, United States
Code, Sections 841(a)(1) and 846;
Title 18, United States Code,
Sections 922(a)(1)(A), 922(g)(1),
and 922(o)

~~UNDER SEAL~~

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

1. Beginning no later than in or about January 2023 and continuing until at least in or about August 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”
CRISTINE SERRANO, a/k/a “Red,”
SHERNELL ANDERSON, a/k/a “Nelly,” and
LARRY LEMON, a/k/a “Jason Johnson,”

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, 400 grams or more of a mixture and

substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1);

In violation of Title 21, United States Code, Section 846.

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months' imprisonment.

3. Before LARRY LEMON committed the offense charged in this count, LARRY LEMON had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 05CR1509101, for which he served more than 12 months imprisonment.

COUNT TWO

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about January 23, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months’ imprisonment.

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about January 31, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months’ imprisonment.

COUNT FOUR

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about January 31, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Glock 23, .40 caliber pistol, bearing serial number BBZT142, with an installed Glock Conversion Device, also known as a “Glock switch”, which firearm had traveled in interstate and foreign commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about January 31, 2023, at Chicago, in the Northern District of Illinois,
Eastern Division,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, did knowingly possess and transfer a machinegun, as defined in Title 18, United States Code, Section 921(a)(24), and Title 26, United States Code, Section 5845(b), namely, a Glock 23, .40 caliber pistol, bearing serial number BBZT142 with an installed Glock Conversion Device, also known as a “Glock switch”;

In violation of Title 18, United States Code, Section 922(o).

COUNT SIX

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about January 4, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,” and
CRISTINE SERRANO, a/k/a “Red,”

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance, and 5 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months' imprisonment.

COUNT SEVEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about January 4, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LARRY LEMON, a/k/a “Jason Johnson,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 5 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before LARRY LEMON committed the offense charged in this count, LARRY LEMON had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 05CR1509101, for which he served more than 12 months imprisonment.

COUNT EIGHT

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about January 18, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,” and
CRISTINE SERRANO, a/k/a “Red,”

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months’ imprisonment.

COUNT NINE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about January 31, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

JONATHAN COLLINS, a/k/a “Short,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Century Arms, VSKA, 7.62x39mm rifle, with serial number SV7111079, and a BCI Defense, SQS15 5.56 caliber semi-automatic rifle, with serial number SQS1339, which firearms had traveled in interstate commerce prior to defendant’s possession of the firearms;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about February 26, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a Glock 44, .22 caliber semi-automatic pistol, bearing serial number AGZG666, with an installed Glock Conversion Device, also known as a “Glock switch”, which firearm had traveled in interstate commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT ELEVEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about February 26, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, did knowingly possess and transfer a machinegun, as defined in Title 18, United States Code, Section 921(a)(24), and Title 26, United States Code, Section 5845(b), a Glock 44, .22 caliber semi-automatic pistol, bearing serial number AGZG666, with an installed Glock Conversion Device, also known as a “Glock switch”;

In violation of Title 18, United States Code, Section 922(o).

COUNT TWELVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about March 27, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,” and
CRISTINE SERRANO, a/k/a “Red,”

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance, and a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months' imprisonment.

COUNT THIRTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about March 27, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Glock 17, 9mm semi-automatic pistol, bearing serial number BTWF655, with an installed Glock Conversion Device, also known as a “Glock switch”, which firearm had traveled in interstate and foreign commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about May 16, 2024, at Chicago, in the Northern District of Illinois,
Eastern Division,

CRISTINE SERRANO, a/k/a “Red,”

defendant herein, knowing that she had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a Springfield Armory USA XD-40, .40 caliber semi-automatic pistol, bearing serial number XD470389, which firearm had traveled in interstate and foreign commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIFTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

From in or around January 2023, and continuing until in or around August 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,”

defendant herein, not being a licensed dealer within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms;

In violation of Title 18, United States Code, Section 922(a)(1)(A).

COUNT SIXTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about June 27, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,” and
SHERNELL ANDERSON, a/k/a “Nelly,”

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months’ imprisonment.

COUNT SEVENTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

3. On or about June 27, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LARRY LEMON, a/k/a “Jason Johnson,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 50 grams or more of methamphetamine (actual), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

4. Before LARRY LEMON committed the offense charged in this count, LARRY LEMON had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 05CR1509101, for which he served more than 12 months imprisonment.

COUNT EIGHTEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about August 1, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JARED DANIELS, a/k/a “Glo” and “Leo Carter,” and
SHERNELL ANDERSON, a/k/a “Nelly,”

defendants herein, did knowingly and intentionally distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

2. Before JARED DANIELS committed the offense charged in this count, JARED DANIELS had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 09CR0891401, for which he served more than 12 months’ imprisonment.

COUNT NINETEEN

The SPECIAL JUNE 2024 GRAND JURY further charges:

1. On or about August 1, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

LARRY LEMON, a/k/a “Jason Johnson,”

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperindinyl] propanamide), a Schedule II Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

2. Before LARRY LEMON committed the offense charged in this count, LARRY LEMON had a final conviction for a serious violent felony, namely, a conviction for armed robbery, in violation of 720 ILCS 5/18-2(a), in the Circuit Court of Cook County, Illinois, Case No. 05CR1509101, for which he served more than 12 months imprisonment.

FORFEITURE ALLEGATION

The SPECIAL JUNE 2024 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, as set forth in this Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

2. The property to be forfeited includes, but is not limited to, a money judgment.

3. If any of the property described above, as a result of any act or omission by defendants: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

Andrew C. Erskine on behalf of the
UNITED STATES ATTORNEY