

**Exhibit 5**

**6/1/15 PETA submission of allegations**



June 1, 2015

Axel V. Wolff, D.V.M.  
 Director, Division of Compliance Oversight  
 National Institutes of Health  
 Office of Laboratory Animal Welfare  
 6705 Rockledge Drive  
 Bethesda, MD 20892

Re: Apparent Noncompliance with the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) and the *Guide for the Care and Use of Laboratory Animals* (the *Guide*) at Primate Products, Inc.; Request for Investigation and Action

Dear Dr. Wolff:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 3 million members and supporters to request that your office investigate possible noncompliance with the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) and the *Guide for the Care and Use of Laboratory Animals* (the *Guide*) related to the treatment of nonhuman primates at Primate Products, Inc. (PHS Approved Animal Welfare Assurance #A4102-01; hereinafter, "PPI"), an animal dealer and research facility located at 34200 Doctors Hammock Rd., Immokalee, FL 34142. PETA requests that your investigation be coordinated with the U.S. Department of Agriculture (USDA), which conducted an inspection at the facility as a result of the information contained in this letter; the USDA concluded its inspection on June 1, 2015.

A witness at PPI documented, including on video, that some PPI workers—including, in some cases, with the knowledge and/or direct participation by PPI's president, veterinarians, manager and a supervisor:

- denied monkeys adequate veterinary care for exposed caudal vertebrae and a fractured, exposed finger bone, among other injuries, for up to nine days, and denied euthanasia to chronically ill and thin monkeys, who instead died in cages;
- pushed monkeys' prolapsed rectal tissue back into their bodies—often without donning fresh gloves, cleaning and lubricating the tissue, or alerting veterinarians—and sometimes holding these animals upside down and shaking them in apparent attempts to drive the tissue deeper into their bodies;
- pulled monkeys' teeth and amputated parts of their tails atop unsanitized tables, sometimes without changing gloves used to handle other animals and without providing any post-procedure pain relief;
- grabbed monkeys by the tails, stalked and attempted to frighten the animals, and violently swung nets at monkeys, some of whom later suffered rectal prolapses;
- apparently failed to submit and review timely reports of sick and injured monkeys for days at a time;
- left monkeys housed with apparently incompatible conspecifics, even for more than 22 weeks, despite repeated written and verbal reports that the monkeys were attacked, had open wounds, were held down and mounted, and had widespread alopecia;

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

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- did not even acknowledge reports of, or observe, animals showing signs of being in apparent psychological distress, let alone provide them with special attention, to the witness's knowledge;
- regularly used minimally diluted and even concentrated industrial bleach when sanitizing enclosures, even while monkeys were inside them;
- left monkeys confined amid black mold and days' worth of accumulated feces and food;
- wet monkeys confined inside cages while flushing them of waste and old food;
- never provided most monkeys housed outdoors with any heat this past winter, even as local ambient temperatures dipped to 33°F —apparently causing widespread huddling, some frostbite and even death; and
- employed a perimeter fence that permitted a black bear on the property, who killed two monkeys there.

(See "[Primate Products, Inc.: Investigative Footage for OLAW Officials](#)" video, at Ex. 1 and "[Primate Products, Inc.: Investigative Photographs for OLAW Officials](#)" CD, at Ex. 2. The latter will arrive by mail.)

All the above appears to fail to be in compliance with PHS Policy and the *Guide*. The above acts and failures are further described in the attached appendix, which is not an exhaustive catalog of all suspected noncompliance items documented by the witness, but instead is intended to illustrate monkeys' fates at PPI and the pervasive failures there with the most severe consequences for many animals. Extensive additional information on additional monkeys' suffering and various husbandry and physical plant issues of concern at PPI is available upon request.

Experts in monkey veterinary medicine and behavior have commented on the findings and corroborate that the animals suffered pain and distress; excerpts from their statements are attached.

In addition to an investigation by USDA, please note that Hendry County, Fla., is investigating whether PPI is violating the county's Land Development Code by using its land in ways inconsistent with the zoning thereof.

The witness will testify to the accuracy of the facts in the attached appendix. I can be reached at 202-829- [REDACTED] or [REDACTED]@peta.org. Thank you for your time and consideration.

Sincerely,



Alka Chandna, Ph.D.  
Senior Laboratory Oversight Specialist  
Laboratory Investigations Department

## I. Failure to Maintain a Program of Adequate Veterinary Care

The *Guide* specifies that:

“Veterinary care is an essential part of an animal care and use program. ... This responsibility extends to monitoring and promoting animal well-being at all times during animal use and during all phases of the animal’s life. ... [A] veterinary program that offers a high quality of care and ethical standards must be provided, regardless of the number of animals or species maintained.”

However, the witness documented serious deficiencies in multiple aspects of PPI’s veterinary program.

### A. PPI’s Program of Veterinary Care Apparently Fails to Use Appropriate Methods to Treat Sick and Injured Monkeys.

The *Guide* directs that an “adequate veterinary care program consists of assessment of animal well-being and effective management of” several components, including: “preventive medicine,” “clinical disease, disability, or related health issues,” “protocol-associated disease, disability, or other sequelae,” “surgery and perioperative care,” “pain and distress,” “anesthesia and analgesia,” and “euthanasia.” However, the witness documented that PPI failed to provide animals with adequate veterinary care, including for severe injuries such as exposed bone; and failed to implement elementary measures to prevent primates from sustaining injuries. Veterinarians and supervisors at PPI routinely dismissed concerns raised by the witness and, reportedly, other employees, who were seeking veterinary treatment for ailing animals.

**Monkey 0911132:** *The witness found that this monkey, who was shipped on or about April 7, was denied adequate veterinary care for an exposed tail bone for at least seven days, despite the witness verbally notifying her supervisor, a PPI manager and another worker, repeatedly, about the animal’s injury, as well as submitting five written reports to PPI staff about the wound, as follows.*

- On March 25<sup>1</sup>, the witness found an open wound on the tip of this animal’s tail, in which apparent bone was exposed, as the animal was housed in enclosure 22, C. (See Photographs 2015-03-25\_16 and ... 19, at Ex. 2.) That day, the witness reported this animal’s condition in writing to PPI staff and verbally notified manager [REDACTED], supervisor [REDACTED] and PPI husbandry technician [REDACTED] about the animal’s condition; [REDACTED] replied that PPI veterinarian [REDACTED] had seen the animal’s injured tail and “knows about it.”
- On March 26 and 29, the witness saw and reported in writing that this animal’s tail tip remained in a similar condition, and photographed the tail on the latter day. (See Photographs 2015-03-29\_02 to ... 03, at Ex. 2.)
- On March 30, the witness saw and again reported in writing that this animal’s tail tip remained in a similar condition and again verbally notified [REDACTED] of the animal’s injured tail; [REDACTED] told the witness that the exposed white object in the tail was not bone, but fat or flesh.
- On March 31, the witness saw and again reported in writing that this animal’s tail tip remained in a similar condition. Later that day, the witness saw PPI staff put this monkey into a carrier, where the witness photographed the animal’s injured tail. (See Photographs 2015-03-31\_5 to ... 7, at Ex. 2.) The witness later found that PPI veterinarian [REDACTED] had written on the witness’s March 31 report, apparently referring to the animal’s tail, that she “[p]lann[ed] to amputate tomorrow morning.”

<sup>1</sup>All dates herein, unless otherwise noted, are in 2015.

<sup>2</sup>PPI veterinarian [REDACTED] told the witness on May 5 that [REDACTED] was Privacy but offered no further information as to when and why.

- Only on April 1, according to PPI records the witness observed on April 5, was the monkey's caudal vertebra confirmed to have been "exposed," and only on that day was 1 cm of the animal's tail tip amputated and sutured.

**Monkey 1004072:** *The witness found that this monkey, whom the witness named Mickey and who has recently been housed in enclosure [REDACTED] and afflicted with a fibrotic mass on the right side of the lower jaw, was denied adequate veterinary care for approximately nine days for various fight-related injuries—including a fractured digit in which bone was exposed—despite the witness reporting her condition to PPI staff in writing at least four times and verbally notifying both her supervisor and a PPI manager about the animal's injuries, as follows.*

- On September 26, 2014, the witness found that Mickey was favoring her left hand. The witness called supervisor [REDACTED] to enclosure [REDACTED] where the animal was housed, where [REDACTED] stated that Mickey "got beat up" by other monkeys. [REDACTED] told the witness at approximately 3:20 p.m. that there was "nothing" he could do for the monkey "because it [was] so late in the day."
- On September 27 and 28, 2014, the witness found that Mickey remained in a similar condition and reported this in writing to PPI staff. On September 27, 2014, the monkey was reportedly provided vetropolycin and carprofen, according to PPI records the witness saw on April 19.
- On September 29, 2014, the witness found that Mickey continued to hold her left hand up off the floor. (See Inc. 1, at Ex. 1.) The witness saw that the monkey appeared to have an exposed finger bone on this hand and verbally notified manager McCormack about the monkey's condition; McCormack simply replied "OK." The same day, a report entered in PPI's records indicated that the monkey's wounds were healing "well."
- On October 5 and 6, 2014, the witness found that Mickey's affected digit on the left hand was swollen and again reported her condition in writing to PPI staff.
- On October 6, 2014, the witness asked PPI veterinarian Lane—believed to be [REDACTED]—if anyone had examined the monkey; [REDACTED] stated that she had no information on this animal and her condition. Later this day, [REDACTED] told the witness that she found that this monkey had a broken finger and that the bone was exposed. That day, the witness saw [REDACTED] remove the monkey from the enclosure; part of her finger and exposed bone was amputated this day, according to PPI's records, which the witness saw on April 19. Those records listed no veterinary treatments provided between September 27 and October 6, 2014.

**Monkey 3462110508:** *The witness found that this monkey was provided neither pain relief nor surgical treatment for an exposed tail bone for at least three days and as long as more than two weeks, despite the witness verbally notifying a PPI manager and an acting supervisor about the animal's injury, as follows.*

- On January 11, the witness found that this monkey had an open wound—approximately 2 inches long and .5 inch wide—on the mid-section of her tail. (See Inc. 2, at Ex. 1.) The witness saw layers of flesh exposed in the deep wound and what the witness suspected was bone. The witness verbally notified [REDACTED] her acting supervisor that day, of this animal's injury; he stated that he was aware of the animal's condition, attributed it to a "big fight" in enclosure [REDACTED] where the animal was housed, and simply stated that he (a lay person who told the witness on March 30 that he had no formal veterinary medicine education) had "sprayed gentamicin" on this monkey's tail.
- On January 12, the witness verbally notified manager [REDACTED] of this animal's condition; [REDACTED] said that she was unaware of the animal's condition and stated that there had been a "big fight" in the enclosure approximately two weeks earlier, suggesting that the wound had occurred then. Also, according to PPI records the witness observed on February 5, this monkey first received any recorded care for her severely-injured tail on January 12—but only having the wound cleaned and an unidentified ointment applied to it.
- On January 14, [REDACTED] told the witness that he had amputated some of this animal's tail, which [REDACTED] said was in "bad" condition and confirmed had bone exposed.

- On January 19, the witness found that PPI paperwork indicated that this monkey—whose tail was listed as having been “degloved” and then “docked”—had been provided carprofen and other drugs only beginning on January 14. (See Photographs 2015-01-19\_04 and ... 06, at Ex. 2.)

**Monkey 3994125505:** *The witness found that this monkey was not provided pain relief or surgical treatment for an injured tail for at least three days, despite a veterinarian’s prior awareness of the condition and the witness reporting it in writing to PPI staff, as follows.* On February 25, the witness found and reported in writing to PPI staff that this animal’s tail was de-gloved, with approximately the distal eighth of the appendage’s length covered in red, wounded flesh, which the animal was picking at. Later that day, the witness recorded and photographed the animal’s tail. (See Inc. 3, at Ex. 1 and Photographs 2015-02-25\_04 to ... 06, and ... 13, at Ex. 2.) The witness then spoke with veterinarian [REDACTED] who stated that the animal’s tail was wounded on February 24 and that he was going to “dock” the tail. Later that day, the witness found that the monkey remained in this condition. (See Photograph 2015-02-25\_16, at Ex. 2.) On February 26, the witness found that this animal remained in a similar condition. Only on February 27, according to PPI records the witness observed on March 25, was the monkey’s tail docked, debrided and sutured.

**Monkey 06C009:** *The witness learned that this thin monkey was apparently denied euthanasia—if not appropriate veterinary care for his ailments—as follows.*

- On February 11, the witness heard PPI husbandry technician [REDACTED] tell veterinarian [REDACTED] that this monkey, then housed in enclosure [REDACTED] looked “like a crack addict” because he was “so skinny.”
- On February 12, [REDACTED] reported in writing to PPI staff that this monkey was “losing weight,” as the witness found and photographed on March 9. (See Photograph 2015-03-09\_7, at Ex. 2.)
- On March 3 [REDACTED] told the witness that this monkey remained “skinny.”
- On March 4, the witness found that this monkey’s hips were protruding from under his skin and that his body condition appeared to score approximately 2, or “thin.” (See Inc. 4, at Ex. 1.)
- On March 8, PPI husbandry technician [REDACTED] told the witness that this monkey’s thin body condition made him look like he “had cancer”; [REDACTED] told the witness that despite her reports to [REDACTED] about the animal’s condition, nothing had been done to treat the animal. Later that day, [REDACTED] told the witness that this monkey “looked horrible” and that he had refused to eat anything she had provided to him. [REDACTED] told the witness that she believed that the monkey had “given up on life.” Later on March 8, the witness found that this monkey’s eyes appeared sunken; that his hips were protruding; that he appeared weak and was moving slowly; and that this body condition appeared to score 1, or emaciated. Late on March 8, [REDACTED] told the witness that this animal “looked horrible,” and the witness found that [REDACTED] had reported in writing to PPI staff that this monkey looked “Bad. Not eating and ... not Drinking either.” (See Photograph 2015-03-08\_10, at Ex. 2.)
- On March 9, the witness found this animal laterally recumbent and unresponsive on the floor of enclosure [REDACTED] (See Inc. 5, at Ex. 1 and Photographs 2015-03-09\_01 to ... 02, at Ex. 2.) The witness verbally notified [REDACTED] of the animal’s condition; [REDACTED] replied that he had spoken with [REDACTED] on March 8 about the animal and that [REDACTED] had stated, “Yeah, I know about that monkey.” Later this day, this monkey was moved to PPI’s intensive care unit (ICU).
- On March 11, the witness found that PPI’s records indicated that this monkey had been identified as being in “lean” body condition on February 3 and, a week later, had his body condition scored as “1.5.” The witness saw no indication of medications provided to this animal thereafter until March 8 and March 9, on the latter of which records indicated the monkey was found “down in cage” in PPI’s ICU.

