



March 30, 2022

Anthony S. Fauci, M.D.  
Director  
National Institute of Allergy and Infectious Diseases

Via e-mail: [afauci@niaid.nih.gov](mailto:afauci@niaid.nih.gov)

Dear Dr. Fauci:

Thank you in advance for your time. I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters around the world.

**Based on the information presented below, we urge the National Institute of Allergy and Infectious Diseases (NIAID) to do the following:**

1. Cancel the taxpayer funding granted to experimenter Laura Knoll of the University of Wisconsin (UW)—Madison for any and all renewals of her NIAID-funded protocol, “Sexual Development of Toxoplasma in Feline Intestinal Organoids” (NIH project numbers 1R01AI144016-01, 5R01AI144016-02, 5R01AI144016-03, 5R01AI144016-04).
2. Insist that Knoll reimburse the taxpayer funds used to acquire, breed, confine, and maintain the animals used in experiments whom she, her colleagues, and/or UW-Madison categorized as unnecessary, extraneous, noncritical, nonessential, disposable, or nonpriority or described using similar terminology and—according to documents obtained by PETA through public records requests—euthanized in response to the COVID-19 pandemic.

### **NIAID Funds Wasted on Animals Deemed Extraneous to Tests**

Per its COVID-19 response plan, UW-Madison notified its staff that “[a]ll on-site research activities must be approved by a dean or director, who are directed to only approve essential research, based on their judgement”<sup>1</sup> and that “[r]esearchers should consider reduction or cessation of non-critical animal breeding, including agricultural animals and USDA-covered species.”<sup>2</sup> As a result, an estimated two-

<sup>1</sup>University of Wisconsin—Madison. Kaylie Flaughner People for the Ethical Treatment of Animals (PETA) Public Records Request :: P001886-092321. Accessed March 10, 2022. <https://www.peta.org/wp-content/uploads/2022/01/uw-madison-responsive-records-response-letter.pdf>

<sup>2</sup>University of Wisconsin—Madison. Campus Research Activities Update. Accessed March 10, 2022. <https://news.wisc.edu/campus-research-activities-update/>

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- PETA Asia
- PETA India
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thirds of a nearly 700-member colony of mice assigned<sup>3</sup> to Knoll’s protocol—which received \$1,524,195 from NIAID from FY2019 to FY2022<sup>4</sup>—were euthanized during this timeframe. This was verified in UW-Madison’s public records released to PETA.<sup>5</sup>

The fact that the laboratory led by Knoll had any animals who could be deemed extraneous or described using similar terminology in the first place should raise significant red flags, especially since her experiments are funded by taxpayers, who should not have to foot the bill for such waste.

### **Knoll’s NIAID-Funded Protocol Failed to Reduce and Replace Animal Use**

The presence of any animals deemed nonessential or extraneous in NIAID-funded experiments led by Knoll flies in the face of existing regulations designed to minimize the use of animals in experiments.

National Institutes of Health (NIH)—supported language requiring the minimization of the experimental use of animals is present in the Health Research Extension Act of 1985, the NIH Revitalization Act of 1993, the eighth edition of the *Guide for the Care and Use of Laboratory Animals*, and the U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training:

- The Health Research Extension Act of 1985 states, “The Director of NIH shall require each applicant for a grant, contract, or cooperative agreement involving research on animals ... to include in its application or contract proposal ... (1) assurances satisfactory to the Director of NIH that ... (B) scientists, animal technicians, and other personnel involved with animal care, treatment, and use by the applicant have available to them instruction or training in the ... use of *research or testing methods that limit the use of animals* or limit animal distress” [emphasis added].<sup>6</sup>
- The National Institutes of Health Revitalization Act of 1993 states, “The Director of NIH ... shall prepare a plan ... for the National Institutes of Health to conduct or support research into ... *methods of such research and experimentation that reduce the number of animals used in such research*” [emphasis added].<sup>7</sup>
- The eighth edition of the *Guide for the Care and Use of Laboratory Animals* states, “The *Guide* ... endorses the following principles: *consideration of alternatives (in vitro*

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<sup>3</sup>Cima G. Research Delayed, Rodent Populations Reduced During Pandemic. American Veterinary Medical Association. Published April 29, 2020. Accessed March 10, 2022. <https://www.avma.org/javma-news/2020-05-15/research-delayed-rodent-populations-reduced-during-pandemic>.

