No. ____

In The
Supreme Court of The United States

Cristian Chaverra Moreno,

***Petitioner*,**

v.

United States of America,

***Respondent*.**

On Petition for Writ of Certiorari to the United States Court of Appeals for the Eleventh Circuit

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Petition For Writ Of Certiorari

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QUESTION PRESENTED

Article I, Section 8, Clause 10 of the United States Constitution empowers Congress "[t]o define and punish Piracies and Felonies committed on the high Seas, and Offences against the Law of Nations." That authority is not unlimited. Congress only has authority to define and punish felonies that occur on the high seas, which raises the question of where the high seas begin and end.

The Question Presented is: Under the Define and Punish Clause and the Founders' understanding of sea zones, does Congress have the authority to punish felonies that occur in another country's contiguous zone?

PARTIES TO THE PROCEEDING

Pursuant to SUP. CT. R. 14.1(b)(i), Mr. Chaverra Moreno certifies that there are no parties to the proceeding other than those named in the caption of the case.

Mr. Chaverra Moreno's co-defendants in the district court were Mario Ulloa Jiminez and Rodolfo De Los Santos Jorge.

RELATED PROCEEDINGS

The following proceedings relate directly to the case before the Court:

United States v. Chevarra[1] *Moreno*, No. 23-11693, 2025 WL 2732118 (11th Cir. Sept. 25, 2025).

United States v. Chevarra Moreno, No. 8:22-cr-00321-VMC-TGW (M.D. Fla.).

[1] The district court and the Eleventh Circuit dockets misspelled Mr. Chaverra Moreno's name. Filings in this Court will reflect the correct spelling of his name.

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PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully seeks a writ of certiorari to review the judgment of the United States Court of Appeals for the Eleventh Circuit, rendered in case number 23-11693, in that court on September 25, 2025. *United States v. Chevarra Moreno*, No. 23-11693, 2025 WL 2732118 (11th Cir. Sept. 25, 2025)

OPINION BELOW

The decision under review is reproduced in the Appendix.

STATEMENT OF JURISDICTION

Jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1) and Part III of the Rules of the Supreme Court of the United States. The court of appeals had jurisdiction under 28 U.S.C. § 1291. The decision of the court of appeals was entered on September 25, 2025. Mr. Chaverra Moreno asked this Court to grant a 30-day extension to file his petition, which Justice Thomas granted, resulting in the current deadline of January 23, 2026. This petition is timely filed pursuant to SUP. CT. R. 13.1, 13.3, and 13.5.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. CONST. art. I, § 8, cl. 10

> The Congress shall have Power ... To define and punish Piracies and Felonies committed on the high Seas, and Offences against the Law of Nations.

The **Maritime Drug Law Enforcement Act**, **46 U.S.C. §§ 70501-70508**, is contained in the Appendix.

INTRODUCTION

In an attempt to limit the drugs coming into the country, the United States passed the Maritime Drug Law Enforcement Act ("MDLEA"), allowing for United States' authorities to interdict boats suspected of drug activity on the "high seas" (despite those boats not necessarily being bound for the United States) and bring those individuals to the United States to be prosecuted. In passing the MDLEA, the United States relied on its authority in the Felonies Clause of the Constitution. *See* U.S. Const. art. I, § 8, cl. 10 ("The Congress shall have Power . . . to define and punish Piracies and Felonies committed on the high Seas, and Offences against the Law of Nations.").

That authority is limited to include only felonies that occur on the "high seas." The difficulty for courts has been defining where the high seas begins and ends. The Eleventh Circuit has held that there are only two zones of waters: the high seas and the territorial waters. *United States v. Alfonso*, 104 F.4th 815, 823 (11th Cir. 2024). In so doing, it has ignored the longstanding history of allowing countries to exert authority and sovereignty over an area adjacent to the territorial waters known as the contiguous zone. That holding has also resulted in the Eleventh Circuit respecting the United States' own claim of where its border begins and ends (i.e. at its own contiguous zone) while failing to afford the same respect to other countries. At a time where the United States military is blatantly flouting the sovereignty of other countries through extrajudicial bombings in the Caribbean, this Court should, and must, step in where it can to rein in international actions by this country and

protect the sovereignty of other countries.

