AN INTERNATIONAL ORGANIZATION DEDICATED TO PROTECTING THE RIGHTS OF ALL ANIMALS

PETA

PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

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November 19, 2026

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

Via e-mail: ac.complaints@usda.gov

Dear Ms. Juarez:

I'm writing on behalf of People for the Ethical Treatment of Animals (PETA) to respectfully request that the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) investigate serious animal-welfare concerns, including possible violations of the Animal Welfare Act (AWA) and its implementing regulations, involving the use of dogs in stroke experiments (PROTO201900269) in the laboratory of Matthew J. Gounis at the University of Massachusetts Chan Medical School (UMass Chan; USDA Certificate No. 14-R-0035). Specifically, this complaint addresses a severe adverse event involving a dog identified as F357 on March 25, 2026, as well as a pattern of serious adverse outcomes reported in published experiments conducted under this protocol.

March 25, 2026, adverse event involving dog F357
Records recently obtained from UMass Chan document a serious incident involving a dog identified as F357 during an experiment associated with PROTO201900269. According to the veterinary record (see Appendix A), the dog's blood pressure and oxygen saturation dropped about five minutes after the dog received a "test article." At 12:24 p.m. on March 25, 2026, veterinarians were called to evaluate F357 because the dog's blood pressure remained low despite treatment with phenylephrine. The veterinarians considered whether the test article had triggered a severe allergic reaction (anaphylaxis) or caused the dog's blood vessels to widen (vasodilation).

Veterinary personnel administered diphenhydramine, decreased isoflurane, increased the rate of intravenous fluids to 600 mL/hour, and continued giving phenylephrine in an effort to increase the dog's blood pressure. A blood-gas test revealed that the dog's blood was too acidic (metabolic acidosis), with a pH of 7.24, and veterinary personnel treated the condition with sodium bicarbonate. Although F357's blood pressure eventually rose, the record states that the dog's oxygen level remained low even after the ventilator was set to deliver more breaths per minute.
Particularly troubling is the veterinarian's notation regarding treatment of the dog's persistent hypoxia: **"100% O2 was not an option due to the approved study protocol."**

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

The record then states: **“Since the clot could not be removed and the dog would be euthanized and not recovered, further efforts to increase oxygenation were not deemed necessary.”**

The veterinary record raises serious questions about whether UMass Chan gave its attending veterinarian the authority required under the Animal Welfare Regulations to ensure adequate veterinary care during an emergency. It also raises questions about whether the protocol prevented a clinically appropriate intervention, whether any experimental procedures continued after the decision to euthanize F357, and whether veterinary personnel maintained adequate anesthesia until death.

UMass Chan’s IACUC response

UMass Chan’s April 13, 2026, IACUC meeting minutes (see Appendix B) describe the same test-article adverse event but erroneously identify the governing protocol as PROTO201900298. In subsequent correspondence, UMass Chan clarified that no animal-use protocol bearing that number existed and that the minutes should instead have identified PROTO201900269.

The minutes state that one dog experienced a reaction to a test article, that the attending veterinarian was paged, and that the dog was treated with vasopressors and antihistamines. The principal investigator planned to conduct cytokine and potential antihistamine assays, if available, on serum samples collected before and after administration of the experimental agent. The IACUC recorded that it remained unknown whether the event represented an isolated allergic reaction, as suggested by the animal’s response to antihistamine, or a side effect of the drug.

Despite this uncertainty, the IACUC agreed that future experiments could proceed without pretreating dogs with antihistamines, stating that pretreatment could confound the experimental results. The approved corrective-action plan instead required the attending veterinarian or another clinical veterinarian to be available to provide immediate assistance during future test-article administrations.

The committee was advised that members could privately contact the IACUC office if they wished to discuss the incident without Matthew J. Gounis present. No member requested further discussion. Matthew J. Gounis and another committee member abstained due to potential conflicts of interest, after which the corrective action plan was approved unanimously by the 13 members who voted.

The IACUC’s response raises additional concerns. The committee acknowledged that it remained unknown whether F357 had experienced an isolated allergic reaction or a side effect of the test article, yet permitted further experiments to proceed without antihistamine pretreatment because prophylaxis could confound the experimental results. The corrective action plan instead focused on ensuring veterinary availability during future test-article administrations. APHIS should determine whether this response adequately minimized the risk of recurrence and whether the protocol appropriately balanced experimental objectives against animal welfare and the need for clinically indicated veterinary intervention.

