

Exhibit 8

6/5/15 Letter to PPI from OLAW



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE
NATIONAL INSTITUTES OF HEALTH

FOR US POSTAL SERVICE DELIVERY:

Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive - MSC 7982
Bethesda, Maryland 20892-7982
Home Page: <http://grants.nih.gov/grants/olaw/olaw.htm>

FOR EXPRESS MAIL:

Office of Laboratory Animal Welfare
Rockledge One, Suite 360
6705 Rockledge Drive
Bethesda, Maryland 20817
Telephone: (301) 496-7163
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June 5, 2015

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

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

Dear Mr. Houghton,

Under the Memorandum of Understanding between the National Institutes of Health (NIH) and the U.S. Department of Agriculture, the Office of Laboratory Animal Welfare (OLAW) was notified by the Animal and Plant Health Inspection Service-Animal Care on May 27, 2015 about allegations of serious and continuing noncompliance with the Public Health Service (PHS) Policy on Humane Care and Use of Laboratory Animals (Policy) and serious deviations from the provisions of the Guide for the Care and Use of Laboratory Animals (Guide) at Primate Products, Inc. (PPI). On June 1, 2015 OLAW received from the People for the Ethical Treatment of Animals an additional extensive list of allegations of noncompliance with the PHS Policy and the Guide which an undercover informant had gathered. The submission included written and video documentation of improper handling and treatment of nonhuman primates at the institution. Please direct the Institutional Animal Care and Use Committee (IACUC), avoiding any conflicts of interest, to address the following combination of allegations and if noncompliance is confirmed, provide a reasonable and specific plan and schedule for correction:

- 1) Indicate whether any of the allegations occurred with primates supported by a PHS/NIH grant or contract. If so, provide the relevant grant and/or contract number.
- 2) If noncompliance has occurred with any PHS-supported animals and/or was of a programmatic nature, indicate why the incident(s) was not promptly reported to OLAW. Programmatic problems include those associated with the program of veterinary care, training of technical/husbandry staff, husbandry program, overall physical plant issues, and IACUC related matters such as monitoring of the animal program.
- 3) Allegations of inadequate veterinary care consisting of:
 - a) Failing to promptly attend to primates with exposed caudal vertebrae (primate #0911132, 3462110508, 3994125505).
 - b) Failing to promptly attend to a primate with a fractured and exposed digit (#1004072).
 - c) Failing to promptly euthanize chronically ill, thin primates which later died (#06C009, F514).

- d) Treating rectal prolapses by holding primates upside down and shaking them while repositioning the rectal mucosa. This procedure is sometimes performed outside, without anesthesia, lubrication, or suturing and without veterinary oversight.
 - e) Pulling primate teeth by hand (by an animal caretaker) and amputating tail portions on unsanitized tables and without provision of post-procedural analgesia or veterinary oversight.
 - f) Performing veterinary procedures such as suturing, amputation, debriding, and collecting cerebrospinal fluid in an outdoor area rather than in a dedicated, clean indoor space.
 - g) Failing to address cases of primates exhibiting clinical signs of psychological distress (#A3E053, A2E023, 111618).
 - h) Failure of veterinary and supervisory staff to respond to daily health observation reports.
 - i) Potential inadequate veterinary staffing for the numbers of primates housed.
- 4) Allegations of inadequate husbandry practices consisting of:
- a) Chasing and capturing primates by the tail; removing primates from the cage fencing by pulling the tail.
 - b) Dragging capture nets containing one or more primates along the ground.
 - c) Chasing primates for capture around the enclosure for extended time periods; there is no indication that the primates have been trained by positive reinforcement to enter transfer cages or other enclosure for stress free capture.
 - d) Failing repeatedly to document daily observations of primates in the outdoor enclosures, including animals with health problems.
 - e) Failing to submit prompt reports of sick and injured primates.
 - f) Failure of husbandry staff to administer veterinarian prescribed treatments.
 - g) Housing incompatible primates together for extended time periods resulting in wounding, rectal prolapses, tail degloving, and hair loss (#A2E023, 3462110508, 1005158, M299, 1106013, 0908082).
 - h) Wetting primates while hosing out cages; using highly concentrated bleach solutions for cleaning of cages containing primates.
 - i) Failing to clean enclosures daily resulting in accumulation feces and food and leading to mold accumulation.
 - j) Failing to provide supplemental heat to primates housed outdoors during cold weather for numerous days; this failure may have led to frostbite and necrosis of the tail (#3908501720) as well as possible mortality.

June 5, 2015

A4102-F

5) Allegation of inadequate secondary containment:

- a) Failing to provide a secure perimeter fence which resulted in a bear entering the animal facility and killing two primates.

Under the Health Research Extension Act of 1985, Public Law 99-158 OLAW hereby informs PPI that the conditions of animal care, treatment, or use at this institution which is receiving a contract involving research animals do not meet applicable guidelines (PHS Policy, Guide, Animal Welfare Act/Regulations, Assurance, and conditions of contracts HHHSN272201400003i, HHSN2632201000051i); PPI is being notified of this determination by OLAW and is being given a reasonable opportunity to take corrective action; if no action is taken by the institution to correct such conditions, OLAW will revoke the Assurance and take action leading to revocation of the contracts. Feel free to contact me should you have any questions.

Sincerely,



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

Director

Division of Compliance Oversight

cc: IACUC Chair

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

[REDACTED] NHP Resource Manager, NIH

[REDACTED] Contract Specialist, NIH

[REDACTED] Contract Specialist, NIH

Elizabeth Goldentyer, D.V.M., Eastern Regional Director, USDA-APHIS-AC

[REDACTED] (NIH/OD) [C]

From: [REDACTED] (NIH/OD) [C]
Sent: Friday, June 05, 2015 10:26 AM
To: [REDACTED]@primateproducts.com; [REDACTED]@primateproducts.com'
Cc: [REDACTED]@primateproducts.com; Betty.J.Goldentyer@aphis.usda.gov; [REDACTED]
(NIH/OD) [E]; [REDACTED] (NIH/OD/ORS) [E]; [REDACTED] (NIH/NIAID) [E]
Subject: OLAW A4102-01, Case-F
Attachments: 1052_001.pdf

Good morning Mr. Houghton,

Attached please find Dr. Axel Wolff's response for OLAW A4102-01, Case-F.

If you have any questions, feel free to contact us by phone or by email.

Thank you,

[REDACTED]
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