



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EDP:KPO/LM  
F. #2024R00152/NY-NYE-0966

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March 27, 2026

By ECF and E-mail

Honorable James R. Cho  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Elkin Armando Alomia Quinones, et al.  
Criminal Docket No. 24-462 (EK)

Dear Judge Cho:

The government respectfully submits this letter in support of its request for a permanent order of detention against the defendants Elkin Armando ALOMIA QUIÑONES, alias "Elkin Armando Alomia Quinones," "Elkin Armando Almonia Quinones," and "Elkin Alomia" (ALOMIA QUIÑONES), Luis Alberto ARBOLEDA ESCOBAR, alias "Lucho" and "Luis Arboleda" (ARBOLEDA ESCOBAR), Diego Luis OBREGON AGUIRRE, alias "Diego Luis" (OBREGON AGUIRRE), Edwin OBREGON CASTRO, alias "Edwin Obregon" (E. OBREGON CASTRO), Juan Matias OBREGON CASTRO, alias "Mauricio" and "Matias Obregon" (J. OBREGON CASTRO), Rodrigo OBREGON SAAVEDRA, alias "Don Ricky" (OBREGON SAAVEDRA), and Narjel PAREDES, alias "Nacho" (PAREDES). The defendants were extradited from Colombia on March 26, 2026, and will have an initial appearance before Your Honor on March 27, 2026, in the Eastern District of New York.

For the reasons set forth below, the Court should enter a permanent order of detention pending trial, as no condition or combination of conditions of release can assure the safety of the public or the defendants' appearances at trial, and the government respectfully submits that the Court should therefore enter a permanent order of detention pursuant to Title 18, United States Code, Section 3142(e).

I. Background

On November 13, 2024, a grand jury sitting in the Eastern District of New York returned an four-count Indictment charging the defendants, along with another co-conspirator,<sup>1</sup> with: (1) Conspiracy to Violate the Maritime Drug Law Enforcement Act (“MDLEA”), in violation of Title 46, United States Code, Sections 70506(b), 70506(a), 70503(b) and 70504(b)(2), and Title 21, United States Code, Section 960(b)(1)(B)(ii) (Count One); (2) International Cocaine Distribution Conspiracy, in violation of Title 21, United States Code, Sections 963, 960(b)(1)(B)(ii) and 959(d) (Count Two); and two substantive counts of violating the MDLEA, in violation of in violation of Title 46, United States Code, Sections 70503(a)(1), 70506(a), 70503(b) and 70504(b)(2), and Title 21, United States Code, Section 960(b)(1)(B)(ii) (Counts Three and Four).

All seven defendants appearing today were charged in Counts One and Two of the Indictment. The Indictment also charges ALOMIA QUIÑONES, OBREGON AGUIRRE, E. OBREGON CASTRO, J. OBREGON CASTRO, and PAREDES in Count Three, and ARBOLEDA ESCOBAR, OBREGON AGUIRRE, E. OBREGON CASTRO, J. OBREGON CASTRO, OBREGON SAAVEDRA, and PAREDES in Count Four.

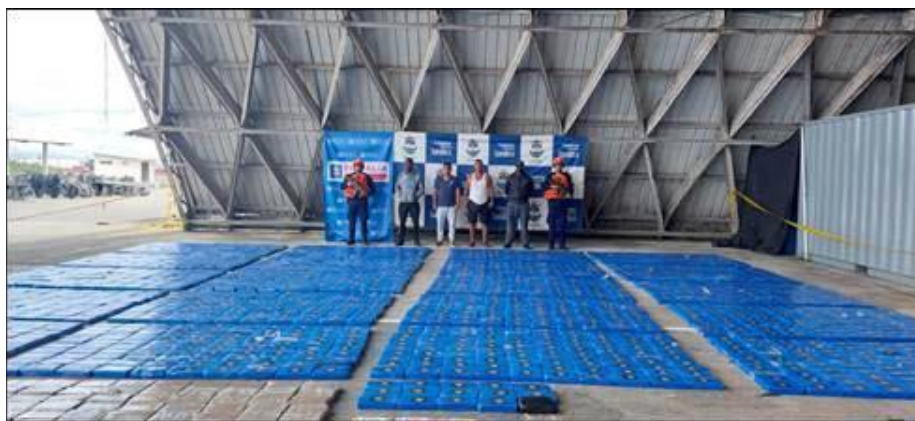
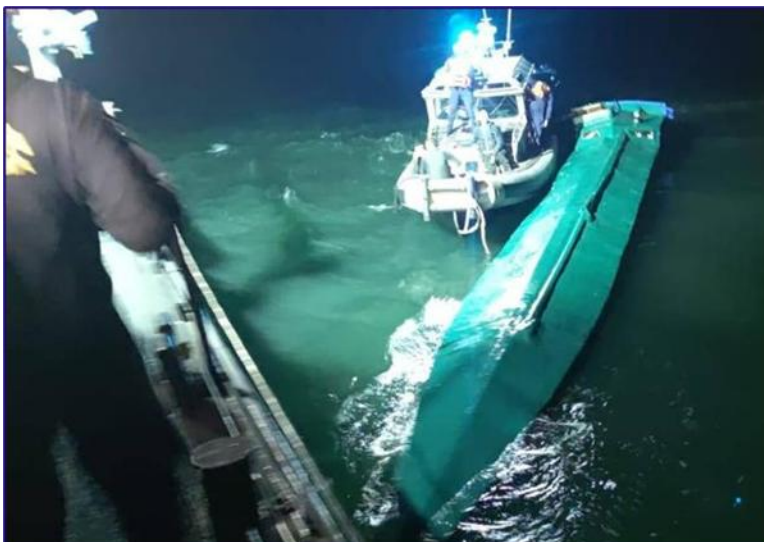
A. Offense Conduct

