



January 24, 2020

Elizabeth Goldentyer, D.V.M.
Associate Deputy Administrator
Animal Care USDA/APHIS/Animal Care (AC)
920 Main Campus Drive, Suite 200
Raleigh, NC 27606-5210

Sent via email: amy.v.benson@usda.gov, animalcare@usda.gov

Dear Dr. Goldentyer,

On behalf of the New England Anti-Vivisection Society (NEAVS), I am writing to file an Official Complaint against Alpha Genesis Inc. [56-R-0105, 56-B-0120], a privately-held research corporation located in Yemassee, South Carolina for a severe and recent violation of the Animal Welfare Act (AWA). In short, staff negligence resulted in the painful and unnecessary death of three monkeys and the suffering of a fourth monkey.

The documents we reviewed were created between August 15, 2019 - August 27, 2019 by Alpha Genesis and the National Institute of Health's Office of Laboratory Animal Welfare (NIH-OLAW). NEAVS obtained these documents in response to a Freedom of Information Act Request on December 20, 2019.

The documents reveal that in 2019, the water supply to a cage that housed at least four primates was not working properly, nor checked appropriately, and consequently resulted in the death of three monkeys and left another monkey severely dehydrated. Alpha Genesis Staff neglected to perform the necessary water system checks for three days. As you may know, this is not Alpha Genesis's first offense in failing to provide adequate water to the primates in their care. In 2015 one monkey died from dehydration and five others were treated after their water line was accidentally switched off for a week. In 2017, seven monkeys were treated for dehydration after the water line to their cage was disconnected. Additionally, Alpha Genesis has self-reported to OLAW 12 non-human primate deaths due to negligence within the last three years alone.

Monkeys are dying of dehydration

A recently uncovered letter, dated August 22, 2019, from Brent C. Morse, DVM, Animal Welfare Program Specialist, Office of Laboratory Animal Welfare to Dr. Greg Westergaard, President and CEO of Alpha Genesis, Inc., documents the following:

"From the information provided OLAW understands that on August 10, 2019 two rhesus macaques were found dead and another was found dehydrated. That animal was



treated for dehydration and suspected diarrhea and is recovering. Two days later another rhesus was found dehydrated and treated but subsequently died. At that time an investigation of the animals' housing was performed finding the water supply to the caging was not functioning properly."

In an earlier correspondence from August 15, 2019, Dr. Westergaard explained that the staff failed to check the water system:

"However, in this circumstance, the supervisor, the animal care technician and the veterinary care technician from 8/9/2019-8/11/2019 did not perform one of their main job functions of checking the lixits."

Request for the Maximum Fine

NEAVS hereby files an Official Complaint against the Alpha Genesis Inc. [56-R-0105] for a serious violation of the AWA. Given Alpha Genesis' history of repeated AWA violations, we respectfully request your office conduct an immediate investigation into Alpha Genesis Inc.'s chronic misconduct. Moreover, given that these abuses are not contested and Alpha Genesis Inc. has admitted these failures in signed documents, we request Alpha Genesis Inc. be fined the maximum penalty of \$11,390 per violation.

Thank you for your consideration of this request, and we look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Herschler", with a long horizontal flourish extending to the right.

Nathan Herschler
Executive Director
New England Anti-Vivisection Society (NEAVS)