



October 13, 2022

Ronald J. Daniels, L.L.M., J.D.  
President  
Johns Hopkins University

Theodore DeWeese, M.D.  
Interim Dean, CEO  
Johns Hopkins Medicine

Via e-mail: [rdaniels@jhu.edu](mailto:rdaniels@jhu.edu); [president@jhu.edu](mailto:president@jhu.edu); [deweese@jhmi.edu](mailto:deweese@jhmi.edu)

Dear President Daniels and Dr. DeWeese:

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 globally, more than 94,000 of whom live in Maryland and over 11,000 of whom live in Baltimore. **Based on the information presented below regarding apparent serious violations of Maryland Code, Crim. Law § 10-604(a)(3)-(4)—which are not exempt under § 10-603—resulting from the mistreatment of animals who were used in invasive laboratory experiments at Johns Hopkins University (JHU), we respectfully urge you to do the following:**

- Shut down all experiments on animals that have violated state and/or federal regulations
- Reimburse all federal funds expended on experiments on animals during the period in which these regulations were violated
- Prohibit future funding from the National Institutes of Health (NIH) for JHU faculty who have contravened state and/or federal regulations related to experiments on animals

### **Public Records Confirm Apparent Violation of Maryland Criminal Code**

According to records PETA obtained through the Freedom of Information Act, animals assigned to a project funded by NIH titled “Multidisciplinary Approach to Study of Patients With Severe Alcoholic Hepatitis Undergoing Liver Transplantation-Project 4 Animal Transplant Models to Characterize Immune and Regenerative Effects of Alcohol” (NIH grant number 5P50AA027054), led by experimenter Zhaoli Sun,<sup>1</sup> were not treated in accordance with the university’s protocol approved by the

<sup>1</sup>RePORTER. National Institutes of Health. Project 4-Animal Transplant Models to Characterize Immune and Regenerative Effects of Alcohol. Accessed October 7, 2022. [https://reporter.nih.gov/search/OgGEX9hUSE6XRuKknU\\_H3A/projects](https://reporter.nih.gov/search/OgGEX9hUSE6XRuKknU_H3A/projects)

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS

Washington  
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

Info@peta.org  
PETA.org

Entities:

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

JHU's Animal Care and Use Committee (ACUC). JHU claims that these experiments on rats would purportedly evaluate the impact of alcohol exposure on liver transplant outcomes in humans.<sup>2</sup>

The rats assigned to this protocol were administered alcohol to induce liver toxicity for up to eight weeks, as opposed to the ACUC-approved five-week timeline. Additionally, rats had been kept for up to two months beyond the ACUC-approved endpoints, when the animals were to be euthanized after enduring a surgical transplant procedure, possibly prolonging their suffering. Furthermore, some animals were found to be in poor health, exhibiting weight loss and incisional herniation, which likely caused them immense pain and suffering.<sup>3</sup>

In a letter from JHU to NIH's Office of Laboratory Animal Welfare (OLAW) dated June 29, JHU Vice Provost for Research Denis Wirtz admits to a "failure by the principal investigator to adhere to the approved protocol for use of rats in a liver transplant study funded by NIH."<sup>4</sup> Given that this experimental misconduct constitutes a confirmed research protocol violation, it appears to fall within the scope of Maryland's cruelty-to-animals statute, since Maryland Code, Criminal Law § 10-603(2) exempts "research conducted in accordance with protocols approved by an animal care and use committee" from criminal prosecution.

### **JHU Has a History of USDA-Reported Violations and Citations**

This violation of research protocol is on top of a growing list of alarming violations of the federal Animal Welfare Act and citations issued by the U.S. Department of Agriculture (USDA) at JHU.<sup>5</sup> According to federal records obtained by PETA, JHU has been cited by the USDA's Animal and Plant Health Inspection Service (APHIS) for negligence and compromising the welfare of the animals used by the university in experiments.<sup>6</sup> The APHIS inspection report reveals the following:

- A JHU principal investigator deviated from a protocol approved by the ACUC by failing to provide pigs with analgesia, claiming that recovery from anesthesia was better without the use of analgesics. JHU veterinary staff were also not consulted on this matter.
- A pig used in a JHU cardiac experiment had a difficult recovery from anesthesia and was later found to be severely injured. The necropsy revealed that this animal had sustained two broken elbows, which occurred when the pig was moved from a transport cage to another location. The JHU senior laboratory technician failed to report the injuries to JHU veterinary staff.

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<sup>2</sup>Wirtz D. and Wolff A. Correspondence Between OLAW and JHU. Accessed October 7, 2022.

<https://www.peta.org/wp-content/uploads/2022/09/2022-07-06-case-2p.pdf>

<sup>3</sup>Wirtz D. and Wolff A.

<sup>4</sup>Wirtz D. and Wolff A.

<sup>5</sup>PETA. USDA Finds Agony for Monkeys at Johns Hopkins. Accessed October 7, 2022.

<https://headlines.peta.org/photos-violations-agony-monkeys-johns-hopkins/>

<sup>6</sup>APHIS, USDA. Inspection Report. August 23, 2021. Accessed October 7, 2022.

