

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

V.

Cemhan “Jimmy” Biricik,
Dr. Martin Perlin,

Defendants.

Case 5:25-cr-20543

MOTION TO MODIFY ORDER SETTING TERMS OF RELEASE

Defendant Cemhan Biricik (“Mr. Biricik”), by counsel, respectfully requests this Court modify its October 28, 2025 Order Setting Conditions of Release. In support of this motion, Defendant states as follows:

1. On July 22, 2025, Mr. Biricik and Codefendant Martin Perlin, M.D. were indicted in the Eastern District of Michigan on one count of Conspiracy to Commit Health Care Fraud under 18 U.S.C. § 1349, fifty-eight (58) counts of individual acts of health care fraud under 18 U.S.C. § 1347 and a forfeiture count.
2. On October 28, 2025, this Court granted Mr. Biricik's Motion for Revocation of Detention Order. ECF # 28.
3. The Court's Order setting conditions of release includes a restriction directing Mr. Biricik to avoid all contact, direct or indirect, with former employees of FastLab or FastDoc, entities involved in the alleged instant offense. See ECF # 39, Sec. 7(h), fourth box.

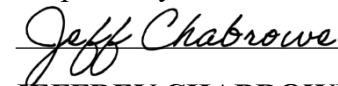
4. There are at least two family members who could be deemed former employees of FastLab. These include Mr. Biricik's son, Jemhan Biricik and his mother-in-law, Caridad Cardoso.

5. We request the the Court's order be modified to permit Mr. Biricik to have contact with these two named individuals, without counsel being present.

The government advises they do not object to this request.

Dated: October 31, 2025
New York, NY

Respectfully submitted,



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