

Exhibit 25

9/8/15 OLAW letter to PPI



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

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September 8, 2015

Re: Animal Welfare Assurance
#A4102-01 (OLAW Case F)

Mr. Paul Houghton
Chief Executive Officer and
Board Chair
Primate Products, Inc.
34200 Doctors Hammock Road
Immokalee, FL 34142

Dear Mr. Houghton,

The Office of Laboratory Animal Welfare (OLAW) acknowledges receipt of your September 2, 2015 letter responding to my August 18, 2015 request for additional information regarding allegations of serious and continuing noncompliance with the PHS Policy on Humane Care and Use of Laboratory Animals at Primate Products, Inc. (PPI). According to the information provided, OLAW understands the following:

- 1) The missing information from the semiannual reports of October 2014 and April 2015 facility inspections and the letter to the Institutional Official (IO) were provided as was the facility inspection report from April 14, 2015.
- 2) Regarding the bear intrusion, PPI acknowledges that this was a programmatic issue and therefore should have been reported. Future potential programmatic issues will be discussed with OLAW.
- 3) The standard operating procedure (SOP) describing euthanasia was revised to accurately reflect current practices.
- 4) The SOP addressing non-quarantine capture and restraint of primates was approved by the Institutional Animal Care and Use Committee (IACUC) and provided.
- 5) The responses to USDA and the revised SOPs on enrichment were provided.
- 6) The OLAW Division of Assurances was provided updated information on the training program, the change in the veterinarian with program authority, and information on the back up veterinarian. The Assurance was revised and accepted by OLAW.
- 7) The SOP addressing hot and cold weather procedures states that GFI outlets are used and that chute doors are open when heat lamps are used to allow the primates to move freely in and out to prevent possible overheating.
- 8) The PPI organizational chart was provided.

- 9) Changes made since the site visit included the replacement of the non-scientist IACUC member with an individual not directly involved with the animal welfare program, recruitment of an ad hoc non-voting IACUC member to assist during semiannual inspections, and assigning a new IACUC chair.
- 10) The April 14 and 21, 2015 facility inspection and program report did not contain a letter to the IO. The new IACUC chair prepared the appropriate letter dated September 1, 2015 and added it to the IACUC records.
- 11) The complaint filed with the Occupational Health and Safety Administration was successfully resolved on June 11, 2015.
- 12) The Hendry County investigation regarding the PPI agricultural zoning classification found no violations of the land development code. This determination was finalized on August 19, 2015.

Based on its assessment of these explanations, review of the supporting documents, and the information gathered during the site visit, OLAW finds PPI to be fully compliant with the provisions of the PHS Policy and the *Guide for the Care and Use of Laboratory Animals*. This Office commends you as IO, Dr. Thomas Rowell as president, [REDACTED] as the Attending Veterinarian, and [REDACTED] as the new IACUC chair, as well as all of your other dedicated and caring staff for promptly and thoroughly addressing all of the noncompliant items. We now find that your program is operating appropriately under monitored self-regulation. The People for the Ethical Treatment of Animals will be informed of OLAW's assessment and because of the high visibility of this case it will be placed in the NIH FOIA library (see <http://www.nih.gov/icd/od/foia/index.htm#foialibrary>). The contract officers will also be notified regarding this outcome. We appreciate your forthright communications and prompt responses to all questions and hereby close this investigation.

Sincerely,



Axel Wolff, M.S., D.V.M.

Director

Division of Compliance Oversight

cc: IACUC Chair

Thomas J. Rowell, D.V.M., PPI President and COO

[REDACTED] NHP Resource Manager, OD, NIH

[REDACTED] Contract Specialist, OD, NIH

[REDACTED] Contract Specialist, NIAID, NIH

[REDACTED] D.V.M., Director DVR, NIH

[REDACTED] Elizabeth Goidentyer, D.V.M., Eastern Regional Director, USDA-APHIS-AC