



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500, MSC 6910
Bethesda, Maryland 20892-6910
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare
6700B Rockledge Drive, Suite 2500
Bethesda, Maryland 20817
Telephone: (301) 496-7163
Facsimile: (301) 402-7065

April 10, 2019

Alka Chandna, Ph.D.
Senior Researcher
People for Ethical Treatment of Animals
501 Front Street
Norfolk, Virginia 23510

Dear Dr. Chandna,

The Office of Laboratory Animal Welfare (OLAW) has completed its investigation into an allegation you submitted March 6, 2019 on behalf of the People for the Ethical Treatment of Animals to Dr. Lauer, NIH Deputy Director for Extramural Research. The matter involved the sale of live dogs by the Companion Animal Alliance (CAA) to Louisiana State University. Your concern stated that CAA was not licensed by the US Department of Agriculture (USDA) and as such the LSU purchases were in violation of the federal Animal Welfare Act (AWA). Under the Memorandum of Understanding between OLAW/NIH and USDA, we have researched this matter and have determined the following:

- 1) In accordance with the USDA guidance document "Licensing and Registration under the Animal Welfare Act" with regard to licensing for animal sales by public shelters, "animal shelters that are part of State, county, or local governments are exempt."
- 2) CAA, although not owned by the parish, is contracted by the parish to serve as the parish's shelter.
- 3) As such, CAA is considered to be part of the parish government and is therefore exempt from licensure requirements.
- 4) As an exempt source, CAA did not require a license to sell dogs to LSU.
- 5) There was no violation of federal law.
- 6) No further action will be taken by OLAW as there was no violation of the Public Health Policy on Humane Care and Use of Laboratory Animals.

Thank you for your interest in animal welfare.

Sincerely,

(b) (6)

Axel Wolff, M.S., D.V.M.
Deputy Director
Office of Laboratory Animal Welfare

cc: Robert Gibbens, D.V.M., USDA-APHIS-AC
Michael Lauer, M.D., OER, OD, NIH

Wolff, Axel (NIH/OD) [E]

From: Wolff, Axel (NIH/OD) [E]
Sent: Tuesday, April 9, 2019 11:42 AM
To: 'Gibbens, Robert - APHIS'
Subject: RE: Dog shelter

Great, thanks for the nuances Bob. I will finish this up and cc you. I appreciate your expert assessment regarding the fine lines of interpretation.

From: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>
Sent: Tuesday, April 9, 2019 11:30 AM
To: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>
Subject: RE: Dog shelter

Hi Axel. Thanks for circling back.

The language from our guidance document, "Licensing and Registration under the Animal Welfare Act" with regard to licensing for animal sales by public pounds is: "Animal shelters that are part of State, county, or local governments are exempt." And CAA, although not owned by the parish, is contracted by the parish to serve as the parish's pound, and as such is considered to be part of the parish government, and therefore exempt. As an exempt source, CAA did not require a license to sell dogs to LSU. There was no violation of law.

Good to see you at PRIMR. Take care.....Bob

Robert M. Gibbens, DVM
Director, Animal Welfare Operations
USDA, APHIS, Animal Care
2150 Centre Avenue, Bldg. B
Ft. Collins, CO 80526
Phone: (b) (6)
Fax: (b) (6)



[Join the Animal Care Stakeholder Registry and receive emails on topics of interest](#)

From: Wolff, Axel (NIH/OD) [E] [mailto:wolffa@od.nih.gov]
Sent: Tuesday, April 9, 2019 4:55 AM
To: Gibbens, Robert - APHIS <robert.m.gibbens@usda.gov>
Subject: Dog shelter

Hi Bob,

Thanks for updating me at PRIMR on the shelter situation. I just want to verify that I am using the correct language in finalizing my letter to PETA. As I understand it, the shelter in question was owned by the parish/county and is therefore exempt from USDA licensure. Dogs were legally sold to LSU by a county government facility and as such there was no violation of the law.

Is there anything else I should include?

Thanks.

Axel

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Wolff, Axel (NIH/OD) [E]

From: Wolff, Axel (NIH/OD) [E]
Sent: Monday, March 11, 2019 1:52 PM
To: 'Gibbens, Robert - APHIS'
Subject: RE: PETA LSU dog issue

Thanks so much for your quick response. I'll await further information.
Axel

From: Gibbens, Robert - APHIS <Robert.M.Gibbens@aphis.usda.gov>
Sent: Monday, March 11, 2019 1:51 PM
To: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>
Subject: Re: PETA LSU dog issue

Hi Axel. It's a complex situation. Sean is not making any determinations, but he is the licensing clerk who communicates with the facilities. We are still gathering information.