While those extrajudicial killings are not before this Court here, the scope of the United States' jurisdictional authority under the MDLEA is. This Court's intervention is desperately needed to ensure that, at least in this context, the United States is respecting the sovereignty of other countries and the right of those countries to patrol and enforce their own laws in the contiguous zone. This case thus presents an exceptionally important question of constitutional law that this Court should answer.

STATEMENT OF THE CASE

Mr. Chaverra Moreno and his codefendants were indicted for conspiring to possess with intent to distribute five kilograms of more of cocaine while on the high seas and onboard a vessel subject to the jurisdiction of the United States ("Count 1"), in violation of 46 U.S.C. §§ 70503(a), 70506(a)-(b) and punishable under 21 U.S.C. § 960(b)(1)(B)(ii); and aiding and abetting his codefendants to possess with intent to distribute five kilograms or more of cocaine while on the high seas and onboard a vessel subject to the jurisdiction of the United States ("Count 2"), in violation of 46 U.S.C. §§ 70503(a), 70506(a), 18 U.S.C. § 2, and punishable under 21 U.S.C. § 960(b)(1)(B)(ii). (Dist. Ct. Doc. 1 at 1-2).

The parties stipulated that the boat was located approximately 71 nautical miles north of Puerto Cabello, Venezuela. (Dist. Ct. Doc. 60 at 3).

Mr. Chaverra Moreno pled guilty to both counts. (Dist. Ct. Doc. 102 at 6-7).

On appeal in the Eleventh Circuit, Mr. Chaverra Moreno argued that the government failed to meet its burden to prove it had jurisdiction over his vessel

because the stipulated approximation of the vessel's location could have placed the vessel in the contiguous zone of either Bonaire or Venezuela. He argued that the contiguous zone is a historically recognized zone that countries have used to stop the smuggling of illegal goods. Given the long history of the contiguous zone and the powers countries maintain in it, the contiguous zone is not the high seas. Thus, the government's failure to firmly prove that the vessel was not in the contiguous zone meant that it failed to prove that the district court had jurisdiction over Mr. Chaverra Moreno.

The Eleventh Circuit determined that the sea is divided into only two zones: territorial waters and the high seas. *United States v. Chevarra Moreno*, No. 23-11693, 2025 WL 2732118 at *3-4 (11th Cir. Sept. 25, 2025). Based on its own prior precedent narrowly interpreting the sea zones, it held that the contiguous zone is part of the high seas because it is not part of the territorial waters of a given country. *Id.* at *4.

This petition follows.

REASONS FOR GRANTING THE PETITION

The question of where the high seas end and where the sovereignty of a given country begins is one of the most important questions this Court can answer as it affects not just what happens in this country but what happens on the international stage.

Congress' authority to enact the far-reaching MDLEA rests, if at all, on its power to define and punish "Felonies committed on the high Seas," under Article I, Section 8, Clause 10, of the Constitution. *See* U.S. Const. art. I, § 8, cl. 10 ("The Congress shall have Power . . . to define and punish Piracies and Felonies committed on the high Seas, and Offences against the Law of Nations."). This is the only expressly extraterritorial grant of power in the Constitution. And courts have "upheld extraterritorial convictions under our drug trafficking laws as an exercise of power under the Felonies Clause." *United States v. Bellaizac-Hurtado*, 700 F.3d 1245, 1257 (11th Cir. 2012) (holding that Congress could not proscribe drug trafficking under the Offences Clause because drug trafficking is not a violation of customary international law); *United States v. Davila-Mendoza*, 972 F.3d 1264 (11th Cir. 2020) (holding that Congress lacked power to enact the statute pursuant to the Foreign Commerce Clause).

The Felonies power, however, is "textually limited to conduct on the high seas." *Bellaizac-Hurtado*, 700 F.3d at 1258. Consequently, Congress' power to enforce the MDLEA is similarly constrained to offenses that are committed on the "high seas." *See id.* (holding "that Congress exceeded its power, under the Offences Clause, when

it proscribed the defendants' conduct in the territorial waters of Panama"); *Davila-Mendoza*, 972 F.3d at 1267 (similarly vacating MDLEA convictions of defendants arrested in Jamaican territorial waters).

