

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

October 19, 2026

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

Via e-mail

Dear Ms. Juarez:

On behalf of People for the Ethical Treatment of Animals (PETA), I am writing to request that the U.S. Department of Agriculture (USDA) investigate potential violations of the Animal Welfare Act (AWA) and its implementing regulations concerning two young male Yorkshire pigs used in invasive cardiac experiments conducted by John Kevin Donahue at the University of Massachusetts Chan Medical School (UMass Chan; USDA Certificate No. 14-R-0035).

According to documents obtained by PETA, two piglets—identified as 717¹ and 796²—were both found dead in their enclosures after being used in Donahue's protocols. The circumstances surrounding their deaths, described below, raise questions about postoperative monitoring, timely veterinary intervention, and the adequacy and implementation of humane endpoints under experimental protocols 202200028 and 202100063.

We also request an investigation into the licensing status of Earle M. Parsons & Sons, Inc., identified as the supplier of pig 796 and two other pigs.³ This facility does not appear in the Animal Care Inspection Service database maintained by the USDA.

Pig 717

Pig 717 weighed 28 kilograms on November 20, 2023, and was described as timid and, in a subsequent entry, very skittish. On December 6, 2023, he was sedated and moved to the operating room for a procedure to induce a heart attack and implant a battery-powered defibrillator under protocol 202200028. A balloon was inflated to block a blood vessel for approximately 2.5 hours.

Following the surgery, approximately 3–4 milliliters of rectal bleeding were observed when a thermometer was removed. That evening, the piglet was

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202-483-PETA

Los Angeles

2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

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501 Front St.
Norfolk, VA 23510
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Info@peta.org
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Entities

- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

¹ Please see Exhibit 1.

² Please see Exhibit 2.

³ Please see Exhibit 3.

described as sluggish. He was found dead in his concrete kennel later that evening and sent for necropsy.

It is unclear whether a veterinarian assessed Pig 717's bleeding and sluggishness, what monitoring occurred after he was returned to his enclosure, and whether any deterioration was promptly recognized and treated. It is also unclear whether Donahue's protocol specified adequate, well-defined humane endpoints to limit pain and distress, and whether UMass Chan's Institutional Animal Care and Use Committee (IACUC) adequately evaluated those safeguards.

Pig 796

Pig 796 was just 10 weeks old and weighed 28 kilograms when he was shipped to UMass Chan in December 2024. Described as timid in an examination log, he was caged alone. On January 9, 2025, at 12 weeks old, he was sedated and taken to surgery under protocol 202100063. Experimenters cut through his breastbone and the sac surrounding his heart to expose the beating organ, "painted" experimental gene therapies onto its surface, and implanted a pacemaker beneath his skin.

The following day, he was found dead in his enclosure. His death was attributed provisionally to cardiac arrest following apparent displacement of a pacemaker lead from the atrium into the ventricles, causing ventricular fibrillation.

It is unclear whether experimenters properly positioned the pacemaker and its leads and verified their function during implantation, or whether postoperative monitoring and staffing were adequate to detect and promptly respond to a life-threatening complication.

Earle M. Parsons & Sons, Inc.

An invoice dated December 30, 2024, documents the shipment of three 10-week-old pigs from Earle M. Parsons & Sons Inc at 140 Mill Valley Road in Hadley, Massachusetts to Donahue's laboratory at UMass Chan. However, this operation does not appear in the USDA's ACIS database and does not appear to be licensed as a dealer authorized to supply experimentation facilities.

We believe the events described above warrant review for possible violations of federal Animal Welfare Regulations (AWRs).

1. Inadequate Veterinary Care and Postoperative Monitoring

Section 2.33(b) of the AWRs mandates that "[e]ach research facility shall establish and maintain programs of adequate veterinary care that include: (1) the availability of appropriate facilities, personnel, equipment, and services ...; (2) the use of appropriate methods to prevent, control, diagnose, and treat diseases and injuries ...; (3) ... a mechanism of direct and frequent communication ... so that timely and accurate information on problems of animal health, behavior, and well-being is conveyed to the attending veterinarian; (4) guidance to principal investigators and other personnel involved in the care and use of animals regarding handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia; and (5) adequate pre-procedural and post-procedural care in accordance with current established veterinary medical and nursing procedures."

