

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 <u>Telephone</u>: (301) 496-7163 <u>Facsimile</u>: (301) 480-3387

May 12, 2023

Re: Animal Welfare Assurance #A3272-01 [OLAW Case 2W]

Dr. Denis Wirtz Vice Provost for Research Johns Hopkins University (b) (4)Garland Hall 3400 N. Charles St. Baltimore, MD 21218

Dear Dr. Wirtz,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your March 28, 2023 letter in response to allegations of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at John Hopkins University (JHU). These allegations were received from People for the Ethical Treatment of Animals (PETA) regarding the USDA APHIS Inspection Report dated December 6, 2022.

It is stated a research lab working from an IACUC-approved protocol in baboons observed pressure ulcers on the heels of one baboon and noted the findings in their clinical records. This clinical presentation was identified during sedation of the animal. The lab did not notify JHU veterinarians at the time of observations but instead initiated treatment and planned to inform veterinarians during regular weekly rounds, scheduled to happen 2 days after initial diagnosis. It is stated on the day of scheduled rounds (December 7, 2022), USDA veterinary medical officers (VMOs) were performing an inspection of JHU facilities. The VMOs noted the sores on the heels of the baboon and inquired about ongoing treatment. In response, the research team stated they identified the ulcers during a sedated exam 2 days earlier and administered topical antibiotics and analgesics. It is stated the treatment was determined to be appropriate, and the USDA cited the university for the lab's failure to report the problem and seek treatment recommendations from RAR veterinary staff in a timely manner. The necessity to report all clinical problems immediately to RAR veterinary staff was reinforced with the laboratory staff as well. It is understood the USDA deemed the matter corrected at the conclusion of their inspection.

Following review of the incident by the ACUC Chair and Attending Veterinarian, the treatment provided by the lab was deemed appropriate. They were also in agreement the lab should have consulted with veterinary staff regarding treatment of the animal and reinforcing guidance on lab responsibility for consulting veterinarians regarding the care of animals was appropriate.

Regarding the reportability of the incident, the ACUC reviewed their responsibility to inform agencies such as OLAW. It is stated the ACUC recalled the memorandum of understanding between OLAW and USDA and reviewed OLAW's guidance on prompt reporting. It was determined the incident did not align with any situation that OLAW considers prompt reporting, but rather was an example of an incident that did not require prompt reporting.

OLAW notes that the clinical presentation of the animal did not develop due to an act of noncompliance. It is understood that the laboratory failed to report the animal's condition in a timely manner, but Page 2 – Dr. Wirtz May 12, 2023 OLAW Case A3272-2W

appropriate treatment was administered to the animal. It is also noted the USDA citation was issued regarding failure to report the problem to RAR veterinary staff in timely manner and seek treatment recommendations, and not for inappropriate care of the animal.

Your letter states this research is supported by NIAID funding, but the Principal Investigator recently joined the JHU faculty, and the funding had not yet been transferred from the awardee's previous institution. It is understood that cost associated with these experiments were charged to a non-federal budget.

We appreciate your cooperation and find no cause for further action by this office.

Sincerely, Jacquelyn T. Tubbs -S Jacquelyn Tubbs, DVM, DACLAM Senior Animal Welfare Program Specialist Division of Compliance Oversight Office of Laboratory Animal Welfare

cc: IACUC Contact

March 28, 2023

Jacquelyn Tubbs, DVM, DACLAM Senior Animal Welfare Program Specialist Division of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health Bethesda, Maryland 20892-6910

RE: Animal Welfare Assurance #A3272-01, OLAW Case 2W

Dear Dr. Tubbs,

Thank you for your letter sent February 14, 2023 addressing the circumstances described in a USDA inspection report involving the treatment of a baboon in one of our facilities. Below please find the results of an investigation completed by the Johns Hopkins University (JHU) Animal Care and Use Committee (ACUC) and the corrective actions put in place by our attending veterinarians.

