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December 10, 2025

Robert Goldstein, M.D., Ph.D.
Commissioner
Massachusetts Department of Public Health

Via e-mail: Robert.Goldstein@mass.gov

Dear Dr. Goldstein:

I hope this correspondence finds you well. I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 10.4 million members and supporters worldwide, 134,732 of whom live in the Commonwealth of Massachusetts, to respectfully request that your office investigate possible mistreatment of animals at the University of Massachusetts Chan Medical School (UMass Chan).

PETA has recently received disturbing reports from an inside source at UMass Chan alleging incompetence and neglect of dogs and other animals in the school's laboratories. The insider provided PETA with photographic and videographic evidence of the allegations.[1] If true, we believe the insider's allegations indicate that UMass Chan failed to comply with fundamental provisions of Massachusetts' Research Animal Regulations (hereafter, the RARs), 105 CMR 910.000.

The university's laboratories repeatedly failed to meet requirements for adequate feeding, effective veterinary care, humane housing, and prompt alleviation of pain and distress. Due to poor housing and husbandry conditions, animals endured prolonged suffering from untreated injuries, inadequate analgesia, and severe stress. Collectively, these allegations reveal systemic noncompliance and a disregard for the state's animal welfare standards governing the use of animals in experimentation.

Although the RARs primarily address the care of dogs and cats, their stated purpose—"to ensure the humane treatment of dogs and cats specifically and of other animals in general"—extends to all animals. This complaint, therefore, includes allegations concerning both dogs and other species. All incidents described in this complaint occurred in 2025, except where otherwise specified.

Inadequate veterinary staffing

From March 2024 to August 14, 2025, UMass Chan had only two veterinarians on staff—Dr. George J. DeMarco and Dr. Joan Cadillac—to care for all of the animals in the school's laboratories. According to the university's Annual Report for FY 2024, this population consisted of 1,485 hamsters, 112 guinea pigs, 70 pigs, 60 sheep, 50 rabbits, 12 domestic ferrets, two dogs, and one nonhuman

[1] Photos and a video are available at this link: https://www.dropbox.com/scl/fo/16sgklklm24g6zvtii8bc/AKcPGEUdz3LalYyvciQwIDg?rlkey=40frixnsxpak82togw2be66n1&st=if6x8sno&dl=0.

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primate.[2] According to its current Animal Welfare Assurance filed with the National Institutes of Health, the facility also maintains an approximate average daily inventory of 23,521 mice, 932 zebrafish, and 214 rats.[3] A third veterinarian, Dr. Sidney Beecy, was added only recently, on August 15.

Dogs used in stroke experiments suffer neglect, inadequate veterinary care, deliberate food restriction, and unsafe housing

The laboratory headed by Principal Investigator (PI) Matthew Gounis uses dogs, rabbits, and pigs in stroke experiments.[4] Dogs undergo multiple invasive surgeries to create and study aneurysms—dangerous bulges in blood vessels that can rupture. In the first operation, experimenters cut into the dog's neck, rerouted the carotid artery, which normally carries blood to the brain, and stitched it to the artery on the opposite side. They also removed a piece of vein from the neck to connect the two arteries, deliberately creating an abnormal pouch-like junction designed to mimic an aneurysm. After a three-week recovery, experimenters cut an incision in the dog's thigh and threaded instruments through the femoral artery, inserting a flow remodeling device into the damaged vessel for testing. In the following weeks, they subjected the dogs to repeated follow-up surgeries, with catheters and imaging equipment passed through their blood vessels. These experiments injure the animals' arteries and subject them to pain and a prolonged cycle of surgical interventions.

The insider reported that several hound dogs used in the Gounis laboratory—born in January at Oak Hill Genetics and shipped to UMass Chan in May at just four months of age—were subjected to treatment that violated the RARs.

