



June 27, 2025

Sarah Helming
Deputy Administrator
Animal Care
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

Via e-mail: Sarah.J.Helming@usda.gov; ac.complaints@usda.gov

Dear Ms. Helming:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 9 million members and supporters worldwide to respectfully request that the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) investigate possible violations of the Animal Welfare Act (AWA) related to alleged mistreatment of monkeys at the Oregon National Primate Research Center, affiliated with Oregon Health & Science University (OHSU; USDA Certificate No. 92-R-0001).

PETA has received information from anonymous whistleblowers that we believe indicates violations of the federal Animal Welfare Act (AWA) and the associated Animal Welfare Regulations (AWRs). According to the whistleblowers, key figures at ONPRC—specifically Drew Martin, Associate Director of the Division of Comparative Medicine, and Cassandra Cullin, the center's Resources and Logistics Head and de facto colony manager, Jeff Stanton, Attending Veterinarian, and Kris Coleman, IACUC Chair—are implicated in a deliberate and far-reaching cover-up.

Serious incidents, including mysterious deaths, escape of monkeys from their housing enclosures, and traumatic injuries stemming from altercations between and among monkeys, are reportedly going undocumented under an unwritten policy that discourages formal reporting.

The whistleblowers have further alleged that monkey escapes from enclosures are frequent across colonies at ONPRC, often resulting in injuries that require veterinary care. Additionally, staff reportedly fail to ensure that monkeys housed together are behaviorally compatible, leading to further injuries, psychological trauma (Self Injurious Behavior (SIB), Stereotypy, and alopecia), and even deaths.

Staff have allegedly been directed to record only the bare minimum, using vague language like "minor wounds," and to close cases quickly in order to minimize scrutiny and avoid accountability. This lack of proper documentation has led to prolonged suffering for sick and injured monkeys, as their conditions often go unrecognized and untreated. Without timely veterinary care, minor injuries can worsen, becoming infected and developing into painful pustules and other serious complications.

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.)

These allegations point to serious lapses in ONPRC's compliance with the AWRs, including violations of the following provisions:

1. Failure to maintain a program of adequate veterinary care; and
2. Failure to provide appropriate training and instruction to personnel.

I. Failure to maintain a program of adequate veterinary care

Section 2.33(b) of the AWRs states: "Each research facility shall establish and maintain programs of adequate veterinary care." The regulation further specifies that adequate care includes the "use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries," "[d]aily observation of all animals to assess their health and well-being," and "a mechanism of direct and frequent communication [to veterinary staff] ... on problems of animal health, behavior, and well-being," and "adequate pre-procedural and post-procedural care in accordance with current established veterinary medical and nursing procedures."

However, according to the whistleblowers, the level of care stipulated by this regulation was not met by ONPRC. Failure to document incidents—such as escapes, deaths, fights, and injuries—directly undermines the ability to provide adequate veterinary care, as required by the Animal Welfare Regulations. Proper documentation ensures that injuries are promptly identified, treated, and monitored, and that patterns of risk or recurring issues can be addressed to prevent future harm. When such events are concealed or left unrecorded, animals may suffer without appropriate medical attention, and systemic problems may go uncorrected, jeopardizing the health and safety of the entire population. A veterinary care program cannot function effectively without accurate, timely records that inform clinical decisions and safeguard animal welfare.

II. Failure to provide appropriate training and instruction to personnel

Section 2.32 of the AWRs stipulates that research facilities must ensure that *"all ... personnel involved in animal care, treatment, and use are qualified to perform their duties."* **Section 2.32(c)(4)** mandates that training must cover *"methods whereby deficiencies in animal care and treatment are reported, including deficiencies reported by any employee of the facility."*

However, the whistleblowers' allegation that multiple senior officials at ONPRC directed staff to minimize documentation of animal welfare problems is incompatible with both the letter and spirit of these requirements. Proper training includes understanding the importance of accurate and thorough recordkeeping as an essential component of veterinary care and regulatory compliance. By directing staff to suppress or underreport incidents, leadership is actively impeding employees' ability to fulfill their responsibilities in accordance with federal requirements, thereby compromising both animal welfare and the integrity of the facility's program of care.

We respectfully urge you to investigate the concerns detailed in this complaint and, if substantiated, to take swift and decisive action—including citing the facility for violations of the Animal Welfare Act and its implementing regulations, and referring the matter to the USDA's Investigative and Enforcement Services for further action.

Thank you for your consideration of this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Alka Chandna". The signature is fluid and cursive, with the first name "Alka" being more prominent than the last name "Chandna".

Alka Chandna, Ph.D.

Vice President

Laboratory Oversight & Special Cases

AlkaC@peta.org | (757) 803-6447