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Phyllis K. Fong, Inspector General, USDA/OIG P.O. BOX 23399 Washington, DC 20026-3399 11/26/12

Inspector General Fong,

I am contacting you today relevant to the conduct of the USDA/APHIS/AC.

Attached to this communication you will find a copy of a complaint which has been filed with both the Eastern and Western Regional Offices of USDA/APHIS/AC.

This complaint centers around two basic issues relevant to the Charles River Laboratories. First, reports have disclosed that within a 3 year period no less than 9 animals (4 rabbits, 1 dog, and 4 primates) have been killed by negligence, with the cause listed by Charles River Laboratories themselves as "gavage error." As I am sure you know, this means that during an oral dosing study the test chemical was most likely put directly into the animals' lungs instead of the stomach. This is clearly an indication of improper animal handling (section 2.38) and unqualified personnel (section 2.32). Additionally, dozens of animals were allowed to reach a level of debilitation so that they lost as much as 33% of their body weight, (violating section 2.33).

The reports which contained the information which is the basis of this complaint has been in the hands of USDA/APHIS/AC for as much as 3 years. The documentation which is the basis of this complaint is contained in the Column E explanations of the Annual Reports filed by Charles River Laboratories with the USDA.

The question which must be asked is, does anyone at the USDA actually read these reports with an eye towards law enforcement? There have now been several incidents in which animal deaths have been disclosed in these reports which centered around potential Animal Welfare Act violations. This is not mere paperwork, but the end of animals' lives. Why is this information ignored?

Therefore, I officially request that your office immediately initiate an investigation of the information that I have provided to you regarding both the Charles River Laboratory and USDA/APHIS/AC.

Sincerely,

Michael a Budhie, a. H. of.

Michael A. Budkie, A.H.T., Executive Director, SAEN

Attachments: Charles River Laboratories annual report Column E explanations for 2009, 2010, 2011