

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

May 11, 2021

Michelle G. Bulls
Director
Office of Policy for Extramural Research Administration
National Institutes of Health
6705 Rockledge Dr.
Bethesda, MD 20817

Via e-mail: Michelle.Bulls@nih.gov

Dear Director Bulls:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters regarding serious concerns about a National Institutes of Health–funded grant for experiments on barn owls conducted by Johns Hopkins University’s (JHU) Shreesh Mysore, an assistant professor in the Department of Psychological and Brain Sciences at Johns Hopkins University (JHU; PHS Assurance # D16-00173). Specifically, after we supplied evidence to the Maryland Department of Natural Resources (DNR) that from 2015 through 2018, Mysore failed to obtain permits needed to confine and conduct invasive brain experiments on owls in his laboratory, Maryland Secretary of Natural Resources Jeannie Haddaway-Riccio confirmed to us in a letter dated May 5, 2021, that he had indeed been breaking state law for years.¹

Based on the information presented below, we ask that your office investigate this important matter and demand repayment of all disallowed taxpayer funds expended by Mysore and/or JHU during the period in which he violated Maryland state law, per the requirements of the NIH Grants Policy Statement. We also ask that you prohibit Mysore from receiving future funding from NIH and other government agencies for experiments on animals, based on his history of noncompliance with state law and the overwhelming failure of his experiments on owls to translate to human health as documented by NIH itself.

Mysore is the recipient of National Eye Institute (NEI) grant # R01EY027718 for a project involving the study of the neural correlates

¹Haddaway-Riccio, J. Letter from Maryland Department of Natural Resources to PETA. May 5, 2021.

Washington, D.C.
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
757-622-PETA

Berkeley
2855 Telegraph Ave.
Ste. 301
Berkeley, CA 94705
510-763-PETA

Info@peta.org
PETA.org

Affiliates:

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

of sensory selection and stimulus prioritization in barn owls (*Tyto alba*). To this end, he keeps approximately 30 barn owls in his laboratory at JHU, performs invasive neurophysiological experiments on them and ultimately kills them. A permit is required in Maryland “to possess a protected bird or parts of a protected bird for educational or scientific purposes, or for the purpose of propagation,”² and since barn owls are a “protected bird,”³ Mysore violated the regulations implementing the state’s captive wildlife statutes while using federal funds. Evidence furnished to PETA by the Maryland Department of Natural Resources (DNR) confirmed that, from 2015 through 2018, Mysore engaged in the regulated confinement of owls for experimentation without securing the necessary permits as is required by Maryland state law.

In Secretary Haddaway-Riccio’s letter to PETA, she states, “... Dr. Mysore’s original scientific collecting permit expired on December 31, 2014. A few years later, Dr. Mysore reapplied for a scientific collecting permit...” and she notes that the DNR sent Mysore a letter on March 4, 2021, warning him “that he will need to renew the permit annually and that operating under an inactive permit is a violation and subject to potential enforcement action and foreclosure of the research project.”⁴

As you know, the [NIH Grants Policy Statement](#) is explicit in disallowing the expenditure of taxpayer funds for costs resulting from violations of state law:

Costs resulting from non-Federal entity violations of, alleged violations of, or failure to comply with, Federal, state, tribal, local or foreign laws and regulations are unallowable, except when incurred as a result of compliance with specific provisions of the Federal award, or with prior written approval of the NIH awarding IC.⁵

The Statement also includes adherence to [Title 45 Section 75.441 of the Code of Federal Regulations](#), which states:

Costs resulting from ... violations of, ... or failure of the institution to comply with, Federal, state, ... local ... laws and regulations are unallowable except when incurred as a result of compliance with specific provisions of the Federal award, or with prior written approval of the HHS awarding agency.⁶

Mysore used federal funds to conduct experiments on owls while in violation of Maryland state law. The permitting provisions for scientific collection are not optional—they are a basic legal prerequisite to keeping these owls, who would otherwise be protected under the law, confined for use in invasive brain experiments. Mysore’s failure to satisfy the requirements of Maryland’s wildlife regulations strongly counsels against allowing

²Md. Code Regs. 08.03.09.06(B).

³Md. Code Regs. 08.03.01.01.

⁴Haddaway-Riccio.

⁵U.S. Department of Health and Human Services, National Institutes of Health. *NIH Grants Policy Statement*. National Institutes of Health; April 2021.

⁶45 CFR §75.300. Statutory and National Policy Requirements.

Mysore and JHU to engage in the continued possession of barn owls and other protected birds. **Furthermore, Mysore’s experiments on owls do not pass a harm-benefit analysis, given that NIH itself has reported that Mysore’s animal-based projects have a shockingly dismal 5% “approximate potential to translate” to human health, determined by the very low likelihood that his published papers will be cited in later clinical trials or guidelines.**⁷

It is incumbent upon your office to uphold its regulations and support sound human-relevant science by seeking repayment of relevant funds and permanently barring Mysore from receiving future NIH grant awards.

You can contact me directly via e-mail at ShalinG@peta.org. Thank you for your time and consideration. I look forward to your response.

Sincerely,

A handwritten signature in black ink that reads "Shalin G. Gala". The signature is written in a cursive style with a large, sweeping initial 'S'.

Shalin G. Gala
Vice President, International Laboratory Methods
Laboratory Investigations Department

cc: Michael Lauer, Director, Office of Extramural Research (OER)
Patricia Brown, Director, Office of Laboratory Animal Welfare (OLAW)
Michael Chiang, Director, National Eye Institute (NEI)

⁷iCite, Hutchins BI, Santangelo G. iCite Database Snapshots (NIH Open Citation Collection) [Internet]. figshare; 2019. doi: 10.35092/yhjc.c.4586573. Search terms “mysore, shreesh, owl” were inputted and the average approximate potential to translate (APT) was determined.