



declaring the lands to be a Restricted Area of the Department of the Army comprising approximately 2,000 acres of land located along the southern border of the United States, by accessing the designated Restricted Area which contained posted notice prohibiting unauthorized access, all in violation of Title 50, United States Code, Section 797.

COUNT THREE

On or about **October 21, 2025**, in the Western District of Texas, the Defendant,

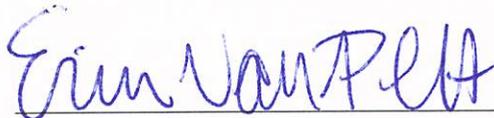
**JOSE INES PINO-AYALA,**

entered any military reservation, post, fort, arsenal, station, and installation, specifically, the National Defense Area created by lawful authority on April 30, 2025, by the Senior Commander, U.S. Army Ft. Bliss, establishing a National Defense Area, and declaring the lands to be a Restricted Area of the Department of the Army comprising approximately 2,000 acres of land located along the southern border of the United States, and said entry was for any purpose prohibited by law or lawful regulation, specifically, Title 8 U.S.C. Section 1325(a)(1), all in violation of Title 18 United States Code Section 1382.

Respectfully submitted,

JUSTIN R. SIMMONS  
UNITED STATES ATTORNEY

By:



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