- On March 15, [REDACTED] told the witness and [REDACTED] that this monkey had “died” on March 14; [REDACTED] replied that [REDACTED] “waited too long to do anything.”
- On March 17, the witness found that PPI’s records indicated that the animal, following 30 minutes of apparent IV fluid administration on March 14, “started gasping” and produced white and yellow “mucopurulent discharge” from his nose before dying. The witness saw that the records bore no indication of this monkey having been examined or treated between February 15 and March 7.

**Monkey F514:** *The witness learned that this chronically ill and thin monkey was denied euthanasia—if not appropriate veterinary care for his ailments—as follows.*

- On March 25 and 26, the witness found that PPI husbandry technician [REDACTED] had reported in writing to PPI staff that this animal was losing weight and “not Eating,” respectively. (See Photographs 2015-03-25\_23 and 2015-03-26\_4, at Ex. 2.)
- On March 31, the witness saw this animal in room [REDACTED] of PPI’s holding building, and that the animal was emaciated, with sunken cheek bones and eyes and protruding ribs, hips and vertebrae. When the witness verbally notified [REDACTED] and [REDACTED] about the animal’s apparently dire condition, [REDACTED] stated that the monkey looked “horrible.” When the witness asked the men what could be done for the monkey, [REDACTED]—apparently referring to balancing a space heater atop a trash can and two plastic containers to provide the animal with warmth—replied, “This is all I am doing.” After the witness indicated that she would report the animal’s condition in writing to PPI staff and asked when [REDACTED] would next be at the facility, [REDACTED] replied, “You asking too many questions.” The witness noted that the temperature gauge for the room indicated that its temperature was 63°F. Later, PPI behavioral technician [REDACTED] told the witness that this monkey “looked horrible” and was shivering on March 30, when [REDACTED] said that she had notified [REDACTED] of the animal’s condition.
- On April 1, veterinarian [REDACTED] stated that this monkey had “died overnight.” [REDACTED] stated that on March 31, she had told [REDACTED] that the monkey “need[ed] fluids” urgently, and that the animal’s body temperature had dipped to 94°F. [REDACTED] said, “When we were leaving [for the day], I looked at [the monkey] and told [REDACTED], ‘This monkey is going to die overnight.’”
- On April 5, the witness found that PPI’s records indicated that this 30-month-old monkey had been afflicted with enteritis “on and off since” July 2013, was “very thin” and had “Markedly hemorrhagic mucosa” in the “jejunum, ileum and colon.” The records indicated that the monkey’s body condition was scored a “1” on October 9, 2014 and that on March 11, the 1.67-kg. monkey was deemed “thin.” Only on March 30 was the monkey provided trimethorpin sulfa, according to the records, as his weight was down to 1.38 kg. The records indicated that on March 31, the monkey was provided with vitamin B complex, iron, fluids and apparent Pepto-Bismol before he was “Found dead in cage” on April 1.

**Lay and other workers pushed monkeys’ prolapsed rectal tissue back into their bodies—often without donning clean gloves or cleaning and lubricating the tissue—and sometimes shook these animals:**

The witness saw that PPI president and veterinarian [REDACTED] veterinarian [REDACTED] manager [REDACTED] supervisor [REDACTED] and husbandry technician [REDACTED] pushed monkeys’ prolapsed rectal tissue back into their bodies—without changing the gloves they had used to handle other animals and almost always without cleansing or lubricating the tissue—and that some of the lay workers then held the animals upside down and shook them in apparent attempts to drive the tissue deeper into their bodies, as follows:

- [REDACTED] On December 15, 2014, the witness found that a monkey’s bloody rectum protruded approximately 1” from his anus in enclosure [REDACTED] and alerted acting supervisor [REDACTED] to the condition. The witness saw [REDACTED] then hold the animal upside down and use his finger to push the monkey’s prolapsed tissue back into his body. (See Inc. 6, at Ex. 1.) The witness then saw [REDACTED] repeatedly shake the upside down animal. (See Inc. 7—10, at Ex. 1.) On January 20, the

witness saw [REDACTED] pull one of the fleeing monkeys he had chased and grabbed in enclosure [REDACTED] that day off the fencing. The witness saw that the animal's rectum had prolapsed. The witness saw [REDACTED] push the prolapsed tissue back into the animal's anus and stick his pinky finger into the animal's anus. (See Inc. 11, at Ex. 1.) On February 3, the witness saw [REDACTED] push another monkey's prolapsed rectal tissue back into the animal's anus and then put his finger into the animal's orifice, in enclosure 7, A, as [REDACTED] held this animal upside down.

- [REDACTED] On February 4, the witness saw president [REDACTED] push a monkey's prolapsed rectal tissue back into the animal's anus in quadrant [REDACTED] as [REDACTED] held the animal. (See Inc. 12, at Ex. 1.)
- [REDACTED] On December 24, 2014, the witness saw PPI manager [REDACTED] push a monkey's prolapsed rectal tissue back into the animal's body. As [REDACTED] stood by, the witness saw [REDACTED] then shake the upside down animal in an apparent attempt to drive the tissue into the animal's cavity. (See Inc. 13, at Ex. 1.) On March 10, the witness saw [REDACTED] push a monkey's prolapsed rectal tissue back into the animal's anus in quadrant [REDACTED]
- [REDACTED] On January 22, the witness saw [REDACTED] push prolapsed rectal tissue back into the body of a monkey in enclosure [REDACTED] and then insert his pinky finger into the animal's anus. (See Inc. 14, at Ex. 1.) On April 16, the witness saw [REDACTED]-wearing fresh gloves, but having not cleaned or lubricated the tissue—push the prolapsed rectum of Sweet P, a monkey described in detail below, back into her anus. (See Inc. 15, at Ex. 1.) On February 3, the witness saw [REDACTED] push a monkey's prolapsed rectal tissue back into the animal's anus in quadrant [REDACTED] as [REDACTED] held the animal upside down.
- [REDACTED] On December 17, 2014, the witness saw [REDACTED] push a monkey's prolapsed rectal tissue back into the animal's body at PPI's Miami facility. The same day, the witness described to [REDACTED] how she had seen [REDACTED] shake the above described animal on December 15, 2014; [REDACTED] affirmed that such shaking could be used to move a monkey's tissue further into his or her body.

**Other procedures performed under insanitary conditions, including by lay persons, and possibly without adequate anesthesia and analgesia:**

On October 31, 2014, the witness observed president [REDACTED] manager [REDACTED] supervisor [REDACTED] and [REDACTED] withdraw spinal and ocular fluids and blood from monkeys in quadrant [REDACTED]—whose prior anesthesia and sedation regimen the witness could not determine—and euthanize the animals. That day, the witness saw that one monkey's limbs moved rapidly as [REDACTED] collected blood from a hind limb, including as [REDACTED] looked on. (See Inc. 16—17, at Ex. 1.) The witness then saw [REDACTED] put a needle into this monkey's chest and that the animal's hind limbs and lower body moved abruptly at approximately the same time as [REDACTED]'s action. (See Inc. 18, at Ex. 1.) Soon thereafter, as [REDACTED] moved the blood collection tube around as the needle remained in the monkey's chest, the witness saw that the hind limbs moved vigorously. (See Inc. 19, at Ex. 1.) The same day, the witness saw [REDACTED] repeatedly put a needle into the chest of another live monkey in order to collect blood. The witness saw that this monkey blinked approximately three times while the needle was in his or her chest.

On April 1, the witness saw lay worker [REDACTED]—without changing his gloves—grab a tooth in a monkey's mouth and repeatedly pull on it, until he tore the tooth out from the red, inflamed gum around it; the animal was provided no anesthesia or pain relief beyond the ketamine with which the animal was sedated earlier on that day. (See Inc. 20, at Ex. 1.) On April 9, the witness reported to veterinarian [REDACTED] that monkey 1010113 in enclosure [REDACTED] had an injured tail tip, with exposed bone. [REDACTED]—having handled other monkeys and without donning clean gloves, or providing any anesthesia or pain relief beyond .6 ml of ketamine the witness had sedated the 4.84 kg animal with approximately 15 minutes earlier—used a scalpel to cut into the animal's bone as the monkey, atop a plastic table that had not been sanitized for the procedure, opened his mouth and moved about. (See Inc. 21, at Ex. 1.) [REDACTED] told the witness that the monkey could “feel” the incisions. On April 19, the witness saw that PPI's records did not list any medications—or other treatment—being provided to this monkey after [REDACTED]

cut part of the bone off. On April 14, as [REDACTED] looked on [REDACTED]—while wearing gloves that he had handled other animals with and working on a table that was not sanitized for the procedures—manually pulled teeth from two monkeys who were provided no anesthesia or pain relief beyond the ketamine with which they had been sedated earlier that day. (See Inc. 22—23, at Ex. 1.) Similarly, on April 22, as [REDACTED] looked on [REDACTED]—while wearing gloves that he had handled other animals with and working on a table that was not sanitized for the procedures—manually pulled two teeth from a monkey who was provided no anesthesia or pain relief beyond the ketamine with which he had been sedated earlier that day. (See Inc. 23.01, at Ex. 1.)

**B. PPI’s Program of Veterinary Care Apparently Lacks an Effective Mechanism of Direct and Frequent Communication to Ensure that Information on Animal Health is Conveyed to Veterinary Staff.**

The *Guide* stipulates that “a mechanism for direct and frequent communication should be established to ensure that timely and accurate information is conveyed to the responsible veterinarian about issues associated with animal health, behavior, and well-being, and that appropriate treatment or euthanasia is administered.” However, the witness documented that animal health problems may not have been conveyed to veterinary staff.

At PPI’s Immokalee facility, each husbandry technician, after observing the animals in all enclosures (s)he is assigned to work in that day, is expected to submit a written report describing remarkable physical conditions in the monkeys or, alternately, indicating that the animals appeared to be in unremarkable physical condition. The witness understood that PPI’s supervisors—including [REDACTED] and [REDACTED]—and veterinary staff were to review these reports in a timely manner and, as appropriate, ensure adequate veterinary treatment for reported animals. Despite this, the witness sometimes found that her report was the only one present where the reports were submitted—or was one of a fraction of those that would be expected to be found had all technicians working on a given day submitted reports. For example, on October 6, 2014, veterinarian [REDACTED] told the witness that she did not “even check for the reports because no one ever does them anyways.” Later on October 6, 2014, [REDACTED] came to the witness apparently holding the only observation reports she found from this day and October 5, 2014. The witness saw just three reports in [REDACTED]’s hands: two were those submitted by the witness, and the third had been submitted by PPI husbandry technician [REDACTED]. The witness noted that there should have been at least 10 such reports submitted from October 5—6, 2014 and thus in [REDACTED] hands.

**Further, PPI supervisory and veterinary staff apparently neglected to review those observation reports which technicians did submit.** The witness frequently found that her and others’ observation reports describing injured and apparently-ill monkeys bore no indication of having been reviewed one or more days after their submission. For example, on December 13, 2014, the witness found five observation reports, dated December 10—12, 2014, on a counter at PPI, but bearing no indication that they had been reviewed by a veterinarian, despite their descriptions of monkeys who were thin, wounded, and missing hair. (See Photographs 2014-12-13\_2 to ... \_6, at Ex. 2.) Similarly, on the morning of February 3, the witness found that three reports dated February 2, and one from [REDACTED] dated February 1, remained in a mailbox and had apparently not been reviewed by veterinary staff. (See Inc. 24, at Ex. 1.) On November 11, 2014, the witness found her November 8—9, 2014 observation reports sitting on a counter, but bearing no indication that they had been reviewed by a veterinarian, despite their descriptions of monkeys whose hair loss and sores the witness had reported on those days. Finally, on November 30, 2014, the witness found that monkeys in quadrant [REDACTED] had loose stool and that the eyes of at least two monkeys in enclosure [REDACTED] were sunken, and put a related observation report on a counter in a PPI trailer where staff left such reports. At approximately 3:30 p.m. that day, the witness found that this report was still under the bottle of insect repellent she had put atop it when submitting it. On December 1, 2014, [REDACTED] asked the witness if she had submitted an observation report a day earlier; when the witness showed him

the report, which remained under the insect repellent and appeared untouched, [REDACTED] replied, "I've been slacking."

Again, on April 21, the witness opened a PPI mailbox to find that her April 20 observation report—on which she had described having seen lacerations and watery stool on one monkey and that another monkey was favoring his swollen, lacerated right hand—remained there and bore no indication that a veterinarian or supervisor had reviewed it or examined the reported animals. Similarly, on May 13, the witness found late in the work day that at least four observation reports—including [REDACTED] report that monkey F514 appeared "sick" in enclosure [REDACTED] and the witness's own report of a monkey who suffered a seizure in enclosure [REDACTED] a thin, slow-moving monkey in enclosure [REDACTED] whose eyes appeared to be sunken; and loose or watery stool in five enclosures—remained in the PPI mailbox and bore no indication that a veterinarian had reviewed them.