We know that going forward CAA will not be selling dogs to LSU. It is possible they will donate dogs for no compensation, which would not require a license from us.

I'll let you know once we have a decision.....Bob

Robert M. Gibbens, DVM
Director, Animal Welfare Operations
USDA, APHIS, Animal Care

From: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>
Sent: Monday, March 11, 2019 1:42 PM
To: Gibbens, Robert - APHIS
Subject: PETA LSU dog issue

Hi Bob,

OLAW has received the same complaint from PETA that your staff is working on, namely the investigation into status of licensure for Companion Animal Alliance in Louisiana. I see that Sean Rehurek is currently determining whether Louisiana State University purchased dogs from an unlicensed entity. A letter from Bernadette Juarez dated February

17, 2019 to Jeremy Beckham stated that the investigation may take 30-60 days. At this time, I will keep this case in an open status awaiting the findings of your people. Please keep me apprised on any information relevant to this situation. Thanks very much.

Axel Wolff

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Wolff, Axel (NIH/OD) [E]

From: Gibbens, Robert - APHIS <Robert.M.Gibbens@aphis.usda.gov>
Sent: Thursday, March 21, 2019 1:05 PM
To: Wolff, Axel (NIH/OD) [E]
Subject: RE: PETA LSU dog issue

Sounds good. When we have the determination, I'll let you know....it may be a few weeks.

Bob

From: Wolff, Axel (NIH/OD) [E] [mailto:wolffa@od.nih.gov]
Sent: Thursday, March 21, 2019 11:02 AM
To: Gibbens, Robert - APHIS <Robert.M.Gibbens@aphis.usda.gov>
Subject: RE: PETA LSU dog issue

Thanks so much, Bob. This is very helpful. I will wait for the determination and then ask LSU if any of these dogs were used on PHS projects. I'll add what you provided to the file and await further information.
Axel

From: Gibbens, Robert - APHIS <Robert.M.Gibbens@aphis.usda.gov>
Sent: Thursday, March 21, 2019 12:59 PM
To: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>
Subject: RE: PETA LSU dog issue

Hi Axel - - here's a quick update.

We know that previously, LSU acquired dogs from the Companion Animal Alliance (CAA), and provided compensation to CAA in the form of donations of products, services, and possibly money. CAA is contracted by the Parish to do shelter work. If CAA transferred/sold the dogs under that contract, then the sales were not covered under the AWA as government owned/operated pounds and shelters are exempt.

CAA is also licensed with us, as they sell dogs to other entities such as rescues. If CAA transferred/sold the dogs to LSU under their USDA license, we have major concerns, as those dogs would be considered random source dogs and Congress has prohibited us from licensing dealers selling random source dogs to research. We are trying to determine what CAA's contract with the Parish includes, and what it does not include. In the meantime, it is our understanding that if CAA transfers/sells any dogs to LSU (or any other research facility), those would only be dogs that were euthanized by CAA prior to the transfer/sale, which is legal to do under their USDA license. The only other legal option involves CAA donating live dogs to LSU, and receiving no compensation of any kind, as donations with no compensation are not covered under the AWA.

That may be all you need, but if the details of CAA's contract with the Parish impacts OLAW's decision making process, let me know and I'll forward our determination once it is made.

Thanks.....Bob

Robert M. Gibbens, DVM
Director, Animal Welfare Operations
USDA, APHIS, Animal Care
2150 Centre Avenue, Bldg. B

Ft. Collins, CO 80526

Phone: (b) (6)

Fax: (b) (6)



Join the Animal Care Stakeholder Registry and receive emails on topics of interest

From: Gibbens, Robert - APHIS

Sent: Monday, March 11, 2019 11:51 AM

To: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>

Subject: Re: PETA LSU dog issue

Hi Axel. It's a complex situation. Sean is not making any determinations, but he is the licensing clerk who communicates with the facilities. We are still gathering information.

We know that going forward CAA will not be selling dogs to LSU. It is possible they will donate dogs for no compensation, which would not require a license from us.