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A research lab studying the biology of organ transplant and working from an ACUC approved protocol in baboons noted on consecutive days in their clinical records that pressure ulcers had developed on the heels of one of their animals. The lab did not inform JHU veterinarians at the time of these observations but instead immediately initiated appropriate treatment and planned to inform veterinarians during regular weekly rounds (scheduled to happen 2 days after initial diagnosis). On the day of the scheduled rounds (December 7, 2022), USDA veterinarians were performing an inspection of JHU facilities. During their walk-through, USDA inspectors noted the sores on the heels of the baboon and asked about ongoing treatments. The research team indicated that the ulcers had been discovered by staff during a sedated exam two days earlier and provided topical antibiotics as treatment and additionally administered analgesics. While the lab's treatment of the ulcers was determined to be appropriate during these routine rounds, the USDA cited JHU under § 233(b)(3) for the lab's failure to report the problem and seek treatment recommendations from RAR veterinary staff in a timely manner. The need to report all clinical problems immediately to RAR veterinary staff, regardless of severity or whether they are anticipated in the protocol, was reinforced with laboratory staff. The USDA deemed the situation corrected at the conclusion of their inspection.

The ACUC Chair reviewed the circumstances with the attending veterinarians and agreed that the treatment provided was appropriate. The ACUC and the veterinarians were also in agreement that the lab should have consulted with veterinary staff about treatment and that the reinforced guidance on lab responsibility for consulting veterinarians about care of animals was also appropriate.

The ACUC additionally reviewed their responsibility to inform our oversight partners including OLAW. In completing this assessment, the ACUC recalled the memorandum of understanding between USDA and OLAW¹. The ACUC additionally reviewed OLAW guidance on prompt

Office of the Provost



reporting² and determined that the circumstances did not align with any situation that OLAW considered appropriate for prompt reporting. Instead, the ACUC concluded that the situation fit best with an example OLAW described as <u>not</u> requiring a prompt report ("animal ... illness from spontaneous disease when appropriate quarantine, preventive medical, surveillance, diagnostic, and therapeutic procedures were in place and followed"). Although the research is supported by NIH/ NIAID funding, the PI only recently joined the JHU faculty and the funding had not yet been transferred from the awardee's previous institution. Consequently, costs associated with these experiments were charged to an internal (non-federal) budget.

Multiple weekly rounds have been completed since the USDA inspection and report. The care of animals in this laboratory has met our high expectations and are consistent with federal guidance on the care and use of laboratory animals. The ACUC considers the matter closed.

Please do not hesitate to contact me if you have additional questions.

Sincerely,

Denis Wirtz, Ph.D. Vice Provost for Research Johns Hopkins University

Theophilus H. Smoot Professor in Engineering Science Departments of Chemical and Biomolecular Engineering and Oncology and Pathology Director, Johns Hopkins Physical Sciences in Oncology Center Director, NCI Pre- and Postdoctoral Training Programs

(b) (6)

cc:

(b) (6)

Brendan J. Canning, Ph.D., Chair, Johns Hopkins University Animal Care and Use Committee, Eric Hutchinson, D.V.M., DACLAM, Attending Veterinarian and Assistant Vice Provost for Animal Research and Resources, Johns Hopkins University

¹ https://olaw.nih.gov/guidance/finalmou.htm

² https://grants.nih.gov/grants/guide/notice-files/not-od-05-034.html

VII. Institutional Endorsement and PHS Approval

A. Authorized Institut	ional Official		
Name: Paul J. Feustel,	Ph.D.		
Title: Director, Office of	f Research Affairs		
Name of Institution: Alb	any Medical College		
Address: <i>(street, city, sta</i> Dean's Office, MC # 1 47 New Scotland Avenue			
Phone: (b) (6)	Fax:	(b) (6)
E-mail: FeusteP@amc.ed	u		
Acting officially in an auth the Institution's responsi as specified above.	orized capacity on behalf of this Insti bilities under this Assurance, I assure	itution and with a the humane care	in understanding of e and use of animals
	(b) (6) Feustel, Paul dc=EDU, dc=AMC, dc=AMCNT, gu=AlbanyMed,		

B. PHS Approving Official (to be completed b	y OLAW)
Name/Title: Office of Laboratory Animal Welfare (OLA National Institutes of Health 6705 Rockledge Drive RKL1, Suite 360, MSC 7982 Bethesda, MD USA 20892-7982 (FedEx Phone: +1 (301) 496-7163 Fax: +1 (301) 915-9465	
Signature :	Date:
Assurance Number:	
Effective Date:	Expiration Date:

17

McCoy, Devora (NIH/OD) [E]

From:Tubbs, Jai (NIH/OD) [E]Sent:Monday, April 3, 2023 7:06 AMTo:Denis WirtzCc:Brendan Canning; Clyde Bernett; OLAW Division of Compliance Oversight (NIH/OD)Subject:RE: Animal Welfare Assurance #A3272-01, OLAW Case 2W

Good morning,

Thank you for the report. We will send an official response soon.