Additional serious adverse outcomes reported under PROTO201900269

The March 2026 incident is particularly concerning when considered alongside serious adverse outcomes reported in published experiments conducted under PROTO201900269.

A 2024 study by Matthew J. Gounis and colleagues[1] describes canine stroke experiments conducted under UMass Chan IACUC protocol PROTO201900269. Experimenters obtained bilateral femoral arterial access and advanced a microcatheter into the middle cerebral artery (MCA), where they deployed a coil to obstruct blood flow and cause an ischemic stroke. The coil was left in place for 45 minutes and then removed in an attempt to restore circulation. Some dogs received chilled saline through an insulated catheter before and after restoration of blood flow, while control dogs received no additional therapy. The dogs were then transferred for extensive MRI imaging**.**

The paper documents numerous severe complications and a high rate of death or euthanasia. Twelve dogs underwent the procedures. Two were excluded after sustaining basilar artery perforator injuries that caused subarachnoid hemorrhage (i.e., injuries to small branches of the basilar artery caused bleeding into the space surrounding the brain). Of the 10 randomized dogs, one was excluded because the MCA failed to recanalize (i.e., it remained blocked) after the coil was removed, and another was excluded after MRI revealed a global brain infarct (i.e., widespread death of brain tissue from a lack of blood flow). Four additional dogs were euthanized after post-procedure MRI because their infarcts exceeded one-third of the MCA territory, and a fifth dog was euthanized after failing to recover from MRI. **Ultimately, only three of the 10 randomized dogs survived to the intended 30-day endpoint. One surviving dog developed signs of blindness following the induced infarct, although the paper states that the condition improved and resolved within one week.**

The authors acknowledged "the low number of animals that survived the infarct" and stated that the model's post-infarct mortality rate "was not unexpected." The publication identifies the experiments as approved under PROTO201900269.

Thus, separate from the March 2026 event involving F357, **published work conducted under PROTO201900269 documents vascular injury, intracranial hemorrhage, extensive brain infarction, failure to restore cerebral blood flow, failure to recover following MRI, and euthanasia before the intended study endpoint.** These outcomes warrant scrutiny of whether the protocol adequately anticipated the frequency and severity of adverse outcomes associated with the procedures and whether its veterinary-intervention and humane-endpoint provisions were sufficient.

Possible violations of the Animal Welfare Regulations
I. Failure to provide adequate veterinary care
Section 2.33(b) of the Animal Welfare Regulations requires research facilities to maintain a program of adequate veterinary care that includes appropriate facilities, personnel, equipment, and services; appropriate methods to prevent, diagnose, control, and treat diseases and injuries; timely communication of animal-health and welfare concerns to veterinary staff; and adequate pre-procedural and post-procedural care in accordance with established veterinary medical and nursing procedures. **9 C.F.R. § 2.33**

F357's records raise serious questions about compliance with these requirements. Although veterinary personnel responded to the acute adverse event and provided treatment, the approved protocol itself reportedly precluded administration of 100% oxygen despite refractory hypoxia. It is unclear whether the attending veterinarian retained sufficient authority to provide all clinically

[1] King RM, Peker A, Epshtein M, et al. Active drug-coated flow diverter in a preclinical model of intracranial stenting. *J Neurointerv Surg*. 2024;16(7):731-736.

indicated treatment or whether experimental restrictions improperly constrained the veterinary response.

APHIS should determine whether withholding 100% oxygen was scientifically justified, explicitly approved by the IACUC, and consistent with accepted veterinary practice. APHIS should also determine whether the decision not to pursue further attempts to improve oxygenation was based solely on the determination that F357 would be euthanized or whether the dog's clinical condition and welfare were independently assessed.

II. Failures in IACUC review and oversight

Section 2.31(d) of the Animal Welfare Regulations requires the IACUC to determine that procedures involving animals will avoid or minimize discomfort, distress, and pain; that investigators have considered alternatives to procedures that may cause more than momentary or slight pain or distress; and that animals experiencing 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. **9 C.F.R. § 2.31**

The March 2026 incident raises substantial questions about whether PROTO201900269 adequately anticipated and addressed the risks associated with the test article, experimentally induced cerebral occlusion, failed clot removal, and refractory hypoxia. It also raises questions about whether the IACUC's corrective action adequately minimized the risk of recurrence.