**PPI husbandry staff may not administer those treatments prescribed by veterinarians.** For example, on April 8, the witness found a form, dated April 6, indicating that two monkeys at PPI were scheduled to receive various medications and fluids for dehydration, diarrhea and lethargy. Manager [REDACTED] saw the document and asked supervisor [REDACTED] and [REDACTED]—the workers typically assigned to provide such treatments—why no one had initialed the document as having provided these treatments. Both men indicated that they had not provided the listed treatments. The witness then saw [REDACTED] crumple the paper up and throw it into a trash receptacle [REDACTED] saw this, but said nothing, and none of the parties indicated that the animals would be treated or that PPI veterinarians would be informed that the scheduled treatments were skipped. The witness later retrieved and photographed the document. (See Photograph 2015-04-08\_01, at Ex. 2.)

### **C. PPI's Program of Veterinary Care Apparently Lacked—and May Still Lack—Appropriate and Adequate Personnel.**

The *Guide* specifies that a facility's animal care and use program must ensure adequate staffing "to achieve the humane care and use of animals." However, on December 15, 2014, manager [REDACTED] told the witness that veterinarian [REDACTED] no longer worked for PPI and that [REDACTED] was now the only veterinarian available at the Immokalee facility. On December 17, 2014, [REDACTED] told the witness that he was the only veterinarian for animals at both the Immokalee and PPI's Miami facility, which, as of five days earlier, had together housed more than 1700 monkeys. Only on or about March 23 did veterinarian [REDACTED] begin working at the Immokalee facility. On May 5, [REDACTED] told the witness that [REDACTED] was "let go;" that she did not believe that PPI would hire another veterinarian; and that she thought that PPI president [REDACTED]—who the witness found had rarely, if ever, been involved in the observation and treatment of sick and injured animals at the facility—would begin working more with monkeys there. However, the witness never saw [REDACTED] providing care to any sick or injured monkeys reported to the veterinary staff thereafter, through May 21. On May 6, [REDACTED] told the witness that since it was "just" [REDACTED] providing veterinary treatment to (approximately 1,000) monkeys at PPI, she would only "focus" on attending to animals reported for passing watery stool in one enclosure at a time, though those in several enclosures had been repeatedly reported as being affected. Further, the Florida Department of Business & Professional Regulation Online Services website indicates that no individual with the surname [REDACTED] is licensed to practice veterinary medicine in the state.

## **II. Failure to Handle Animals Humanely**

### **A. PPI Personnel's Manner of Handling Monkeys Apparently Causes Them Trauma, Behavioral Stress, Physical Harm and Unnecessary Discomfort.**

The *Guide* specifies that “proper care, use, and humane treatment” must be incorporated into all aspects of animal use. Further, facilities are advised to employ husbandry methods aimed at “enhance[ing] animal well-being and minimize or eliminate pain and distress” to animals. However, the witness documented seven PPI employees—including president [REDACTED], veterinarians [REDACTED] and [REDACTED] and supervisor [REDACTED]—grabbing monkeys by the tails, as described below. Further, none of those individuals in management positions, or manager [REDACTED] who sometimes observed such handling, reprimanded any of these workers for such handling. Despite this, evidence suggests that PPI leadership did not want investigative personnel to observe this handling; on April 22, [REDACTED] told the witness that “he”—apparently president [REDACTED]—did not want Hendry County code enforcement personnel visiting PPI that day “to see us catching” monkeys.

- On October 21, 2014, the witness saw [REDACTED] chase and grab a monkey—who had just had what was later diagnosed as a seizure, and had run into a concrete wall and fencing—by the tail and hold the animal by the tail, without supporting his or her weight, before the animal fell to the concrete floor at least 3 feet below. (See Inc. 25, at Ex. 1.)
- On January 20, the witness saw [REDACTED] grab two monkeys by the tail; the second animal was later found to have a rectal prolapse. (See Inc. 26—27, at Ex. 1.)
- On January 22, the witness saw [REDACTED] grab a monkey by the tail, force this animal into a net with another monkey, pick the net up and let the monkeys strike the concrete floor, and then drag the netted animals several feet across the floor. (See Inc. 28—29, at Ex. 1.) The witness then saw [REDACTED] grab another monkey, with both hands, by the tail. (See Inc. 30, at Ex. 1.) The witness saw this monkey expel watery feces, which PPI behaviorist [REDACTED] had told the witness monkeys did as a defense mechanism when they felt “frightened.”
- On January 27, the witness saw [REDACTED] grab four monkeys by the tail. (See Inc. 31—34, at Ex. 1.)
- On February 3, the witness saw [REDACTED] grab two monkeys by the tail. (See Inc. 35—36, at Ex. 1.)
- The witness saw [REDACTED] grab and/or pull additional monkeys by the tail, some of whom screamed, on December 24, 2014, January 27, March 26, and April 1, 13 and 22.
- On April 14, the witness saw that one of the monkeys [REDACTED] had netted in enclosure [REDACTED] was afflicted with a rectal prolapse. Further, on March 25, [REDACTED] explained the presence of blood on his scrubs that day by telling the witness that he had “knocked a monkey out” when the animal’s head struck a perch in enclosure [REDACTED]. Later that day, the witness found that this animal had an approximately 1-inch-long laceration over the left eyebrow. (See Photographs 2015-03-25\_09 to ... 15, at Ex. 2.) On March 29, [REDACTED] told the witness that he believed that he had caused this monkey to have a concussion. [REDACTED] stated that he was “swinging” a net to capture this animal and that the animal’s head was “wnack[ed]” against a perch after the monkey was captured.

- On December 10, 2014, after the witness saw [REDACTED] grab and hold a monkey in enclosure [REDACTED] by the tail, [REDACTED] admitted to the witness that, “You’re not supposed to do it.” Despite this, on January 20, the witness saw [REDACTED] grab a fleeing monkey by the tail. (See Inc. 37, at Ex. 1.)
- On January 27, the witness saw [REDACTED] grab a monkey by the tail. (See Inc. 38, at Ex. 1.)
- On February 19, the witness saw [REDACTED] and [REDACTED] whom he supervised but did not reprimand for such handling, chase, lunge at and catch several monkeys with nets. (See Inc. 39—42, at Ex. 1.)
- The witness saw [REDACTED] grab more monkeys by the tail on October 31, 2014 and January 27.
- Further, on March 26, [REDACTED] told the witness that he and other PPI staff—who were handling and processing monkeys in quadrant [REDACTED] that day—had found that a monkey in enclosure [REDACTED] had an “obviously” dislocated knee. Later on March 27, [REDACTED] affirmed that the injury “definitely happened yesterday” when he and others were catching animals in the enclosure. Later on March 27,

the witness found that the monkey, whose ID was 1107056, had a cast on her left leg. On April 7, the witness found that PPI's records indicated that the monkey had suffered a dislocated "left stifle"; this monkey has recently been housed in enclosure [REDACTED]

[REDACTED] On December 24, 2014, the witness saw [REDACTED] grab a monkey by the tail. (See Inc. 43, at Ex. 1.) On February 3, the witness saw [REDACTED] grab monkeys by the tail. (See Inc. 44—45, at Ex. 1.) On March 10, the witness saw [REDACTED] holding a fleeing monkey by only the tail. (See Inc. 46, at Ex. 1.) The witness saw [REDACTED] grab additional monkeys by the tail on November 13, 2014 and January 14.

[REDACTED] On April 12 and April 13, the witness saw veterinarian [REDACTED] grabbing monkeys by the tail; the witness heard [REDACTED] tell [REDACTED] on April 12 that doing so was "much easier than netting them." On April 14, the witness saw [REDACTED] lunge after monkeys, who appeared to tire; [REDACTED] told the witness that, "It's easier to grab their tails when they're tired." Shortly thereafter, the witness saw [REDACTED] grab at least three monkeys by the tails, including one whom she held in this manner for approximately 35 seconds. (See Inc. 47, at Ex. 1.) On April 15, the witness saw [REDACTED] grab approximately six monkeys by their tails.

*Estrada:* On February 3, the witness saw [REDACTED] grab three monkeys by the tail. (See Inc. 48—50, at Ex. 1.)

[REDACTED] On October 23, 2014, the witness saw veterinarian [REDACTED] grab two monkeys by the tail and lift the second animals such that all four feet were off the floor and the animal's weight was not supported. (See Inc. 51—52, at Ex. 1.)

[REDACTED] On February 12, the witness saw PPI president [REDACTED] grab a monkey by the tail and then saw [REDACTED] and [REDACTED] try to grab other monkeys by the tails. The witness did not hear [REDACTED] indicate in any way to [REDACTED] that he should handle monkeys in another fashion.

### III. Failure to Ensure Psychological Well-Being of Nonhuman Primates

The *Guide* stipulates that "animals should be housed under conditions that provide sufficient space as well as supplementary structures and resources required to meet physical, physiologic, and behavioral needs," warning that "[e]nvironments that fail to meet the animals' needs may result in abnormal brain development, physiologic dysfunction, and behavioral disorders ... that may compromise both animal well-being and scientific validity." Specifying that environmental enrichment should "facilitate the expression of species-typical behaviors and promote psychological well-being," the *Guide* advises that "[w]ell-conceived enrichment provides animals with choices and a degree of control of their environment, which allows them to better cope with environmental stressors." However, the witness documented PPI's failure to ensure the psychological well-being of nonhuman primates.

#### A. PPI Staff Apparently Fails to Ensure the Compatibility of Monkeys Housed Together.

The *Guide* specifies that while enclosures should "account for the animals' social needs" and while "[s]ingle housing of social species should be the exception," "[s]ocial housing of incompatible animals can induce chronic stress, injury, and even death." However, the witness documented that many monkeys at PPI were repeatedly injured and lived in near-constant torment as a result of being housed with incompatible pen-mates.

**Monkey 1005158:** *This monkey, whom the witness named Loretta and who has recently been housed in enclosure [REDACTED] was left housed with other monkeys in enclosure [REDACTED] for more than 22 weeks, despite*

at least 16 written and seven verbal reports to PPI staff, including behaviorist [REDACTED] veterinarians [REDACTED] and [REDACTED] and manager [REDACTED] that the monkey was attacked and that her face was frequently lacerated; that she appeared overly submissive and hyper-vigilantly watched other monkeys in the enclosure; and that she had widespread alopecia, as follows:

- On October 21, 2014, the witness found Loretta with several lacerations around the eyes and reported her condition in writing to PPI personnel. On October 25, 2014, the witness found and reported in writing to PPI staff that Loretta remained in a similar condition. Later this day [REDACTED] told the witness that he would inform behaviorist [REDACTED] of Loretta's condition. On October 27, 2014, the witness verbally reported Loretta's condition to veterinarian [REDACTED].
- On November 11, 2014, the witness found and reported in writing to PPI staff that Loretta had fresh lacerations beside her eyes. On November 14, 2014, the witness submitted a behavioral referral form to PPI staff, indicating that Loretta had facial lacerations and appeared overly submissive to other monkeys in the enclosure. On November 15 and 16, 2014, the witness found Loretta sitting on the floor with her eyes darting side to side as other monkeys moved about. (See Inc. 53—54, respectively, at Ex. 1.) On November 17, 2014, the witness found that Loretta had more lacerations on her face, reported this verbally to [REDACTED] and again submitted a behavioral referral form describing Loretta's condition and behavior. On November 21, 2014, the witness again found that Loretta's face was cut. Later this day, the witness told manager [REDACTED] about Loretta's condition; [REDACTED] replied, "Ugh, what are we going to do with those girls?" The same day, the witness saw that a PPI document listing the facility's animals with remarkable behaviors included Loretta but, under a behavioral treatment column, read "N: CTM," which the witness suspected meant "no: continue to monitor." On November 22 and 23, 2014, the witness again saw and reported in writing to PPI staff that Loretta remained in a similar condition. On November 24, 2014, the witness found that Loretta was lying laterally recumbent on the floor of the enclosure. (See Inc. 55, at Ex. 1.) Later that day, the witness told [REDACTED] about this behavior; [REDACTED] said, "Maybe there is something really wrong with this monkey." On November 29, 2014, the witness found that Loretta continued to appear hyper-vigilant regarding her cohorts' movements. (See Inc. 56, at Ex. 1.)
- On December 4, 2014, the witness found that Loretta had fresh, bloody lacerations on her face, including one approximately 3 inches long beside her left eye. The witness reported this condition in writing to PPI staff. Later this day, veterinarian [REDACTED] told the witness that he had observed the lacerations. On December 7, 2014, the witness found that Loretta's facial lacerations remained, as did her hyper-vigilant observations of the behaviors of her cage mates. (See Inc. 57—58, at Ex. 1.) On December 15, 2014, the witness verbally described to behaviorist [REDACTED] her repeated observations of Loretta's behavior. [REDACTED] indicated that [REDACTED] could add visual barriers to the enclosure and—after the witness agreed to take on the additional responsibility of cleaning them—that the maintenance staff could add barrels to the enclosure to permit Loretta to hide in or behind. On December 26, 2014, the witness found and reported in writing to PPI staff that Loretta had fresh lacerations on her face. Later this day, the witness saw another monkey attack Loretta and separated the animals, after which the witness saw Loretta shaking, with her back turned to other animals, and then stand on a perch, where the witness documented the monkey's alopecia. (See Inc. 59, at Ex. 1.)
- On January 1, the witness saw that Loretta was listed as being "hypervigilant" and "very submissive" on PPI's list of animals reported as having abnormal behaviors. On January 13, the witness saw and reported in writing to PPI staff that Loretta again had facial lacerations. On January 20, [REDACTED] told the witness that this enclosure's population was "unstable." On January 21, the witness saw and reported in writing to PPI staff that Loretta was favoring her right hand. On January 25 and February 5, the witness found that Loretta remained in similar condition with remarkable alopecia. (See Photographs 2015-01-25\_07 to ... 09, and Photographs 2015-02-05\_4 to ... 6, at Ex. 2.)
- On February 8, the witness found and again reported in writing to PPI staff that Loretta had a laceration near her left eye and was favoring her right hand. (See Photographs 2015-02-08\_05 and ... 08 to ... 09, at Ex. 2.) On February 10, the witness found that Loretta remained in a similar condition.