Kind Regards,

J. Tubbs

From: Denis Wirtz <wirtz@jhu.edu> Sent: Sunday, April 2, 2023 1:09 PM To: Tubbs, Jai (NIH/OD) [E] <jacquelyn.tubbs@nih.gov> Cc: Brendan Canning <bjc@jhmi.edu>; Subject: [EXTERNAL] Animal Welfare Assurance #A3272-01, OLAW Case 2W

Dear Dr. Jacquelyn Tubbs,

Please find attached our letter regarding. Animal Welfare Assurance #A3272-01, OLAW Case 2W.

Please do not hesitate to contact me if you have any further question.

Best regards, Denis

Denis Wirtz | wirtz@jhu.edu Vice Provost for Research TH Smoot Professor, Chemical and Biomolecular Engineering, Pathology, Oncology, INBT Director Johns Hopkins Physical Sciences-Oncology Center (PS-OC) Director Johns Hopkins Cellular Cancer Biology Imaging Research Center (CCBIR) Johns Hopkins University and Johns Hopkins School of Medicine 3400 N. Charles St. Baltimore, MD 21218 (b) (6)

https://wirtzlab.johnshopkins.edu

(b) (6)

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IOHNS HOPKINS UNIVERSITY

3272-JW

February 27, 2023

Jacquelyn Tubbs, DVM, DACLAM Senior Animal Welfare Program Specialist Department of Health and Human Services Division of Compliance Oversight Office of Laboratory Animal Welfare 6700B Rockledge Drive, Suite 2500 MSC 6910 Bethesda, Maryland 20892-6910

Re: Animal Welfare Assurance #A3272-01 [OLAW Case 2W]

Dear Ms. Tubbs,

I received your letter dated February 14, 2023 in the above referenced case. The Johns Hopkins University Animal Care and Use Committee ("ACUC") will review this matter, and we expect to submit a written report by the March 31, 2023 deadline.

Sincerely,

(b) (6)

Denis Wirtz, Ph.D. Vice Provost for Research Theophilus H. Smoot Professor in Engineering Science Johns Hopkins University

McCoy, Devora (NIH/OD) [E]

From:	McCoy, Devora (NIH/OD) [E]
Sent:	Monday, February 27, 2023 11:03 AM
То:	Denis Wirtz
Cc:	OLAW Division of Compliance Oversight (NIH/OD)
Subject:	RE: Quick update about our response to case #A3271-01 (OLAW Case 2w)

Good morning Dr. Wirtz,

Thank you for this acknowledgement.

Best, Devora

Devora McCoy, BS, MBA (pronunciation) Program Analyst Division of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health

Phone: 301-435-2390 Email: devora.mccoy@nih.gov

From: Denis Wirtz <wirtz@jhu.edu> Sent: Monday, February 27, 2023 11:00 AM To: McCoy, Devora (NIH/OD) [E] <devora.mccoy@nih.gov> Cc: Subject: [EXTERNAL] Quick update about our response to case #A3271-01 (OLAW Case 2w)

(b) (6)

February 27, 2023

Jacquelyn Tubbs, DVM, DACLAM Senior Animal Welfare Program Specialist Department of Health and Human Services Division of Compliance Oversight Office of Laboratory Animal Welfare 6700B Rockledge Drive, Suite 2500 MSC 6910 Bethesda, Maryland 20892-6910

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Re: Animal Welfare Assurance #A3272-01 [OLAW Case 2W]



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

February 14, 2023

FOR EXPRESS MAIL: Office of Laboratory Animal Welfare 6700B Rockledge Drive, Suite 2500 Bethesda, Maryland 20817 <u>Telephone</u>: (301) 496-7163 <u>Facsimile</u>: (301) 480-3387

Re: Animal Welfare Assurance #A3272-01 [OLAW Case 2W]

Dr. Denis Wirtz Vice Provost for Research Johns Hopkins University (b) (4)Garland Hall 3400 N. Charles St. Baltimore, MD 21218

Dear Dr. Wirtz,

The Office of Laboratory Animal Welfare (OLAW) has received from People for the Ethical Treatment of Animals (PETA) allegations of noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at John Hopkins University regarding the USDA APHIS Inspection Report dated December 6, 2022 (see attachment). It is possible that such occurrences should have been reported directly to our office as required by the PHS Policy and per your commitment to do so in your Animal Welfare Assurance.