The Eleventh's Circuit's determination that the contiguous zone is part of the high seas conflicts with the history of the contiguous zone and creates a split between how courts treat the United States's own contiguous zone and how they treat other countries' contiguous zone.

I.

The Eleventh Circuit's decision is wrong and is in direct conflict with historical understandings of the contiguous zone and the powers countries retain in that zone.

The starting point to answering the question of what qualifies as the high seas is to consider the definition and scope of the high seas. The high seas are waters that lie beyond the sovereignty of any nation. United Nations Convention on the Law of the Seas ("UNCLOS"), pt. VII, art. 89, Dec. 10, 1982, 1833 U.N.T.S. 397. Thus, when we are looking for the outer bounds of the high seas, we must consider where a country's authority and sovereignty begins.

While countries certainly have sovereignty over their own territorial waters, they also have sovereignty and authority over the contiguous zone. The definition of the contiguous zone supports that adjacent countries have sovereignty over their own contiguous zone and history also supports that the contiguous zone has long been understood to be separate from the high seas and subject to the sovereignty of the adjacent country.

The contiguous zone is defined as a zone where a country can exercise the necessary authority to:

> (a) prevent infringement of its customs, fiscal, immigration or sanitary laws and regulations within its territory or territorial sea;
>
> (b) punish infringement of the above laws and regulations committed within its territory or territorial sea.

Id., pt. II, art. 33. The contiguous zone extends for 24 nautical miles from a country's baseline. *Id.*

Dating back to the Founding, our country and the international community have long understood that the contiguous zone is not part of the high seas. The Framers understood that there existed a category of waters that extended beyond the territorial seas but was not yet the high seas. As far back as the late 18th century, United States' officials, like Thomas Jefferson, acknowledged a category of waters—known then as "customs waters"—just beyond the territorial waters where countries could enforce laws related to customs and immigration. *See* Office of Coast Survey, *Law of the Sea: History of the Maritime Zones under International Law* (2013), https://coast.noaa.gov/data/Documents/OceanLawSearch/NOAA%20Office%20of%20Coast%20Survey,%20History%20of%20the%20Maritime%20Zones%20Under%20International%20Law.pdf. The zone known as "customs waters" in the 18th century is the same as the modern "contiguous zone." *Id.*

Even earlier than Thomas Jefferson's acknowledgment of the "customs waters" zone, Great Britain passed laws known as the "Hovering Acts," thus establishing its own version of the contiguous zone and allowing Britain to enforce its customs laws

upon ships within "four leagues" of its shore to prevent illegal smuggling and protect the safety of the country. *See* Edwin D. Dickinson, *Jurisdiction at the Maritime Frontier*, 40 Harv. L. Rev. 1, 13 (1926). The United States followed Britain's lead and enacted its own version of the "hovering acts." *Id.* at 13-14.

Further, the United States historically relied on these laws and this zone to stop the illegal importation of slaves into the country. *Id.* at 14. It used its expanded authority to stop boats once they entered this contiguous zone and prevent those ships from continuing the illegal importation of slaves. *See id.* The contiguous zone, under different names, has a longstanding history in this nation and Britain of allowing countries to enforce their laws to stop the importation of illegal goods or stop the importation of slaves. *See id.* The history of the contiguous zone and that it differs from international waters has also been recognized by four judges on the old Fifth Circuit. *See United States v. Williams*, 617 F.2d 1063, 1096 (5th Cir. 1980) (Rubin, J. concurring in the result in which Kravitch, J., Johnson, J., and Randall, J. joined) (stating that there are "historic policy differentiations between the contiguous waters and international waters").