1. Inadequate Feeding Practices: At UMass Chan, the existing kennels are of a dimension that can only accommodate dogs weighing no more than 19 kg, as required under the Animal Welfare Act (AWA) and mirrored in § 910.103(C)(2) of the RARs. Instead of constructing larger enclosures, the laboratory manages the dogs' size by restricting their food intake, leaving them consistently underweight and chronically hungry. Their ribs and hip bones are visible, and some have developed food aggression severe enough to require solitary housing.

    a. Section 910.130 of the RARs mandates that institutions must provide food to dogs "of sufficient quantity and nutritive value to meet the normal daily requirements for the condition and size" of the animal. However, UMass Chan deliberately restricted the food provided to dogs used in the Gounis laboratory in order to prevent them from exceeding the weight threshold that would have required larger enclosures under the RARs. Instead of complying with the law by acquiring appropriately sized kennels, the institution chose to underfeed the dogs to keep their weight artificially low. This practice is evident in the accompanying photographs and is particularly apparent in the case of Dog F484, whose account is presented below.

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[2] UMass Chan Annual Report for FY 2024, submitted to the USDA. https://www.peta.org/wp-content/uploads/2025/12/umass-med-school-annual-report-fy2024-1.pdf

[3] UMass Chan's Public Health Service-Approved Animal Welfare Assurance, which will expire on November 30, 2028. https://www.peta.org/wp-content/uploads/2025/12/UMass-Amherst-Animal-Welfare-Assurance.pdf

[4] Matthew Gounis' protocol ("Image-Guided Vascular Remodeling for the Treatment of Brain Aneurysms"; No. A-1909) proposed using 260 rabbits, 40 dogs, and 10 pigs.

2. Dog F484: A young brown-and-white hound, identified as F484, was subjected to a series of invasive experiments. Within two weeks of her arrival at UMass Chan, she underwent survival surgery in which experimenters cut into her femoral artery to implant a flow remodeling device, leaving her with bruising and swelling. In the weeks that followed, she was sedated again and again for MRIs that also required "cutdowns" (cutting into the flesh to again expose the femoral artery and inserting the imaging instrument in the vessel) while simultaneously being dosed with blood-thinning drugs such as aspirin and clopidogrel. Despite being described as friendly and playful, she also bore injuries from fighting with cage mates, lost teeth, and suffered bruising, abrasions, and seromas (a pocket of clear liquid that develops under the skin) at surgical sites.

   Over the summer, F484 steadily lost weight, dropping from more than 14 kilograms to as little as 12.5 kilograms, leading staff to remark repeatedly in emails that she looked "pretty skinny."[5] Her body condition score eventually fell to 1.5 out of 5, signaling emaciation. She developed diarrhea and was treated with metronidazole, received acupuncture sessions, and required repeated feeding adjustments, yet her health remained precarious. The records show a young dog enduring invasive surgeries, chronic weight loss, cage injuries, and gastrointestinal illness in the course of a few months—her life reduced to a series of procedures, complications, and attempts at patchwork management in the laboratory.

   F484 weighed 14 kg but was restricted to just 2 cups of kibble per day, with staff barred from offering additional food or treats. At just 8 months of age and weighing 14 kg, this puppy should have received around 2.5 to 3 cups of food each day, but UMass Chan restricted her to only 2 cups, leaving her chronically underfed and hungry.

   a. Section 910.130 of the RARs mandates that institutions must provide food to dogs "of sufficient quantity and nutritive value to meet the normal daily requirements for the condition and size" of the animal. However, UMass Chan's failure to provide adequate food to F484 constitutes a noncompliance with § 910.130 of the RARs.
   b. Section 910.133 of the RARs mandates that dogs "housed in the same primary enclosure shall be maintained in compatible groups." However, UMass Chan failed to provide safe and compatible housing for F484, resulting in injuries from fighting with cage mates.
   c. Section 910.134 of the RARs mandates that each institution establish a program of "adequate veterinary care." However, UMass Chan performed acupuncture on F484 even though she was concurrently receiving clopidogrel, a blood-thinning medication. Acupuncture is generally contraindicated for dogs receiving clopidogrel because of the elevated risk of bleeding and hematoma formation.[6]

3. Dog F474: A black, white, and tan hound dog, identified as F474 and described as shy but friendly and active, was subjected to invasive procedures soon after she arrived at

[5] Please see Photograph F484.
[6] Plumb, D. C. (2022). *Plumb's veterinary drug handbook* (10th ed.). Wiley-Blackwell.
Clopidogrel significantly inhibits platelet aggregation; even minor invasive procedures, such as acupuncture, may increase the risk of hemorrhage or hematoma.