However, the unexpected deaths of Pigs 717 and 796 raise serious concerns about whether UMass Chan provided adequate postoperative monitoring and timely veterinary intervention. We urge the USDA to determine whether deficiencies in care contributed to either pig's death or allowed avoidable pain and distress to go unaddressed.

2. IACUC Review, Protocol Detail, and Humane Endpoints

Section 2.31(d) of the AWRs stipulates a set of requirements for the IACUC's review of proposed use of animals, including that "procedures involving animals will avoid or minimize discomfort, distress, and pain to the animals" [2.31(d)(1)(i)]; "animals [who] 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" [2.31(d)(1)(v)]; "medical care for animals will be available and provided as necessary by a qualified veterinarian" [2.31(d)(1)(vii)]; and "activities that involve surgery include appropriate provision for pre-operative and post-operative care of the animals in accordance with established veterinary medical and nursing practices" [2.31(d)(1)(ix)].

We urge the USDA to determine whether UMass Chan's IACUC approved protocols with inadequate postoperative care requirements or humane endpoints, whether personnel failed to implement approved safeguards, or both.

3. Unlicensed Supplier

Section 2.1(a)(1) of the AWRs requires dealers to hold a valid license unless an exemption applies. PETA has not located Earle M. Parsons & Sons, Inc. in USDA's public database. We request that USDA determine whether the supplier held a valid license at the time of the December 30, 2024, transaction, including under another business name, and, if not, whether an exemption applied or the sale violated federal licensing requirements.

We respectfully request that the USDA investigate the incidents outlined above, determine whether UMass Chan or Earle M. Parsons & Sons, Inc. violated the Animal Welfare Act or its implementing regulations, and, if violations are substantiated, pursue whatever enforcement action the agency deems appropriate.

Thank you for your attention to this matter.

Sincerely,



Alka Chandna, Ph.D.
Vice President
Laboratory Oversight & Special Cases
AlkaC@peta.org | (757) 803-6447

Exhibit 1



ANIMAL HEALTH RECORD

Department of Animal Medicine

Donahue 202200028

717 / Swine

PI/Docket

Animal ID # / Species

DATE	Time	DVM	OBSERVATIONS	TREATMENTS	Initials
11/20/2023			Arrived active, alert and healthy		ST
	1:30		Fresh scratch on upper part of (R) hind and (R) flank. Older healing scratch on (R) side of rump. Very skittish	Neosporin applied gave grapes	
11-21-23	1140		Healing scratches	Neosporin	ST
11-22-23	12:45		BAR healing scratches	Neosporin	ST
11-27-23			BAR continued healing scratches lifting	No TX	ST
11-28-23	820		BAR. Heavy grater scratches lifting	NO TX	ST
11/28/23	13:13		START FAST	Fentanyl Patch 100mc/hr	PHC
	13:39		Wrong Pig (No FAST needed)	Fentanyl Patch removed & placed Back in Dry Drawer	PHC
11/29/23	9:10		BAR, Resting. Normal output. Scratches appear fully healed	No TX	ST
12/2/23	10AM		BAR, standing, WNL	No TX	JM
12/3/23	17:27		FASTing started ~~1 cup grain~~ 1 cup grain		PHC
12-4-23	8:00		Pig was accidentally fed by animal care tech - removed food measured food amount left ~ 1 cup of food consumed		ST
	9:30		Surgery canceled per vet	Pig fed	SW/ST
12-04-23	17:00		BAR		Frank
12-05-23	14:30		Fast the Pig	Food	Frank
12-06-23	08:15		A scar behind the left ear	ASPI 325mg	
	08:35		Sedation and move to the operation room	T.KX 0.838ml x 3/hr	Frank
12/06/23	7:28p		Pig back from successful surgery intervention walking + eating	2.0mg/kg	KK

P.T.O.

