AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS

PETA

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

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Bernadette Juarez
Deputy Administrator
Animal Care
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

Via e-mail: Bernadette.R.Juarez@USDA.gov; ac.complaints@usda.gov

Dear Ms. Juarez:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 10.4 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 mistreatment of animals at the University of Massachusetts Chan Medical School (UMass Chan; USDA Certificate No. 14-R-0035).

PETA has recently received disturbing reports from an inside source at UMass Chan alleging incompetence and neglect of animals in the school's laboratories. The insider provided PETA with photographic and videographic evidence of the allegations.[1] If true, we believe the alleged treatment of animals violates the federal Animal Welfare Act (AWA) and the associated Animal Welfare Regulations (AWRs).

The insider made the following allegations:

1. 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 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 on August 15.

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

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2. Gounis Laboratory: The laboratory headed by Principal Investigator (PI) Matthew Gounis uses dogs, rabbits, and pigs in stroke experiments.[4] Dogs and rabbits 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, reroute the carotid artery, which normally carries blood to the brain, and stitch it to the artery on the opposite side. They also remove 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 thread instruments through the femoral artery, inserting a flow remodeling device into the damaged vessel for testing. In the following weeks, they subject 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 shared accounts of several dogs used in the Gounis laboratory. The hounds were born in January 2025 at Oak Hill Genetics in Illinois and were shipped to UMass Chan on May 22, 2025, when they were only four months old.

   a. 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. On June 4, experimenters cut into her artery to implant a flow remodeling device, and just a week later, on June 11, they performed a "cutdown" (a painful surgical exposure of blood vessels) 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. 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.[5] 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

[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.

[5] 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.

while simultaneously being given daily doses of clopidogrel, an anticoagulant that is contraindicated for use in animals undergoing acupuncture.

b. A young brown-and-white hound, identified as F484, was subjected to a series of invasive experiments. Within two weeks of arrival, she underwent survival surgery in which experimenters cut into her 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 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 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."[6] 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.

c. Following a 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.[7] Three weeks later, the seroma had begun to harden, indicating the persistence and progression of the condition without intervention. Months later, the seroma is still present.

d. 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.[8]

e. At UMass Chan, the dimensions of the existing kennels can only accommodate dogs weighing no more than 19 kg, as required under Animal Welfare Regulations. Instead of constructing larger enclosures, the laboratory manages the size of the dogs by limiting their food, leaving the animals consistently underweight. For example, dog F484 weighed only 14 kg but was restricted to

[6] Please see Photograph F484.
[7] Please see Photographs F442_1 and F442_2.
[8] Please see Photographs F480_1 to F480_4.

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. This holds true for many dogs in the school's laboratories: they are kept in a state of chronic hunger, with visible ribs and hip bones, and some have developed food aggression that necessitates solitary housing.

3. Liu Laboratory: The laboratory headed by PI Shuying Liu studies the immune system's response to nucleic acid-based vaccines using rabbits, mice, and rats.[9] 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 shared an account of a rabbit in the Liu laboratory.

   a. Rabbit #2202 arrived at UMass Chan on May 20, 2025, 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.[10] 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, leaving muscle exposed. 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.[11] Moreover, 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] On July 16, Rabbit #2022 was killed.

4. Gruntman Laboratory: The laboratory headed by PI Alicia Gruntman uses ferrets in respiratory experiments that cause considerable pain and distress.[13] 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. The stated goal is to monitor disease progression of alpha-1 antitrypsin (AAT) deficiency in ferrets and test experimental treatments. In one arm of the protocol, ferrets are restrained

[9] 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.
[10] Please see Photographs Liu_1 and Liu_2.
[11] Please see Photographs Liu_3 to Liu_5.
[12] Please see Photographs Liu_6 and Liu_7.
[13] Alicia Gruntman's protocol ("Animal Modeling Core for Alpha-1 Antitrypsin Deficiency"; No. 20220011) proposed using 122 ferrets in Column D experiments.

alone in a clear Plexiglas chamber for two hours to measure their breathing. Afterward, they are subjected to respiratory challenges in which they are forced to inhale elevated carbon dioxide or reduced oxygen levels for several minutes.

The insider shared an account of a ferret in the Gruntman laboratory.

a. A ferret identified as #700561 was born at Marshall Bioresources in September 2024, shipped to UMass Chan on January 14, 2025, and enrolled in PI Grutman's protocol. On Tuesday, April 22, 2025, 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 bruised, distended small intestine obstructed by a half-inch piece of bedding. This ferret suffered from progressive dehydration, abdominal pain, and systemic decline over several days before her death, reflecting both the hazards of the housing environment and the inadequacy of the veterinary response.