UMass Chan. On June 4, experimenters cut into her femoral artery to implant a flow remodeling device, and just a week later, on June 11, they performed a cutdown for invasive imaging. During this procedure, a catheter was mistakenly left behind, and staff suspected that F474 may have swallowed it. The catheter was later passed through the dog's digestive tract and was recovered in her feces. By mid-June, F474 had also been attacked by her stressed cagemates, sustaining bite wounds that required stapling.

In the weeks that followed, F474 endured repeated sedations, surgical aftereffects, and a cascade of complications, including bruising, swelling, fluid-filled seromas, abrasions, and oozing wounds at surgical sites on her thigh. She developed persistent and painful problems with her right front paw, including swelling, abrasions, inflammation, bleeding nail beds, and open wounds that required repeated interventions and acupuncture. Her body condition deteriorated, with her weight plummeting from 16.3 kg in July to 13.5 kg by late August—a 17 percent drop.

Since late July, F474 has been experiencing a swollen joint on her right front leg.[7] A small lesion appeared on the same leg, likely due to the dog licking the area in response to discomfort. Staff applied ointment to the wound and used bitter apple spray to prevent the dog from licking the area. No X-rays were taken of the leg, so it was never determined whether the swelling was due to a fracture, infection, or another cause, and no diagnosis was made. F474 also did not receive pain medication for the swollen joint. Instead, she was treated with acupuncture while simultaneously being given daily doses of clopidogrel, an anticoagulant that is contraindicated for use in animals undergoing acupuncture.

a. Section 910.134 of the RARs mandates that adequate veterinary care includes prevention, and dogs who are "sick or diseased [or] injured … shall be provided with veterinary care." The regulation also directs institutions to ensure "the appropriate use of anesthetic, analgesic, or tranquilizing drugs, whenever [an] animal is likely to suffer more than transient pain." However, UMass Chan failed to take appropriate diagnostic measures to determine the cause of the swelling observed *for months* on F474's leg and failed to provide pain relief to the dog. The school's decision to perform acupuncture on her while she was receiving daily doses of clopidogrel increased the risk of prolonged bleeding or hematoma formation at acupuncture sites, which constitutes an additional failure to comply with veterinary care provisions outlined in the RARs.
b. UMass Chan's failure to recover a catheter following an experimental surgery on F474 led to the dog ingesting the device and later passing it in her feces. The unmonitored presence of this foreign object in the gastrointestinal tract would likely have caused pain or discomfort as it passed. The incident reflects both a failure to employ methods designed to prevent injury, pain, and distress, in violation of § 910.134 of the RARs.
c. Section 910.133 of the RARs mandates that dogs "housed in the same primary enclosure shall be maintained in compatible groups." However, UMass Chan failed to provide safe and compatible housing for F474, resulting in serious bite wounds inflicted by a cage mate—injuries that necessitated surgical stapling.

[7] Please see Photographs F474_1 to F474_9. In several photographs, the swelling on F474's right front leg is conspicuous; in others, her ribs are clearly visible beneath a markedly thin frame.

d. Section 910.130 of the RARs mandates that institutions must provide food to dogs "of sufficient quantity and nutritive value to meet the normal daily requirements for the condition and size" of the animal. However, F474's 17% weight loss over a two-month period indicates that UMass Chan failed to provide adequate nutrition, constituting noncompliance with § 910.130 of the RARs.

