UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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

AFFIDAVIT IN SUPPORT OF SUPPLEMENTAL 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 my Supplemental Motion to Release Assets.

2. As I previously stated in my Affidavit of September 30, 2025, 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. Prior to that time, I operated a photography and marketing business, consulted on cryptocurrency investment, and ran other businesses.

4. In January 2022, FastLab became authorized to receive electronic federal transfer payments. As the government has outlined in its probable cause July 29, 2025 affidavits for the seizures, those proceeds went into various accounts.

5. Many of my accounts, however, were opened before FastLab started doing business. These included, among others, Mavric Marketing Chase account x2663, SunTrust x2295, Robinhood Brokerage x825420838, and Truist x1798. These accounts have been seized by the

government, but they included funds generated by my business activities, and those of my wife, prior to and independent of FastLab operations. I am able to substantiate that many of these

6. Contemporaneously with my July 31, 2025 arrest, government officials seized all my personal and real property, and my bank accounts. A lien was imposed on my property.

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

8. 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.

9. I am also unable to pay certain legal costs I have incurred and will be incurring further to defend the criminal charges in this case. I borrowed funds to make initial legal retainer payments but further such funds are not available to me.

10. For these reasons, I request the Court modify the outstanding seizure orders to permit me to access some portion of the seized accounts.

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: November 18, 2025



Cemhan Biricik
9623 Macchiato Avenue
Boca Raton, Florida 33496