I'll let you know once we have a decision.....Bob

Robert M. Gibbens, DVM

Director, Animal Welfare Operations

USDA, APHIS, Animal Care

From: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>

Sent: Monday, March 11, 2019 1:42 PM

To: Gibbens, Robert - APHIS

Subject: PETA LSU dog issue

Hi Bob,

OLAW has received the same complaint from PETA that your staff is working on, namely the investigation into status of licensure for Companion Animal Alliance in Louisiana. I see that Sean Rehurek is currently determining whether Louisiana State University purchased dogs from an unlicensed entity. A letter from Bernadette Juarez dated February 17, 2019 to Jeremy Beckham stated that the investigation may take 30-60 days. At this time, I will keep this case in an open status awaiting the findings of your people. Please keep me apprised on any information relevant to this situation. Thanks very much.

Axel Wolff



March 6, 2019

Michael S. Lauer, M.D.
Deputy Director for Extramural Research
Office of the Director
National Institutes of Health (NIH)

Sent via U.S. Mail and E-Mail: michael.lauer@nih.gov

Dear Dr. Lauer:

I write on behalf of People for the Ethical Treatment of Animals (PETA) and its 6.5 million members and supporters regarding Louisiana State University (LSU) and its practice of purchasing live dogs from Companion Animal Alliance (CAA), an animal shelter in Baton Rouge. PETA recently received information showing that CAA may have a pending USDA application to become a licensed class "B" dealer. Accordingly, we urge your office to begin investigating this matter to ensure that NIH funds are not expended on any project using such dogs, in accordance with NIH Notice Number NOT-OD-14-034.¹

Background

In October 2018, PETA was contacted by a whistleblower who was the former executive director of CAA. This individual shared with PETA evidence which revealed that the shelter had sold at least 70 live dogs to LSU for use in lethal anatomy laboratories, as well as for other unknown experimental or teaching purposes. That month, PETA started submitting state open records requests to LSU to learn more about its past purchases and use of these dogs. We believe that because CAA was not licensed by the USDA, LSU's purchases were likely in violation of the federal Animal Welfare Act (AWA).² On February 6, 2019, PETA filed a formal complaint with the USDA. The USDA is currently investigating PETA's complaint.³

While it appears that the majority of the dogs supplied to LSU by CAA were used in a lethal anatomy training laboratory in the LSU School of Veterinary Medicine, internal emails obtained by PETA reveal that at least some dogs were also used "by other departments" for unknown experimental or teaching purposes.⁴ PETA submitted a records request for simply the *titles* of any animal use protocols for projects utilizing shelter-sourced dogs, but LSU refused to release this information.⁵

¹ <https://grants.nih.gov/grants/guide/notice-files/NOT-OD-14-034.html>.

² 7 U.S. Code § 2133.

³ PETA's February 6, 2019 complaint is available at <https://www.peta.org/wp-content/uploads/2019/02/2019-02-06-PETA-Complaint-to-USDA-re-LSU.pdf>. Confirmation from USDA's Animal Care office that the matter is being investigated is attached as Exhibit A.

⁴ Exhibit B.

⁵ Exhibit C.

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

Washington, D.C.
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

Oakland
554 Grand Ave.
Oakland, CA 94610
510-763-PETA

Info@peta.org
PETA.org

Affiliates:

- PETA Foundation (U.K.)
- PETA Asia-Pacific
- PETA India
- PETA Germany
- PETA Netherlands

CAA's Application for Class "B" Dealer License

Recently, new records were provided to PETA that show that on December 6, 2018, while a PETA open records request was pending, CAA applied for a class "B" dealer license from the USDA. This license would allow CAA to begin *lawfully* selling "random source" live animals to LSU (and other research facilities) for use teaching or experimentation. On December 21, 2018, the USDA responded to CAA's application, providing CAA with the Customer ID Number 505239, and explaining the next steps of the licensing process. A USDA inspector appears to have been assigned the task of arranging a pre-licensing inspection, the next step in issuing CAA a class "B" dealer license.⁶

According to publicly accessible information in NIH's RePORT database, in Fiscal Year 2018, LSU received 162 NIH awards, for a combined total funding amount of more than \$54 million. Just earlier this month, the NIH and LSU announced that LSU's School of Veterinary Medicine was being awarded \$11.5 million to establish a pulmonary research center. As you are likely aware, NIH policy prohibits any awarded funds from being expended on a project which utilizes dogs procured from class "B" dealers. As of this date, it is unknown what projects or experiments at LSU intend to utilize dogs purchased from CAA, were it to become a licensed class "B" dealer. LSU has refused to publicly release this information. But given the size and scope of the NIH-funded activity at LSU, and its veterinary school in particular, PETA is gravely concerned that LSU may be running afoul of NIH policy.