Animal # 717

Time (q15min)	12:15	12:30	12:45	13:00	13:15	13:30	13:45	14:00	14:15	14:30
Heart Rate:	123	124	118	116	112	110	108	98	219	112
Resp Rate:	16	16	16	16	16	16	13	15	13	13
Blood Press:	86/49	86/43	84/47	82/42	87/42	63/43	53/17	110/70	97/68	61/24
SpO ₂ :	99	98	98	97	97	97	98	98	98	99
Temp:	98.7	99.1	99.3	99.8	100.5	100.5	100.7	101.6	101.7	102.3
CO ₂	41	39	40	39	38	37	36	38	39	34
Isoflurane%	1.5	1.5	1.5	1.5	1.5	1.5	2.5	2.5	1.5	1.5
O ₂ L/minute	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Fluid rate ml/hr	5	5	5	5	5	5	5	5	5	5
ABP	97/43	97/72	96/70	90/69	77/57	64/34	55/34	50/37	64/41	70/43

Invasive BP

BB
BB

Time	Comments	Initials
13:40	Dopamine 147 times - ON	du
13:45	ISO set for 2.5 for 5 min	du
13:50	Balloon up at 11:50	du
13:50	ISO set for 1.5 back	du
14:05	Dopamine off	2T
16:20	Balloon off/down	du
4:35	Neck pressure closing started - fixed 1.5 mL Green	du
5:10p	ISO turned off Surgery complete	

balloon
inset

ADDITIONAL DRUG THERAPY

Date	Time	Treatment/Therapy	Dose	Volume	Route	Purpose/Effect	Initials

*Requires Veterinary Sign Off

Comments:

BB - Before Ballooning
AB - After Ballooning

717

02

P.T.O

POSTOPERATIVE INFORMATION
UMMS Department of Animal Medicine

Protocol# MS Study IVF #161 PI D. Kim Donahue Date: 12/06/23
Animal # 277 Species Swine Building

IMMEDIATE POSTOPERATIVE OBSERVATIONS (until sternal position is maintained)

Date	Time	Temp	SpO2	HR	RR	Observation	Initials
12/6/23	5:15p	102	99	170	-	3-4 ml of blood from Rectum upon Recovery Rectal Temperature	KK
12/6/23	5:20p	-	-	-	-	Pie in face - Begin Hunger on - Pie Starting to move	KK
12/6/23	5:30p	-	-	-	15	Pie in sternal position -	KK
12/6/23	5:40p	-	-	-	13	Pie still somnolent	KK
12/6/23	5:42p	-	-	-	15	Pie moving head and eyes open	KK
12/6/23	5:50p	-	-	-	18	Pie awake but sleepy	KK
12/6/23	6:00p	-	-	-	15	Increased Extension of front legs	KK
12/6/23	6:15p	-	-	-	13	Pie grooming	KK
12/6/23	6:30p	-	-	-	13	Pie Somnolent	KK

POSTOPERATIVE TREATMENT AND OBSERVATION INFORMATION

Date	Time	Treatment/Drug	Dose	Volume	Route	Observation	Initials
12/6/23	16:48	Excede	5mg/kg	1.5ml	zoo	Antibiotics	KK

Swine Physical Examination Log

PI & Protocol # Donahue 202200028 Animal ID # 717

Date: 11-20-23

Weight 28 kg Sex: ♂

Appearance: Good

Temperament: Timid

Urine ☒ normal amount/consistency ☐ abnormal * (describe below)

Feces ☒ normal amount/consistency ☐ abnormal * (describe below)

Mucous membrane ☒ pink/normal ☐ pale * ☐ ulcer/ blister/other lesion*

Oral/nasal condition ☒ normal ☐ abnormal* (describe below)

Eye condition ☒ normal ☐ abnormal* (describe below)

Ear condition ☒ normal ☐ abnormal* (describe below)

Skin Condition ☒ normal ☐ abnormal* (describe below)

Ambulation/Gait ☒ normal ☐ abnormal * (describe below)

Hoof condition ☒ normal ☐ abnormal* (describe below)

Discharge (if any) ☐ ocular ☐ nasal ☐ genital ☐ anal

Fecal (new arrivals only) ☐ negative ☐ positive _____

Comments (describe any abnormalities)

See AHR

**please refer to animal health record*

Veterinarian Initials (arrival physical) _____ Technician initials: ST

Exhibit 2

Department of Animal Medicine UMass Chan Medical School

Department of Animal Medicine UMass Chan Medical School

Do Not Write In This Space



Page#: 1 of 2Date: 01-09-2025

ANESTHESIA RECORD UMass Chan Medical School Department of Animal Medicine

AFPT# 234Protocol# 202100063 PI: Donahue Animal # 796 Species: Swine Weight: 30kgSurgery Suite# SA-180B Building: Med School Surgeon: Kevin Anesthetist: XuProcedure Performed: pacer / lead placement, open chest gene paintingGeneral Appearance: BAR **PREOPERATIVE INFORMATION**