4. Dog F442: Following surgery, a brown-and-white hound, identified as F442, developed a baseball-sized seroma at the incision site on her leg where the femoral artery had been accessed. The swelling was first noticed on September 2; however, records show that no treatment was provided beyond observation.[8] Three weeks later, the seroma had begun to harden, indicating the persistence and progression of the condition without intervention.

    a. Section 910.134(B) of the RARs mandates that dogs "shall be observed daily by the animal caretaker in charge [and that] sick or diseased [or] injured … dogs … shall be provided with veterinary care or humanely disposed of." While it appears that F442 was observed daily, UMass Chan simply observed the dog's growing seroma without providing timely and appropriate treatment. This failure to provide treatment both undermined the purpose of the daily observations mandated in the RARs and allowed the swelling to progress and harden. Persistent seromas in their early stages can often be managed with compression, aspiration, or other standard methods, but when left untreated, they can trigger inflammation, cause pain, and impair mobility. Once hardened, a seroma may require surgical removal or a more complicated aspiration procedure.

5. Dog F480: A white-and-tan hound, identified as F480, underwent surgeries on June 5 and June 12. Following the second operation, staff noticed small seromas in the inguinal region. On June 15, a laboratory employee reported incisional dehiscence at the left inguinal site with necrotic margins. F480 underwent surgical repair, and an Elizabethan collar (e-collar) was applied. On June 25, an employee noticed that the e-collar was no longer on the dog, and the securing fabric tie could not be located, raising concern that the dog had eaten the tie. On June 26, approximately 16 inches of the tie were recovered in the dog's vomit.[9]

    a. Section 910.134(B)(4) of the RARs states, "It shall be incumbent upon each research institution to ensure that all personnel who carry out animal anesthesia, surgery, or other manipulations are qualified through training and experience to accomplish these tasks in a humane and scientifically acceptable manner." However, the dehiscence of F480's surgical incision likely stemmed from poor suturing technique or inadequate post-surgical monitoring and would have caused her pain and distress. UMass Chan's failure to prevent this pain and distress constitutes noncompliance with the veterinary care provisions set forth in the RARs. Additionally, the university's failure to prevent F480 from ingesting the fabric tie indicates further noncompliance.

[8] Please see Photographs F442_1 and F442_2.
[9] Please see Photographs F480_1 to F480_4.

A rabbit used in a vaccine experiment sustained severe degloving injury, necrotic tissue, and an e-collar-induced open wound on the back of her neck

The laboratory headed by PI Shuying Liu studies the immune system's response to nucleic acid-based vaccines using rabbits, mice, and rats.[10] In these experiments, animals are repeatedly injected with DNA or RNA vaccines every few weeks, with blood drawn at multiple points along the way. They are kept alive for months to over a year before ultimately being killed so their tissues can be collected.

The insider reported that a rabbit used in the Liu laboratory was subjected to treatment that violated the RARs.

1. Rabbit #2202 arrived at UMass Chan on May 20 and was repeatedly injected with vaccines and subjected to blood draws. Within weeks, she sustained a severe degloving injury to her hind foot, leaving muscles exposed.[11] It was unclear whether the injury resulted from fighting or the foot becoming caught in the cage. On June 19, Dr. Cadillac tried to suture the wound but found there wasn't enough skin to close it, and the surgery left muscle exposed. The condition of the toe worsened, and on June 23, Dr. Cadillac observed that the tip of the toe, the toe pad, and the top of the nail were dark, suggesting that the tissue had become necrotic. On June 26, Dr. Cadillac amputated the second and third phalanx of the injured toe, confirming in the surgical record that the tissue was necrotic.[12] At the time of the initial surgery on June 19, an e-collar was placed on the rabbit to prevent her from biting her wound, despite the serious welfare concerns associated with the use of these collars in rabbits, including stress, difficulty eating and drinking, and painful chafing that can lead to open sores. Indeed, the rabbit developed a large open wound that extended across the nape of her neck.[13] On July 16, Rabbit #2022 was killed.

    a. Dr. Cadillac was unable to determine whether Rabbit #2022's initial degloving injury resulted from fighting or from her foot becoming caught in the cage. Either circumstance indicates that UMass Chan failed to provide safe and secure housing, contrary to the intent of the RARs.
    b. The failure to close the wound during the June 19 surgery left the rabbit vulnerable to tissue necrosis. The exposed muscle likely contributed to the necrosis observed four days later by allowing infection, impairing blood flow, and preventing proper healing. This would have caused significant pain and distress, contrary to the intent of the RARs.
    c. The application of the e-collar without proper monitoring led to the development of the large, painful open wound that extended across the nape of the rabbit's neck, contrary to the intent of the RARs.

