UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 25-cr-20543
Honorable Judith E. Levy

vs.

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

Defendants.

First Forfeiture Bill of Particulars

The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 982(a), 18 U.S.C. § 982(a)(7) , and 28 U.S.C. § 2461. For Counts One through Fifty-Nine of the Indictment, Cemhan "Jimmy" Biricik and Dr. Martin Perlin shall forfeit to the United States, pursuant to 18 U.S.C. §

981(a)(1)(C), together with 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(7) any property, real or personal, which constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offenses(s), which includes, but is not limited to the following:

- 2025 Cirrus SR22T, Tail #N203FD, S/N: 10395 (25-FBI-004748);
- 2023 Lamborghini Urus registered to and in the possession of Fast Lab Technologies or Cemhan Biricik at 9623 Macchiato Ave., Boca Raton, FL, (VIN: ZPBUC3ZLXPLA25853) (25-FBI-004749);
- 2023 Bentley Bentayga registered to Fast Lab Technologies LLC and in the possession of Cemhan Biricik at 9623 Macchiato Ave., Boca Raton, FL, (VIN: SJAAR2ZVXPC023963) (25-FBI-004751);
- 2022 Ford Bronco Raptor registered to and in the possession of Fast Lab Technologies LLC or Cemhan Biricik at 9623 Macchiato Ave., Boca Raton, FL, (VIN: 1FMEE5JR1NLA50344) (25-FBI-004752);
- 2024 BMW M4 registered to and in the possession of Isabel Caridad Biricik at 9623 Macchiato Ave., Boca Raton, FL, (VIN: WBS33BA02RCP10794) (25-FBI-004755);
- 2023 Rivian R1T registered to Fast Lab Technologies LLC or Cemhan Biricik and in the possession of Isabel Caridad Biricik at 505 S. Flagler Dr., West Palm Beach, FL, (VIN: 7FCTGAAA7PN021960) (25-FBI-005183);
- 2022 Ford Bronco Sport registered to Cemhan Biricik and in the possession of Jemhan Biricik at 102 Grandview Street, Clarks Summit, PA, (VIN: 3FMCR9C69NRE24285) (25-FBI-006390);
- All Funds on Deposit in Morgan Stanley Account #XXX-XX1145 (25-FBI-004750);

- All Funds on Deposit in Morgan Stanley Account #XXX-XX1585 (25-FBI-004753);

- All Funds on Deposit in Morgan Stanley Account #XXX-XX1785 (25-FBI-004754);

- $3,834.12 in funds from Bank Account #XXXXXXXX0411 held in the name of Martin Perlin, MD., P.C. at Bank of America, Detroit, MI (25-FBI-005815);

- $1,460.92 in funds from Bank Account #XXXXX1005 held in the name of Zenith Business Advisory Solutions Inc at JPMorgan Chase Bank, Detroit, MI (25-FBI-005816);

- $2,129.67 in funds from Bank Account #XXXXX3500 held in the name of Hasan Duykan Seyhun or Mert Kultur at JPMorgan Chase Bank, Detroit, MI (25-FBI-005817);

- $11,145.39 in funds from Bank Account #XXXXX2609 held in the name of Soho Workspaces 2 Inc at JPMorgan Chase Bank, Detroit, MI (25-FBI-005818);

- $17,951.82 in funds from Bank Account #XXXXXXXXX1794 held in the name of Fast Lab Technologies LLC at Truist Bank, Charlotte, NC (25-FBI-005819);

- $4,401.66 in funds from Bank Account #XXXXXXXXX1808 held in the name of Fast Lab Technologies LLC at Truist Bank, Charlotte, NC (25-FBI-005820);

- $1,009.82 in funds from Bank Account #XXXXXXXXX1816 held in the name of Fast Lab Technologies LLC at Truist Bank, Charlotte, NC (25-FBI-005821);

- $17,177.48 in funds from Bank Account #XXXXXXXXX1798 held in the name of Cemhan Biricik or Isabel Caridad Biricik at Truist Bank, Charlotte, NC(25-FBI-005822);

- $29,638.88 in funds from Bank Account #XXXXXXXXX2295 held in the name of Cemhan Biricik or Isabel Caridad Biricik at Truist Bank, Charlotte, NC (25-FBI-005823);

- $2,680.13 in funds from Bank Account #XXXXXXXX7728 held in the name of Cemhan Biricik or Isabel Biricik at Social Financial Bank, San Francisco, CA (25-FBI-005824); and

- Miscellaneous Jewelry from 9623 Macchiato Ave, Boca Raton, FL (25-FBI-007023)
    - Roberto Coin Venetian Princess 16k Gold necklace;
    - Roberto Coin Venetian Princess 16k Gold earrings;
    - Roberto Coin Venetian Princess 16k Gold ring;
    - Breitling watch

- Miscellaneous Designer Bags from 9623 Macchiato Ave, Boca Raton, FL (25-FBI-007024)
    - Louis Vuitton monogram bag brown;
    - Louis Vuitton bag white;
    - Gucci bag brown;
    - Prada bag brown;
    - Louis Vuitton monogram bag black;
    - Caroline Herrera bag; and

- Real property located at 9623 Macchiato Ave. Boca Raton, FL 33496, and being more fully described as:

  LEGAL ADDRESS: Lot 361, HYDER AGR-PUD -SOUTH PLAT FIVE, according to the map or plat thereof as recorded in Plat Book 129, Page 123, Public Records of Palm Beach County, Florida

  COMMONLY KNOWN AS: 9623 Macchiato Ave. Boca Raton, FL 33496

  PARCEL ID: 00-42-46-31-14-000-3610

TITLED TO: Cemhan Biricik and Isabel Biricik, Husband and Wife. (25-FBI-006816)

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets, or limit the government from seeking the imposition of a forfeiture money judgment.

Respectfully submitted,

JEROME F. GORGON JR.
United States Attorney

S/K. Craig Welkener
K. Craig Welkener (DC 1033585)
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
(313) 226-0248
Kenton.Welkener@usdoj.gov

Dated: December 9, 2025

Certification of Service

I hereby certify that on December 9, 2025, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

S/K. Craig Welkener
K. Craig Welkener (DC 1033585)
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
(313) 226-0248
Kenton.Welkener@usdoj.gov