

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS
FOUNDATION

Washington
1536 16th St. N.W.
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Norfolk
501 Front St.
Norfolk, VA 23510
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Amanda McAdoo
Director
The Cottonwood School of Civics and Science

Via e-mail: amandamcadoo@thecottonwoodschool.org;
amysampleward@thecottonwoodschool.org;
marivansickle@thecottonwoodschool.org;
board@thecottonwoodschool.org

October 24, 2022

Dear Ms. McAdoo,

I am Director of Litigation for the PETA Foundation. I write to follow up on prior correspondence with Samantha Crowe and address an urgent matter that has arisen.

Specifically, I understand from your email of Friday, October 21, 2022 that you and your colleagues are meeting today to evaluate an upcoming student field trip to Oregon National Primate Research Center (“ONPRC”), currently scheduled for Wednesday, October 26, 2022. In addition to the prior concerns raised by Ms. Crowe, it has come to PETA’s attention that the Cottonwood School of Civics and Science hosted an ONPRC representative on Friday, October 21, 2022. PETA understands that this ONPRC representative, while purporting to address well-founded student concerns, made maliciously false and defamatory statements about PETA.

Specifically, PETA understands that this ONPRC representative told a class of sixth graders, among other falsehoods, that undercover footage taken by a PETA investigator had been manipulated and deceptively edited.

As an initial matter, and as I communicated to Oregon Health & Science University (“OHSU”) and ONPRC, in correspondence attached to this letter as **Exhibit A**, this is a lie. As with every PETA investigation, footage captured and published by PETA shows only the truth. At ONPRC, PETA captured and published a true and accurate depiction of what ONPRC inflicts on primates—miserable conditions including but far from limited to small, barren cages, causing primates observable, severe psychological injury. Further reinforcing these findings are [numerous](#), [persistent examples](#) of

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[egregious neglect and mistreatment](#) of primates documented in Ms. Crowe's October 11, 2021 correspondence.

In addition, and as I have communicated to OHSU and ONPRC, these statements were blatantly intended to convey a false and defamatory representation of PETA, its investigator, and its investigations. For these reasons, as you can see in **Exhibit A**, PETA has demanded that OHSU and ONPRC immediately cease and desist, retract, and issue an apology for these maliciously false and defamatory statements.

As I have informed OHSU and ONPRC, the safest course of action is to cancel this Wednesday's scheduled field trip. I urge you to seriously consider this suggestion as well. OHSU and ONPRC's apparent commitment to providing students a maliciously false perception of its experiments on primates not only exacerbates PETA's cognizable injuries, but also subverts any educational purpose the field trip may serve. PETA will be evaluating all of its options to redress any injuries caused by these and any similar statements, and reserves all rights.

I look forward to hearing from you sufficiently in advance of Wednesday, October 26, 2022.

Sincerely,

Asher Smith
AsherS@petaf.org

cc: Ms. Amy Sample Ward and Ms. Mari Van Sickle, Co-Chairs,
Board of Directors, The Cottonwood School of Civics and Science

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EXHIBIT A

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Danny Jacobs, M.D., M.P.H., F.A.C.S.
President
Oregon Health & Science University
3181 S.W. Sam Jackson Park Rd.
Portland, OR 97239-3098

Nancy L. Haigwood, Ph.D.
Director
Oregon National Primate Research Center
505 NW 185th Avenue, L584
Beaverton, OR 97006-3448

Via email to jacobsda@ohsu.edu; haigwoon@ohsu.edu;
gordondi@ohsu.edu

October 24, 2022

Dear Dr. Jacobs and Dr. Haigwood,

I am Director of Litigation for the PETA Foundation. I write to demand that you immediately cease, retract, and issue an apology for maliciously false and defamatory statements that have come to PETA's attention.

Specifically, PETA understands that on October 21, 2022, a representative for Oregon National Primate Research Center ("ONPRC"), Diana Gordon, spoke to a sixth grade class at the Cottonwood School of Civics and Science in Portland, Oregon in advance of an upcoming student field trip to ONPRC, scheduled for Wednesday, October 26, 2022. PETA further understands, and has been reliably informed, that, during Ms. Gordon's presentation, she told the class, in response to well-founded student concerns, that undercover footage taken by a PETA investigator had been manipulated and deceptively edited. Ms. Gordon reportedly elaborated that such manipulation included efforts to make cages holding primates appear smaller than they actually were.

Such statements are blatantly intended to convey a false and defamatory representation of PETA, its investigator, and its investigations. As with every PETA investigation, footage captured and published by PETA shows only the truth—here, a true and accurate depiction of conditions at ONPRC.

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That footage published by PETA showed primates at ONPRC confined to small, barren cages; displaying observable psychological injury such as frantic pacing, spinning, and rocking; forced to eat food out of waste-filled trays; denied adequate veterinary care and pain relief; sprayed with high-pressure hoses; and subjected to rough handling in addition to other traumatizing conditions is due, as you are aware, exclusively to ONPRC's actual and knowing conduct. Indeed, many of these precise same conditions are apparent in [videos](#) taken by ONPRC personnel, subsequently obtained by PETA through the public records process. Likewise, as Oregon Health & Science University ("OHSU") itself has recently admitted, and been reminded by regulators, [egregious neglect and mistreatment](#) of primates has persisted.

PETA's cognizable injuries are exacerbated by the manner of Ms. Gordon's dissemination of these defamatory statements—to young students, whom OHSU apparently hopes to persuade to support experiments on primates, and against animal advocacy, through deceptive and defamatory means. To this end, it is relevant that Ms. Gordon, as PETA is further informed, repeated other falsehoods concerning conditions at ONPRC. It is also not lost on PETA that the context for such statements was preparation for a sanitized tour of ONPRC facilities, during which students would see only a small area that ONPRC uses primarily for public relations purposes and that houses just a fraction of the primates caged on site.

Accordingly, PETA demands that OHSU, including through both yourselves and Ms. Gordon, immediately cease and desist from these and any similar defamatory statements about PETA, its investigators, and investigations, and retract and apologize for these maliciously defamatory statements. The safest course of action, and my expectation, is that you will cancel the upcoming visit by the Cottonwood School of Civics and Science. Furthermore, I expect that, upon receipt of this correspondence, you will draft a retraction and apology for PETA's review and return the same to me. We can then discuss the proper venue(s) for dissemination of this retraction and apology.

Failure to comply with this letter will require PETA to consider alternative means of protecting itself. PETA reserves all rights in this regard.

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I expect to hear from you sufficiently in advance of Wednesday, October 26, 2022. PETA considers this an urgent matter.

Sincerely,



Asher Smith
AsherS@petaf.org

cc: Ms. Diana Gordon, Education Outreach Specialist, ONPRC

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