PETA is writing to urge the NIH to suspend future awards and grants to LSU until the agency can conduct an inquiry with LSU to determine how and when the university intends to use dogs purchased from class "B" dealers, to ensure that NIH funds do not touch any of these projects.

Thank you for your prompt attention to this matter. I look forward to hearing from you, and I am able to assist your investigation in any way possible. Once this investigation is complete, I would appreciate being notified of the outcome. I can be reached at JeremyB@peta.org or (b) (6)

Sincerely,

A handwritten signature in black ink that reads "JEREMY BECKHAM". The signature is stylized with a large, looped "B" and a checkmark-like flourish at the end.

Jeremy Beckham, MPA, MPH, CPH
Research Associate
Laboratory Investigations Department
People for the Ethical Treatment of Animals

⁶ These records are attached to this complaint as Exhibit D.

Exhibit A

From: Rehurek, Sean P - APHIS Sean.P.Rehurek@aphis.usda.gov
Subject: USDA complaint AC19-137 against LSU
Date: February 17, 2019 at 7:23 PM
To: JeremyB@PETA.org

Hello Jeremy,

Thank you for your concern. Your complaint has been assigned number, AC19-137. If you wish to obtain further information on your complaint, please see the attached letter.

Thank you.

Sean Rehurek

Inspection Licensing Assistant

(b) (6)

USDA-APHIS-AC
2150 Centre Ave.
Building B, 3W85
Fort Collins, CO 80526
ph: (b) (6)
fax: (b) (6)

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AC19-137
respon...ter.doc

Exhibit B



United States Department of Agriculture

Animal and Plant
Health Inspection
Service

Animal Care
Western Region

February 17, 2019

Jeremy Beckham
JeremyB@peta.org

Dear Complainant:

Thank you for your correspondence dated 11-Feb-19 concerning Louisiana State University. Your complaint has been issued number AC19-137. **Depending on the circumstances of the situation, please allow us enough time (30 to 60 days) to thoroughly look into your concerns.** After that time, the status of our findings may be requested through the Freedom of Information Act (FOIA) office.

FOIA Requests can be submitted three ways:

1. Web Request Form: <https://efoia-pal.usda.gov/App/Home.aspx>
2. Fax: (b) (6)
3. US Mail:
USDA- APHIS- FOIA
4700 River Road, Unit 50
Riverdale, MD 20737

Should you have any questions regarding the APHIS FOIA process or need assistance using the Web Request Form **please contact the APHIS FOIA office at 301-851-4102.**

Animal Care is the division of the U.S. Department of Agriculture (USDA) that is responsible for the enforcement of the Animal Welfare Act. The Act provides minimum standards for the humane care and use of animals at USDA licensed or registered facilities.

Animal Care inspectors conduct routine unannounced inspections at all USDA licensed and registered facilities to ensure that they are meeting or exceeding these minimum standards. Our inspectors also conduct searches when necessary in response to valid concerns and complaints received from the public to ensure the well-being of the animals and compliance with the law. If violations are found enforcement action appropriate for the circumstances will be initiated.

Please be assured that we will look into your concern(s) and the appropriate action(s) will be taken.

Thank you for your interest into the welfare of these animals.

Sincerely,

Bernadette Juarez
Deputy Administrator
USDA APHIS Animal Care

Exhibit C



LOST A PET? FOUND A PET?

Contact Companion Animal Alliance
at the Baton Rouge animal shelter!

We love to reunite pets and families!

2680 Progress Road
(near the Baton Rouge airport)

10:00 a.m. - 5:00 p.m. daily

lostpets@caabr.org

www.caabr.org



[Quoted text hidden]

(b) (6)

Wed, May 16, 2018 at 3:20 PM

That would be great. Is 9:30 a good time?

(b) (6)

[Quoted text hidden]

(b) (6)

Mon, May 21, 2018 at 9:03 AM

Good morning!

