

March 14, 2024

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Via e-mail: [abuhamaz@evms.edu](mailto:abuhamaz@evms.edu)

Dear President Abuhamad:

I'm writing on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters globally—to request your prompt intervention to end a decades-long series of controversial and inhumane baboon pregnancy experiments conducted at Eastern Virginia Medical School (EVMS).

Of the [five U.S. Department of Agriculture \(USDA\) violations](#) EVMS received from 2021 to the present, two of those—one critical and one repeat—involve these experiments. Most recently, the USDA rescinded a previously granted exception for five female baboons (known at EVMS as “26741,” “26876,” “27320,” “07105,” and “03105”) after experimenters failed to adhere to the few simple conditions set forth. I'm writing to urge you to allow the five identified female baboons on the protocol to be retired to a sanctuary (which PETA could arrange and which is long overdue) and to immediately end these experiments—which have yielded nothing beneficial for more than 40 years—to prevent more animals from suffering physical and psychological torment and pain.

### The Experiments

Since 1980, EVMS investigator Gerald J. Pepe has used olive baboons to purportedly study the role of hormones during pregnancy. In the experiments, female baboons are impregnated and subjected to daily hormone injections for up to 70 days. Throughout their pregnancies, the baboons are repeatedly sedated for blood draws and subjected to muscle biopsies, cardiac tests, and metabolic examinations. Their fetuses are cut out at different stages of pregnancy, some up to nine days before reaching full development.

For the current three-year protocol (#21-003), EVMS' Institutional Animal Care and Use Committee (IACUC) approved the use of **156 baboons**—including **63 fetuses** cut out of their mothers and killed and an additional **40 babies** born for the purpose of being used in other experiments. Pepe has admitted that the hormonal manipulations used in his experiments are “associated with a 20% loss

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due to spontaneous abortion or failure of neonates to thrive.” We suspect that figure is on the conservative side.

### **Not Just Numbers: The Plight of Just One Baboon Known as ‘26876’**

Jemma, identified as “26876,” is just one of several baboons whose multiple pregnancies and caesarian sections served as a red flag for federal authorities. She was 6 years old when she arrived at EVMS in 2011. Caged in near-constant isolation and deprived of everything that’s natural and important to her species, she began pulling out her hair and biting on cage bars—behavior indicative of extreme psychological distress. Records reveal the extent of her suffering, documenting skin lesions, genital tears, and traumatic injuries, including missing fingers. She found solace briefly when one of the many babies she was forced to carry by experimenters, a boy named Boo, was with her for only a few months. But he was taken from Jemma in 2018, at just 8 months of age, and she resumed her self-harming behavior.

In 2019 and 2020, Jemma was subjected to two cesarean sections, both performed in the first trimester of her pregnancies. Just a year later, she was impregnated again. She was injected daily with a drug known to induce seizures in animals, and a laboratory worker, on at least one occasion, found her unresponsive after the drug was administered. Procedures outlining what should be done in such an emergency were allegedly in place, but there are no records to indicate that they were followed. There are also no records to show that Jemma received any veterinary treatment at all. She recovered from the seizure, then underwent a third cesarean section two days later. This one was performed “near term,” and her daughter was killed after the surgery.

### **Violations of Federal Law**

The federal Animal Welfare Act (AWA) stipulates that animals used in experiments can be subjected to only one major survival surgery (i.e., an operative procedure from which the animal is allowed to recover) unless using animals in additional survival surgeries can be scientifically justified or has approval from federal authorities. However, in a September 14, 2021, inspection report, the USDA—the agency charged with enforcing the AWA—cited EVMS for a critical violation of this regulation, writing the following:

At least three female baboons have undergone multiple major operative procedures on more than one IACUC-approved protocol without prior approval from the APHIS Administrator [the USDA’s Animal and Plant Health Inspection Service conducts agency inspections]. Protocol 21-003 involves a major operative procedure from which animals are recovered. Medical records and study records indicate that three adult female baboons (ID #: 26876, 26741, and 28768) have each undergone major operative surgeries on prior protocols as well as the current protocol.

The citation elaborates that each of the baboons underwent three cesarean sections and continues as follows:

The protocols indicate animals will be undergoing multiple major surgeries but do not provide a scientific justification nor have approval from the Administrator. These protocols, which have each been reviewed and approved by the IACUC,

have spanned over 6 years. According to the facility, due to the multiple surgeries performed, the IACUC created a policy to limit the number of major operative procedures an individual animal can undergo to a maximum of six in an animal's life. 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.