(See Photographs 2015-02-10\_08 to ... 10, at Ex. 2.) On February 11, the witness found and reported in writing to PPI staff that Loretta had lacerations, continued alopecia, and was shivering in the enclosure with no other monkeys huddling with her. On February 14, the witness saw that PPI's list of animals reported for abnormal behavior indicated that "aggression ha[d] decreased" in enclosure [REDACTED] despite the witness's continued reports of Loretta's fresh facial lacerations. On February 26, the witness found that this document indicated that behaviorist [REDACTED] scheduled February 17 observation of Loretta had *not* been completed.

- On March 2, the witness pointed out to behaviorist [REDACTED] that Loretta was missing most of her hair; [REDACTED] replied that Loretta was "self-pluck[ing]" the hair out. When the witness reported to [REDACTED] that Loretta appeared hyper-vigilant, [REDACTED] simply responded that the monkey was not overly submissive, "like cowering in the corner." On March 5, the witness found that PPI's list of animals reported for abnormal behaviors indicated that Loretta's behavior had *not* been resolved and that [REDACTED] s March 2 observation had concluded that the "animal is low ranking, but does not need to be relocated." On March 11, the witness found and reported in writing to PPI staff that Loretta had a scratch on her body. On March 17, the witness saw that Loretta was no longer included on PPI's list of animals reported for abnormal behavior. On March 22, the witness found that Loretta's remarkable alopecia remained. (See Photographs 2015-03-22\_13 to ... 19, at Ex. 2.) On March 26, the witness saw and reported in writing to PPI staff that Loretta had lacerations on the back of her arm. Later that day, the witness verbally notified [REDACTED] that Loretta was virtually hairless, appeared to be frightened at most times, and had fresh lacerations on her arm. Later that day, [REDACTED] told the witness that she had looked at Loretta and stated, "I see what you mean." [REDACTED] stated that she would move Loretta to another enclosure, but shortly thereafter told the witness that she had run out of time and would not be able to move Loretta that day. On March 27, the witness found and reported in writing to PPI staff that Loretta's lacerated arm remained in a similar condition, as did her alopecia. (See Inc. 60—61, at Ex. 1, and Photographs 2015-03-27\_02 to ... 04, at Ex. 2.) Later that day, [REDACTED] and [REDACTED] moved Loretta to a paneled-off section of enclosure [REDACTED] (See Inc. 62—63, at Ex. 1.)
- On April 17, the witness found that Loretta was housed in enclosure [REDACTED] and was still missing significant hair. (See Inc. 64, at Ex. 1.) On April 21, the witness found that Loretta's alopecia remained and that she was housed in enclosure [REDACTED] (See Photographs 2015-04-21\_01 to ... 04, at Ex. 2.) On April 23, the witness saw and reported in writing that Loretta had many lacerations on her face and head, as well as continued alopecia; later that day, the witness saw Loretta plucking her own hair and submitted another abnormal behavior referral describing this. (See Inc. 64.01, at Ex. 1, and Photographs 2015-04-23\_22 to ... 28, at Ex. 2.) On April 28, [REDACTED] told the witness that she had yet to see the witness's April 23 written report of Loretta's self-plucking, but stated that Loretta was "stressed" and that she was considering re-housing Loretta with the very monkeys she was removed from on March 27. On April 29 and 30, the witness saw and reported in writing that Loretta was scratching her white, flaky skin. On May 10, the witness saw that PPI's list of animals reported as having abnormal behaviors indicated that staff still "needed" to observe Loretta following the witness's report 17 days earlier that the monkey was plucking her own hair out. On May 11, the witness saw a monkey chasing and grabbing Loretta, who bared her teeth in response; the witness submitted another abnormal behavior referral that day.

**Monkey M299:** *This monkey, whom PPI staff call "Baby Girl" and "Hank's daughter," has been largely left housed since at least October 2014 with other monkeys in enclosure [REDACTED] and now [REDACTED] despite written and verbal reports to PPI staff—including behaviorist [REDACTED] veterinarian [REDACTED] and supervisor [REDACTED] by the witness and [REDACTED] that the monkey was being attacked and repeatedly wounded by cohorts, as follows:*

- On September 17, 2014, the witness and [REDACTED] heard and saw monkeys fighting in enclosure [REDACTED]. The witness then heard [REDACTED] verbally report their observations to manager [REDACTED]. On October 3, 2014, the witness saw that [REDACTED] reported in writing to PPI staff that monkeys in this enclosure [REDACTED] were "still" fighting.

- On December 10, 2014, [REDACTED] told the witness that behaviorist [REDACTED] had ignored her mid-October 2014 reports that an animal in this enclosure—whom [REDACTED] confirmed on January 2 was called Baby Girl—was being “picked on and beat up and would not eat.” [REDACTED] told the witness that she repeatedly reported her observations of such behaviors and that [REDACTED] alleged that she was lying and said that “these things weren’t happening.” On December 18, 2014, [REDACTED] told the witness that monkeys in this very enclosure had facial lacerations. On December 19, 2014, the witness saw that at least two monkeys in this enclosure had facial lacerations. The witness saw that one monkey had lacerations near her eyes, sat against a wall in the enclosure and darted her eyes from side to side. On December 26, 2014, the witness found that this animal had a bloody, half-dollar sized wound on her right forearm. (See Inc. 65—66, at Ex. 1.) The witness verbally notified supervisor [REDACTED] of this injury. [REDACTED] replied that, “There’s nothing wrong,” affirmed that he knew of the animal and said that the monkey’s arm is “always like that.” David Perez told the witness that the monkey’s left arm “used to look” similarly bloodied, “from bite marks from the other monkeys,” who also picked the animal’s scabs off.
- On December 27, 2014, [REDACTED] told the witness that Baby Girl had been attacked by other monkeys in the enclosure for two or three months; that the animal “always” had wounds on her forelimbs and that other monkeys in the enclosure bit and re-opened the wounds [REDACTED] told the witness that she had reported the fighting in this enclosure “over and over, but they never do anything about it.” The same day, veterinarian [REDACTED] told the witness that this monkey “always” had wounds on her arms and echoed [REDACTED]’s statement that other monkeys bite or rip the scabs off. [REDACTED] told the witness that he had informed [REDACTED] of this monkey’s condition and that [REDACTED] had stated that she would attempt to find another enclosure for the animal to be housed in. When the witness notified [REDACTED] of [REDACTED]’s statement that [REDACTED] might re-house the animal, [REDACTED] replied, “That’s what she always says.” On December 29, 2014, the witness submitted an abnormal behavior referral form to PPI staff, describing this animal’s frightened appearance and vigilant watch of the monkeys she was housed with. On January 1, the witness saw that PPI’s list of monkeys reported for abnormal behaviors indicated that fighting had been reported in this enclosure on November 5, 2014. On January 2, the witness found that Baby Girl remained housed in enclosure 15, A and appeared to have a scab on her right forearm.
- On February 15, the witness saw that Baby Girl had facial lacerations and that the wound on the animal’s right arm still appeared raw. On February 26, the witness saw that Baby Girl’s right forearm remained wounded, with a bloody laceration approximately 1 inch wide and 1.5 inches long. The witness saw other monkeys in the enclosure chasing this animal, who licked and/or bit the wound. (See Inc. 67, at Ex. 1 and Photographs 2015-02-26\_21 and ... 24 to ... 30, at Ex. 2.) That day, [REDACTED] told the witness that he had “looked at” this monkey’s wound “the other day.” When the witness expressed her concern about the animal’s condition to [REDACTED] and described the monkey’s biting and/or licking the wound, [REDACTED] told the witness to notify [REDACTED]. When the witness did so, [REDACTED] simply replied that she would “take a look at her tomorrow.” The witness then observed that Baby Girl remained in a similar condition. (See Inc. 68, at Ex. 1.)
- On March 5, the witness found that PPI’s list of animals reported for abnormal behaviors indicated that Baby Girl was to be put in a paneled-off section of an enclosure in order for her “arm injury ... to heal.” Only on March 8 did the witness find that Baby Girl had been put in a paneled-off section of enclosure [REDACTED] and separated from the animals who had apparently injured her. On March 18, [REDACTED] told the witness that Baby Girl—and the other monkeys from enclosure [REDACTED]—had been moved to enclosure [REDACTED]. [REDACTED] stated that the monkey’s wounded arm had healed and implied that staff had concluded that other monkeys—and not Baby Girl—were causing her injuries. Despite this, [REDACTED] said Baby Girl had been re-housed with the other monkeys and was no longer housed separately. [REDACTED] laughed and admitted that this did not “make any sense.” When the witness asked [REDACTED] if PPI staff would wait for Baby Girl to be injured again before they removed her from the group, [REDACTED] replied, “I guess so.” [REDACTED] added that she had observed Baby Girl to be un-injured earlier that day,

but after leaving the enclosure and returning moments later, found that Baby Girl's eyebrow was wounded. On March 19, the witness saw that Baby Girl's left eyebrow was lacerated. On April 28 and May 17, the witness found that Baby Girl's right arm was again bloodied. [REDACTED] confirmed that she was aware that the monkey had again been wounded.

**Monkey 1106013:** *This monkey, whom the witness named Skeet, has been housed in enclosure [REDACTED] since January, despite at least 13 written and seven verbal reports to PPI staff, including veterinarian [REDACTED] manager [REDACTED] and supervisor [REDACTED] that the monkey's rectum prolapsed at least 13 times and that at least one other monkey in the enclosure was chasing, holding down and trying to mount Skeet. The witness also found that PPI's list of animals reported for abnormal behaviors bore no indication of the witness's report of Skeet's condition and the cohort's behavior 15 weeks after that report was submitted.*

- On January 18 and January 22, the witness saw and reported in writing to PPI staff that Skeet was afflicted with a rectal prolapse.
- On February 2, the witness saw that at least one monkey, who appeared to be tattooed "1110029," chased and repeatedly tried to mount Skeet, after which the latter's rectal tissue prolapsed twice. That day, the witness reported this animal's prolapsed rectum in writing to PPI staff and then verbally informed [REDACTED] of Skeet's condition and the other animal's behavior. When the witness suggested that the dominant monkey might be anally penetrating Skeet—a behavior [REDACTED] had told the witness monkeys engage in—[REDACTED] laughed and said, "No. That's not it." On February 5, the witness saw that Skeet's rectum had again prolapsed. The witness reported in writing to PPI staff on both her daily observation report and an abnormal behavior referral form that Skeet had been repeatedly afflicted with rectal prolapses and added on the latter that another monkey was trying to mount Skeet. The same day, the witness verbally reported Skeet's condition to supervisor [REDACTED]. Later that day [REDACTED] told the witness that he wanted to bring Skeet to PPI's ICU, but did not have "room" for the animal there. On February 9, the witness saw and reported in writing to PPI staff that Skeet was again afflicted with a rectal prolapse. That day, the witness repeatedly saw another monkey chasing, grabbing and mounting Skeet and heard Skeet screaming. The witness then verbally notified [REDACTED] and supervisor [REDACTED] about these observations. Heath then told the witness that she had observed the animals in this enclosure for 15 minutes on February 6 and had not observed any fighting. On February 16, 18, 23, 25 and 26, the witness saw and reported in writing to PPI staff that Skeet was again afflicted with a rectal prolapse, and repeatedly saw that the monkey whom she had seen chasing, holding down and mounting Skeet remained housed with him. The witness then verbally told veterinarian [REDACTED], supervisor [REDACTED] and [REDACTED] on February 26 that Skeet continued to be afflicted with a rectal prolapse.
- On March 12 and 17, the witness saw and reported in writing to PPI staff that Skeet was again afflicted with a rectal prolapse and found that he remained housed with the monkey whom she had seen chasing, holding down and mounting him. On May 10—for the sixth time since February 14—the witness again found that PPI's list of animals reported for abnormal behaviors bore no indication of the witness's February 5 report of Skeet's condition and his being chased, held down and mounted by another monkey in the enclosure. On April 26, the witness saw that monkey 1110029—whom the witness had seen chasing and holding down Skeet—remained housed with Skeet in enclosure [REDACTED].

**Monkey 0908082:** *This monkey, whom the witness named Sweet P and who was recently housed in room [REDACTED] of PPI's ICU, was left housed with other monkeys in enclosure [REDACTED] for nearly three weeks, despite at least three written and seven verbal reports to PPI staff, including behaviorist [REDACTED], veterinarian [REDACTED], manager [REDACTED] and supervisor [REDACTED] that the monkey was attacked and that she appeared afraid of other monkeys in the enclosure. The monkey was then housed alone for nearly three weeks, where [REDACTED] "forgot about her," as follows:*

- On September 27, 2014, the witness saw at least two monkeys chase, bite and scratch Sweet P in enclosure [REDACTED]. After intervening to stop the fighting, the witness saw Sweet P sit in the fetal position on the floor, facing a corner of the enclosure. After another monkey pulled on Sweet P's arm, Sweet P ran into an attached chute the witness opened a door to. The witness saw that Sweet P was shaking in apparent distress. The witness verbally notified [REDACTED] [REDACTED] and supervisor [REDACTED] of this incident.
- On October 2, 2014, the witness found that Sweet P remained housed with the very monkeys who attacked her. That day, the witness told [REDACTED] about this and other recent fights between monkeys in this enclosure. [REDACTED] said that she was unaware of these fights. On October 5, 2014, the witness found that Sweet P remained housed with the monkeys who attacked her and that Sweet P crouched in a barrel and routinely flinched and looked around in the enclosure when other monkeys made noises and/or moved about. (See Inc. 69—70, at Ex. 1.) On October 6, 2014, the witness verbally notified veterinarian [REDACTED] about this animal's behavior and continued housing with the animals who attacked her. [REDACTED] simply asked if [REDACTED] had been informed; the witness affirmed that she had notified [REDACTED]. On October 10, 2014, the witness saw and reported in writing to PPI staff that Sweet P remained housed with these animals and would not enter a chute with them when the enclosure was cleaned. Later this day, the witness verbally reported this behavior to [REDACTED] who said that she would e-mail [REDACTED] regarding this. Veterinarian [REDACTED] then told the witness that he believed that Sweet P was being "bullied" by other animals in the enclosure and that "maybe tomorrow," Sweet P could be housed elsewhere.
- On October 13, 2014, the witness saw and reported in writing to PPI staff that Sweet P's behavior remained the same. That day, the witness recorded this monkey sitting in a barrel and then moving from it, apparently attempting to flee the monkeys she remained housed with. (See Inc. 71—72, at Ex. 1.) Later that day [REDACTED] told the witness that [REDACTED] would decide if Sweet P should be moved to another enclosure. On October 16, 2014, the witness saw and reported in writing to PPI staff that Sweet P's behavior continued. Later that day, the witness verbally reported this animal's behavior to [REDACTED] who said that she would take "a look" at the animal. [REDACTED] later told the witness that Sweet P had diarrhea—which [REDACTED] said "can be a sign of stress"—and that the animal had been put in PPI's holding building until she recovered, at which time PPI staff would try to house the animal with other monkeys in quadrant [REDACTED].
- On October 23, 24, 25, 27 and November 2, 3 and 6, 2014, the witness found that Sweet P was housed alone in the PPI holding building, and recorded her on October 23, 24, and 25 and November 6, 2014. (See Inc. 73—76, respectively, at Ex. 1.)
- On November 3, 2014, when the witness asked [REDACTED] what her plan was for Sweet P, [REDACTED] admitted, "Honestly, I forgot about her." Only on or about November 6, 2014 was Sweet P co-housed with another monkey, whom the witness called Pumpkin. On February 23, [REDACTED] told the witness that she wondered why Sweet P was still housed in this building; [REDACTED] replied, "That's what they do. They put animals in the cages and leave them there."
- On April 16, Sweet P was moved to enclosure [REDACTED] but that day, [REDACTED] scored her body condition a "2," and told the witness that Sweet P was unhealthy. On April 20, the witness found that Sweet P appeared to be very weak, and the monkey was taken to PPI's ICU building. On April 21, Williams told the witness that Sweet P was likely dehydrated and could not fully extend her hind limbs, and that her body condition scored a "1.5." Later that day, [REDACTED] told [REDACTED] and the witness that Sweet P was likely malnourished and that her being caged for so long could have caused her legs "hypo-extension." On April 23, [REDACTED] told the witness that Sweet P likely had arthritis.