We request information regarding the Inspection Report dated December 6, 2022 describing the following incident:

A female baboon was observed with a wound on the left heel during the USDA facility
inspection. A review of study observation records revealed the laboratory staff observed bilateral
pressure ulcers on the feet on December 5th and 6th. The lab staff administered treatment but did
not inform RAR veterinary staff of the findings until the scheduled weekly rounds on December
7th. RAR veterinarians examined the animal and noted the pressure ulcers on the hind feet. The
lab staff had initiated treatment on December 5th and the treatment plan was reviewed by the RAR
veterinary staff on December 7th.

Please instruct the IACUC, avoiding any conflict of interest, to send a report, signed by you as the Institutional Official, to the following OLAW email inbox: <u>OLAWdco@od.nih.gov</u> and provide a description of the occurrences and all corrective/preventive actions. Please have them consider if any of the occurrences represented programmatic failures. Please also include information regarding any PHS/NSF/DHHS/NASA funding of activities related to the occurrences, including grant or contract numbers. If other reportable non-compliances have occurred during this period, please also include them with the report.

We appreciate your cooperation and ask that you please provide the requested information by March 31, 2023. Please contact me if I can be of assistance at <u>jacquelyn.tubbs@nih.gov</u>.

Page 2 – Dr. Wirtz February 14, 2023 OLAW Case A3272-2W

> Sincerely, Jacquelyn T. Tubbs -S Date: 2023.02.14 1520:21-05:00 Jacquelyn Tubbs, DVM, DACLAM Senior Animal Welfare Program Specialist Division of Compliance Oversight Office of Laboratory Animal Welfare

cc: IACUC Contact

McCoy, Devora (NIH/OD) [E]

From:	McCoy, Devora (NIH/OD) [E]
Sent:	Wednesday, February 15, 2023 9:54 AM
To:	wirtz@jhu.edu
Cc:	OLAW Division of Compliance Oversight (NIH/OD); (b) (6) acuc@jhmi.edu
Subject:	OLAW Investigative Case A3272-2W
Attachments:	A3272-2W.pdf; PST_Inspection_Report_Johns Hopkins University (1).pdf

Good morning Dr. Wirtz,

Attached please find Dr. Tubbs' investigative report for OLAW Case A3272-2W. Please note that additional information is being requested by March 31, 2023. If you have any questions, feel free to contact us by phone or by email.

Best, Devora

Devora McCoy, BS, MBA (pronunciation) Program Analyst Division of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health

Phone: 301-435-2390 Email: <u>devora.mccoy@nih.gov</u>

January 13, 2023

Brent C. Morse, D.V.M. Director Division of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health

Via e-mail: MorseB@mail.nih.gov

Dear Dr. Morse:

We believe that the federal Animal Welfare Act violation documented in the attached U.S. Department of Agriculture inspection report for Johns Hopkins University (JHU) constitutes a violation of the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy). Last year, JHU received \$839,852,301 from the National Institutes of Health (NIH), and according to NIH, an estimated 47% of those funds supported projects that involved experiments on animals.

In 1985, members of Congress from both sides of the aisle worked together to strengthen protections for animals in laboratories in order to address deep-seated ethical concerns held by the American public regarding the use of animals in experiments. Polling by the Pew Research Center found that more than 50% of U.S. adults oppose the use of animals in experiments, and other surveys suggest that the support of the shrinking group that continues to accept animal experimentation is contingent on the existence and enforcement of stringent regulations aimed at protecting animals.

As you know, institutions that receive funding from Public Health Service agencies—including NIH—are required to comply with PHS Policy. Failure to do so violates not only federal animal welfare guidelines and policies but also public expectations that facilities receiving tax dollars to use animals—who are capable of experiencing pain, distress, love, and companionship and value their lives just as we value ours—at the very least observe minimal standards aimed at ensuring some modicum of animal welfare.

We ask that your office investigate the incident outlined in the attached report.

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Thank you for your time and consideration.

Sincerely yours,

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PEOPLE FOR THE ETHICAL TREATMENT OF ANIMALS

Washington 1536 Toth St. N.W. Washington, DC 20036 202-483-PETA

5777-24

Los Angelos 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

Emilios.

- PETA Asia
 PETA India
- PETA France
- PETA Australia
- * PELA Germany
- PETA Switzerland

* PEEA Netherlands

• PETA Foundation (U.K.)