We are still finishing up our dogs for the fall semester and need more females. We were unable to use all of the animals in the last batch due to size and skin. They were used by other departments. Will there be 6 female dogs around 40-60lb available this week?

Thank you,

(b) (6)

On Wed, May 16, 2018 at 12:08 PM, (b) (6) wrote:

[Quoted text hidden]

(b) (6)

Mon, May 21, 2018 at 9:06 AM

I'm sorry, I sent that email too soon. (b) (6) would actually like to have 5 additional dogs of each sex to have on hand. So this would mean that we still need 5 more intact males and 11 females before we are done with the animals.

(b) (6)

[Quoted text hidden]

(b) (6)

Tue, May 22, 2018 at 4:29 PM

From: (b) (6)
Subject: (b) (6)
Date: December 6, 2018 at 8:31 AM
To: Jeremy Beckham <JeremyB@peta.org>
Cc: (b) (6)

JP

Mr. Beckham –

If the records you are requesting are those kept/reviewed by the IACU then those records are not subject to public records under Louisiana law. See, *Dorson v. State*, 94-1591 (La. App. 4 Cir. 6/29/95), 657 So. 2d 755, writ denied, 95-1951 (La. 11/13/95), 662 So. 2d 472. Therefore, there are no public records responsive to this request.

Sincerely,

LSU

(b) (6)

From: Jeremy Beckham <JeremyB@peta.org>
Sent: Thursday, December 6, 2018 9:26 AM
To: (b) (6)
Cc: (b) (6)
Subject: RE: PRR Beckham - Vet School

Dear (b) (6)

I would like to offer some additional clarification in response to your below statement that the request for animal use protocols is "overly broad and vague."

Any faculty member or individual otherwise associated with LSU who intends to use animals for teaching, research, education, or experimentation is required to submit a written form outlining the proposed use of animals for approval to LSU's Institutional Animal Care and Use Committee (IACUC). LSU describes these records as the "Animal Use Protocol":

https://www.lsu.edu/vetmed/dlam/iacuc/iacuc_resources.php

LSU has made publicly available a blank Animal Use Protocol form which can be downloaded at this link:

at this link:

https://www.lsu.edu/vetmed/dlam/iacuc/iacuc_protocolform.docx

You will notice at the top of the form is a space for "Title." It is this part of the record/information that I was requesting in my original October 31, 2018 request. PETA re-asserts its request for this information. Thank you.

Sincerely,

Jeremy Beckham, MPA, MPH, CPH
Research Associate
Laboratory Investigations Department
(b) (6)

From: (b) (6)
Sent: Wednesday, December 5, 2018 3:04 PM
To: Jeremy Beckham <JeremyB@peta.org>
Cc: (b) (6)
Subject: RE: PRR Beckham - Vet School

Dear Jeremy –

This email is to respond to your Public Records Request made in your e-mail, copied below, pursuant to the Louisiana Public Records Act.

LSU responds as follows:

- Any written agreements, memorandums, or contracts between any employee, department, or school of Louisiana State University (LSU), including the School of Veterinary Medicine, and any animal shelter, including the Companion Animal Alliance (CAA).
 - None
- Invoices, intake records, transfer records, or any other record of sale or acquisition related to any live or dead dog and/or cat acquired by LSU from any animal shelter, including CAA.
 - The LSU documents responsive to your request is attached hereto.
- Any and all photographic or videographic records of dogs and/or cats acquired by LSU from any shelter, including CAA.
 - None

- Any written LSU policies governing the use of animals procured from animal shelters, including any animal used for teaching, surgical, research, or experimentation purposes.
 - None.
- Any correspondence, including emails, letters, and text messages concerning the acquisition of live or dead animals from any shelter, including CAA, for use in teaching or research, from or to any of the following individuals associated with LSU: (b) (6)

 - This has been requested, to the extent any communications exist, such will be produced upon receipt.
- The titles of any animal use protocol that allow for the use of dogs and/or cats procured from animal shelters.
 - LSU is unable to respond to your request as it is overly broad and vague. It is not known what is meant by "title" or what is being sought by your request. As such, LSU has no responsive documents to this requests.
- Final disposition records of any animals obtained from animal shelters.
 - None.

This communication concludes LSU's response to your Public Records Request. LSU requests that you acknowledge receipt of this email.