The committee acknowledged that it did not know whether the reaction was an isolated allergic response or a side effect of the test article. Yet it permitted future experiments to continue without antihistamine pretreatment because the intervention could confound the results. The corrective action appears to have focused on ensuring that a veterinarian would be present to respond to another reaction, rather than preventing or reducing the likelihood and severity of such a reaction. APHIS should determine whether this approach adequately protected the animals and whether the IACUC gave sufficient weight to animal welfare when balancing prophylactic treatment against experimental objectives**.**

The adverse outcomes reported in King *et al.* raise a related protocol-level question: whether the humane endpoints, veterinary-intervention criteria, anticipated adverse outcomes, and mortality associated with PROTO201900269 received adequate ongoing IACUC review as experience with the model accumulated. This question does not depend on the March 2026 procedure being identical to the procedure described in the publication. Rather, APHIS should examine the totality of adverse outcomes documented in animals used under the protocol and determine whether those outcomes warranted modification, additional safeguards, suspension, or other IACUC action.

Requested USDA investigation

We respectfully request that APHIS investigate F357's treatment and UMass Chan's conduct and oversight of canine stroke experiments under PROTO201900269. In particular, we urge APHIS to determine:

- Whether the IACUC and veterinary staff had reviewed all available safety information before approving administration of the test article;
- Why the approved protocol precluded administration of 100% oxygen despite F357's refractory hypoxia;
- Whether withholding 100% oxygen was scientifically justified in writing and specifically approved by the IACUC;

- Whether the attending veterinarian retained authority to administer clinically indicated emergency treatment notwithstanding experimental restrictions;
- The nature and cause of the clot that could not be removed and whether failed clot removal was an anticipated experimental outcome, procedural complication, or adverse event;
- Whether the inability to remove the clot independently required termination of the procedure or immediate euthanasia;
- Whether the governing protocol's veterinary-intervention criteria and humane endpoints were adequate and appropriately followed;
- Whether the IACUC adequately evaluated the risks of continued test-article administration after an event for which anaphylaxis and a drug-induced effect remained possible explanations;
- Whether allowing future experiments to proceed without prophylactic antihistamines adequately minimized the risk of recurrence;
- Whether the complications, mortality, and other adverse outcomes associated with canine stroke experiments conducted under PROTO201900269 were fully reflected in the protocol and considered during ongoing IACUC review; and
- Whether the frequency and severity of adverse outcomes associated with work conducted under PROTO201900269 warranted protocol modification, suspension, additional safeguards, or further IACUC review.

We further request that APHIS obtain and review the complete version history of PROTO201900269, including all amendments, investigator correspondence, veterinary consultations, adverse-event reports, corrective-action plans, test-article safety information, humane-endpoint provisions, and records concerning the March 25, 2026, procedure and F357's euthanasia.

The circumstances documented here extend beyond a single unexpected adverse event. UMass Chan's records describe a dog who experienced severe cardiovascular and respiratory instability during an experiment, including refractory hypoxia for which an ordinarily available supportive intervention was expressly precluded by the approved protocol. The subsequent IACUC review allowed further experiments to proceed without antihistamine pretreatment even though the committee had not resolved whether the reaction represented an isolated allergic response or an effect of the test article. Separately, published research conducted under PROTO201900269 documents numerous severe complications and the premature loss of animals subjected to canine stroke experiments. Considered together, these records raise substantial questions about whether the protocol adequately anticipated and addressed serious adverse outcomes, whether appropriate veterinary intervention was available when animals experienced severe physiological complications, and whether UMass Chan's IACUC adequately minimized animal pain and distress as experience with the protocol accumulated.

It is worth noting that two months before F357's March 25 emergency, USDA cited UMass Chan under Section 2.31(e)(3) of the Animal Welfare Regulations for an omission in another IACUC-approved protocol overseen by the same principal investigator, involving the creation of artificial aneurysms in dogs. In its January 13, 2026, inspection report, USDA found that protocol #59 identified a seroma—a collection of fluid at the incision site—as a possible complication of device implantation. Yet the protocol omitted that same risk from its description of an imaging procedure that also required surgically exposing a blood vessel.