**B. PPI Staff Apparently Fails to Provide Adequate and Effective Special Attention to Monkeys Showing Signs of Being in Psychological Distress.**

The *Guide* stipulates that “species-specific plans for housing and management” of nonhuman primates “should be developed,” and further advises that “[s]uch plans should include strategies for environmental and psychological enrichment.” The *Guide* also specifies that “animals should be observed for signs of ... abnormal behavior” and that distress to animals should be minimized. However, the witness found that PPI staff sometimes remarkably delay—if not deny altogether—simply recording reports of abnormal behaviors and then observing and providing effective, special attention to monkeys exhibiting such behaviors. For example, on May 10, the witness saw that PPI’s list of animals reported for abnormal behaviors bore no acknowledgment of a report she had submitted nearly nine weeks earlier describing monkeys pacing and rolling their heads in enclosure [REDACTED]. Further, on January 11 and January 13, the witness found that monkey A3E053 was pacing in the PPI holding building, and submitted an abnormal behavior referral about the monkey on January 11. (See Inc. 77—78, at Ex. 1.) On January 15, [REDACTED] told the witness that she and [REDACTED] had seen monkey A3E053 pace, but stated that she did not think any treatments for such “locomotive” behaviors existed. [REDACTED] stated that she believed that PPI only documented such abnormal behaviors so that if monkeys exhibiting them were later sold, PPI could tell its customer(s), “Well, you knew this monkey had this issue” and the buyer wouldn’t be able to get a “refund.” On January 22, [REDACTED] told the witness that, according to [REDACTED] the extent to which PPI attempts to treat animals with “locomotive” abnormal behaviors “depends” on whether the behavior compromises the animal’s ability to eat or causes self-harm. The witness also documented other monkeys’ abnormal behaviors and the attention that PPI staff paid—or did not pay—to the animals.

**Monkey A2E023:** *This monkey, whom [REDACTED] named Ginger, paced in circles for at least 14 weeks—and reportedly engaged in other abnormal behaviors—in PPI’s holding building and most recently in enclosure [REDACTED] despite repeated written and verbal reports to PPI staff, which housed her alone and, perhaps tellingly, allowed mold to grow on one enrichment device provided to her. The witness found that PPI’s list of animals reported for abnormal behaviors bore no indication of the witness’s report of Ginger’s pacing more than 10 weeks after that report was submitted. Ginger has most recently been housed in room [REDACTED] of PPI’s ICU.*

- On November 13, 2014, [REDACTED] told the witness that she had notified Nelsen that Ginger was “walking around in circles all day long.” On November 17, 2014, [REDACTED] told the witness that this monkey—who was housed in PPI’s holding building—also “pick[ed] at” her tail. [REDACTED] indicated that she had asked [REDACTED] if she could provide the animal with additional enrichment to “keep her from picking at her tail.” According to [REDACTED] [REDACTED] responded, “That’s [REDACTED]’s] job.” [REDACTED] told the witness, “So I’m not doing anything and if there’s nothing put in the cage, I’m reporting it. Fuck them. I’m done. I was just trying to help, but I guess you’re damned if you do and damned if you don’t.” On November 21, 2014, the witness found that Ginger was housed alone and that the animal’s tail was missing hair and had dried blood on it. (See Inc. 79, at Ex. 1.) On November 22, 2014, the witness observed Ginger—through a door window—pace in a cage for approximately 2 minutes; the witness entered the room and, after approximately 1 minute of standing still there, saw Ginger resume pacing. (See Inc. 80, at Ex. 1.) The witness left the room and, on returning shortly thereafter, found that Ginger was again—or still—pacing in circles. On November 24, 2014, [REDACTED] told the witness that Ginger paced in circles “all of the time.” The witness then verbally notified [REDACTED] that she had observed Ginger walking in circles.
- On November 29 and November 30 and December 6, 14 and 21, 2014, the witness again saw and recorded Ginger pacing in circles in the holding building. (See Inc. 81—85, respectively, at Ex. 1.) On December 21, 2014, the witness saw that a plastic ball, with seeds in it, had been added to the outside of the cage housing Ginger, but that the limited space between the bars at the cage front left little room for this monkey to reach through and access it. On January 4, the witness found mold growing on the seed in this ball, which may be indicative of the attention paid to it by the monkey and/or paid by PPI staff to the animal’s behavior and response to this device.

- On January 5, the witness found that grapes had been put inside this ball, but noted that they appeared to be too large for the monkey to pull through the holes in the ball's surface. On January 11, the witness submitted an abnormal behavior referral about Ginger's pacing. On January 22, [REDACTED] told the witness that this monkey, whom [REDACTED] said was still picking at a scabbed wound, had been moved to an outdoor enclosure. [REDACTED] told the witness she had never seen the animal pace in circles, but had seen her "do a head thing" in which she threw back and turned her head.
- On February 23 [REDACTED] told the witness that Ginger, who was housed alone in a paneled-off section of an enclosure in quadrant [REDACTED], was still rolling her head. On February 26, the witness found that PPI's list of animals reported for abnormal behaviors bore no indication of Ginger's head toss behavior about which [REDACTED] had informed the witness. On March 3, the witness saw Ginger walking in circles in the paneled-off section of enclosure [REDACTED]. On March 5, the witness found that PPI's list of animals reported for abnormal behaviors bore no indication of the head toss that Heath had seen Ginger engage in, nor her pacing. On March 9, the witness submitted another abnormal behavior referral describing Ginger's circling and picking at her own tail. On March 17, March 29, April 26, and May 10, however, the witness saw that PPI's list of animals reported for abnormal behaviors bore no acknowledgment of this report or Ginger's pacing. On May 11, [REDACTED] told the witness that a monkey bit and nearly severed Ginger's tail when Ginger was introduced to other monkeys in enclosure [REDACTED]. That day, [REDACTED] told the witness that the monkey had been taken to PPI's ICU.

**Monkey 111618:** *The witness found that PPI staff failed to even observe this monkey, whose pacing and other abnormal, repetitive behaviors the witness repeatedly reported in writing and verbally to PPI staff, for approximately seven or more weeks following the first such report.* On November 14, 2014, the witness saw this monkey repeatedly walking back and forth between sides of enclosure [REDACTED] and, on reaching either, put a hand on a wall or fence surface, stand erect, roll the head backwards, and then pace in the opposite direction. The witness saw this behavior continue, with minimal interruption, for approximately five minutes. Later that day, the witness recorded this behavior as it persisted. (See Inc. 86—87, at Ex. 1.) The witness then submitted an abnormal behavior referral about this monkey's behavior and verbally notified [REDACTED] of it; [REDACTED] said, "That's bad." On November 15, 2014, the witness saw and reported in writing to PPI staff that this monkey continued to engage in these behaviors. (See Inc. 88, at Ex. 1.) On November 16, 2014, the witness again saw this monkey engaging in these behaviors. (See Inc. 89, at Ex. 1.) On January 1, the witness found that PPI's list of monkeys reported for abnormal behaviors indicated that this monkey still "need[ed]" to be observed by PPI staff—nearly seven weeks after the witness had reported the monkey's behavior.

#### **IV. Failure to Maintain Enclosures in a Manner that Ensures the Animals' Health and Well-Being**

The *Guide* specifies that: "All [animal] enclosures should be kept in good repair to prevent escape of or injury to animals, promote physical comfort, and facilitate sanitation and servicing," "provid[ing] for the animals' health and well-being." However, the witness documented deficiencies in PPI's housing of nonhuman primates.

##### **A. PPI Staff Apparently Use Potentially Harmful Concentrations of Disinfectants When Sanitizing Enclosures and Fixtures Therein.**

The *Guide* advises that sanitation of animal enclosures "by hand with hot water and detergents or disinfectants ... requires considerable attention to detail," noting that "surfaces [should be] rinsed free of residual chemicals and that personnel have appropriate equipment to protect themselves from exposure to hot water or chemical agents used in the process." The *Guide* further recommends "regular evaluation of sanitation effectiveness." However, on January 8, the witness observed that PPI's SOP for cleaning and disinfecting outdoor enclosures instructed workers to "Dilute bleach by using 1 part bleach to 9 parts water." Despite this, PPI workers—even with the approval of manager [REDACTED] and supervisor [REDACTED]

—regularly used far stronger concentrations and even un-diluted, industrial bleach when sanitizing monkey enclosures, even while monkeys were inside the enclosures, and discussed hiding such use from PPI leadership and at least one accrediting agency, as follows:

- On September 29, 2014, supervisor told the witness to use “half [bleach] and half [water] or more than half” bleach, and even a 1:10 water to bleach ratio solution, when sanitizing enclosures, because “everyone” did so. Supervisor told the witness that if she was asked about what ratio of water to bleach she used, the witness should answer a 10:1 ratio, because PPI workers give that information to the Association for Assessment and Accreditation of Laboratory Animal Care, International (AAALAC).
- On October 11, 2014, told the witness that she used “just bleach”—without diluting it with water—to sanitize enclosures, and advised the witness to do the same, because nothing less would eliminate the black mold found in various PPI enclosures. told the witness to use non-diluted bleach, in particular, on the weekends because no PPI management is present then. said that she had used concentrated bleach to sanitize enclosures at PPI all 9 years she had worked there and that when she had informed supervisor that the witness was “following the SOP” and using heavily-diluted bleach to sanitize enclosures, replied, “Fuck SOP.”
- On October 27, 2014, the witness saw spraying a solution—which she said shortly after was “pure bleach”—onto the walls, perches and barrels inside enclosure where the monkeys remained housed. When the witness expressed concern that bleach would burn monkeys exposed to it, admitted that she had long been using undiluted bleach to sanitize enclosures. Shortly thereafter, the witness saw monkeys sitting on the perches and barrels in the enclosure and licking what the witness suspected was undiluted bleach off their hands and feet. On December 23, 2014, the witness detected a strong odor of bleach when she approached as the latter sprayed a solution in enclosure. told the witness that she was using concentrated bleach to sanitize the monkey enclosures in quadrant because she would “be here all day” if she “diluted the bleach.”
- On January 8, when the witness told supervisor that she followed PPI’s SOP and used a 1:9 ratio of bleach to water to sanitize enclosures, replied, “I told you not to do that” and instructed her to use a 1:1 ration of bleach and water. The witness replied that she did not want to use a 1:1 ratio because of concerns for the fumes’ effects on the monkeys’ and her own health. When David Perez relayed the witness’s concerns to advised that one could use a 1:1 bleach to water ratio, but not “constantly.” When the witness reiterated her concerns about such a strong solution’s effects on the animals’ and her own health, said that one could develop lung lesions if one were to spray bleach in a barrel and “stick [your] head inside,” but that a person working outside should not be affected. The witness asked and what would occur if PPI facilities director found her using a 1:1 bleach to water solution; told the witness to tell that she was using bleach to water solution and that would not be able to tell the difference. When the witness asked what would occur if PPI president found her using a minimally-diluted bleach solution, replied, “You won’t get in trouble will not know what you are using.”

*Despite giving the above instructions, PPI’s supervisor and manager—and even a member of its Institutional Animal Care and Use Committee (IACUC), who was aware of such use—knew of its potential to harm monkeys and staff. For example, on September 29, 2014, supervisor told the witness that the virtually un-diluted bleach he was telling the witness that very day to use would burn monkeys and stated, “you can tell when a monkey’s been burned by bleach.” Supervisor told the witness that he had seen monkeys’ palms and other parts of their bodies burned by such bleach solutions. On November 6, 2014, manager told the witness and other technicians at a meeting to cease using more than “the correct ratio” of bleach to water because “50/50 bleach [and water]*

will damage the floors and the monkeys are low to the ground and inhale the fumes and it can cause lung lesions.” On March 12, [REDACTED] told the witness that a 1:9 bleach to water solution was sufficient for cleaning purposes and that the use of more concentrated bleach would only harm animals, staff or enclosure floors. [REDACTED] then admitted that she had seen PPI staff sanitize enclosures—with undiluted bleach emanating strong odors—while monkeys were inside enclosures and even walking and dragging their tails through the solution. On April 14, the witness re-iterated to [REDACTED] that workers were using concentrated bleach to clean enclosures. On April 16—apparently following an IACUC meeting—[REDACTED] told workers that straight bleach is “very toxic” and can “burn ... the monkeys.”

