IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	**MOTION FOR PERMISSION TO TRAVEL**
	)	
TIJEMA BROWN	)	
	)	**3:25-cr-00106-KDB-SCR**
Defendant.	)	
	)	

NOW COMES the Defendant by and through undersigned Counsel and hereby moves this honorable court for permission to travel and in support of said Motion avers:

1.) Defendant was indicted on May 22, 2025, and charged with violations of 18 USC §§1343 and 1349 and appeared for her initial appearance on Friday, May 23, 2025.

2.) During the hearing Counsel advised that Ms. Brown currently has a trip planned, predating her awareness of the formal accusation, Indictment, and First Appearance.

3.) AUSA Warren does not object as long as pertinent information is provided regarding Ms. Brown's travel to and from Jamaica on June 7, 2025, until June 11, 2025.

4.) Ms. Brown is scheduled to travel to Montego Bay, Jamaica with two other individuals, who Ms. Brown advises are her cousin and God-sister.

5.) These plans were confirmed in May 2025, prior to the indictment, and they will stay at the Ocean Eden Bay Resort.

6.) Ms. Brown has a one-year-old son who lives in Charotte, NC and she is gainfully employed at Amazon as well as confirmed air travel.

7.) She and her travel mates have paid for the Resort stay prior to Ms. Brown becoming aware of the formal accusations.

8.) Ms. Brown is not a flight risk and will be returning to the Western District of North Carolina on June 11, 2025 to the home where she resides with her son, Mother and Grandmother.

9.) This Motion is not for dilatory purposes and for compelling cause.

WHEREFORE, Defendant, Tijema Brown, prays the Court allow her to travel to Montego Bay, Jamaica June 7, 2025, to June 11, 2025.

Submitted on this 27th day of May 2025.

s/Kimberly Y. Best
Kimberly Y. Best
The Best Law Firm, PLLC
212 N. McDowell St., Suite 208
Charlotte, NC 28204
thebestlawfirmpllc@gmail.com
980-553-0139

CERTIFICATE OF SERVICE

I, Kimberly Y. Best, hereby certify that I have served a copy of the foregoing MOTION TO TRAVEL upon the following parties via ECF.

Matthew Warren, Esq.
Assistant United States Attorney
227 W. Trade St., Suite 1650
Charlotte, NC 28202

Submitted this 27TH day of May 2025.

/s/Kimberly Y. Best
Kimberly Y. Best, Esq. 24932
212 N. McDowell St., Suite 208
Charlotte, NC 28204
thebestlawfirmpllc@gmail.com
980-553-0139

Check in beginning 24 hours before departure

Time until check-in 13d

Tijema Lastephanie Brown

Join AAdvantage®

Confirmation code: NDFOSG

Trip name: RDU/MBJ

Issued: May 13, 2025

Status: Ticketed

Change trip

Basic Economy restrictions may apply

Get trip notifications >

Choose seats

Cancel trip

Review before you cancel

Add bags

Additional services

Wheelchair, infant, service animal, pet and special assistance

Raleigh/Durham, NC to Montego Bay, Jamaica

1 Stop . Travel time: 6h 15m

ON TIME

Duration: 1h 25m

Departs	Arrives
RDU	PHL
8:15 AM	**9:40 AM**
Raleigh/Durham, NC	Philadelphia, PA

AA 1115 · Basic Economy

Share alerts for this flight >

1h 05m connection at PHL

ON TIME

Duration: 3h 45m

Departs	Arrives
PHL	MBJ
10:45 AM	**1:30 PM**
Philadelphia, PA	Montego Bay, Jamaica