Given that prior citation and the serious complications under the stroke protocol discussed here,

we respectfully urge USDA to investigate these concerns and, if substantiated, cite UMass Chan for all applicable violations of the Animal Welfare Act and its implementing regulations and take appropriate enforcement action.

Thank you for your consideration of this important matter.

Sincerely,



Katherine V. Roe, Ph.D.
Chief Scientist
Laboratory Investigations Department

This document is a supplement to the medical record (anesthesia form) for animal F357 documenting events on 25-March-2026. IACUC protocol 202100059.

At 12:24 veterinarians were called to the [redacted] to evaluate a dog for hypotension which did not respond to phenylephrine administration. The blood pressure and SpO2 dropped about 5 minutes after the test article was administered. DDX included test article induced anaphylactic response or vasodilation. The attending vet instituted the following Rx to increase BP:

Diphenhydramine

Iso decreased to 1.25 %

Fluid rate increased to 600ml/hr

Continue phenylephrine administration.

BP gradually increased after Rx instituted and was at an acceptable value by 13:00. Fluid rate was decreased to 300ml/hr (13:15) and phenylephrine D/C at 13:45

Blood gas (12:56) indicated a metabolic acidosis (pH 7.24, PCO2 41) and was treated with 9 meq of Na bicarb. This increased the pH to 7.33 and decreased the BE which was deemed acceptable. Hypoxia was refractory despite increase in RR. Animal was on a ventilator and medical grade air. 100% O2 was not an option due to the approved study protocol. Since the clot could not be removed and the dog would be euthanized and not recovered, further efforts to increase oxygenation were not deemed necessary.

MRI + STAINED BRAIN SECTIONS INDICATED NO MID OR BRAINSTEM LESIONS

26-Mar-2026

George DeMarco, AV

INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE MEETING AGENDA

Monday, April 13 2026

Zoom

Present:

MG (Member Chair)	*x*	*FH (Member)*	*x*	*JM (Member)*		*RZ (Member)*	*x*
GD (Member AV)	*x*	*HK (Member)**	*x*	*GP (Member)*	*x*	*YXW (Member)*	*x*
NH (Member; vice chair)	*x*	*OK (Member)*	*x*	*CP (Member)*	*x*		
JD (Member)	*x*	*EKJ (Member)*	*x*	*RR (Member-Nonscientist)*	*x*	*JC (Alternate Vet)*	*x*
MF (Member)	*x*	*GM (Member)*		*MR (Member)*	*x*	*AJ (Alternate Nonscientist)*	
DH (Member Non-Affiliate)	*x*	*CM (Member IACUC director)*	*x*	*CT (Member)*	*x*	*MN (Alternate non-affiliate)*	

**CT joined late.*

***HK joined late. First voted at 15:17:34 to accept the Inspection Report*

Non-Members Present: VCP (Regulatory and Compliance Specialist), LJ (Regulatory and Compliance Specialist), DS (Post-approval Monitor), AD (Post-approval monitoring), JA (Protocol Specialist)

Start time: 3:00 pm
End time: 4:20 pm

1. Introductory Remarks: Introduction of JA, Protocol Specialist, to the Committee.

2. A list of protocols approved by DMR from 2/25/26 to 3/24/26 was reviewed.

3. Meeting Minutes

   a) March 2, 2026
   Motion was made to approve the meeting minutes. The minutes were adopted unanimously. (16 members voted)

4. Protocols for Review
   a) Adding CC as a Surgeon to PROTO201900290, PROTO201900287, IPROTO202500000033 Protocols
   - PROTO201900290 Gene Silencing as a Therapy for Hereditary Sensory and Autonomic Neuropathy (HSAN) Type 1
   - PROTO201900287 Therapeutic Studies in Transgenic Mouse Models of Amyotrophic Lateral Sclerosis
   - IPROTO202500000033 Gene Therapy for Central Nervous System Conditions

   Motion was made to accept the addition of CC as a surgeon to the following protocols: PROTO201900290, PROTO201900287, and IPROTO202500000033. *The motion was approved unanimously. (16 members voted)*

5. Consent Agenda

   a) Recommended Analgesics and Anesthetics Formulary by Species was reviewed.
   Language was added to match existing SOP's. No concerns were raised by the Committee. A motion was made to accept the updated Recommended Analgesics and Anesthetics Formulary by Species. The formulary was approved unanimously (17 members voted; CT joined meeting)*

   b) Policy 3.01.05: Guidelines for Compounding Drugs and Chemicals was reviewed.