<https://www.peta.org/wp-content/uploads/2021/10/210823-jhu-ir-pig-monkeys.pdf>

- A JHU laboratory displayed a significant lack of aseptic technique and failed to maintain a sterile workspace—nearly 50% of cranial implants embedded in rhesus macaques by one JHU experimenter resulted in contamination and chronic antibiotic-resistant infections in these monkeys. As a result, the experimenter euthanized these animals.
- Experimenters in JHU’s Traylor Laboratory used expired compounds during experiments on rabbits. Two bottles of heparin—one expired in 2017 and the other in 2018—and one bottle of sodium chloride that had expired in 2019 were used in these experiments.

### **JHU Experimenter Violated State Law for At Least Seven Years**

In addition, PETA uncovered that JHU experimenter Shreesh Mysore had been illegally experimenting on and killing barn owls for up to seven years without facing any repercussions for his blatant negligence.<sup>7</sup> Mysore failed to acquire the necessary permits to possess barn owls for invasive brain experiments and operated without a permit from 2015 to 2018, despite having been reminded by the Maryland Department of Natural Resources (MD DNR).

Adding to Mysore’s transgression of the law, PETA uncovered that killing the owls after they were used in experiments violated the conditions of the scientific collection permit issued by the MD DNR. We pointed out to the agency that in the issued permit, Mysore states, “At the end of the study, birds may be euthanized.”<sup>8</sup> Furthermore, Mysore confirmed his killing of the owls in his relevant NIH grant application, stating, “Animals will be euthanized with beuthanasia D (under 4% isoflurane), and perfused with saline followed by a fixative solution (paraformaldehyde) to recover brains for histology and tract tracing. Deaths will be documented in animal inventory records.”<sup>9</sup> However, Maryland Code, Natural Resources § 10-909(e)(1) explicitly prohibits such killing of wildlife—which, per the statutory definition, includes the barn owls used by Mysore—by permittees, stating that “[t]he permit becomes void on proof that the permittee has ... [c]aptured or killed any wildlife.”<sup>10</sup> As a result, the MD DNR revoked Mysore’s license.<sup>11,12</sup> PETA addressed this issue in a detailed letter to JHU on June 6,<sup>13</sup> but the school has failed to take appropriate corrective actions against Mysore. After temporarily

<sup>7</sup>PETA. Owls’ Skulls Cut Open at Johns Hopkins University. Accessed October 7, 2022.

<https://headlines.peta.org/johns-hopkins-university-owl-experiments/>

<sup>8</sup>Maryland Department of Natural Resources. Scientific Collecting Permit. Accessed August 5, 2022.

<https://www.peta.org/wp-content/uploads/2022/03/sco-mysore.pdf>

<sup>9</sup>Mysore S. Research Project Grant. February 3, 2016. Accessed October 7, 2022.

<https://www.peta.org/wp-content/uploads/2021/01/Mysore-grant-application.pdf>

<sup>10</sup>Md. Code, Nat. Res. § 10-909.

<sup>11</sup>Peditto P. Mysore Permit. MD DNR. May 12, 2022. Accessed October 7, 2022. <https://www.peta.org/wp-content/uploads/2022/06/Mysore-Permit.pdf>

<sup>12</sup>Larney T. Permit Revocation. Maryland Department of Natural Resources. May 12, 2022. Accessed October 7, 2022. <https://www.peta.org/wp-content/uploads/2022/05/State-of-Maryland-Mail-Permit-Revocation.pdf>

<sup>13</sup>Swaminathan S. Letter to JHU Regarding Mysore’s Repeat Violations. June 6, 2022. Accessed October 7, 2022. <https://www.peta.org/wp-content/uploads/2022/06/2022-06-06-letter-to-jhu-re-mysore-repeat-violation.pdf>

issuing a permit that explicitly prohibited the killing of owls, the MD DNR perplexingly issued the school a new permit that allows for business as usual.<sup>14</sup>

JHU has demonstrated its apparent inability to abide by the most fundamental regulations that provide animals used in experiments with bare minimum protections. **Therefore, we urge you to issue corrective sanctions against experimenters whose blatant violations of state and/or federal law have severely compromised the well-being of countless animals in JHU's laboratories.**

You can contact me directly at [ShriyaS@peta.org](mailto:ShriyaS@peta.org). Thank you for your consideration of this important issue. We look forward to your swift response.

Sincerely yours,



Shriya Swaminathan  
Science Policy Advisor  
International Laboratory Methods Division  
Laboratory Investigations Department

CC: JHU Animal Care and Use Committee  
[acuc@jhmi.edu](mailto:acuc@jhmi.edu)

Nancy Ator, Ph.D.  
Chair  
ACUC, Johns Hopkins University/Johns Hopkins Medicine  
[ator@jhmi.edu](mailto:ator@jhmi.edu)

Denis Wirtz  
Vice Provost for Research  
Johns Hopkins University  
[wirtz@jhu.edu](mailto:wirtz@jhu.edu)

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<sup>14</sup>MD DNR. Scientific Collecting Permit. Accessed October 7, 2022. <https://www.peta.org/wp-content/uploads/2022/07/JHU-Permit-to-Possess-Species-of-Protected-Wild-Birds.pdf>