The inspection narrative concludes: **“Animals [who] undergo major operative procedures and are recovered are subjected to stress, pain, and discomfort.”** Violations such as this one have brought [the need for increased transparency and accountability](#) at animal testing facilities, including university laboratories, to the attention of Virginia legislators.

After persistent pushing by EVMS, Dr. Betty Goldentyer, then deputy administrator of APHIS Animal Care, who unexpectedly retired after being called to [testify in a grand jury hearing](#) regarding USDA Animal Care's stunning failure to take meaningful corrective action against Envigo, despite issuing more than 70 citations over the course of 10 months, yielded to the pressure and granted an exception to EVMS in June 2022. This exception allowed the school to perform multiple major survival surgeries on five adult female baboons (“26741,” “26876,” “27320,” “07105,” and “03105”) being used in protocol #21-003, permitting up to six cesarean sections on each animal. Goldentyer placed a number of conditions on the exception—including that work would be performed in accordance with the protocol and that the IACUC “evaluates animal well-being along with the effectiveness and soundness of methods and procedures, a minimum of every six months during the approval period.” She added, “Any failure to abide by the above provisions will result in the automatic withdraw[al] of APHIS' approval of this exemption.”

On May 2, 2023, EVMS was again cited by the USDA for its failure to ensure that procedures on baboons in protocol #21-003 were carried out in accordance with EVMS' own protocol. In particular, the inspection report documented that baboons used in the protocol were subjected to a greater frequency of blood draws than permitted in the protocol—exposing the animals to detrimental impacts on their well-being. The report also documented that experimenters failed to weigh the baboons at the frequency specified in the protocol—another failure that could jeopardize the welfare of the animals. The report further observed:

The protocol describes an anticipated adverse event (“seizures”) in approximately 10% of animals receiving a study drug from days 100–170 gestation. Due to this known adverse event, the protocol documents steps that will be taken for animals found non-responsive, actively seizing, or unconscious which includes removing the animal from the cage, performing a blood gas analysis and glucose level, catheter placement and potential supplementation of dextrose depending on the blood glucose result. A 16-year-old female, Olive Baboon #26876, “Jemma,” while receiving the study drug, was found unresponsive at 6 am by a technician on June 16, 2021. There are no records indicating treatment was provided as outlined in the protocol. The only entry is from the attending veterinarian (AV) stating that she was found unresponsive at 6 am but by the time the AV arrived she had consumed some apples and was up and quiet, alert, and responsive.

On May 16, 2023, Dr. Roxanne Mullaney, then acting deputy administrator of APHIS Animal Care (she now serves as deputy administrator of APHIS Animal Care) wrote to EVMS, informing the school that in light of its failure to perform activities in accordance with protocol #21-003, APHIS “hereby withdraws its approval of the exception for this protocol.” She emphasized that “[n]o additional research-related major operative procedures from which they recover may be performed on animals 26741, 26876, 27320, 07105, and 03105.”

On July 31, 2023, EVMS self-reported the violations to the National Institutes of Health’s Office of Laboratory Animal Welfare (OLAW), as is required by federal law. On August 14, 2023, OLAW responded to EVMS, concluding, “Please be advised that it is your institution’s responsibility to report these incidents to the funding institute’s Chief Grants Management Officer and to make sure that no expenses related to these non-compliant activities are charged to the grant.”

### **Conclusion**

Despite continuing for more than four decades, these invasive and deadly experiments have yielded no benefit to humanity. The USDA’s concern over the well-being of the baboons used in these experiments is clear from the agency’s letter to OLAW and in its exception withdrawal—both exceedingly rare occurrences. Other USDA violations in the past few years involved chinchillas and rhesus macaques, and EVMS’ 2022 AAALAC annual report shows mice, rats, and rabbits have also been subjected to experimentation. We implore you to assume personal responsibility in safeguarding the baboons and all other animals used in experiments in EVMS laboratories, and we urge you to end the inhumane pregnancy experiments immediately and transfer the five female baboons who have suffered through multiple major surgeries to a reputable sanctuary, where they’d finally experience some semblance of a real life.

We’d be happy to meet with you to discuss this important matter further.

Sincerely,



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