



July 10, 2023

Frank A. Lattanzio, Jr.
IACUC Chair
Eastern Virginia Medical School

Via e-mail: lattanfa@evms.edu

Dear Dr. Lattanzio:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 9 million members and supporters to ask that you immediately revoke approval for the Eastern Virginia Medical School (EVMS) project “Regulation of Fetal-Placement Development in the Primate” under which numerous painful and invasive experiments have been carried out on baboons. By their very nature, these experiments cause tremendous harm to vulnerable baboons; but the repeated failure of the EVMS experimenters involved in this project to comply with minimum animal welfare standards stipulated by law has exacerbated the agony suffered by the animals.

Baboons used in this project—carried out by EVMS’ Gerald J. Pepe and his colleagues—are subjected to multiple major surgeries without scientific justification or appropriate approval, in deviation from federal law. They are administered harmful chemical agents that unleash debilitating symptoms and are subjected to muscle biopsies, ultrasounds, and repeated blood draws. When their bodies are no longer useful to the experimenters, they are killed. In one experiment, baboons were impregnated and then injected with letrozole—a drug that reduces estrogen levels in the body and is known to have severe side effects in humans, including nausea, vomiting, hot flashes, acute irritability, and depression. The fetuses of some of the baboons were surgically removed from their bodies and killed so their tissue could be analyzed. Other baboons were allowed to continue their pregnancies to term; the infant baboons were then subjected to biopsies so their tissue could be analyzed.

EVMS has been cited multiple times by the U.S. Department of Agriculture (USDA) for this laboratory’s repeated failures to comply with the federal Animal Welfare Act and its implementing regulations.

- A May 2, 2023 USDA inspection report documents that experimenters deviated from the protocol that had been approved by the Institutional Animal Care and Use Committee (IACUC), and notes that this was a repeat violation.
 - The protocol permitted subjecting baboons to ketamine sedation followed by blood draws every two to four days. However, EVMS records documented that a 17-year-old baboon named Alissa had undergone sedation and blood draws on a daily basis—including, but not limited to, three periods from January to March 2023. A 16-year-old baboon named Jemma similarly underwent daily

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sedations and blood draws, including, but not limited to, four periods from May to June 2021. As noted in the inspection report: “Increased blood draw frequency can have potential impacts on animal health and well-being.”

- The protocol stipulated that all adult female baboons should be weighed monthly or weekly when the animal is being used in an experiment. However, EVMS records reveal that five baboons were weighed less frequently—only during their semi-annual physical or during a surgical procedure. As noted in the inspection report: “Monitoring the animal’s weight weekly is described in the protocol as a clinical parameter to be monitored to indicate adverse effects, pain, and/or distress to the animals.” The experimenters’ failure to adhere to this aspect of the protocol further jeopardized the animals’ welfare.
- The protocol permitted experimenters to administer an experimental drug to pregnant baboons—even though it was known that approximately 10% of the baboons receiving the drug would suffer a seizure. In an attempt to limit the baboons’ suffering, the protocol required that certain steps be taken for “animals found non-responsive, actively seizing, or unconscious.” However, after Jemma—the 16-year-old baboon mentioned earlier—was given the experimental drug, she was found unresponsive in her cage; there was no indication that treatment was provided as stipulated in the protocol.
- A September 14, 2021 USDA inspection report documents that experimenters failed to secure IACUC approval, as required by law, before subjecting baboons to multiple “major operative surgeries.” Classifying this as a critical violation, the report identifies three baboons who were each subjected to three caesarian sections over a span of six years. As noted in the inspection reports: “The facility has not sought or received approval from the Administrator for any of the animals [who] have undergone multiple major operative procedures on any of the protocols. Animals [who] undergo major operative procedures and are recovered [i.e., not killed] are subjected to stress, pain and discomfort.” This was marked as a critical violation.

Curiously, EVMS completely omitted details pertaining to the violations of federal law documented in the May 2, 2023 inspection report in its June 13, 2013 letter to Senators J. Chapman Petersen and David W. Marsden, ostensibly aimed at providing detailed explanations for AWA violations in EVMS’ laboratories for the period from 2021 to 2023, as had been requested by the senators.

What is clear is that EVMS’ experiments on pregnant baboons call into question the integrity of the system of oversight at the institution. The continuance of these experiments and EVMS’ attempts to obscure them from state government inquiry suggests that EVMS has as little respect for the public’s expectations that institutions that use nonconsenting, sentient animals in experiments will adhere to some provisions for their protection as it has for the animals imprisoned in its laboratories.

We strongly urge the EVMS IACUC to revisit and suspend its approval for experiments using baboons to study fetal development, give more thoughtful consideration to the costs borne by the animals, and reject any such studies that are submitted to the IACUC in the future. May we hear from you about this urgent matter? I can be reached by email at [address] or by phone at [number].

Thank you.

Sincerely,

A handwritten signature in black ink that reads "E. Trunnell". The signature is written in a cursive, flowing style.

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