United States Department of Agriculture Animal and Plant Health Inspection Service

INS-0000831815

(b) (6)

Inspection Report

Johns Hopkins University 720 Rutland Avenue (b) (4) Baltimore, MD 21205 Customer ID: 81 Certificate: 51-R-0006 Site: 003 JOHNS HOPKINS UNIVERSITY, THE

> Type: ROUTINE INSPECTION Date: 06-DEC-2022

2.33(b)(3)

Repeat

Attending veterinarian and adequate veterinary care.

On December 7th, 2022 during the USDA facility inspection, a female baboon was observed to have a round approximately quarter sized wound located on the on the left heel. The baboon was observed shifting weight between the right and left feet and lifting the left foot. Upon review of study observation records, the laboratory staff observed bilateral pressure ulcers on the feet on December 5th and applied Bacitracin.

The laboratory staff did not inform the RAR veterinary staff about the bilateral ischial pressure abrasion until the scheduled weekly rounds on Wednesday December 7th. After rounds with the laboratory members, a RAR veterinarian observed the baboon and noted ulceration on both hind feet. The laboratory staff had started a treatment plan of Bacitracin and pain medication on December 5th. The treatment plan was reviewed by the RAR veterinary staff on December 7th.

Daily observations may be done by someone other than the attending veterinarian provided there is a mechanism for direct and frequent communication on problems of animal health and behavior. The mechanism for reporting daily observations must ensure direct and frequent communication with the Attending Veterinarian to allow for a timely and accurate diagnosis and treatment of health issues.

Corrected during the time of inspection.

Prepared By: Title:	(b) (6) Date: 15-DEC-2022
Received by Title:	Attending Veterinarian	Date: 15-DEC-2022

Page 1 of 2

Obtained by Rise for Animals. Uploaded to Animal Research Laboratory Overview (ARLO) on 08/16/2023



United States Department of Agriculture Animal and Plant Health Inspection Service (b) (б) INS-0000831815

Inspection Report

2.38(f)

Critical

Miscellaneous.

Procedures under a traumatic brain injury study were conducted on August 26th, 2022 and August 31, 2022. One study rabbit was euthanized after demonstrating significant neurological deficits. The necropsy revealed an abscess at the incision site. On September 5, 2022, a veterinary resident noticed dehiscence of the incision for another study rabbit. A RAR veterinarian identified another study rabbit with an infection at the incision site. All three rabbits were euthanized. Upon further investigation by the veterinary staff, it was determined that the research staff was not appropriately following the established aseptic procedures during the surgeries. An IACUC investigation cited inadequate aseptic technique, inadequate postsurgical monitoring, and not following the established humane endpoint parameters. Handling of all animals shall be done as carefully as possible in a manner that does not cause trauma or physical harm. The research facility did not ensure research staff performed procedures in accordance with the protocol and facility policies. The research facility must ensure research staff have knowledge of and follow all facility policies and procedures for conducting research so that study animals are handled in a manner that prevents physical harm or distress. An appropriate corrective action plan was implemented that included retraining, veterinary oversight, and a new location for performing the surgery.

This inspection and exit interview were conducted with facility representatives and the IO.

This inspection was conducted 12/06/2022 to 12/09/2022.

Additional Inspectors:

 Prepared By:
 (b) (6)
 Date:

 Title:
 15-DEC-2022

 Received by Title:
 Attending Veterinarian
 Date:

 15-DEC-2022
 15-DEC-2022

(b) (6)

Page 2 of 2



United States Department of Agriculture Animal and Plant Health Inspection Service

Customer: 81 Inspection Date: 06-Dec-2022

Species Inspected

Cust No	Cert No	Site	Site Name	Inspection
81	51-R-0006	003	JOHNS HOPKINS UNIVERSITY, THE	06-DEC-2022

Count	Scientific Name	Common Name
000060	Mesocricetus auratus	SYRIAN / GOLDEN HAMSTER (COMMON PET/RESEARCH TYPE)
000009 000041 000214 000089	Canis lupus familiaris Cavia porcellus Callithrix jacchus Macaca mulatta Macaca pomostrino	DOG ADULT DOMESTIC GUINEA PIG COMMON MARMOSET RHESUS MACAQUE
000011 000085 000135 000034 000085 000025	Macaca nemestrina Sus scrofa domestica Oryctolagus cuniculus Rousettus aegyptiacus Eptesicus fuscus Chinchilla lanigera	PIG-TAILED MACAQUE DOMESTIC PIG / POTBELLY PIG / MICRO PIG DOMESTIC RABBIT / EUROPEAN RABBIT EGYPTIAN FRUIT BAT BIG BROWN BAT CHINCHILLA (DOMESTICATED)
000025 000002 000033 000067 000034 000007 000003	Mustela putorius furo Felis silvestris catus Cricetulus griseus Carollia perspicillata Papio anubis Ovis aries aries Papio hamadryas	DOMESTIC FERRET CAT ADULT CHINESE HAMSTER SEBA'S SHORT-TAILED BAT OLIVE BABOON SHEEP INCLUDING ALL DOMESTIC BREEDS HAMADRYAS BABOON