   No concerns were raised. A motion was made to approve Policy 3.01.05: Guidelines for Compounding Drugs and Chemicals. The motion was approved unanimously (17 members voted)

6. Department of Animal Medicine Operations Update
   SB resigned but may stay on for protocol reviews.

JC is tracking incidences of mouse parvovirus.

7. Announcements and Discussion

a) Inspection and program review report (Fall 2025) was presented to the Committee.

Vote to adopt our semi-annual program report to IO approved.
A motion was made to accept the semi-annual report to the IO. The motion was approved unanimously. (16 members voted; DH didn't vote)

Inspection findings were presented to the Committee, in addition to corrective actions and deficiency designations. All corrective action items have been completed. *A motion was made to accept the semi-annual inspection report. The motion was approved unanimously. (17 members voted (HK voted**); RZ didn't vote)*

b) Foreign assurance update

The PI decided not to pursue the previously discussed project. No further review or action is needed.

8. Educational Material:

Webinar recommended to the Committee (hosted by NABR). Members will be sent the registration link.
Challenges We Face Today in Defending Animal Research
https://us06web.zoom.us/webinar/register/WN_IMRjJnXBTtuPZbpN9yT70w#/registration

9. Protocol Violations & Adverse Events

a) PROTO201900298
One dog experienced a reaction to a test article. The AV was paged and the animal was successfully treated with vasopressors and antihistamines. The PI will perform cytokine and potential antihistamine assays (if available) on collected blood serum samples prior to and following administration of the experimental agent. It is unknown at this time if this was an isolated allergic reaction, as is suggested by the response to antihistamine, or a side effect of the drug.

IACUC agreed that future studies may proceed without pretreating animals with antihistamines since it could confound results. It is an important safety measure to establish the effects of the drug before it can be approved for clinical trials. The AV or a clinical veterinarian will be available to provide support to animals immediately if needed in the future.

The committee was advised to privately message the IACUC Office if any member wished to discuss this matter without MG present. No member requested further discussion and MG/NH abstained from voting to avoid possible conflicts of interest.

A motion was made to accept the corrective action plan to have vet staff available for future testing prior to the administration of the test article. The plan was accepted unanimously (13 members voted; CT, RZ, and FH did not vote; MG/NH abstained)

b) PROTO201900337

Incident from 3/26/25: A deceased mouse was found in an animal facility housing room, outside of a cage. A researcher was in the housing room. Potential causes and corrective actions proposed by the PI were discussed. Corrective actions included:

- wearing a tighter fitting gown with fitted sleeves that will not interfere with handling animals.
- counting pups in the cage before and after handling cages to ensure that all mice are present.

The Committee agreed that this was an isolated incident, with low likelihood of recurrence. The IACUC recommended the lab space be evaluated to ensure it is not overly cluttered which may obstruct view of animals or cages.

The Committee requests a PAM audit be initiated within a month of this meeting.

A motion was made to approve the Corrective Action plan proposed by the PI and initiation of a PAM audit within one month. The motion was approved unanimously (MG abstained; 17 voted)

Incident from 3/23/26: one cage of two rats was found without a water bottle. Rats were checked by veterinarian and found to be active, alert and hydrated. Only 3 individuals (two researchers and one animal care technician) were in the corridor on the preceding day, none of whom acknowledged they handled the cage when interviewed.

After discussion, the Committee determined that the research and animal care staff must receive reinstruction to be more diligent in verifying the presence of water bottles on cages not on automatic watering.

A motion was made to accept the proposed plan. The motion was approved unanimously. (MG abstained; 17 voted)

c) OLAW report

The IACUC discussed allegations made to OLAW. MG/JC/GD were asked to leave the meeting to avoid potential conflicts of interest. The IACUC discussed the investigation and concluded there were no non-compliant items discovered throughout the investigation that should have been reported to OLAW.

A motion was made to accept the response to OLAW. The motion was approved unanimously. (15 members voted; RR left meeting; MG/JC/GD abstained)