Sincerely,

LSU

(b) (6)

From: (b) (6)

Sent: Thursday, November 1, 2019 9:08 AM

Sent: Thursday, November 1, 2018 9:08 AM
To: 'JeremyB@peta.org' <JeremyB@peta.org>
Subject: PRR Beckham - Vet School
Importance: High

Dear Mr. Beckham –

This email is to acknowledge receipt of the Public Records Request made in your email, copied below. LSU is currently reviewing this request and will be back in communication.

Please acknowledge receipt of this email. Thank you.

Sincerely,

LSU

(b) (6)



From: Jeremy Beckham [mailto:JeremyB@peta.org]

Sent: Wednesday, October 31, 2018 5:44 PM

To: (b) (6)

Cc: (b) (6)

Charles T McCauley <mccauley@lsu.edu>; (b) (6)

Subject: Records Request from PETA re Use of Animals from Shelters

Importance: High

October 31, 2018

LSU President F. King Alexander
Louisiana State University
3810 W. Lakeshore Dr.
Baton Rouge, LA 70808

Sent via email: (b) (6)

Dear (b) (6)

Pursuant to the state open records law La. Rev. Stat. Ann. Secs. 44:1 to 44:41, I write on behalf of People for the Ethical Treatment of Animals (PETA) to request the following records (January 1, 2011 – present):

- Any written agreements, memorandums, or contracts between any employee, department, or school of Louisiana State University (LSU), including the School of Veterinary Medicine, and any animal shelter, including the Companion Animal Alliance (CAA).
- Invoices, intake records, transfer records, or any other record of sale or acquisition related to any live or dead dog and/or cat acquired by LSU from any animal shelter, including CAA.
- Any and all photographic or videographic records of dogs and/or cats acquired by LSU from any shelter, including CAA.
- Any written LSU policies governing the use of animals procured from animal shelters, including any animal used for teaching, surgical, research, or experimentation purposes.
- Any correspondence, including emails, letters, and text messages concerning the acquisition of live or dead animals from any shelter, including CAA, for use in teaching or research, from or to any of the following individuals associated with LSU: (1) (b) (6)
(b) (6)
(b) (6) (3) Charles McCauley, Director of Veterinary Clinical Sciences, and/or (b) (6)
- The titles of any animal use protocol that allow for the use of dogs and/or cats procured from animal shelters.
- Final disposition records of any animals obtained from animal shelters.

PETA is a non-profit public interest animal protection organization whose federal tax-exempt number is 52-1218336. As such, PETA requests that a non-profit fee, if available, be applied to the request, or that fees be waived. PETA has no commercial interest in the records requested but seeks them strictly in an effort to ensure the public is fully informed about operations and regulations involving the use of animals in laboratories (an issue of well-established public importance). If the foregoing request for a non-profit fee is denied, and fees are expected to exceed \$50.00, please notify me to this effect before this disclosure request is processed.

I prefer electronic delivery of responsive records. The requested documents can be emailed to me at JeremyB@peta.org. If that is not possible, please mail them to the address contained in my signature below.

I would request your response within ten (10) business days.

If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Also, please provide all segregable portions of otherwise exempt material.

Thank you for your attention to this matter. Please do not hesitate to get in touch with me if you have any questions or require clarification as to the scope of my request.

Sincerely,

Jeremy Beckham, MPA, MPH, CPH
Research Associate
Laboratory Investigations Department
PETA
501 Front St.
Norfolk, VA 23510

(b) (6)

Exhibit D

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0039. The time required to complete this information collection is estimated to average 25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

OMB
APPROVED
0579-0039

No license may be issued unless a completed application has been received (7 U.S.C. 2132-2141), and the applicant is in compliance with the standards and regulations Section 21.33.