These charges stem from the defendants’ involvement in a sophisticated international drug trafficking organization (“DTO”) which conspired to traffic more than 5,000 kilograms in self-propelled semi-submersible vessels launched from the Pacific coast of Colombia towards areas controlled by the Sinaloa Cartel in Mexico. The DTO conducted a sophisticated maritime drug distribution operation consisting of multiple inter-connected phases. First, members of the conspiracy sought investors to finance multi-ton cocaine loads, including financing the construction of the semi-submersible vessels and payments to crew members and co-conspirators. Then, members of the conspiracy built and hired engineers and workers to assist in building self-propelled semi-submersible vessels capable of carrying thousands of kilograms of cocaine. They also hired crew members to transport the narcotics in the vessels. Before launching the cocaine-laden vessels members of the conspiracy conducted countersurveillance on the high seas by strategically positioning fishing vessels on the same routes.

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<sup>1</sup> The charged co-conspirator is in custody in a foreign country, pending extradition to the United States.

On June 27 2023, the Colombian Navy seized approximately 2,312 kilograms of cocaine from a DTO semi-submersible vessel near the Colombian Pacific coast, which, based on a coordinate chart located aboard the vessel, was en route to Mexico (pictured below).



On October 7, 2023, the Colombian Navy seized approximately 3,300 kilograms of cocaine from another DTO semi-submersible vessel near the Colombian Pacific coast, which was en route to Mexico (pictured below).





B. The Defendants' Roles and Backgrounds

1. JUAN MATIAS OBREGÓN CASTRO, aka, "Mauricio" ("MAURICIO")

Mauricio is a Colombian citizen who served as one of the leaders of the DTO. Evidence shows that he was in charge of coordinating and overseeing each "project" (launch) including seeking financial support from investors to hiring and coordinating with other co-conspirators to assist in the conspiracy. Prior to the June 2023 seizure, Mauricio gave instructions for how the crewmembers should outfit the semi-submersible and provided a list of items for the crew members to buy for the journey, including a compass. Mauricio also provided instructions about the countersurveillance fishing vessels to other members of the DTO then, after the June 2023 seizure, discussed the public reporting of the seizure.

2. DIEGO LUIS OBREGÓN AGUIRRE ("DIEGO"), alias, "El Capi"

Diego is a Colombian citizen who served as one of the leaders of the DTO. Evidence shows that he was in charge of coordinating and overseeing each "project" (launch) including seeking financial support from investors to hiring and coordinating with other co-conspirators to assist in the conspiracy. Prior to the June 2023 seizure, Diego asked co-defendant Rengifo to organize crewmembers before the June 2023 voyage. Diego and Mauricio also discussed how the cocaine would be loaded onto the semi-submersible and discussed increasing the size of the semi-submersible to fit additional cocaine.

3. ELKIN ARMANDO ALMONIA QUIÑONES ("ELKIN")

Elkin is a Colombian citizen who coordinated the transportation of cocaine across Colombia and facilitated logistics for building and operating the semi-submersible vessels. Evidence shows that he acquired items to build the semi-submersible and, following the June 2023 seizure, discussed it with his co-defendants.