AA 857 · Basic Economy

Stay in Falmouth

Jun 7, 2025 - Jun 11, 2025

Reservation details

Booked

Check-in
Sat, Jun 7
3:00 PM

Check-out
Wed, Jun 11
noon

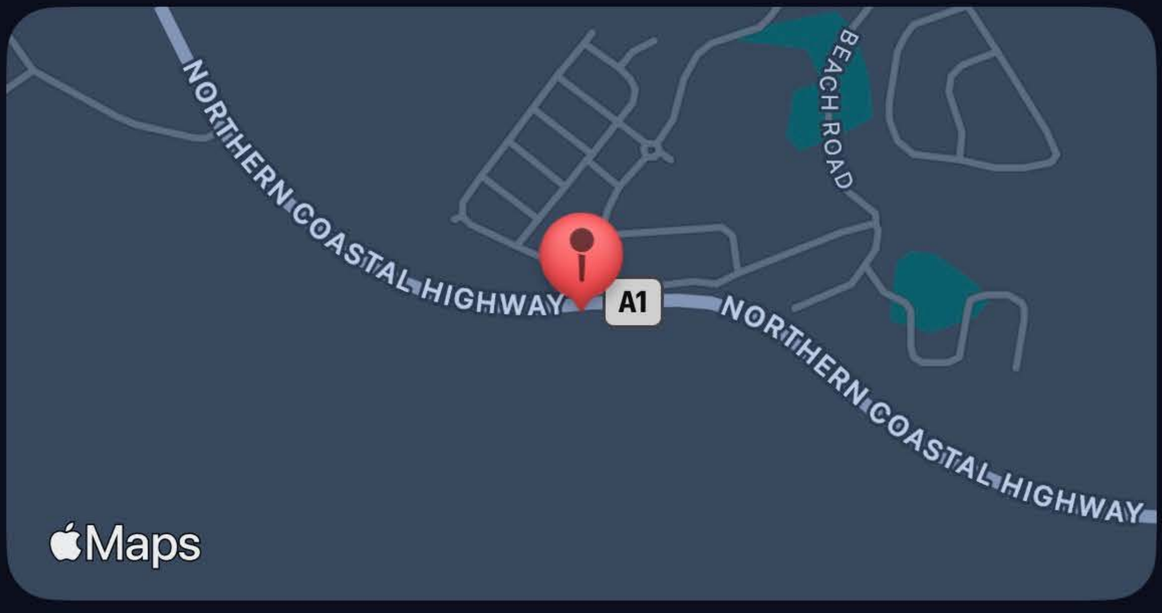
Check-in and special instructions

View pricing details

Contact property

Change or cancel booking

Location



Mountain Spring Bay, Coral Spring, Montego Bay, Falmouth Jamaica

View in local language

Get directions

Accommodation details

Reserved for **Tijema Brown.**

You booked **1 room**.

Junior Suite Garden View

View special requests in your itinerary

All special requests (such as in-room amenities, bed type, and smoking preference) are shared with the hotel, but requests are not guaranteed and may incur additional charges. We recommend you confirm them directly with the hotel before travel.

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Manage your plans and make trip updates on the fly - wherever the journey takes you.
Explore the app

You'll earn **$36.72 in OneKeyCash** after this trip. You're going places!

View rewards activity

Price Summary

Accommodation 1	**$1,835.80**
Nights: 4 (avg./night)	$458.95
Taxes	Included

Total **$1,835.80**

View full itinerary

Download to your phone



Ocean Eden Bay - Adults Only - All inclusive

Expedia itinerary: 73116241094273

Traveler details

Adults, 2

Mountain Spring Bay, Coral Spring, Montego Bay, Falmouth Jamaica

Check-in	Check-out
Sat, Jun 7	Wed, Jun 11
Check-in time starts at 3:00 PM	noon

Wednesday, June 11, 2025

Montego Bay, Jamaica to Raleigh/Durham, NC

1 Stop . Travel time: 6h 08m

ON TIME

Duration: 3h 05m

Departs	Arrives
MBJ	CLT
10:20 AM	**2:25 PM**
Montego Bay, Jamaica	Charlotte, NC

AA 863 · Basic Economy

Share alerts for this flight >

2h 05m connection at CLT

ON TIME

Duration: 58m

Departs	Arrives
CLT	RDU
4:30 PM	**5:28 PM**
Charlotte, NC	Raleigh/Durham, NC

AA 1894 · Basic Economy