5. Donahue Laboratory: The laboratory headed by PI Kevin Donahue uses pigs and rabbits in cardiac experiments.[14] The pigs, who are 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

[14] Kevin Donahue's protocol ("Rabbit Biodistribution and Toxicology Study of Atrial Gene Therapy"; No. 20210017) proposed using 30 New Zealand white rabbits.

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 only mild opioids such as buprenorphine in an inadequate effort to address the pain. Following a scathing February 27, 2024, USDA inspection report,[15] 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 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 Protocol 028.

a. A pig identified as #822 underwent an induced myocardial infarction in the Donahue laboratory and subsequently developed atrial fibrillation. On May 22, 2025, #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.

b. A pig identified as #845 underwent an induced myocardial infarction on July 11, 2025. 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. On August 4, the entire wound was black and necrotic, and the pig avoided handling of his ear and shook his head when touched, indicating significant pain.[16]

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.

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

a. 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.

[15] https://www.peta.org/wp-content/uploads/2025/12/2024-02-27-umass-med-school-ir-pig-protocol.pdf.
[16] Please see Photographs 845_1 to 845_12.

b. 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.

c. 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.

d. 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.[17]

We believe that the treatment of animals at UMass Chan, as reported by the insider, constitutes noncompliance with several AWRs, as set forth below.

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 "availability of appropriate facilities, personnel, equipment, and services," "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," "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, the level of care stipulated by this regulation was not met by UMass Chan.

1. Staffing: For more than 16 months from March 2024 through August 2025, UMass Chan employed only two veterinarians to oversee the care of the tens of thousands of animals held in its laboratories—a level of staffing that appears inadequate to meet regulatory requirements. Although the institution also lists seven veterinary technicians, only three of these individuals hold formal training and credentials; the remaining staff acquired their skills solely through on-the-job experience, raising further concerns about compliance.
2. Dog F474:
    a. UMass Chan's failure to take appropriate diagnostic measures to determine the cause of the swelling observed *for months* on F474's leg, its failure to provide pain relief to the dog, and its decision to perform acupuncture on her while she was receiving daily doses of clopidogrel—thereby increasing the risk of

[17] Please see the video file, "Rabbits stressed upon hearing dogs in adjacent room."

prolonged bleeding or hematoma formation at acupuncture sites—constitute violations of this regulation.

b. UMass Chan staff failed to recover a catheter following an experimental surgery on Dog F474, which was later determined to have been ingested by the animal. Several days afterward, the catheter was recovered in the dog's feces. The unmonitored presence of this foreign object in the gastrointestinal tract would likely have caused pain or discomfort as it passed, and the incident reflects both a failure to employ methods designed to prevent injury, pain, and distress, and a troubling indication that staff may not be adequately qualified to perform their duties in violation of Section 2.32 of the AWRs, which mandates that it is "the responsibility of the research facility to ensure that all … personnel involved in animal care, treatment, and use are qualified to perform their duties." In particular, Section 2.32(c)(1)(i) and (ii) advise that "[t]raining and instruction of personnel must include guidance in … [t]he basic needs of each species of animal; [and] [p]roper handling and care for the various species of animals used by the facility."

3. Dog F442: UMass Chan failed to treat a large seroma that developed at the incision site on Dog F442's leg, allowing the swelling to progress to the point that the mass began to 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. UMass Chan's failure to provide appropriate treatment to Dog F442 constitutes a clear violation of this regulation.
4. Dog F480: The dehiscence of Dog F480's surgical incision, which may have stemmed from poor suturing technique or inadequate post-surgical monitoring, would have caused her pain and distress. UMass Chan's failure to prevent this pain and distress constitutes a violation of this regulation. Additionally, the university's failure to prevent F480 from ingesting the fabric tie is a further violation of this regulation.
5. Rabbit #2202: After Rabbit #2202 sustained a serious toe degloving injury—likely the result of unsafe housing[18] or being caged with an incompatible mate[19]—UMass Chan's failure to properly treat the wound allowed the tissue to become necrotic, ultimately necessitating amputation. Compounding this neglect, staff placed an e-collar on the rabbit and then failed to monitor her, even though it is well documented that e-collars cause rabbits significant stress and make it difficult for them to eat or drink. The collar caused chafing that developed into an open, painful sore at the nape of her neck. Both injuries were entirely preventable, and this pattern of neglect and mishandling at multiple junctures constitutes a clear violation of this regulation.
6. Ferret #700561: From the moment Ferret #700561 showed signs of illness on April 23, including lethargy, dehydration, and vomiting, staff should have pursued prompt diagnostic measures, particularly given the discovery that a section of the hammock in her cage was missing. Instead, the veterinarian dismissed staff concerns and failed to

[18] If the injury sustained by Rabbit #2202 was the result of unsafe housing, this would constitute a violation of Section 3.125 of the AWRs, which mandates that housing facilities "shall be maintained in good repair to protect the animals from injury."