A ferret used in respiratory experiments died from an untreated intestinal obstruction

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[10] Shuying Liu's protocol ("Immunogenicity study of nucleic acid-based vaccines"; No. 202200023) proposed using 165 rabbits, 480 mice, and 64 rats in Column D experiments.
[11] Please see Photographs Liu_1 and Liu_2.
[12] Please see Photographs Liu_6 and Liu_7.
[13] Please see Photographs Liu_3 to Liu_5.

The laboratory headed by PI Alicia Gruntman uses ferrets in respiratory experiments that cause considerable pain and distress.[14] The animals are injected intravenously with a recombinant adeno-associated virus and subjected to repeated blood draws from the jugular vein over a six-month period. Using a bronchoscope, experimenters collect cells from the ferrets' lungs—an invasive procedure repeated as many as 15 times before the animals are ultimately killed. In one arm of the protocol, ferrets are restrained alone in a clear Plexiglas chamber for two hours to measure their breathing. Afterward, they are subjected to respiratory challenges by inhaling elevated carbon dioxide or reduced oxygen levels for several minutes.

The insider reported that a ferret used in the Gruntman laboratory was subjected to treatment that violated the RARs.

1. A ferret identified as #700561 was born at Marshall Bioresources in September 2024, shipped to UMass Chan on January 14, 2025, and placed in the Gruntman laboratory. On April 22, she was sedated for a blood draw from her jugular vein. The following morning, she was described as less active and quiet on exam, with signs of dehydration (skin tenting) and possible vomiting in her cage. Despite being offered supportive food, she showed no interest in eating. An employee noticed that a 4" x 4" section of the hammock in the ferret's cage was missing, and suggested that the ferret be X-rayed to observe and then remove any foreign bodies in her stomach. However, Dr. Cadillac dismissed this idea. Over the next two days, the ferret's condition worsened. On April 24, staff noted persistent vomiting—including vomit containing cotton, suggesting ingestion of bedding material—continued dehydration, and lack of appetite, even after syringe feeding and administration of the anti-vomiting drug maropitant.

   By April 25, Ferret #700561 appeared depressed, with no feces, abdominal bloating, and a dangerously low body temperature of 92°F (normal for ferrets is 100–104°F). Radiographs were finally taken, revealing air and ingesta in the stomach and large intestine, consistent with a gastrointestinal obstruction caused by a foreign body. Euthanasia was approved after failed attempts to collect blood, but the procedure itself was prolonged and stressful. Because the catheter used for intravenous delivery was too narrow to permit adequate flow of the viscous euthanasia solution (Euthasol), staff were forced to administer the drug in three separate doses over a six-minute period; the animal did not die until eight minutes after the first injection. Necropsy confirmed severe gastrointestinal compromise: a dilated, fluid-filled stomach and a bruised, distended small intestine obstructed by a half-inch piece of bedding.[15]

   a. UMass Chan failed to perform timely diagnostics to determine the cause of Ferret #700561's inappetence and lethargy, setting off a series of harmful missteps. After the ferret began vomiting in an effort to clear the obstruction, staff administered an antiemetic that worsened her suffering. Radiographs were delayed for three days, at which point the intestinal blockage was finally confirmed. This failure to act promptly and appropriately contravenes the intent of the RARs.

[14] Alicia Gruntman's protocol ("Animal Modeling Core for Alpha-1 Antitrypsin Deficiency"; No. 20220011) proposed using 122 ferrets in Column D experiments.
[15] Please see Photographs Ferret Necropsy 1 and Ferret Necropsy 2.

b. UMass Chan's use of a catheter too narrow to allow proper administration of the viscous euthanasia solution demonstrates either incompetence or disregard for humane procedures. As a result, the ferret's suffering was prolonged—it took eight minutes for the animal to die—in direct violation of the intent of the RARs.