While in UNCLOS the international community and the United States expanded the contiguous zone from 12 miles to 24 miles, it remains true that the United States near the time of the founding recognized a zone of waters just beyond the territorial waters where it maintained a certain level of law enforcement authority to board ships and enforce customs and immigration laws that it did not otherwise have on the "high seas." This long-recognized zone of waters, whether it

was known under the historical term of "customs waters" or the modern term "contiguous zone," is separate from the high seas because it grants countries the jurisdiction to enforce their own laws that they otherwise could not enforce on the high seas. This history distinguishes the contiguous zone from the Exclusive Economic Zone ("EEZ"), a modern creation, because the contiguous zone has existed since the founding. *See Alfonso*, 104 F.4th at 823; Dickinson, 40 Harv. L. Rev. at 13-14.

The Eleventh Circuit made no effort to recognize this history and longstanding acknowledgement of the quasi-territorial nature of the contiguous zone and instead held that its prior precedent meant that there could only be two zones of waters. But, history supports that the high seas did not include either the contiguous zone or the territorial sea zone because countries retained law enforcement authority in both zones. If one country retains law enforcement jurisdiction over a zone of waters, then that zone of waters is not open to all countries and is controlled or managed by the adjacent country. *See* UNCLOS, pt. VII, art. 87(1), 89. In refusing to acknowledge that the controlling jurisdictional and constitutional question is whether the zone of waters at issue lies beyond the governing authority of any one state, the Eleventh Circuit rendered an opinion that is blatantly incorrect. A consideration of this nation's history shows that the contiguous zone was not historically understood to be part of the high seas, and accordingly, Congress has no authority to define and punish felonies inside the contiguous zone of another country.

II.

The Eleventh's Circuit treatment of the contiguous zone in the MDLEA context has deepened the inconsistent and murky treatment of the contiguous zone.

The Eleventh Circuit's cursory determination that the contiguous zone is part of the high seas for MDLEA purposes created a split in how courts treat our own contiguous zone as compared to how courts treat the contiguous zone of other countries. On the one hand, courts have said explicitly that the United States' own contiguous zone is a functional border that grants our own law enforcement the authority to search boats without probable cause upon entering the contiguous zone under the border-search exception. *United States v. Hidalgo-Gato*, 703 F.2d 1267, 1270, 1273 (11th Cir. 1983); *see also United States v. Touset*, 890 F.3d 1227, 1232-33 (11th Cir. 2018) (explaining that searches of property at the border do not require reasonable suspicion). By contrast, on the high seas, the Coast Guard must have reasonable suspicion for a limited search and probable cause for a full search. *See United States v. Roy*, 869 F.2d 1427, 1430 (11th Cir. 1989).

On the other hand, the Eleventh Circuit has now said that it will not offer the same respect to other countries' contiguous zone. *See Chevarra Moreno*, 2025 WL 2732118 at *3-4. If our own contiguous zone is functionally the border between our country's territory and the high seas, then why is that not true for all other countries? The Eleventh Circuit offers no reason for this disparate treatment, which has deep international implications as it represents a refusal of the United States to offer the same authority that we enjoy over our contiguous zone to other countries.

Essentially, the Eleventh Circuit has stripped countries of the authority to determine how they wish to patrol and enforce their own laws within their own contiguous zones.

This interpretation is especially concerning given the *Charming Betsy* canon of interpretation. *See Murray v. Schooner Charming Betsy*, 6 U.S. (2 Cranch) 64, 118 (1804). The *Charming Betsy* canon sets out that acts of Congress should not be interpreted to violate the laws of nations. *Id.* While this canon is directly addressing not violating international law, it is logical and consistent to also use this canon for the proposition that courts should not interpret our laws in such a way that infringe on the rights or sovereignties of other nations. *See also United States v. Prado*, 933 F.3d 121, 137 (2d Cir. 2019) (explaining that in passing the MDLEA, "Congress here took pains to avoid interference with vessels regulated by other nations"). The Eleventh Circuit has essentially done just what this canon suggests it should not have done: granted less respect and sovereignty to other nations than it does to the United States. If the United States has law enforcement authority over its own contiguous zone and views the contiguous zone as our own border, then other countries should have that same authority and right to view its contiguous zone as their border.