## **B. PPI Staff Fails to Keep Primary Enclosures and Premises Clean.**

The *Guide* specifies: “*Cleaning* removes excessive amounts of excrement, dirt, and debris, and *disinfection* reduces or eliminates unacceptable concentrations of microorganisms. The goal of any sanitation program is to maintain sufficiently clean and dry bedding, adequate air quality, and clean cage surfaces and accessories. The frequency and intensity of cleaning and disinfection should depend on what is necessary to provide a healthy environment for an animal.” However, the witness found that manager [REDACTED] was aware of—but actively attempted to prevent internal and external reporting that—PPI enclosures not being cleaned and sanitized as frequently as prescribed by federal regulations and guidelines. For example, on December 18, 2014, [REDACTED] stated that she had called “USDA and AAALAC” to report that PPI had a “deviation” in the cleaning of its facility. On December 23, 2014, [REDACTED] affirmed that she was expected to inform the authorities each time an enclosure was not flushed of feces and unused food daily, and each time an enclosure was not sanitized weekly. Given that, by that date, the witness had regularly seen such failures, she asked whether [REDACTED] called the authorities every week. [REDACTED] replied, “No. ... You don’t want to call too often because it can send up red flags and look like you can’t keep up. ... I usually do a quarterly thing.” Similarly, on January 2, [REDACTED] told the witness to discontinue writing on sanitization logs that, in light of other duties and tasks, she sometimes did not have sufficient time to bleach enclosures on a weekly basis. [REDACTED] told the witness, “You can’t write that you didn’t have time on those papers,” because if an “investigator” were to see the documents, such statements would “send up red flags.” [REDACTED] told the witness to instead write that she “inadvertently” did not flush or sanitize an enclosure.

McCormack and others have been aware that PPI’s outdoor monkey housing enclosures are filthy. On January 8, she asked staff to raise their hands if they thought that the outdoor enclosures “were clean”; no one raised their hand. Again, no one raised their hand when McCormack asked which workers thought these enclosures were clean “6 to 8 months ago.” McCormack told attendees that day that she thought that USDA representatives were coming to PPI a week earlier because she was told that they were in the area. McCormack said that she would have “panic[ked]” had USDA representatives inspected PPI given these enclosures’ conditions. McCormack added that five or six monkeys had recently fallen ill at PPI and implied that the animals’ conditions were caused by unsanitary, bacteria-ridden conditions where the animals were housed. Since September 2014, the witness has often found algae, black mold, and more than one day’s worth of feces and food in monkey enclosures. For example:

- On October 3, 2014, the witness found extensive feces and old food accumulated on the floor of enclosure [REDACTED]. (See Inc. 90—91, at Ex. 1.) The witness found what appeared to be white mold on the excreta and food. The same day, the witness found a puddle of green water, with apparent mold in and around it, on the floor of enclosure [REDACTED]. On October 7, 2014, the witness found what appeared to be black mold on the walls and floor of enclosure [REDACTED] (See Inc. 92—94, at Ex. 1.)
- On November 7, 2014, the witness found approximately two days’ worth of accumulated feces in enclosures in quadrant [REDACTED] (See Inc. 95, at Ex. 1.) The witness found that the feces were so dried to the floor that it could not be removed by mere high-pressure water, but had to be kicked off the floor. The witness also found approximately two days’ worth of accumulated feces in enclosures in quadrant [REDACTED]. On November 9, 2014, the witness found that [REDACTED] had been assigned to clean these

quadrants on November 6, 2014. (See Photograph 2014-11-09\_01, at Ex. 2.) On November 29, 2014, the witness found that room [REDACTED] in PPI's holding building appeared to have not been cleaned the preceding day, given the accumulation of food and feces in the trays beneath monkey enclosures there and a collection of water—apparently mixed with waste—that had stained the floor there brown. (See Inc. 96, at Ex. 1.) The same day, the witness found similarly filthy conditions in another holding building room. (See Inc. 97, at Ex. 1.) Also on November 29, 2014, the witness found at least one day's worth of food and feces littering the floors of the four enclosures in quadrant [REDACTED] (See Inc. 98, at Ex. 1.) The witness noted that [REDACTED] was scheduled to have cleaned all these enclosures on November 28, 2014. On November 30, 2014, the witness found at least two days' worth of feces on the floors of the enclosures in quadrant [REDACTED] (See Inc. 99, at Ex. 1.) Also on November 30, 2014, the witness found at least two days' worth of feces on the floors of the enclosures in quadrant [REDACTED]. The witness noted that supervisor [REDACTED] and PPI maintenance worker [REDACTED]<sup>3</sup> had also been assigned to clean all these enclosures on November 28 and November 29, 2014, respectively. The witness then found that no PPI staff had initialed or otherwise marked a feeding and cleaning record for quadrant [REDACTED] since November 26, 2014, to indicate that these tasks had been completed. (See Photograph 2014-11-30\_04, at Ex. 2.)

- On December 26, 2014, supervisor [REDACTED] told the witness that PPI staff did not flush all enclosures of feces and food on December 25, 2014 and admitted that he “didn't flush some runs. You'll be able to tell,” as she worked that day. Also on December 26, 2014, the witness found at least two days' worth of feces and food on the floors of the enclosures in quadrant [REDACTED] which [REDACTED] had been scheduled to clean on December 24, 2014. (See Inc. 100, at Ex. 1.)
- On January 2, the witness found what appeared to black mold on many surfaces on the exterior surfaces of enclosure walls, in chutes used to confine monkeys during cleaning, and on the pipes supplying water to water dispensers for monkeys in quadrant [REDACTED] (See Inc. 101—104, at Ex. 1.) On January 14, the witness found that McCormack had posted a list of her findings on a recent walk through of PPI and noted that McCormack reported finding that enclosure [REDACTED] A was “extra dirty with dried feces” and that there was black mold in enclosure [REDACTED] (See Photographs 2015-01-14\_03 to ... 04, at Ex. 2.) On January 18, the witness found that [REDACTED] had posted a memo instructing workers to clean cages [REDACTED] and [REDACTED] in room [REDACTED] of PPI's holding building, which she referred to as “awful” and smelling “sour.” (See Photograph 2015-01-18\_1, at Ex. 2.)
- On February 10, the witness found black mold in enclosure [REDACTED] (See Photograph 2015-02-10\_05, at Ex. 2.) On February 12, the witness found an accumulation of food and feces in enclosure [REDACTED] that appeared to have collected over 24 or more hours since the enclosures had been flushed. (See Inc. 105, at Ex. 1 and Photographs 2015-02-12\_1 to ... 3, at Ex. 2.) On April 19, the witness found accumulated feces and food in quadrants [REDACTED] and [REDACTED]—where PPI husbandry technician [REDACTED] had been scheduled to work on April 17 and 18—and documented the conditions before cleaning the enclosures. (See Inc. 106, at Ex. 1 and Photographs 2015-04-19\_02 to ... 09, at Ex. 2.) On April 23, the witness found black mold in all four enclosures of quadrant [REDACTED] including on the walls, floors and enrichment items. (See Photographs 2015-04-23\_01 to ... 09, at Ex. 2.) The same day, [REDACTED] told PPI staff that the facility has had a “big problem with the black mold” in recent years. On May 3, the witness found accumulations of waste in up to 20 enclosures in quadrants [REDACTED]—[REDACTED] and [REDACTED] where [REDACTED] and [REDACTED] had been scheduled to work on May 2) suggesting that they had not been flushed in at least one day; the witness documented the conditions in enclosure [REDACTED] and cleaned all the enclosures. (See Photographs 2015-05-03\_32 and ... 33, at Ex. 2.)

### **C. PPI Staff Fails to Remove Monkeys From Primary Enclosures When Flushing Them with Water and Apparently Fails to Ensure the Animals Are Not Wetted in the Process.**

<sup>3</sup>This man's surname is not known.

The *Guide* stipulates: “For pens or runs, frequent flushing with water and periodic use of detergents or disinfectants are usually appropriate to maintain sufficiently clean surfaces. If animal waste is to be removed by flushing, this will need to be done at least once a day. During flushing, animals should be kept dry.” Indeed, on April 30, the witness found that PPI’s SOP for cleaning cages in its holding building read, “Care should be taken not to wet animals.” Despite this, on January 13, [REDACTED] admitted to the witness that he wet monkeys—whom he did not remove from cages in PPI’s holding building rooms while flushing them of waste and old food—with water. [REDACTED] added that he removed waste trays from the under the cages, however, because if left in place they caused water to splash back onto him. On January 6, the witness entered holding building room [REDACTED] and found [REDACTED] spraying water into cages while monkeys were housed inside, including directing a strong stream of water in one such occupied cage. (See Inc. 107, at Ex. 1.) The same day, the witness found that Sweet P, who was housed in this room at the time, was wet. On March 22, the witness again found that Sweet P was soaking wet just after the room had been flushed and/or bleached. (See Inc. 108, at Ex. 1.) Further, in working at PPI, the witness found that even when monkeys housed outdoors at the facility were moved to metal-barred chutes attached to outdoor enclosures when the enclosures were cleaned, it was virtually impossible for monkeys to not be wetted during this time because water splashed over the short walls separating the enclosures from the chutes and monkeys.

#### **D. PPI and Its Staff Failed to Provide Monkeys Housed Outdoors with Heat to Prevent The Ambient Temperature from Falling Below 45 °F.**

The *Guide* specifies that: “Animals should be housed within temperature and humidity ranges appropriate for the species, to which they can adapt with minimal stress and physiologic alteration” and further recommends a dry-bulb temperature between 64 and 84°F. However, the witness, who worked five days a week at PPI, documented that despite ambient local temperatures routinely dropping below 45°F between December 13, 2014 and February 16, she never saw monkeys housed outdoors there provided with any heat. Only on February 19—ahead of an overnight low of 33°F—did PPI personnel indicate that eight heaters would be provided to animals in up to seven of the approximately 104 outdoor enclosures at its facility. (See Photograph 2015-02-19\_4, at Ex. 2.) When the witness returned to work on February 22, however, no heaters were in any enclosures.

On January 21, the witness found that PPI’s SOP pertaining to cold temperatures did not mandate that monkeys housed outdoors at the facility be provided with heat to maintain ambient temperatures at or above 45°F. Instead, the witness saw that PPI’s SOP indicated that when temperatures had or were predicted to fall below 46°F, heat lamps and propane heaters “may ... be used as appropriate.” Though the SOP indicated that in such cold temperatures, a “tarpaulin should be spread & fixed ... on at least 2 sides of the Centiquad facing north and west,” the witness noted that very day—by which time temperatures had repeatedly dropped well below 46°F—that only one of PPI’s 26 monkey housing outdoor quadrants had a tarp spread on two sides of the quadrant, and that some quadrants had no tarps spread on their sides. On February 5, as overnight lows continued to drop below 46°F, the witness found that *no* quadrant had tarps on more than two of its sides and that only two of the 26 quadrants had tarps on two of their sides. The witness further saw on February 5 that 15 other quadrants each had a tarp on only *one* side, and that nine quadrants—constituting more than one third of PPI’s outdoor housing—had *no* tarps outside them.

PPI management was well-aware that monkeys housed outdoors were not provided with heat. On December 15, 2014, manager [REDACTED] told the witness that the monkeys “don’t need heaters.” On February 10, supervisor [REDACTED] told the witness that no more tarps would be put up around any outdoor enclosures and that since some were put up, PPI did not “need” to provide heaters for animals housed outdoors. On February 12, the witness mentioned to [REDACTED] that the overnight low on February 13—14 was forecast to be in the 30s. [REDACTED] told the witness that she would not put out

heaters for the monkeys housed outdoors and said that the monkeys “should be fine.” However, PPI’s failure to maintain ambient temperatures above 45°F apparently injured and may have killed monkeys, as follows:

- On December 5, 2014, [REDACTED] pointed out a monkey in holding building room [REDACTED] and told the witness that he had recently amputated part of the animal’s tail because it was frost bitten. [REDACTED] told the witness that “cynos” can suffer frostbite as temperatures drop to approximately 40°F. [REDACTED] told the witness that he amputated parts of approximately four monkeys’ frost-bitten tails at PPI over the winter of 2013-2014. On December 6, 2014, the witness recorded the partially amputated tail of this monkey, whom a PPI document identified as monkey 3908501720. (See Inc. 109, at Ex. 1.) The same day, the witness noted that a PPI document describing this animal’s veterinary treatment confirmed his or her “Necrotic, frost bitten tail.” (See Photograph 2014-12-06\_4, at Ex. 2.)
- On December 13, 2014, the witness saw that [REDACTED] had reported having found a “Dead Animal” in enclosure [REDACTED] (See Photograph 2014-12-13\_9, at Ex. 2.) [REDACTED] then told the witness that she had found a dead monkey and said, “I think it was the cold. Cynos go down easy in the cold.” [REDACTED] told the witness that monkeys “[s]ometimes” die from the cold at PPI and that approximately two monkeys had died of hypothermia in the preceding year.
- On March 12, as [REDACTED] looked at the red and raw-appearing tail tips of several monkeys in quadrant [REDACTED] Nelsen told the witness that it had been “cold enough” in recent weeks to cause frostbite to the animals’ tails and suggested that might have caused the animals’ observed conditions.