[19] If the injury sustained by Rabbit #2202 was the result of an altercation with an incompatible cage mate, this would constitute a violation of Section 3.133 of the AWRs, which mandates that "animals housed in the same primary enclosure must be compatible.

take radiographs until two days later, despite the ferret continuing to vomit bedding material and deteriorating. This delay in diagnosis left the animal to endure preventable suffering from an untreated gastrointestinal obstruction. Moreover, administering an anti-nausea drug likely compounded the ferret's suffering, as vomiting would have provided some relief from the gastrointestinal blockage that was developing. The manner in which Ferret #700561 was euthanized compounded this neglect. Because the catheter used was too narrow for the viscous Euthasol solution, the procedure required three administrations over six minutes, with death not occurring until eight minutes after the first injection. This prolonged and stressful death underscores a failure to ensure that appropriate equipment and methods were in place to prevent unnecessary pain and distress. Taken together, the inadequate response to clear clinical signs, the unsafe housing that allowed bedding ingestion, and the botched euthanasia procedure demonstrate serious lapses in veterinary oversight and constitute violations of the Animal Welfare Act's mandate to minimize animal suffering through adequate housing, care, and veterinary treatment.

7. Bedding for Pigs in the Donahue Laboratory: 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 constitutes a violation of this regulation.
8. Failure to Stock Hydromorphone in the Donahue Laboratory: UMass Chan's failure to stock hydromorphone, despite its inclusion in PI Donahue's protocol following the USDA's February 27, 2024, inspection, reflects a failure to maintain the necessary supplies to provide adequate pain relief—constituting a violation of veterinary requirements.
9. Reperfusion Injuries: 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 injuries sustained by Pigs #822 and # 845.

II. Failures in the functioning of UMass Chan's Institutional Animal Care and Use Committee

Section 2.31(d) of the AWRs describes the responsibilities of the Institutional Animal Care and Use Committee (IACUC) in reviewing proposed animal use protocols. In particular, the regulations state that:

- "Procedures involving animals will avoid or minimize discomfort, distress, and pain to the animals";
- "Procedures that may cause more than momentary or slight pain or distress to the animals will … be performed with appropriate sedatives, analgesics or anesthetics, unless withholding such agents is justified for scientific reasons, in writing, by the principal investigator and will continue for only the necessary period of time"; and
- "Animals that would otherwise experience severe or chronic pain or distress that cannot be relieved will be painlessly euthanized at the end of the procedure or, if appropriate, during the procedure."

Rabbits #1984, #1985, and #1986: 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 violation of this regulation.

Reperfusion Injuries in Pigs: Additionally, 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 violating this regulation.

III. Failure to provide adequate food to dogs

Section 3.9 of the AWRs stipulates that dogs must be given food "of sufficient quantity and nutritive value to maintain the normal condition and weight of the animal." However, UMass Chan deliberately restricted the food provided to dogs used in PI Gounis' experiments in order to prevent them from exceeding the weight threshold that would have required larger enclosures under the AWRs. 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 was particularly evident in the case of Dog F484.

IV. Failure to ensure that dogs caged together are compatible

Section 3.6(c)(2) of the AWRs states, "All dogs housed in the same primary enclosure must be compatible, as determined by observation." However, in mid-June, Dog F474 sustained bite wounds inflicted by her cage mate that were so severe they required surgical stapling. These injuries could have been prevented had the animals been housed appropriately or separated once incompatibility was evident. Additionally, the deliberate underfeeding of dogs in PI Gounis' protocol predictably fostered food aggression, heightening the likelihood of fights and injuries.

V. Failure to provide safe housing for animals

Section 3.133 of the AWRs states, "Animals housed in the same primary enclosure must be compatible. Animals shall not be housed near animals that interfere with their health or cause them discomfort." However, rabbits in the Donahue laboratory were housed in a room adjacent to dogs, and as seen in video footage provided by the insider, exposure to frequent barking from the adjacent room elicited repeated thumping by the rabbits, indicating fear and distress in the animals, in clear violation of this regulation.

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,

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