Beyond this direct split in the treatment of our contiguous zone compared to other countries' same contiguous zone, the holding in this case is in tension with statements from this Court. While debates over the contiguous zone and its treatment have been minimal, there are several instances where the contiguous zone is implicitly considered part of the territorial waters of the United States—or at least not part of the high seas. The 1927 case of *Maul v. United States* provides an

instructive example of the implicit acceptance of the contiguous zone as separate from the high seas and more akin to territorial waters. 274 U.S. 501, 505 (1927). In *Maul*, this Court explained that acts from the 1800s only permitted the boarding and searching of vessels that were "within the territorial waters of the United States or within 4 leagues (12 miles) of the coast." *Id.* At first blush, this quote seems to just be restating our current understanding of where our territorial waters begin and end—12 nautical miles from the coast. However, historically, the United States' territorial waters extended three nautical miles, not 12. *See* "Thomas Jefferson to Edmond Charles Genet, 8 November 1793," *Founders Online,* National Archives, https://founders.archives.gov/documents/Jefferson/01-27-02-0295 (last accessed Dec. 18, 2025). It was not until 1988 that President Reagan extended our territorial waters to 12 nautical miles. Proclamation No. 5928, 54 Fed. Reg. 777 (Dec. 27, 1988). Accordingly, this Court has seemingly acknowledged that the contiguous zone is part of our territorial waters and not part of the high seas, which puts the Eleventh Circuit's holding at odds with this Court.

The inconsistent treatment of the contiguous zone does not end there. The circuits have been split for over two decades over how to treat the contiguous zone as it relates to jurisdiction under a different statute. Four circuits have held that the contiguous zone was part of the United States and was the "interdiction zone" for drug trafficking. *United States v. Cabaccang*, 332 F.3d 622, 644 (9th Cir. 2003) (Kozinski, J., dissenting and O'Scannlain, Graber, McKeown, and Tallman, JJ., joining) (collecting cases). The Ninth Circuit only recognized the three nautical mile

territorial waters boundary. *See id.* The dissent noted that such a holding departed not only from the other circuits but also from longstanding international and federal law recognizing the contiguous zone as the zone of waters where countries can stop boats suspected of drug smuggling. *Id.* at 644-45. The dissent also noted that there would now be one boundary for the Ninth Circuit and a different boundary "everywhere else." *Id.* at 645.

There are two relevant takeaways from the dissent in *Cabaccang*. First, the circuits have been split since 2003 over how to treat our own contiguous zone in the jurisdictional context of another statute. *Id.* at 644. The contiguous zone has passed under the radar as a zone of waters that is not the territorial zone of waters but is also not the high seas. Courts have skirted the issue of how to view the contiguous zone while seemingly acknowledging that it is a special zone of waters separate from the high seas and an extension of the enforcement authority countries have in their territorial waters. *See id.* at 644-45. This avoidance and implicit acknowledgement has resulted in not just different boundaries between the circuits for our own country but has also now resulted in one boundary for the United States and another for all other countries. We have acknowledged that our interdiction zone for drug smuggling starts at the contiguous zone. But, the Eleventh Circuit's holding refuses to grant that same interdiction zone to all other countries. That inconsistency must be remedied.

Second, the Ninth Circuit dissent acknowledges that the contiguous zone is a historically and internationally recognized interdiction zone. *Id.* at 645. The dissent

confirms that the contiguous zone has long been viewed as the zone of waters where countries stop and search vessels suspected of drug smuggling. *Id.* The contiguous zone has existed for centuries as the zone of waters where countries have the authority to interdict vessels suspected of smuggling contraband. The Eleventh Circuit has departed from that long-standing principle and has now held that the contiguous zone (for every country other than our own) is part of the high seas.

Without this Court's intervention, the split over the treatment of the contiguous zone will persist and the status of the contiguous zone will remain murky. It is now time for this Court to step in and answer once and for all whether the contiguous zone is a part of the high seas.

III.

This case presents an unusually important question of constitutional law, warranting review even in the absence of a circuit split.