Pigs and rabbits used in cardiac experiments experienced severe pain, injury, and death
The laboratory headed by PI Kevin Donahue uses pigs and rabbits in cardiac experiments.[16] The pigs—only three to six months old—are housed alone in barren kennels with cement flooring. They are occasionally provided with a rubberized mat, but more often left directly on the hard cement. Pine shavings are used as bedding, yet the fine particles irritate the pigs' eyes and respiratory tracts, causing painful injuries.

In this laboratory, experimenters induce a myocardial infarction in pigs by occluding a major artery to the heart for 2.5 hours using a balloon inserted through a blood vessel. The experimenters surgically implant a defibrillator device into a vein in the neck and the tip of the heart. This device is used to repeatedly shock the heart and force the pigs into abnormal heart rhythms. This causes severe pain, but the laboratory uses mild opioids such as buprenorphine to address the pain. Following a scathing February 27, 2024, U.S. Department of Agriculture inspection report,[17] which documented a critical AWA violation for inadequate veterinary care for pigs used in PI Donahue's Protocol 028, the protocol was amended to instruct laboratory staff to administer the stronger opioid hydromorphone to help address the breakthrough pain experienced by pigs in this laboratory; however, the laboratory still does not stock this opioid.

The insider shared accounts of two other pigs used in PI Donahue's protocol whose treatment contravened the intent of the RARs.

1. A pig identified as #822 underwent an induced myocardial infarction in the Donahue laboratory and subsequently developed atrial fibrillation. On May 22, #822's rectal temperature was just 92˚F—well below the normal range for pigs (101.5-103.5˚F). He also sustained a reperfusion injury to his ear, caused by impaired blood flow to his extremities. Such injuries are intensely painful, as the sudden return of blood to oxygen-deprived tissues triggers inflammation, swelling, and nerve irritation. Other pigs in the laboratory have suffered similar injuries to their ears, tails, and feet, with oxygen deprivation causing tissue necrosis and blue-black discoloration.

2. A pig identified as #845 underwent an induced myocardial infarction on July 11. But by July 22, he exhibited bruising and cyanosis of the distal right ear that was sensitive to the touch. On July 23, the area measured approximately 2 x 5 cm and had turned a red-black color. The attending veterinarian assessed the lesion as consistent with vascular thrombosis likely related to prior ear catheterization. He expressed concern about possible necrosis. On July 29, the pig was sedated, and the devitalized tissue was debrided. By July 31, the wound measured approximately 1.0" on the inner pinna, 1.75" on the outer pinna, and 2" in length, with little or no perfusion along the pinna margin.

[16] Kevin Donahue's protocol ("Rabbit Biodistribution and Toxicology Study of Atrial Gene Therapy"; No. 20210017) proposed using 30 New Zealand white rabbits.
[17] https://www.peta.org/wp-content/uploads/2025/12/2024-02-27-umass-med-school-ir-pig-protocol.pdf.

On August 4, the entire wound was black and necrotic, and the pig avoided handling of the ear and shook his head when touched, indicating significant pain.[18]

a. UMass Chan housed pigs on pine shavings, despite the well-known risk that the fine particles produced by this bedding irritate animals' eyes and throats. By ignoring safer alternatives and subjecting the pigs to preventable harm, the university demonstrated a reckless disregard for their welfare—conduct that contravenes the intent of the RARs.
b. UMass Chan's failure to stock hydromorphone, despite its inclusion in PI Donahue's protocol, reflects a failure to maintain the necessary supplies to provide adequate pain relief, in contravention of the intent of the RARs.
c. Despite the well-recognized susceptibility of the pinnae and other extremities to reperfusion injury following myocardial infarction and atrial fibrillation, UMass Chan failed to employ simple measures to prevent such injuries. For example, the provision of supplemental oxygen could help maintain stable hemodynamics, and temperature control could help prevent hypothermia. Avoidance or careful management of ear catheterization—including limiting dwell time or using the smallest feasible catheter—could have prevented the painful injuries sustained by Pigs #822 and # 845. UMass Chan's failure to apply these simple measures to limit pain and discomfort to pigs in the Donahue laboratory contravenes the intent of the RARs.
d. Section 910.200 of the RARs recognizes the responsibilities of the "animal care committee" (also known as the Institutional Animal Care and Use Committee or IACUC) to provide institutional oversight of projects involving the experimental use of dogs and cats. In particular, § 910.200(A)(4) mandates that "the experiment must be conducted so as to avoid all unnecessary suffering and injury to the animal." However, UMass Chan's IACUC failed to ensure that PI Donahue's protocol incorporated concrete measures to prevent ischemia-reperfusion injuries in pigs. By approving a protocol without such safeguards, the IACUC failed to ensure that procedures minimize discomfort, distress, and pain to animals, thereby contravening the intent of the RARs.