DO NOT USE THIS SPACE - OFFICIAL USE ONLY

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICEAPPLICATION FOR LICENSE
(TYPE OR PRINT)

NEW LICENSE

SEND THE COMPLETED FORM TO:

USDA-APHIS-Animal Care

LICENSE/CUSTOMER NUMBER	EXPIRATION DATE	AMOUNT	DATE RECEIVED
		10.00	17 DEC 2018

1. NAME OF APPLICANT AND MAILING ADDRESS: (See Instructions)

Companion Animal Alliance
2550 Bourrier Ave.
Baton Rouge, LA 70820
225.908.5360

COUNTY: East Baton Rouge TELEPHONE NUMBER:

2. ALL BUSINESS NAMES AND LOCATION ADDRESSES HOUSING ANIMALS:

INCLUDE DIRECTIONS TO EACH LOCATION (P.O. Box not acceptable)
☐ Use additional sheet, if necessary
Companion Animal Alliance
2550 Bourrier Ave.
Baton Rouge, LA 70820
225.908.5360

COUNTY: East Baton Rouge TELEPHONE NUMBER:

3. IF THE APPLICANT IS A CORPORATION, PARTNERSHIP OR OTHER BUSINESS ENTITY, LIST THE ENTITY'S PARTNERS OR OFFICERS AND AGENT FOR SERVICE OF PROCESS.

NAME	TITLE
(b) (6)	

(B) ACTIVE USDA LICENSE NUMBER IN WHICH YOU HAVE AN INTEREST:

5. TYPE OF LICENSE:

☐ Class A - Breeder ☒ Class B - Dealer ☐ Class C - Exhibitor

6. LIST YOUR 12 MONTH BUSINESS YEAR: (Calendar or Fiscal)

FROM			TO		
MO	DAY	YEAR	MO	DAY	YEAR
01	01	18	01	01	19

7. TYPE OF ORGANIZATION:

☐ Individual ☐ Corporation ☐ Partnership
☒ Other SCH 3

8. DEALERS ONLY - CLASS A OR CLASS B LICENSES MUST COMPLETE THIS BLOCK. (Class C Licenses go in Block 9)

CLASS A (BREEDER) - LINE 10 * % OF LINE 10
CLASS B (DEALER) - LINE 10 * LINE C LESS THE PURCHASE COST OF THE ANIMALS SOLD. (9 CFR Sections 2.6 and 2.7)

	DOGS	NONHUMAN PRIMATES	RODENTS (Do not include lab rats or mice)
A. ESTIMATE TOTAL NUMBER OF ANIMALS TO BE PURCHASED IN THE NEXT BUSINESS YEAR	9000 85 SCH	CATS	MURINE MAMMALS
B. ESTIMATE TOTAL NUMBER OF ANIMALS TO BE SOLD IN THE NEXT BUSINESS YEAR	85	GUINEA PIGS	FARM ANIMALS
C. ESTIMATE GROSS DOLLAR AMOUNT DERIVED FROM REGULATED ACTIVITIES (SALES, COMMISSIONS, ETC.)	\$ 3,500	HAMSTERS	WILD/EXOTIC MAMMALS (Not listed elsewhere)
D. ESTIMATE DOLLAR AMOUNT ON WHICH FEE IS BASED	\$ 3,500	RABBITS	WILD/EXOTIC FELINES
			TOTAL (All animals listed in Block 9)

CERTIFICATION

I hereby make application for a license under the Animal Welfare Act 7 U.S.C. 2131 et seq. I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and agree to comply with all the regulations and standards in 9 CFR, Subpart A, Parts 1, 2, and 3. I certify that the applicant is 18 years of age or older.

10. SIGNATURE:

(b) (6)

11. PRINT NAME AND TITLE:

(b) (6)

12. DATE:

12 6 18

AUD 30-1

(PREVIOUS EDITION)

17 DEC 2018



United States Department Of Agriculture

RE: AWA LICENSE APPLICATION

Animal and Plant
Health Inspection
Service

Animal Care

Fort Collins Office
2150 Centre Avenue
Building B 3W11
Fort, Collins, CO
80526
Phone: 970-494-7478

(b) (6)

December 21, 2018

Customer ID Number: 505239

Dear Applicant:

Raleigh Office
920 Main Campus Dr.
Suite 200
Raleigh, NC 27606
Phone: 919-855-7100

We received your application for a USDA license under the Animal Welfare Act (AWA) and \$10 application fee. Here are the next steps in the licensing process.

What will happen next?

To obtain a license, you must demonstrate compliance with the regulations and standards during a pre-licensing inspection by a USDA inspector. The inspector will call you within 10 business days from the date of this letter to schedule a pre-licensing inspection. During this inspection, the USDA inspector will inspect your animals, facilities, equipment, and records for compliance. Please have the following documents available for inspection, if applicable: A written program of veterinary care if you use a part-time attending veterinarian or have consultant arrangements; an exercise plan for dogs; and/or an environmental enhancement plan for nonhuman primates.

