



March 4, 2026

By ECF

Hon. William P. Dimitrouleas, U.S.D.J.
U.S. District Court, Southern District of Florida
299 East Broward Boulevard
Fort Lauderdale, FL 33301

Re: Victim Impact Statement in *U.S. v. Charles Boyd* and *U.S. v. Patrick Boyd*, 24-cr-20255

I am Associate General Counsel and Head of Anti-Counterfeiting at Gilead Sciences, Inc. (“Gilead”), and I submit this Victim Impact Statement on behalf of Gilead in connection with the sentencing of Charles Boyd and Patrick Boyd. The Boyds are responsible for flooding U.S. pharmacies with counterfeit and black-market bottles of Gilead’s life-saving HIV medications, turning an illicit profit at the expense of tens of thousands of patients who rely on uninterrupted, effective treatment to manage a serious, lifelong condition and protect public health. Although HIV is now manageable with consistent, effective treatment, the Boyds’ distribution of counterfeit and black-market HIV medicines threatened to undo that progress—placing patients at risk of life-threatening consequences and exposing the public to the dangers of untreated HIV. I write to emphasize the human cost of their crimes and the importance of general deterrence in protecting patients and public health in general from similar schemes in the future.

As the Court is aware, before the Boyds were indicted, Gilead initiated a civil anti-counterfeiting suit against, among others, the Boyds and their company, Safe Chain Solutions, Inc. (“Safe Chain”). Gilead brought that suit after receiving reports of Gilead-branded HIV medicines being distributed to pharmacies in what appeared to be authentic bottles, but with a fake foil seal and the wrong medicine inside. Those bottles had been sold by the Boyds’ company, Safe Chain. As the litigation progressed and Gilead gathered more evidence, it became apparent that Safe Chain had sold tens of thousands of bottles of counterfeit Gilead HIV medicines.

Some of those counterfeits sold by the Boyds’ company had the wrong medicine inside a re-sealed Gilead-branded bottle; others were once-authentic medicines that had already been dispensed to a patient, and then were illegally bought back from those patients on the black market. Those black-market medicines were repackaged into counterfeits and processed for illicit resale, including by having their patient pharmacy labeling removed, and then re-sold as new with counterfeit pedigrees that listed fake chains of custody to conceal their black-market origins.

As the manufacturer of authentic, life-saving HIV medicine that was counterfeited, Gilead was, of course, a victim of the Boyds’ crimes. But the greatest harm caused by the Boyds’ scheme must be measured in terms of the patients they injured. Every bottle that the Boyds sold represents a month’s worth of HIV medicine missed by a patient. The patients who were convinced to sell their bottles for cash were deprived of their life-saving medicine, and the patients who unknowingly received bottles with the wrong medicine inside thought they were

treating their HIV, but in reality, were taking anything from headache medicine to high-dose antipsychotics. The Boyds were responsible for selling over 28,000 bottles of illegitimate Gilead-branded HIV medicine, meaning that patients missed over 28,000 months of their HIV antiretroviral therapy.

The human cost of the Boyds' crime is staggering. HIV is an incurable and serious medical condition that, without proper treatment, can have life-threatening consequences for both patients and public health. Not long ago, an HIV diagnosis was considered a death sentence. Today, modern HIV medicines, if taken daily as directed, reduce patients' viral loads to undetectable levels. Patients with an undetectable viral load can live long, healthy lives, and they cannot transmit the disease, for example, to sexual partners. But when patients do not take their HIV medicine as prescribed, the consequences can be devastating. Patients' viral loads can climb, leading not only to the devastating health consequences of untreated HIV, but also creating serious risks to public health from community transmission of the disease and the development of drug resistance.

HIV care depends on patient trust. When a patient opens a sealed bottle and finds the wrong pills inside—or learns later they ingested counterfeit medicine—their trust in pharmacies, drug manufacturers, and the healthcare system collapses. Many may delay or abandon treatment, worsening health disparities and increasing transmission risk. Patients living with HIV already face stigma, marginalization, and barriers to care. The Boyds exploited this vulnerable population for profit.

Because of the enormous impact these crimes have upon patients and public health, deterrence is of the utmost importance. As the head of Gilead's anti-counterfeiting efforts, I can attest to the sad reality that we continue to see large-scale exploitation of vulnerable patients who are convinced to sell their HIV medicines for cash on the black-market, and those black-market medicines are then reintroduced into the U.S. pharmaceutical supply chain. In my experience, this criminal activity remains rampant because it is extremely profitable, and because there is a widespread belief among those who engage in these schemes that this is a "safe" crime to commit. The general deterrence created by the criminal justice system is the best way to protect patients. It is crucial that bad actors understand that if they are apprehended selling black-market HIV medicine, they will receive an appropriately severe sentence.

All patients sourcing their medicine from the legitimate U.S. supply chain deserve genuine, safe, and effective medicine, especially people living with HIV, whose health and lives depend on it. The Boyds stole that from countless patients. For these reasons, we respectfully request that the Court impose a serious and appropriate sentence reflecting the gravity of these offenses and the need for strong deterrence. Thank you for your attention to this critically important matter.

Sincerely,



Lori F. Mayall
Senior Assoc. General Counsel, IP
Head of Anti-Counterfeiting
Gilead Sciences, Inc.