UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No. 25-cr-20543
Hon. Judith E. Levy

D-1 CEMHAN "JIMMY" BIRICIK,

Defendant.

STIPULATION TO MODIFY ORDER SETTING CONDITIONS OF DEFENDANT'S BOND (ECF No. 39)

The parties through their undersigned counsel, hereby stipulate and agree as follows:

1. On July 22, 2025, Defendant Biricik was indicted in the Eastern District of Michigan on one count of Conspiracy to Commit Health Care Fraud under 18 U.S.C. § 1349, and fifty-eight (58) substantive counts of health care fraud under 18 U.S.C. § 1347.

2. On October 28, 2025, this Court granted Defendant's Motion for Revocation of Detention Order and ordered the Defendant be released on bond. The Court's Order setting conditions of release includes a restriction directing

Defendant to avoid all contact, direct or indirect, with co-defendants and former employees of Fast Lab or Fast Doc, entities involved in the alleged instant offense. (See ECF No. 39: Order Setting Conditions of Release, Sec. 7(h), PageID. 294).

3. There are at least two family members who are former employees of Fast Lab. These include Defendant's son, Jemhan Biricik and his mother-in-law, Caridad Cardoso. The parties stipulate to modify this condition to restrict all contact with co-defendants, and former employees of Fast Lab and Fast Doc, except for Defendant's son Jemhan Biricik and his mother-in-law, Caridad Cardoso.

IT IS SO STIPULATED.

Respectfully submitted,

JEROME F. GORGON JR.
United States Attorney

s/*Regina R. McCullough* Regina R. McCullough Assistant U.S. Attorney 211 W Fort St, Suite 2100 Detroit, MI 48226 313-226-9618 Regina.McCullough@usdoj.gov	s/*Ryan A. Particka* Ryan A. Particka Assistant U.S. Attorney 211 W Fort St, Suite 2100 Detroit, MI 48226 313-226- Ryan.Particka@usdoj.gov
s/*Jeffrey Chabrowe* Counsel for Cemhan Biricik Managing Partner The Law Office of Jeffrey Chabrowe 521 Fifth Ave 17th Floor	s/*Todd A. Spodek* Counsel for Cemhan Birick Managing Partner The Woolworth Building 233 Broadway, Suite 710

New York, NY 10175 (917) 529-3921 Jeff@chabrowe.com	New York, NY 10279 (212) 300-5196 ts@spodeklawgroup.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Criminal No. 25-cr-20543
Hon. Judith E. Levy

D-1 CEMHAN "JIMMY" BIRICIK,

Defendant.

ORDER MODIFYING DEFENDANT'S BOND CONDITIONS

Before the Court is Defendant's motion to modify order setting terms of release. (ECF No. 41.) Pursuant to the above stipulation of the parties, the Court finds that there is good cause to modify DEFENDANT'S current bond condition as follows:

Defendant shall avoid all contact with co-defendants and former employees of Fast Lab and Fast Doc, except his son Jemhan Bircik, and mother-in-law Caridad Cardoso.

SO ORDERED.

Date: November 5, 2025

s/Judith E. Levy
JUDITH E. LEVY
United States District Judge