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ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Case: 5:25-cr-20543
Assigned To : Levy, Judith E.
Referral Judge: Altman, Kimberly G.
Assign. Date : 7/22/2025
Description: SEALED MATTER
(LLH)

D-1 Cemhan "Jimmy" Biricik,
D-2 Dr. Martin Perlin

Defendants.
_____/

GOVERNMENT'S MOTION AND SUPPORTING BRIEF TO SEAL INDICTMENT AND ARREST WARRANTS

The United States of America hereby moves for an order sealing the Indictment and Arrest Warrants in this case and states:

1. The indictment in this case charges the Defendants with one or more federal crimes.

2. Rule 6(e)(4) of the Federal Rules of Criminal Procedure provides:

> *(4) Sealed Indictment.* The magistrate judge to whom an indictment is returned may direct that the indictment be kept secret until the defendant is in custody or has been released pending trial. The clerk must then seal the indictment, and no person may disclose the indictment's existence except as necessary to issue or execute a warrant or summons.

Fed.R.Crim.P. 6(e)(4).

3. The government requests that the Indictment and Arrest Warrants be sealed because it is concerned that the Defendants may attempt to flee, destroy

evidence, or intimidate witnesses if the Indictment becomes a matter of public record before the Defendants are arrested.

WHEREFORE, the government requests this Court to issue an order sealing the Indictment and Arrest Warrants.

Respectfully submitted,

JEROME F. GORGON, Jr.
United States Attorney

s/Regina McCullough
REGINA R. McCULLOUGH
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
regina.mccullough@usdoj.gov
(313) 226-9618

Dated: July 22, 2025

IT IS SO ORDERED.

Hon. Anthony P. Patti
United States Magistrate Judge

Entered: July 22, 2025