UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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| UNITED STATES OF AMERICA, | ) | |
| v. | ) | Case 5:25-cr-20543 |
| Cemhan "Jimmy" Biricik,<br>Dr. Martin Perlin, | ) | |
| Defendants. | ) | |

**AFFIDAVIT IN SUPPORT OF MOTION TO MODIFY POST-INDICTMENT SEIZURE OF ASSETS**

1. My name is Cemhan Biricik. I am a defendant in the above captioned case. I submit this Affidavit to support motion to Modify Post-Indictment Seizure of Assets.

2. I am currently incarcerated at Livingston County Jail, 150 S. Highlander Way, Howell, Michigan. I permanently reside at 9623 Macchiato Avenue, Boca Raton, Florida. I live there with my wife and children. I was born in Turkey but emigrated to the United States in 1983. In 2001, I became a U.S. citizen.

3. I operated a business (FastLab) from about October 2021 to 2025 conducting and making available Covid testing. The operations of that business are the subject of the instant criminal case.

4. I was arrested on July 31, 2025 in this case in Florida. My case was later transferred to the Eastern District of Michigan, Southern Division.

5. Contemporaneously with my arrest, government officials seized all my personal and real property, and my bank accounts. A lien was imposed on my property.

6. I have no assets of any sort, nor any cash or bank accounts, other than that already seized by the government.

7. My family is unable to meet their regular domestic needs because our funds have been seized. These include property maintenance, food, medical expenses and education costs.

8. I am also unable to pay certain related staff costs at FastLab which are necessary for me to obtain extensive data about business operations from business software programs, data that is necessary for me to defend these charges. Specifically, I have six employees who are owed back due wages totaling $11,083. I cannot obtain business operational data without paying these employees their back due wages.

9. Lastly, I am unable to pay legal costs necessary for me to fully defend myself in this complicated case.

10. For these reasons, I request the Court modify the outstanding seizure orders to permit allocation of costs in these areas.

11. I swear under penalty of perjury pursuant to 28 U.S.C. § 1746 the foregoing is true and correct to the best of my knowledge and belief. I understand this document will be used in a court proceeding.

Dated: September 30, 2025



Cemhan Biricik
Livingston County Jail
150 S. Highlander Way
Howell, MI 48843