If the inspection reveals any deficiencies, you will have two additional chances to demonstrate compliance with the regulations and standards.

What happens after I pass the pre-licensing inspection?

The final step in the licensing process is paying the appropriate licensing fee. Copies of your application and fee schedule are enclosed for your convenience. Based on your current application, your fee will be \$(130.00). After passing the pre-licensing inspection, the inspector will review this licensing fee to ensure it is the correct amount for you to pay.

Should you have any questions, need to make changes to your application, or need to obtain a new fee amount based on changes to your application, please contact Jeremy Flockhart at (b) (6)

Sincerely,

(b) (6)

Robert M. Gibbens, D. V. M.
Director, Animal Welfare Operations
USDA, APHIS, Animal Care

(b) (6)

(b) (6)

An Equal Opportunity Provider and Employer

Wolff, Axel (NIH/OD) [E]

A3612-1G

From: Lauer, Michael (NIH/OD) [E]
Sent: Wednesday, March 6, 2019 10:59 AM
To: Wolff, Axel (NIH/OD) [E]; Brown, Patricia [OLAW] (NIH/OD) [E]
Cc: Hampton, Lori (NIH/OD) [E]; Morse, Brent (NIH/OD) [E]; Lauer, Michael (NIH/OD) [E]
Subject: Re: Concerns from PETA re Louisiana State University:

Excellent, Axel, thanks so much and yes, acknowledged receipt.

Best, Mike

From: "Wolff, Axel (NIH/OD) [E]" <wolffa@od.nih.gov>
Date: Wednesday, March 6, 2019 at 10:57 AM
To: "Lauer, Michael (NIH/OD) [E]" <michael.lauer@nih.gov>, "Brown, Patricia [OLAW] (NIH/OD) [E]" <brownp@od.nih.gov>
Cc: "Hampton, Lori (NIH/OD) [E]" <hamptonl@od.nih.gov>, "Morse, Brent (NIH/OD) [E]" <morseb@mail.nih.gov>
Subject: RE: Concerns from PETA re Louisiana State University:

Hi Mike,

This is a typical PETA request and we can handle it as we have all previous ones. Because it involves an ongoing USDA investigation, OLAW will probably consult with them as well as the institution. Feel free to acknowledge receipt of this complaint and indicate that it has been forwarded to OLAW for investigation.

Axel

From: Lauer, Michael (NIH/OD) [E] <michael.lauer@nih.gov>
Sent: Wednesday, March 6, 2019 10:26 AM
To: Brown, Patricia [OLAW] (NIH/OD) [E] <brownp@od.nih.gov>
Cc: Wolff, Axel (NIH/OD) [E] <wolffa@od.nih.gov>; Hampton, Lori (NIH/OD) [E] <hamptonl@od.nih.gov>; Lauer, Michael (NIH/OD) [E] <michael.lauer@nih.gov>
Subject: FW: Concerns from PETA re Louisiana State University:

Hi Pat – what do you think?

Many thanks and happy to talk.

Best, Mike

From: "Dr. Alka Chandna" <AlkaC@peta.org>
Date: Wednesday, March 6, 2019 at 9:14 AM
To: "Lauer, Michael (NIH/OD) [E]" <michael.lauer@nih.gov>
Cc: Jeremy Beckham <JeremyB@peta.org>
Subject: Concerns from PETA re Louisiana State University:

Dear Dr. Lauer,

I hope this correspondence finds you well. Please find attached a formal complaint from PETA pertaining to concerns that Louisiana State University may be running afoul of NIH policy regarding the use of dogs obtained from Class B dealers in NIH-funded projects. I am submitting this complaint on behalf of my colleague Jeremy Beckham (copied here).

Thank you for your time and consideration.

With kindest regards,

Alka Chandna

Alka Chandna, Ph.D.
Vice President, Laboratory Investigations Cases
Laboratory Investigations Department
People for the Ethical Treatment of Animals
1536 16th Street NW, Washington, DC 20036

The more we learn of the true nature of non-human animals, especially those with complex brains and corresponding complex social behavior, the more ethical concerns are raised regarding their use in the service of man -- whether this be in entertainment, as "pets," for food, in research laboratories, or any of the other uses to which we subject them. – Dr. Jane Goodall