The witness found monkeys huddled in most of the outdoor enclosures she observed, almost daily, between December 10, 2014 and February 16. For example, on December 13, 2014, when the low temperature in the area was 39°F—for the third day in a row—the witness recorded this behavior in enclosures [REDACTED] [REDACTED] and [REDACTED]. (See Inc. 110—112, respectively, at Ex. 1.) On January 25—when temperatures in the area dipped to 37°F—the witness recorded monkeys huddling in enclosure [REDACTED] (See Inc. 113, at Ex. 1.) On January 27—when temperatures in the area dipped to 44°F—the witness photographed monkeys huddling in enclosure [REDACTED] (See Photograph 2015-01-27\_1, at Ex. 2.) On February 14—when weather records indicated that temperatures in the area dipped to 33.8°F—the witness documented monkeys huddling in enclosures [REDACTED] and [REDACTED] (See Inc. 114, at Ex. 1 and Photographs 2015-02-14\_20 to ... 21, at Ex. 2.) Later that morning, [REDACTED] showed PPI staff a temperature gauge he said that agency representatives used; [REDACTED] pointed the mechanism’s label at grass outside PPI’s trailer and stated that the temperature was 34°F.

#### **E. PPI’s Outdoor Housing Facility’s Perimeter Fence Did Not Keep An Unwanted Species Out.**

The *Guide* stipulates: “Programs designed to prevent, control, or eliminate the presence of or infestation by pests are essential in an animal environment ... For animals in outdoor facilities, consideration should be given to eliminating or minimizing the potential risk associated with pests and predators.” However, on October 7, 2014, the witness saw a black bear on PPI property, near quadrant [REDACTED] and ran to alert PPI staff. The witness and [REDACTED] returned to the area and saw the bear run and climb over PPI’s perimeter fence, which was approximately 6 feet tall and had barbed wire atop it. Later that morning, [REDACTED] told the witness that supervisor [REDACTED] had found a dead monkey in enclosure [REDACTED] [REDACTED] told the witness that the animal likely bled to death from “severe” bite wounds inflicted by this bear. Later on October 7, 2014, [REDACTED] told the witness that [REDACTED] had found a second dead monkey in enclosure [REDACTED]. On entering quadrant [REDACTED], the witness found the remains of a monkey on the floor. (See Inc. 115, at Ex. 1.) The witness saw that the monkey’s right arm, below the bicep, appeared to have been torn off, and that there was a large laceration on one of the monkey’s limbs. The witness saw blood inside enclosure [REDACTED] and bear feces both inside the enclosure and on its overhead fencing. Nazareno told the witness that the bear had killed this monkey, whose ID ended in “1315,” as well.

**Notable Subjects and Objects at Primate Products, Inc. (“PPI”)**  
34200 Doctors Hammock Rd., Immokalee, FL 34142

PETA offers this list of notable subjects and objects, *by last-known location* at PPI’s Immokalee site, to facilitate APHIS personnel’s inspection of the same. As APHIS knows, PPI maintained a second site in Miami, Fla. PETA understands that PPI sold it in late March or early April. Please consult this list in tandem with the provided maps of the Immokalee site.

**Preliminary considerations:** All personnel sent to inspect PPI should be prepared to display an original document showing that they have recently tested negative for tuberculosis, as well as to provide a copy of that document for PPI. PETA suspects that PPI will otherwise refuse or delay access to its facility.

APHIS personnel sent to inspect PPI will arrive at the facility’s automated main gate, which requires that PPI employees enter a code to open it—and that visitors press “0” and/or a silver button surrounded by a blue light to contact PPI personnel in the facility’s main office and request access. PETA suspects that PPI office personnel will alert PPI president [REDACTED] and/or operations manager [REDACTED] who may be elsewhere on the grounds or even off-site, before this gate is opened to APHIS personnel. The driving distance from this gate to PPI’s main office is several thousand feet along a dirt road. The driving distance from that main office to the vast majority of PPI’s monkey enclosures, and the trailer in which documents APHIS personnel may wish to inspect are kept, is another 1,000 or more feet down a dirt road. PETA expects that PPI management may require APHIS personnel to put on PPI-provided shoe covers prior to entering monkey enclosures. APHIS personnel should know that PPI does not require that its employees shower-in/out or don any specialized personal protective equipment (PPE)—beyond scrubs, boots, rubber gloves, eye protection and a face mask—prior to entering its monkey enclosures.

Obviously, in just the minutes the above events and travel will occupy, PPI employees could remove, discard and/or hide evidence. PETA suspects that PPI management will attempt to stall APHIS personnel’s inspection, as appears to have occurred on March 3, 2015 at PPI’s Miami facility (see attached letter). Given PPI management’s instructions to employees to deeply clean the facility in preparation for outside parties’ visits, PETA suspects that PPI staff may attempt to alter the appearance of the facility if given *any* time/opportunity to do so, so APHIS’ ability to secure the premises upon arrival will be absolutely critical. PETA hopes that APHIS personnel, immediately upon their arrival at PPI’s main gate, will order that all PPI personnel cease all activity, report to PPI’s main office, and remain there under APHIS supervision until the inspection is complete. (Inspectors should know that entrances to all of PPI’s outdoor quadrants and the enclosures therein are kept padlocked and will require some PPI personnel to gain access to.)

**General considerations:** Throughout the 26 outdoor housing structures known as “centiquads” or quadrants, APHIS personnel may note many monkeys’ hair loss and loose and watery stool, as well as black mold on enclosures’ walls, near water dispensing devices, in feeders and on items such as Kongs on enclosures’ floors. Floors may also be cracked—such as in enclosure [REDACTED] where the witness saw the floor break apart on March 12, submitted a work request for that day,

but found as of May 21 had not been repaired—and/or rough with crevasses which are difficult, if not impossible, to remove waste from and sanitize. APHIS personnel may also find that locks on enclosure doors are rusted and/or difficult to open, and that PPI uses “clips,” which are believed to injure monkeys’ mouths when the animals put their mouths on/around them, to secure gates, swings, and various other devices inside some enclosures.

APHIS personnel may also wish to speak with PPI veterinarian [REDACTED] about her being the sole veterinarian to care for the facility’s approximately 1,000 monkeys since approximately May 6, following [REDACTED]’s separation from the company on or about May 5. Though [REDACTED] indicated on May 6 that she believed that [REDACTED] would begin helping to provide care to monkeys at the facility, the witness did not see [REDACTED] caring for any sick or injured animals reported to veterinary staff at PPI thereafter (through May 21).

*Some of the locations which APHIS personnel may wish to prioritize inspecting follow.*

**Trailer:** Here, APHIS personnel will find a binder of PPI workers’ recent observation reports on the conditions of monkeys at the facility. These reports will likely point APHIS personnel to sick and injured animals actively suffering at the facility. APHIS personnel will also find a computer near the workers’ break area, by which PPI staff can access and inspect the company’s veterinary records, on the “enos” program. [REDACTED] has a computer in her office, as well, which is believed to be able to access these records.)

APHIS personnel will also find a folder of recently-completed abnormal behavior referrals submitted by PPI staff, as well as a printed document displaying a table of those animals behaviorist [REDACTED] and her assistant, [REDACTED] are supposed to observe and attend to following workers’ reports. APHIS personnel may find that this table omits some or many animals whose abnormal behaviors (including apparent incompatibility with cohorts) have recently been reported—suggesting that these animals are being denied behavioral observation, attention and/or housing with compatible monkeys. APHIS personnel will also find PPI’s cleaning logs in this trailer, which may reflect days on which outdoor enclosures were not flushed of waste, and PPI’s standard operating procedure pertaining to cold temperatures, which does not mandate that monkeys housed outdoors at the facility be provided with heat to maintain ambient temperatures at or above 45°F.

**Quadran [REDACTED]:** In enclosure [REDACTED], APHIS personnel should find monkey 1005158—whom the witness named Loretta and whose hair loss, behaviors and being attacked by cohorts as recently as on May 11 have been the subject of nearly 30 written and verbal reports by the witness to PPI staff, including behaviorist [REDACTED], veterinarian [REDACTED] and manager [REDACTED], as recently as on May 17; monkey 1004072—whom the witness named Mickey, who has recently been afflicted with a fibrotic mass on the right side of her lower jaw, and who was denied adequate veterinary care for approximately nine days for various fight-related injuries—including a fractured digit in which bone was exposed—in September and October 2014; a monkey whose tattooed identification (ID) number ends in “7674,” whose swollen right ear the witness first reported to PPI personnel on April 27 and who remains in that condition; and monkey 09091932—whom the witness named Pumpkin and whose facial lacerations and partially-closed right eye the witness most recently reported in writing to PPI staff on May 11.

In enclosure [REDACTED] APHIS personnel should find monkey 0902122 and monkeys whose ID numbers end, respectively, in “2012,” “125,” and “5110,” whom the witness has repeatedly reported for having sunken-looking eyes, watery stool, and/or dry, flaky skin. APHIS personnel should also find in this enclosure a monkey whose face is redder than that of all the others in the enclosure. The witness first reported this monkey as having been wounded on April 13, and PPI behavioral staff found this monkey’s left side and thigh to be lacerated on May 5. The witness also saw and reported that this monkey was chased and/or attacked on May 17 and 18. APHIS personnel may also find that cement in an area approximately 1.5 feet in diameter is missing from this enclosure’s floor, which the witness saw break apart on May 11 and submitted a work request for the same day.

In the paneled-off section of enclosure [REDACTED] APHIS personnel should find monkey 11100701, whom the witness reported in writing to PPI staff and verbally to [REDACTED] and [REDACTED] on April 2 had been attacked by cohorts; who was left with those monkeys until April 11, when he was found to have an aural hematoma; who is again housed with these same animals; about whom PPI’s list of animals reported for suspected incompatibility indicated, as of May 10, that “Before ob could be done, animal was relocated”; and whom the witness saw a monkey whose ID number ends in “00131” try to grab on May 11, and about which the witness submitted an abnormal behavior referral that day.

APHIS personnel may also find loose stool throughout this quadrant, which [REDACTED] told the witness on May 6 she would “focus” on attending to in one enclosure at a time because it was “just” her providing veterinary care to PPI’s approximately 1,000 monkeys following [REDACTED]’s separation from working there on or about May 5. While [REDACTED] told the witness on May 13 that she wanted bottles of Gatorade, Metamucil and pro-biotic provided to monkeys in all of this quadrant’s enclosures [REDACTED] said a day later that she and [REDACTED] had decided that such a solution would only be applied to one enclosure of monkeys at a time—and in buckets—because “it [presumably referring to her previous suggestion] will be a lot of upkeep.”

“ICU”: Here, in room [REDACTED] APHIS personnel should find monkey 0908082, whom the witness named Sweet P and who was left housed with other monkeys in enclosure [REDACTED] for nearly three weeks, despite at least 10 written and oral reports to PPI staff, including behaviorist [REDACTED] manager [REDACTED] and supervisor [REDACTED] that the monkey was attacked and that she appeared afraid of other monkeys in the enclosure. The monkey was then housed alone for nearly three weeks, where [REDACTED] admittedly “forgot about her.” Sweet P was taken to the ICU on April 20 for apparent dehydration, malnourishment, a body condition score of 1.5, the inability to fully extend her hind limbs, and suspected arthritis.

APHIS personnel should also find in ICU room [REDACTED] monkey A2E023, whom PPI worker [REDACTED] named Ginger, and who paced in circles for at least 14 weeks in PPI’s holding building and then most recently in enclosure [REDACTED] despite repeated written and verbal reports to PPI staff, which housed her alone. As of May 21, PPI staff failed to include the witness’s March 9 report of this behavior in its list of animals reported for abnormal behaviors. On May 11, [REDACTED] told the witness that a monkey bit and nearly severed Ginger’s tail when Ginger was introduced to other monkeys in enclosure [REDACTED] That day, [REDACTED] told

the witness that the monkey had been taken to PPI's ICU; there, on May 14, the witness saw that Ginger's tail was amputated and that Ginger was pacing in a cage in room [REDACTED]. If APHIS personnel do not find this monkey in the ICU, they will likely find her housed in enclosure [REDACTED].

In the ICU, APHIS personnel should find a monkey whose ID number ends in "8029," whose thin body condition, watery stool, lethargy, and/or sunken-appearing and dull eyes the witness has reported in writing five times to PPI since May 7, and verbally alerted [REDACTED] supervisor [REDACTED], [REDACTED] and [REDACTED] o. On May 14, [REDACTED] told the witness that this monkey was "doing bad," had a body condition score of between 1 and 1.5 and may need to be euthanized. If APHIS personnel do not find this monkey in the ICU, they will likely find him housed in enclosure [REDACTED].

**Area between quadrants [REDACTED] and [REDACTED]** Here, APHIS personnel will find two mailboxes, where PPI personnel submit their written reports of their observations of animals' conditions in the quadrants they are assigned to work in on a given day. APHIS personnel may find that reports from a prior day, bearing no indication of veterinary review, remain there (as did at least three reports, dated May 20, at approximately 3 p.m. the following day), or may find few or no reports, indicating that PPI staff has yet to report observing the animals' conditions on the day of inspection.

**Quadrant [REDACTED]:** In enclosure [REDACTED] APHIS personnel should find monkey 1109012, whose hair loss, thin body condition, sunken-looking eyes, distended abdomen, loose stool and lacerations the witness has reported in writing to PPI staff, including veterinarians [REDACTED] and [REDACTED] manager [REDACTED] and supervisor [REDACTED] at least 17 times since March 15. In enclosure [REDACTED] APHIS personnel should find monkey 1107056, whose left stifle supervisor [REDACTED] stated was dislocated on March 26 as a result of his and other PPI staff's catching of animals in that enclosure. In the paneled-off section of enclosure [REDACTED] APHIS staff should find monkey 1108012, whose watery stool and what [REDACTED] called "really bad diarrhea" the witness has repeatedly reported in writing to PPI staff in recent weeks.

In enclosure [REDACTED] APHIS personnel should find a monkey whom the witness found convulsing on the enclosure floor on May 12; who was taken to and returned from the ICU that day (for unknown care); who again appeared to have a mild seizure on May 14, which the witness reported in writing and verbally notified [REDACTED] of; and whom [REDACTED] said would need to be euthanized if in fact having seizures.

Here, APHIS personnel should also find two monkeys whose pacing and head-rolling the witness reported in writing to PPI staff on May 6.