000959 Total

Page 1 of 1

Morse, Brent (NIH/OD) [E]

From:
Sent:
To:
Subject:

Morse, Brent (NIH/OD) [E] Wednesday, January 18, 2023 7:40 AM (b) (6) RE: For Dr. Brent Morse, from PETA – AWA violation complaint

Good morning,

OLAW acknowledges receipt of your letter and your subsequent email with attachment. We will investigate the concern(s) and take any action required by the PHS Policy.

Sincerely, Brent Morse

Brent C. Morse, DVM, DACLAM Director, Division of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health

From: (b) (6) Sent: Friday, January 13, 2023 12:48 PM To: Morse, Brent (NIH/OD) [E] <morseb@mail.nih.gov> Subject: [EXTERNAL] For Dr. Brent Morse, from PETA – AWA violation complaint Importance: High

January 13, 2023

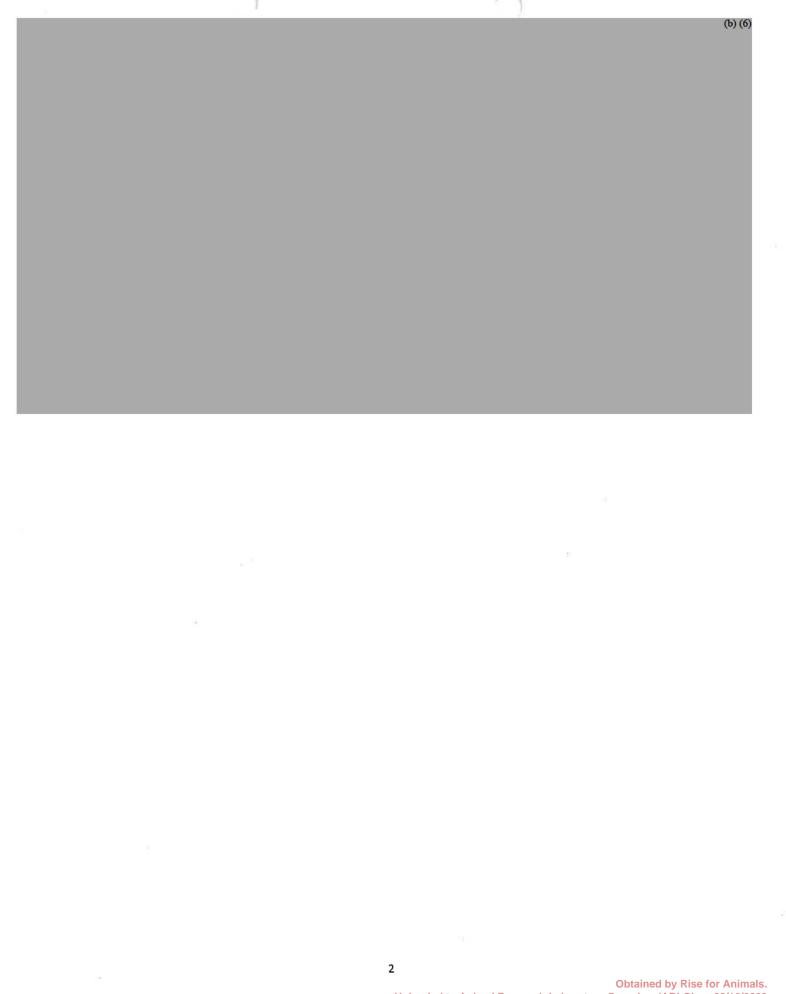
Brent C. Morse, D.V.M. Director Division of Compliance Oversight Office of Laboratory Animal Welfare National Institutes of Health

Dear Dr. Morse,

Please find enclosed a letter on behalf of People for the Ethical Treatment of Animals—PETA entities have more than 9 million members and supporters worldwide—regarding a critical violation of the Animal Welfare Act at Johns Hopkins University, which is corroborated by the enclosed inspection report issued by the United States Department of Agriculture.

Thank you for your consideration of this important issue, and we look forward to your response.

(b) (6)



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