In the Donahue laboratory, experimenters subjected rabbits to median sternotomies in which a vertical incision was made along the length of the breastbone, allowing access to the heart, and the pericardium was opened. The rabbits were denied adequate pain relief and became severely stressed, stopped eating, and developed gastrointestinal stasis—a painful condition in which gas, fluid, and food accumulate in the digestive tract, causing bloating and agony that can quickly prove fatal. Additionally, rabbits in the Donahue laboratory were housed in a room adjacent to dogs; exposure to frequent barking elicited repeated thumping—a well-recognized sign of fear and distress in rabbits.[19]

The insider shared accounts of three female rabbits in the Donahue laboratory who endured median sternotomies and suffered markedly afterward, in contravention of the intent of the RARs.

[18] Please see Photographs 845_1 to 845_12.
[19] Please see the video file, "Rabbits stressed upon hearing dogs in adjacent room."

1. Rabbit #1984 showed obvious signs of pain—squinting eyes, hunched posture, depression, and gastrointestinal stasis—yet received only limited interventions and lingered in distress for weeks before being killed on April 15, 2022.
2. Rabbit #1985, who underwent surgery on April 13, 2022, appeared scruffy, inactive, and barely ate, but her suffering was similarly unresolved before she was killed on May 6.
3. Rabbit #1986, housed alone, underwent a median sternotomy on April 13, 2022, and rapidly declined. She became scruffy, stopped eating, produced almost no waste, and developed hypothermia—clear red flags of severe postoperative distress. Despite these obvious warning signs, her suffering went unresolved, and she was found dead on April 16. Necropsy revealed fluid buildup in the chest, adhesions around the lungs and heart, and a congested liver, underscoring the grave consequences of inadequate postoperative care.

    a. Section 910.200 of the RARs recognizes the responsibilities of the IACUC to provide institutional oversight of projects involving the experimental use of dogs and cats. In particular, § 910.200(A)(4) mandates that "the experiment must be conducted so as to avoid all unnecessary suffering and injury to the animal" and § 910.200(A)(5) requires that "the scientist in charge of the experiment must terminate it whenever he/she believes that its continuation may result in unnecessary injury or suffering to the animals." However, rabbits used in PI Donahue's protocol endured extensive suffering before they were killed, and Rabbit #1986 suffered egregiously before she was discovered dead in her cage. Although the Donahue protocol specifies criteria for removing rabbits from the study and euthanizing them, the humane endpoint criteria were either inadequately defined or improperly applied, failing to prevent severe pain and distress in contravention of the intent of the RARs.

The federal AWA does not insulate UMass Chan from liability under state law because it expressly does not preempt the field. Moreover, the enforcement of state law for the protection of animals is crucial, given that the AWA provides only minimal protections—and even those have been routinely found by the USDA's own internal watchdog to be inadequately enforced. Additionally, UMass Chan's conduct appears to fall squarely within the prohibitions of Massachusetts' laws. We respectfully urge your office to conduct a thorough investigation into the concerns detailed in this complaint and, if substantiated, to take swift and decisive enforcement action, including citing the facility for violations of the Research Animal Regulations. I would be pleased to provide any additional information or assistance that may aid your office in its review and investigation of these matters.

Thank you for your consideration of this important matter.

Sincerely,

Alka Chandna

Alka Chandna, Ph.D.
Vice President
Laboratory Oversight & Special Cases