<sup>4</sup>National Institutes of Health. RePORTER. Sexual Development of Toxoplasma in Feline Intestinal Organoids. Accessed March 10, 2022. <https://reporter.nih.gov/search/hZZvRI4-7UWc8-IrJu7SFQ/projects>

<sup>5</sup>University of Wisconsin–Madison. Kaylie Flaughter People for the Ethical Treatment of Animals (PETA) Public Records Request :: P001886-092321. Accessed March 10, 2022. <https://www.peta.org/wp-content/uploads/2022/01/uw-madison-responsive-records-response-letter.pdf>

<sup>6</sup>Health Research Extension Act of 1985, Publ. L. No. 99-158. Accessed March 10, 2022. <https://olaw.nih.gov/policies-laws/hrea-1985.htm>

<sup>7</sup>NIH Revitalization Act of 1993, Publ. L. No. 103-43. Accessed March 10, 2022. <https://grants.nih.gov/grants/olaw/pl103-43.pdf>

*systems, computer simulations, and/or mathematical models) to reduce or replace the use of animals” [emphasis added].<sup>8</sup>*

- The U.S. Government Principles for the Utilization and Care of Vertebrate Animals Used in Testing, Research, and Training (1985) states, “The animals selected for a procedure should be of an appropriate species and quality and *the minimum number required to obtain valid results*” [emphasis added].<sup>9</sup>

When an NIAID-funded experimenter such as Knoll buys, breeds, traps, and/or uses animals who at any time—not just during the COVID-19 pandemic—can be deemed extraneous or described using similar terminology, she squanders limited research funds, much of which come from taxpayers, and flouts the foundational “3Rs” principle of reducing, replacing, and refining the use of animals in experimentation that is enshrined in government regulations and policies.

As taxpayer funds were used to acquire, breed, confine, and/or maintain these animals who were deemed extraneous (or described using similar terminology) and then so readily euthanized and disposed of in response to COVID-19, UW-Madison should reimburse NIAID for this fiscal waste.

Furthermore, the Congressional Research Service has found that during the COVID-19 pandemic, “Suspending research may result in additional costs for activities such as animal care” and “[r]estarting research, when conditions permit, may also incur costs for staff time and supplies to ... reestablish laboratory animal populations.”<sup>10</sup> Taxpayers and NIAID should not be responsible for the additional costs associated with “reestablishing laboratory animal populations,” since universities deemed many of them extraneous to the experiments and because repopulating animals in laboratories at taxpayers’ expense would appear to violate the aforementioned federal regulations and policies that mandate minimizing the use of animals in experiments.

### **Knoll Isn’t Alone in Euthanizing Animals Deemed Extraneous, Wasting Tax Money**

On June 15, 2020, we sent a detailed letter to the U.S. Department of Health and Human Services Office of Inspector General (HHS-OIG) urging Principal Deputy Inspector General Christi Grimm to investigate, assess, and take corrective action regarding the apparent egregious waste of NIH research grants—worth up to billions of taxpayer dollars each year—and the apparent failure of NIH-funded protocols to reduce and replace animal use in experiments as required by federal provisions.<sup>11</sup> Specifically, our

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<sup>8</sup>National Research Council Committee for the Update of the Guide for the Care and Use of Laboratory Animals. Guide for the care and use of laboratory animals. Accessed March 10, 2022.

<https://grants.nih.gov/grants/olaw/guide-for-the-care-and-use-of-laboratory-animals.pdf>

<sup>9</sup>National Research Council Committee for the Update of the Guide for the Care and Use of Laboratory Animals. Appendix B: U.S. government principles for the utilization and care of vertebrate animals used in testing, research, and training. Accessed March 10, 2022. <https://www.ncbi.nlm.nih.gov/books/NBK54048/>

<sup>10</sup>Congressional Research Service. Effects of COVID-19 on the Federal Research and Development Enterprise. Published April 10, 2020. Accessed March 10, 2022.