4. EDWIN OBREGÓN CASTRO ("EDWIN")

Edwin is a Colombian citizen who coordinated countersurveillance operations to monitor the presence of law enforcement in the route of the semi-submersible vessels. He

strategically placed seemingly legal fishing vessels on the high seas to monitor the presence of law enforcement in the area prior to both seizures.

5. NARJEL PAREDES, aka, “Nacho” (“NACHO”)

Nacho is a Colombian citizen who worked with Edwin to coordinate countersurveillance operations to monitor the presence of law enforcement in the route of the semi-submersible vessels. He also spoke with a co-conspirator to purchase supplies for the crewmembers on the semi-submersible prior to the October 2023 seizure.

In 2000, NACHO was convicted in Middle District of Florida for conspiring to possess with intent to distribute 5 kilograms or more of cocaine while on board a vessel subject to the jurisdiction of the United States, in violation of Title 46, U.S.C., Section 103(g). NACHO’s conviction stemmed from his role in conspiring to transport approximately 2,000 kilograms of cocaine in a semisubmersible vessel. He was sentenced to 135 months’ imprisonment.

6. RODRIGO OBREGÓN SAAVEDRA, aka, “Don Ricky” (“DON RICKY”)

Don Ricky is a Colombian citizen who oversaw the construction of one of the semi-submersible vessels used to transport cocaine which was seized in October 2023. He also owned a fishing vessel that was strategically positioned to monitor law enforcement presence on the seas. He also spoke with a co-conspirator to purchase supplies for the crewmembers on the semi-submersible prior to the October 2023 seizure.

7. LUIS ALBERTO ARBOLEDA ESCOBAR, aka, “Lucho” (“LUCHO”)

Lucho is a Colombian citizen who assisted in the construction of one of the semi-submersible vessels used to transport cocaine which was seized in October 2023. Together with Don Ricky, he traveled to the semi-submersible construction site and provided updates to Mauricio after the semi-submersible was built.

II. Legal Standard

In deciding whether to release or detain a defendant, a court “must undertake a two-step inquiry.” United States v. Friedman, 837 F.2d 48, 49 (2d Cir. 1988). “It must first determine by a preponderance of the evidence that the defendant either has been charged with one of the crimes enumerated in Section 3142(f)(1) or that the defendant presents a risk of flight or obstruction of justice.” Id. (citation omitted). “Once this determination has been made, the court turns to whether any condition or combinations of conditions of release will protect the safety of the community and reasonably assure the defendant’s appearance at trial.” Id.

The government may proceed by proffer to establish facts relevant to a detention determination. United States v. Ferranti, 66 F.3d 540, 541 (2d Cir. 1995). Furthermore, “[t]he explained:

[I]n the pre-trial context, few detention hearings involve live testimony or cross examination. Most proceed on proffers. See United States v. LaFontaine, 210 F.3d 125, 131 (2d Cir. 2000). This

is because bail hearings are “typically informal affairs, not substitutes for trial or discovery.” United States v. Acevedo-Ramos, 755 F.2d 203, 206 (1st Cir. 1985) (Breyer, J.) (quoted approvingly in LaFontaine, 210 F.3d at 131). Indeed, § 3142(f)(2)(B) expressly states that the Federal Rules of Evidence do not apply at bail hearings; thus, courts often base detention decisions on hearsay evidence. Id.

United States v. Abuhamra, 389 F.3d 309, 320 n.7 (2d Cir. 2004).

The Bail Reform Act lists four factors to be considered in the detention analysis: (1) the nature and circumstances of the crimes charged, including whether the offense involved a controlled substance or a firearm; (2) the weight of the evidence against the defendant; (3) the history and characteristics of the defendant; and (4) the seriousness of the danger posed by the defendant’s release. See 18 U.S.C. § 3142(g). In evaluating dangerousness, courts consider not only the effect of a defendant’s release on the safety of identifiable individuals, such as victims and witnesses, but also “the danger that the defendant might engage in criminal activity to the detriment of the community.” United States v. Millan, 4 F.3d 1038, 1048 (2d Cir. 1993) (quoting legislative history).

### III. A Presumption of Detention Applies

This case involves offenses for which there is a presumption that no condition or combination of conditions will reasonably assure the defendant’s appearance or the safety of the community. See 18 U.S.C. § 3142(e)(3). Specifically, because the defendant is charged with multiple counts under Title 46 (Maritime Drug Law Enforcement) for which the maximum term of imprisonment is life, and, based on the quantities of cocaine seized, the defendants may be facing a mandatory minimum sentence of ten years, they are each presumed to pose a danger to the community and a risk of flight. Accordingly, the defendants each bear the initial burden of showing that he is not a danger to the community or a flight risk. For the reasons set forth below, no defendant cannot sustain that burden.