While there is a split and inconsistencies over whether the contiguous zone is a part of the high seas, there is no split directly on point over how to view the contiguous zone under the MDLEA and the Felonies Clause. Nevertheless, the questions of how to treat other countries' contiguous zone and the extent of Congress's constitutional authority under the Felonies Clause are enduring and important. Thus, notwithstanding the absence of a circuit conflict, the "unusual importance" of this constitutional issue should persuade the Court to grant review. *See Massachusetts v. Environmental Protection Agency*, 549 U.S. 497, 505-06 (2007) ("Notwithstanding the serious character of that jurisdictional argument and the absence of any conflicting decisions ... the unusual importance of the underlying issue persuaded us to grant the writ."). *See also*, *e.g.,* Petition for a Writ of Certiorari, *Vidal v. Elster*, No. 22-704, 2023 WL 1392051 at *10 (U.S. Jan. 27, 2023) ("The Court has repeatedly granted review of decisions holding federal statutes invalid on First Amendment grounds, even in the absence of a circuit conflict.") (collecting cases); Respondent's Brief in Opposition, *Apprendi v. New Jersey*, No. 99-478, 1999 WL 33611431 at *9 n.4 (U.S. Oct. 20, 1999) (noting the absence of a conflict "with any decision of any other state court of last resort or of a United States court of appeals").

Additionally, the general extraterritorial venue statute, 18 U.S.C. § 3238, allows the government to select the forum of prosecution for *any* offenses arising in the

contiguous zone—including those unrelated to the MDLEA—by controlling where the defendant "is first brought" into the United States. *See* 18 U.S.C. § 3238 (The trial of all offenses begun or committed upon the high seas, or elsewhere out of the jurisdiction of any particular State or district, shall be in the district in which the offender ... is arrested or is first brought."). These venue provisions undermine—and even allow the government to avoid—the usual development of circuit splits. The effect of these venue provisions is exhibited by a recent study that found that 80% of MDLEA prosecutions brought between 2014 and 2020 involving powder cocaine were prosecuted in the Eleventh Circuit. Kendra McSweeney, Mat Coleman and Douglas A. Berman, *The Challenge of Just Federal Sentencing for "Boat Defendants*," 37 FED. SENT. REP. 103, 106 (2025).

Further, over the past several decades, thousands of foreign nationals have been arrested in the middle of the oceans and prosecuted in the United States under the MDLEA. In 2009, the Eleventh Circuit noted that "more than 1,200 convictions" had been obtained by an intergovernmental task force called "Panama Express," in "its first seven years." *United States v. Valencia-Trujillo*, 573 F.3d 1171, 1173 (11th Cir. 2009). A 2017 New York Times article reflected "more than 2,700" arrests in the preceding six years.[2] And a more recent study "generated a dataset of more than 2,770 defendants" who were "brought into the United States for prosecution under the [MDLEA] between

[2] Seth Freed Wessler, The Coast Guard's 'Floating Guantánamos', N.Y. TIMES, Nov. 20, 2017 *available at* https://www.nytimes.com/2017/11/20/magazine/the-coast-guards-floating-guantanamos.html (last accessed Jan. 15, 2026).

FY 2014 and FY 2020." Michael Lissner, *Sentencing Research Without USSC Data: Strategies and Lessons Learned*, 37 FED. SENT. REP. 123 (2025). The United States has now extended its already breathtaking jurisdictional grasp over foreign nationals into a zone of waters that historically would have been beyond its reach.

Finally, this case does not present any vehicle issues. Because this is a jurisdictional question, this Court's review is *de novo* and the issue is not waived by Mr. Chaverra Moreno's guilty plea. *See Chevarra Moreno*, 2025 WL 2732118 at *2. Further, the approximation of the boat's location results in several points inside the contiguous zones of either Bonaire or Venezuela. Those possible points mean that the government failed to carry its burden of proving that the boat was on the high seas. Accordingly, an answer from this Court on whether the contiguous zone is part of the high seas is outcome determinative in this case.

CONCLUSION

There has never been a better or more important time for this Court to answer the question of how far the United States's law enforcement authority can reach. History and respect for the authority of other countries dictate that the Eleventh Circuit's holding is wrong, and only this Court can step in to correct that error. Based on the foregoing, the petition should be granted.

Respectfully submitted,

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