**Quadrant [REDACTED]** In enclosure [REDACTED] APHIS personnel should find monkey M299, whom PPI staff call "Baby Girl" and "Hank's daughter," and who has been largely left housed since at least October 2014 with the monkeys in that enclosure despite written and verbal reports to PPI staff, including behaviorist [REDACTED], [REDACTED] veterinarian [REDACTED] and supervisor [REDACTED] by the witness and PPI worker [REDACTED] that the monkey was repeatedly attacked and wounded by cohorts, most recently around April 28 on the right arm, which remained injured on May 17.

**Holding building:** Here, APHIS personnel may find that animals held in cages are soaking wet, given that PPI workers [REDACTED] and [REDACTED]—if not other PPI workers—did not remove monkeys from the cages when spraying them with water. APHIS personnel may also find that the building’s hallways in general are cluttered, and may find cobwebs and evidence in and around the building of cockroach and rat infestations. In rooms [REDACTED] and [REDACTED], APHIS personnel should find singly-housed African green monkeys, who arrived on April 23 and for whom [REDACTED] said PPI would receive “no medical records.” (APHIS personnel should know that PPI staff will likely require APHIS personnel to change clothing and PPE after entering these rooms.)

In holding building room [REDACTED] APHIS personnel may find monkey PP13A08A, whose remarkably small size (compared to cohorts) and lethargy the witness began reporting in writing to PPI staff on April 12; whom [REDACTED] reported in writing to PPI staff on May 14 was “tin[]y”; and whom [REDACTED] affirmed was thin on May 18 and had moved to this building. If APHIS personnel do not find this monkey in the holding building, they will likely find him housed in enclosure [REDACTED]

Also in the holding building, APHIS personnel may find a carrier which on May 14 the witness labeled “DO NOT USE” and “X”; PPI workers [REDACTED] and [REDACTED] had apparently put this carrier in the building on May 4 after a monkey escaped from it, which they blamed on a faulty lock. The very same carrier was then nearly used to transport a monkey on May 14 before the witness intervened.

**Quadrant [REDACTED]:** In enclosure [REDACTED]—where juvenile and adult monkeys were recently co-housed, leading to fighting, according to Heath—APHIS personnel may find a monkey with a bloodied elbow and another, seen and described by [REDACTED] with a swollen eye and swollen cheek pouch.

**Quadrant [REDACTED]** In enclosure [REDACTED] APHIS personnel should find monkey 110601, whom the witness named Skeet and who has been housed there since January, despite at least 20 written and/or oral reports to PPI staff, including veterinarian [REDACTED] manager [REDACTED] and supervisor [REDACTED] that the monkey’s rectum prolapsed at least 13 times and/or that at least one other monkey in the enclosure—who appeared to be tattooed “1110029” and who may also remain in the enclosure—was chasing, holding down and trying to mount Skeet. As of May 21, the witness’s February 5 submission of an abnormal behavior referral describing this behavior to [REDACTED] had yet to be acknowledged.

**Quadrant [REDACTED]:** In enclosure [REDACTED] APHIS personnel may find a monkey with a raw-looking, partially amputated tail, still housed with the monkeys whom the witness reported in writing to PPI staff on April 28 and May 13 had attacked her, and which the witness verbally alerted [REDACTED] to on May 14 and on May 20.

## Expert Comments on the Witness's Findings at Primate Products, Inc. (PPI)

Veterinary and primate behavior experts reviewed video footage and photographs captured at PPI and opined as follows.

**With regard to Photographs 2015-03-25\_19 and 2015-03-31\_7 at Exhibit 2, depicting monkey 0911132's exposed caudal vertebra the day the condition was discovered and six days later, respectively:**

- [REDACTED] a world-renowned animal behaviorist, veterinary anesthesiologist and professor of behavioral pharmacology, writes, "leaving the monkey with this open lesion, with bone protruding for seven days, before operating, is totally unacceptable by any veterinary standards and would have caused the monkey unnecessary suffering and pain and could have led to infection, septicemia or worse."
- [REDACTED] whose 29 years of veterinary experience includes approximately 13 years providing care to hundreds of chimpanzees used in research, states, "Not only is this injury extremely painful, it presents a severe risk of infection and death for the monkey. This injury should have been treated immediately with amputation as it will never heal as long as there is bone exposure, as is evident from the picture 6 days later. Also, the area that the monkey is being kept is filthy and wet and would allow for bacterial proliferation and infection. The monkey should not have had to endure severe pain for six days before treatment based on the principles of veterinary care to relieve suffering."
- [REDACTED] an emeritus professor of veterinary medicine at the School of Veterinary Medicine at University of California—Davis who has provided care to macaques and other primates used in research, opines, "normal or accepted veterinary medical practice would have dictated that the monkey be sedated and the tail injury examined by a veterinarian and treated on the day it was first noticed."
- [REDACTED] who chairs the Department of Anthropology at the University of Notre Dame; has spent hundreds of hours observing various monkeys in both wild and captive settings around the world; and who is a research affiliate at the Washington National Primate Research Center, writes, "The injury depicted ... should have been provided attention sooner. The captive situation this animal is in increased the chances of infection and made this a more urgent injury. This monkey felt pain and discomfort during the time before the injury was treated."

**With regard to Incidents 7—10 at Exhibit 1, depicting a PPI worker shaking an upside down monkey:**

- [REDACTED] states, "It is totally inappropriate for the lay worker to replace the rectum in this fashion and shaking the monkey upside down to reposition the replaced rectum is not an accepted technique. This procedure would cause the monkey fear and pain and unnecessary suffering. ... This is a veterinary procedure that requires a veterinarian to be present, and/or conducting the replacement procedure."
- [REDACTED] professor emeritus of ecology at the University of Colorado, Boulder; a former Guggenheim Fellow; and the author of more than 1000 essays and 30 books, including the *Encyclopedia of Animal Behavior* and *The Emotional Lives of Animals*, opines, "Holding a monkey upside down, pushing prolapsed rectal tissue back through the anus and then shaking the animal ... causes the animal fear—as he is handled by a much larger being whom he perceives as a predator—and significant behavioral stress, as he is held in an unnatural position and shaken up and down. Such handling only exacerbates the psychological trauma that may have caused the prolapse to begin with."

- [REDACTED] writes, "Shaking a monkey upside down and shoving the tissue back without sedation or lubrication is painful and extremely stressful. This is not acceptable veterinary care for these monkeys or this condition. Where is the veterinary oversight?"
- [REDACTED] states, "The extreme fear in this monkey of being held by a person was compounded by the shaking of the individual; having a foreign body (the person's finger) inserted into the rectum would add to this. ... the shaking would have no beneficial effect on reduction and maintaining the rectal tissue in its normal position; rather, it would serve only to further traumatize the monkey. ... a veterinarian should have been present and should have examined the tissue ...."
- [REDACTED] opines, "the video depicts an absurd way to go about such a treatment and seems to reflect a very poor level of training and supervision at the site ... it seems to me that the workers handling the primates are held to neither a very robust ethical nor very robust training standard."

**With regard to Incident 20 at Exhibit 1, depicting a lay PPI worker pulling out a monkey's tooth:**

- [REDACTED] writes, "I do not ... condone the method of tooth extraction. ... After chemical restraint, a properly trained person using dental instruments should remove the teeth. This will prevent retention of any piece of the root that may cause infection of the gum and surrounding tissue."
- [REDACTED] states, "... it is not clear to me why this was being done as this is not medically necessary in general and removal by the method used by the person would be contraindicated because it might cause damage to other tissues. The decision to remove the tooth should be only on the advice of a veterinarian. Removal then should only have been done by a veterinarian, using appropriate instruments to ensure that no damage to the bone or other tissues occurred."

**With regard to Incident 21 at Exhibit 1, depicting a PPI veterinarian cutting into a monkey's tail bone:**

- [REDACTED] opines, "This whole procedure looks very hokey and makeshift. The surgical procedure, which involves removing bone and incising tissue, is being conducted in an unsterile environment. ... a better anesthetic combination such as ketamine and Valium would help relax as well as immobilize the monkey as well as providing analgesia."
- [REDACTED] writes, "The ... macaque grabbing the edge of the table and yawning frequently ... means the monkey could definitely feel and respond to the pain of the tail surgery and was inappropriately anesthetized for the procedure. Not only should the monkey have been under deeper anesthesia, but pain management should have been addressed. ... Finally ... there is no visual barrier to block the other monkeys from watching the procedures being done. I believe this is extremely psychologically stressful for the awake monkeys."
- [REDACTED] states, "The ... monkey's movements ... indicated that the sedation was insufficient for performing procedures that could cause pain such as cutting away tissue that might still be viable. ... the work on this monkey was being done within close proximity to other monkeys. ... This would cause stress for those individuals. The work should have been done somewhere out of sight and hearing range of other monkeys in order not to impact negatively on them."

**With regard to Incidents 25, 30, 33, 28, 43 and 52 at Exhibit 1, depicting various PPI workers grabbing monkeys by their tails:**

- [REDACTED] the Chancellor Professor of Anthropology at the College of William and Mary, a biological anthropologist with an expertise in primate behavior, and a former

Guggenheim Fellow, opines, “Capturing a monkey with ... bare hands pulling on the monkey's tail to roughly detach him or her from the cage mesh, or using a net in order to snatch the monkey (or into which the monkey is forcibly pushed), are completely unacceptable procedures that cause unnecessary stress and pain to the animals. The practices depicted here are medieval; I know of no set of ethical guidelines that would approve any of the methods made visible in the video. ... I make special note of the large, terrified leaps the monkeys make as they try to elude their captors ...”

- [REDACTED] writes, “None of these are humane or acceptable ways to handle a monkey. This is not only stressful, but medically dangerous. The tail has a lot of nerve endings and pulling it is very painful. Also both the leg and the tail can be dislocated by this technique that may cause severe and irreversible nerve pain. ... No monkeys should ever be caught in these ways.”
- [REDACTED] states, “The workers’ actions—in which they grab monkeys by their tails, net the animals, pull them roughly off fences and even drop or throw one into a net—all cause the animals severe behavioral stress, anxiety, and fear. This is evident in the monkeys’ rapid attempts to hide and run from the workers, as well as the rectal prolapses, found I am told, in animals being chased, captured, and handled in similar manners.”
- [REDACTED] opines, “this handling is unnecessarily rough. The workers seem to have no patience and want to catch the monkeys quickly by any means, including grabbing them by their tails and scooping them with a net. I don’t think it is appropriate or humane to catch a monkey by its tail or handle it roughly as was shown in these videos. I am sure that being grabbed by the tail is painful ...”
- [REDACTED] states, “Capturing monkeys induces extreme fear, as evidenced by the strenuous attempts at avoidance and escape shown by the monkeys. In addition to fear, there was the real danger of dislocating the vertebrae in the tails and even breaking off portions of the tails. Long-tailed macaques do not have prehensile tails, hence the tails cannot withstand the kind of trauma being inflicted on them by the people; individuals of this species of monkey should never be captured and handled by their tails alone. ... the extreme stress induced in the monkeys and the violent handling of the tails could certainly lead to prolapse.”
- [REDACTED] writes, “the video depicts a very poor, careless, unduly aggressive and unacceptable handling technique.”

**With regard to Photographs 2015-02-05\_6 and 2015-02-10\_09, depicting monkey 1005159, whom the witness named Loretta:**

- [REDACTED] writes, “behavioral stress is a recognized psychogenic cause of alopecia in primates, and could well cause the severe hair loss depicted ... this animal was incompatible with her cohorts and should have been separated and re-housed much sooner than she was.”
- [REDACTED] states, “Alopecia, or loss of hair, has numerous causes including ecto-parasites, poor nutrition, systemic illness, self-grooming or stress. Regardless of the cause, once alopecia this severe is noted, an animal should have appropriate testing to determine the cause. Since the monkey is low ranking, it is possible that the hair loss is due to stress. This can manifest as compulsive self-grooming or losing hair due to a complex series of stress induced biological changes that cause the hair to fall out and stop growing.”
- [REDACTED] opines, “When it became apparent that this individual was not progressing in terms of social integration, she should have been relocated to see if another social group would have been more compatible. It is likely that such a determination could have been made much sooner than four months.”

**With regard to video footage of monkeys huddling together in outdoor enclosures, where they had access only to bare plastic barrels elevated above concrete floors:**

- [REDACTED] writes, “The environment in which these monkeys are being kept is totally inappropriate. They are terrified and huddling together, uncertain of what’s to come next. The temperature is too low at 47 degrees Fahrenheit -- let alone the low reported of 34 degrees Fahrenheit. Far better environments are needed for these animals. Unbedded plastic barrels do not provide adequate shelter from the cold and temperatures that low without adequate shelter are simply inhumane.”
- [REDACTED] states, “Macaques spend their time in social groups and are both arboreal and found on the ground. They will huddle together to keep warm, to sleep, social affiliation and when they sense danger. Seeing macaques huddled together on a concrete floor during the day without any grooming behavior concerns me that they are fearful or cold. Again the cold concrete flooring with no substances to provide warmth or stimulate natural foraging behavior, the lack of any enrichment, climbing structures or normal appropriate behavior in these macaques convinces me these monkeys are intensely deprived of an enriching and psychologically stimulating existence.”
- [REDACTED] opines, “For someone like me who has studied social behavior of monkeys in the wild, [this video] is also disturbing to watch. Under normal or even semi-normal conditions, monkeys derive comfort from physical contact with each other, and typically relax in each other’s embrace. What we see here instead are monkeys who are highly anxious despite contact comfort, which points to extremely high stressors in their environment. Their limbs remain tense and their facial expressions reveal anxiety. In addition, the environment is horribly sterile and it is likely the animals were uncomfortably cold.”
- [REDACTED] writes, “these monkeys clearly were frightened and it is not unusual for captive monkeys to huddle together for comfort regardless of the ambient temperature. ... If the monkeys were being forced to endure cold temperatures in this facility, they should have been provided with bedding and secure enclosures that could allow conservation of body heat ... The most glaring issue that I saw in this sequence, however, was the barrenness of the floor. This is highly inappropriate for the welfare and well-being of these individuals. There should be an earthen floor or at least a heavily (thickly) bedded floor to provide substrate for exploration as well as to provide protection for the feet.”