### IV. The Defendants Are Dangers to the Community

The facts and circumstances of this case compel the defendants’ detention, as the relevant Bail Reform Act factors show that he poses a significant danger to the community.

The counts with which the defendants are all charged—connected to trafficking enormous quantities of cocaine using semi-submersibles and conspiring to do so—are extremely serious. The substantive counts carry a mandatory minimum sentences of ten years’ imprisonment. See 46 U.S.C. § 70506 and 960(b)(1)(B)(ii). The seriousness of the charges against the defendants reflect their important roles in financing and building semi-submersible vessels then seeking to traffic thousands of kilograms of cocaine from Colombia through the Pacific Ocean. Defendants Mauricio and Deigo served as leaders of the trafficking organization, overseeing building and launching the semi-submersibles. Elkin assisted in preparing the semi-submersibles for their voyages. Edward and Nacho both coordinated countersurveillance using fishing vessels, to attempt to conceal or protect the semi-submersibles. Don Ricky and Lucho

assisted with constructing the semi-submersibles. The nature of their criminal conduct demonstrates that the defendants are all dangers to the community, and no combination of bail conditions can adequately protect the community from the defendants.

V. The Defendants Pose a Significant Risk of Flight and Should be Detained Pending Trial

The defendants are charged with serious crimes, facing a mandatory minimum sentence of ten years' imprisonment for the substantive charges.

First, as set forth above, the defendants' crimes are serious. Together, the defendants worked as part of a drug trafficking organization to traffic more than 5,000 kilograms of cocaine hidden in semi-submersibles with routes planned through the Pacific Ocean towards Mexico.

Second, the defendants face severe penalties if convicted at trial. "The prospect of a severe sentence can create a strong incentive for a defendant to flee and thereby avoid that sentence." United States v. Zhang, 55 F.4th 141, 151 (2d Cir. 2022). Here, if the defendants are convicted at trial, they each face a mandatory minimum sentence of at ten years' imprisonment.

Third, the evidence of the defendants' guilt is strong. The indictment follows a long-term investigation which included seizures of the actual narcotics and evidence from the semi-submersibles as well as lawfully obtained recordings of conversations among and between the defendant and his co-conspirators as they planned and executed their conspiracy. Where the weight of evidence is strong, "it follows that the defendant faces an elevated risk of conviction (and of the attendant punishment), and therefore may present an elevated risk of flight." Id.; United States v. Sabhnani, 493 F.3d 63, 76 (2d Cir. 2007) (finding detention appropriate because, in part, "the evidence of [the defendants'] guilt, both direct and circumstantial, appears strong"); United States v. Bruno, 89 F. Supp. 3d 425, 431 (E.D.N.Y. 2015) ("When evidence of a defendant's guilt is strong, and when the sentence of imprisonment upon conviction is likely to be long a defendant has stronger motives to flee.").

Fourth, the defendants have no ties to this community. The defendants are all citizens of Colombia who were arrested in Colombia and extradited to the United States. Each has strong, continuing ties abroad, which demonstrate each defendants' ability to flee and the significant risk that they will do so. See, e.g., United States v. Zarrab, No. 15-CR-867 (RMB), 2016 WL 3681423, at \*8 (S.D.N.Y. June 16, 2016) (citing the defendant's extensive international travel as one factor supporting detention); United States v. Seif, No. 01-CR-0977 (PHX), 2001 WL 1415034, at \*2-3 (D. Ariz. Nov. 8, 2001) (denying bail for a defendant who was a foreign national, had no family ties to United States, and was an experienced international traveler with substantial connections in countries that did not have extradition treaties with the United States). Home detention and the use of an ankle monitor does not rebut the need for detention given the defendants' foreign citizenship and ties. As courts have observed, home detention with electronic monitoring does not prevent flight; at best, it limits a fleeing defendant's head start. See United States v. Zarger, No. 00-CR-773-S-1 JG, 2000 WL 1134364, at \*1 (E.D.N.Y. Aug. 4, 2000). The defendants have no known ties to this community and remain serious flight risks.

VI. Conclusion

For the foregoing reasons, the government respectfully requests that the Court order the defendants be detained permanently pending trial, as there is no condition or combination of conditions that could reasonably assure the safety of the community or the defendants' appearance at trial.

Respectfully submitted,

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United States Attorney

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