Time	Drug Used	Dose	Volume	Route	Purpose/Effect	Initials
09:50	Fentanyl	100 mcg/hr	1 patch	transdermal	Pain control	CB
09:53	Ketamine	2.2 mg/kg	0.66 ml	IM		CB
09:58	Xylazine	2.2 mg/kg	0.66 ml	IM	Sedation as TKX mix	CB
09:50	Telazol	2.2 mg/kg	0.66 ml	IM		CB
10:20	Meloxicam	0.4 mg/kg	2.4 ml	SC	Pain control	CB
10:25	Cefazolin	20 mg/kg	1200 ml swine	IV	antibiotic	CB

Time of intubation: 10:17 ET Tube size: 5.5 Time of catheterization: 10:10 Time on ventilator: 10:22Time of Blood Collection: ✓ Site of Blood Collection: ✓ Blood Volume Collected: ✓**INTRAOPERATIVE INFORMATION**

Time (q15min)	10:30	10:45	11:00	11:15	11:30	11:45	12:00	12:15	12:30	12:45
Heart Rate:	94	102	108	107	102	90	90	110	95	58
Resp Rate:	25	11	11	11	11	11	11	11	11	11
Blood Press:	112/73	91/66	95/53	89/52	92/55	111/66	100/54	103/58	102/49	101/53
SpO ₂ :	98	98	98	94	98	98	94	96	98	99
Temp:	38.7	38.7	38.6	38.4	38.4	38.2	38.4	38.6	38.7	38.7
CO ₂	39	37	37	37	37	34	35	35	35	34
Isoflurane%	1.5	1.5	1.5	1.5	1.5	2	2	2	2	2
O ₂ L/minute	1	1	1	1	1	1	1	1	1	1
Fluid rate ml/hr	5	5	5	5	5	5	5	5	5	5
Anesthetic depth Assessment* (check when any performed)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

* e.g., jaw tone, palpebral reflex, corneal reflex, withdrawal reflex, mucus membrane (mm) color, capillary refill time (CRT)

IV Catheter Site: ear vein IV Fluids Used: Saline Total Volume Administered: 600 mlTime IV Catheter Removed: 15:10 Time Extubated: 15:20 Time Sternal: 15:25

Time	Comments	Initials
10:20	eye ointment given	CB
11:35	neck pocket opened	CB
11:42	ISO set to 2	DB
12:03	Lead in pima	DB
12:31	Chest open begin	DB
12:50	flushing neck pocket with 300 mg clocin in 500 ml saline	CB
13:15	Detib led to VF	
13:25	ISO set to 1.5	
13:44	neck pocket and chest closing begin	

ANIMAL EUTHANIZED? ☐ YES ☒ NO

If yes, agent and dose used: _____

Time (q15min)	13:00	13:15	13:30	13:45	14:00	14:15	14:30			
Heart Rate:	83	83	82	103	102	126	115			
Resp Rate:	11	11	11	11	22	11	11			
Blood Press:	43/46	47/37	47/41	43/36	48/41	83/33	80/33			
SpO ₂ :	99	99	99	100	100	99	100			
Temp:	96.9	99.1	99.1	98.9	98.9	99.1	99.3			
CO ₂	35	35	36	37	39	31	32			
Isoflurane%	2	2	1.5	1.5	1.5	2.5	1.5			
O ₂ L/minute	1	1	1	1	1	1	1			
Fluid rate ml/hr	5	5	5	5	5	5	5			
Anesthetic depth Assessment*(check when any performed)	✓	✓	✓	✓	✓	✓	✓			

* e.g., jaw tone, palpebral reflex, corneal reflex, withdrawal reflex, mucus membrane (mm) color, capillary refill time (CRT)

Time (q15min)										
Heart Rate:										
Resp Rate:										
Blood Press:										
SpO ₂ :										
Temp:										
CO ₂										
Isoflurane%										
O ₂ L/minute										
Fluid rate ml/hr										
Anesthetic depth Assessment*(check when any performed)										

* e.g., jaw tone, palpebral reflex, corneal reflex, withdrawal reflex, mucus membrane (mm) color, capillary refill time (CRT)