<https://crsreports.congress.gov/product/pdf/R/R46309>

<sup>11</sup>People for the Ethical Treatment of Animals. Request to the U.S. Department of Health and Human Services Regarding the COVID-19 Contingency Plans at U.S. Universities. June 15, 2020. Accessed March

complaint pointed out that during the COVID-19 pandemic, universities across the country have urged or allowed their experimenters to suspend or end NIH-funded animal research activities where the experiments—or the animals used in them—have been categorized as extraneous or described using similar terminology, resulting in mass euthanasia of animals and the waste of taxpayer funds from NIH grants nationwide.

On June 23, 2020, we were notified by the HHS OIG Public Affairs that our complaint was forwarded to the then-director of NIH's Office of Management Assessment (OMA), Michael D. Shannon.<sup>12</sup> On February 17, 2021, we sent a follow-up complaint—containing more disturbing evidence of mass animal euthanasia in NIH-funded experiments in response to the COVID-19 pandemic—to then-Director of OMA Meredith Stein,<sup>13</sup> which the NIH Division of Program Integrity (DPI) subsequently assigned case number 2021-017.<sup>14</sup> We then acquired additional evidence of animal euthanasia in NIH-funded experiments, which we addressed in a letter dated November 18, 2021, to supplement the aforementioned DPI case.<sup>15</sup>

### **Request for Research Accountability and Modernization**

We urge you to cancel the funding granted to Knoll's NIH project numbers 1R01AI144016-01, 5R01AI144016-02, 5R01AI144016-03, and 5R01AI144016-04 and to seek reimbursement from her for any and all NIAID funds wasted in acquiring, breeding, confining, and/or maintaining the animals whom Knoll, her colleagues, and/or UW-Madison deemed extraneous or described using similar terminology and then euthanized in response to the COVID-19 pandemic. Moreover, we encourage NIAID to instead redirect the funds it initially granted to Knoll toward human-relevant, non-animal research methods as described in PETA's Research Modernization Deal.<sup>16</sup>

You can contact me at [ShriyaS@peta.org](mailto:ShriyaS@peta.org). We look forward to your reply regarding this important matter. Thank you.

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10, 2022. <https://www.peta.org/wp-content/uploads/2020/06/20-06-15-Request-to-HHS-OIG-regarding-COVID-19-contingency-plans-at-US-universities.pdf>

<sup>12</sup>HHS-OIG Public Affairs. RE: RE: For HHS OIG, from PETA—re Request for Investigation Into Apparent Waste at NIH and Failure to Reduce/Replace Animal Use. June 23, 2020. Accessed March 10, 2022. [https://www.peta.org/wp-content/uploads/2021/02/2020-06-23\\_For-HHS-OIG-from-PETA-re-request-for-investigation.pdf](https://www.peta.org/wp-content/uploads/2021/02/2020-06-23_For-HHS-OIG-from-PETA-re-request-for-investigation.pdf)

<sup>13</sup>People for the Ethical Treatment of Animals. Follow-Up Letter to the OMA. February 17, 2021. Accessed March 10, 2022. [https://www.peta.org/wp-content/uploads/2021/02/2021-02-17\\_Follow\\_up\\_letter\\_to\\_OMA\\_HHS.pdf](https://www.peta.org/wp-content/uploads/2021/02/2021-02-17_Follow_up_letter_to_OMA_HHS.pdf)

<sup>14</sup>National Institutes of Health. DPI case #2021-017 Acknowledgment Letter. Accessed March 10, 2022. <https://www.peta.org/wp-content/uploads/2022/02/nih-dpi-case-number-assignment.pdf>

<sup>15</sup>People for the Ethical Treatment of Animals. Complaint Update. November 18, 2021. Accessed March 10, 2022. [https://www.peta.org/wp-content/uploads/2022/02/2021-11-18\\_Complaint-update\\_NIH-OMA\\_DPI.pdf](https://www.peta.org/wp-content/uploads/2022/02/2021-11-18_Complaint-update_NIH-OMA_DPI.pdf)

<sup>16</sup>People for the Ethical Treatment of Animals. The Research Modernization Deal 2021. Accessed March 10, 2022. <https://www.peta.org/wp-content/uploads/2020/12/PETA-2021-Research-Modernization-Deal.pdf>

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Shriya Swaminathan', with a stylized flourish at the end.

Shriya Swaminathan  
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