Time	Comments	Initials
13:10	gene painting of heart started	CB
14:01	iso 84 to 3	DB
14:02	iso 84 to 2	DB
14:03	iso 84 to 3	DB
14:06	iso 84 to 2.5	DB
14:28	iso 84 to 1.5	DB
14:30:45	chest cavity closed / surgery complete	DB

ADDITIONAL DRUG THERAPY

Date	Time	Treatment/Therapy	Dose	Volume	Route	Purpose/Effect	Initials

Comments:

Anesthesia Recovery Record

Date: 1/9/20	PI: Donahue	Protocol#: PROTO202200028	Tag#/ID 4000/196	Species: Swine
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Procedure Finish Time: 14:15

Last Anesthetic Administration Time: 14:58

- After procedure finish time, animal must be observed **at least every 15 minutes until sternal, at minimum**
- Record time of observation and place a "✓" in the appropriate column below.

[illegible]

Anesthesia recovery was: (circle all that apply)

1. QUICK (≤ 30 min) or MODERATE (≤ 1 hour) or PROLONGED (≥ 1 hour)
2. SMOOTH or ROUGH: VOMIT, ATAXIA, SEIZURE, HYPOTHERMIC, OTHER

Donahue Lab Protocol # 202100063

Special Diet Check Sheet

Location: SA 495 Month / Year: Jan/2025

Start date: 1/9/25

Per protocol, the Donahue Lab is responsible for feeding cages with blue Special Feed/Water cards.

The associate checking/changing the feed will initial on the appropriate date.

Date	Initials	Date	Initials	Date	Initials
1		12		22	
2		13		23	
3		14		24	
4		15		25	
5		16		26	
6		17		27	
7		18		28	
8		19		29	
9	DK	20		30	
10	DK	21		31	
11					

Swine Physical Examination Log

PI & Protocol #: Donahue 202100063

Animal ID # 796

Date: 12-31-24 Weight: 28 kg Sex: ♂

Appearance: Good Temperament: Timid Temp: 101.3° HR: 88 RR: 28

Urine ☒ normal amount/consistency ☐ abnormal * (describe below)

Feces ☒ normal amount/consistency ☐ abnormal * (describe below)

Mucous membrane ☒ pink/normal ☐ pale * ☐ ulcer/ blister/other lesion*

Oral/nasal condition ☒ normal ☐ abnormal* (describe below)

Eye condition ☒ normal ☐ abnormal* (describe below)

Ear condition ☒ normal ☐ abnormal* (describe below)

Skin Condition ☒ normal ☐ abnormal* (describe below)

Ambulation/Gait ☒ normal ☐ abnormal * (describe below)

Hoof condition ☒ normal ☐ abnormal* (describe below)

Discharge (if any) ☐ ocular ☐ nasal ☐ genital ☐ anal

Fecal (new arrivals only) ☒ negative ☐ positive _____

Housing ☐ socially housed ☒ singly housed: check exception

Social housing exceptions ☐ fighting ☐ protocol ☐ medical* ☒ compatible pair not available

Comments (describe any abnormalities)

*see animal health record

Veterinarian signature: [Signature] Technician initials: ST

Initial Physical Examinations and Routine Health Monitoring

Exhibit 3

Packing Slip

Earle M Parsons & Sons Inc
140 Mill Valley Rd
Hadley, MA 01035
(413) 584-0629

DATE

INVOICE #

12/30/2024

22629

BILL TO:

U Mass Chan Medical School
Accounts Payable
55 Lake Ave. North
Worcester, MA 01655-0102
Invoices@umassp.edu

SHIP TO:

U Mass. Med. Center
Dr. Donahue
PO#WA01557252

P.O. NUMBER	TERMS	REP	SHIP	VIA	F.O.B.	PROJECT
WA01557...	Net 30		12/30/2024			

QUANTITY	ITEM CODE	DESCRIPTION	PRICE EACH	AMOUNT
3	HR03	Swine 40-65 Lbs [18-29 Kg.], Yorkshire male 25-29 kg		
	D01	Processing & Delivery		
	Fuel Surcha...	Fuel Surcharge		
		Tag 795 26 kg DOB 10-17-2024		
		Tag 796 28 kg DOB 10-17-2024		
		Tag 797 27 kg DOB 10-24-2024		



296574