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Dr. Elizabeth Goldentyer  
USDA/APHIS/AC  
920 Main Campus Drive, Suite 2000  
Raleigh, NC 27606

6/12/13

Dr. Goldentyer,

I am contacting you today relevant to the University of Pennsylvania 23-R-0023, concerning a very serious matter which we believe requires severe action.

As you know, a USDA inspection report dated May 5, 2013 cited the University of Pennsylvania for several violations of the Animal Welfare Act (AWA). The University violated AWA sections relevant to improper Animal Handling and Inadequate Facilities. However, the Animal Handling violation is extremely disturbing.

The Animal Handling violation lists a situation where a university staff person didn't follow University policy for properly administering anesthesia, didn't follow University requirements for anesthesia administration training and for assistance with the procedure. As a result of improper animal handling, the piglet being used in this procedure was killed. The University then suspended the protocol. Following this incident during an internal inspection, the IACUC (Institutional Animal Care & Use Committee) staff noticed that another piglet was being used for a terminal procedure without adequate anesthesia. As a result, the IACUC suspended 4 protocols involving this researcher.

It is clear that this is a significant violation of the Animal Welfare Act, and a very serious situation. However, it is additionally clear that potentially several other sections of the AWA may well have been violated. This situation should be investigated and violations of other code sections should be issued, including but not limited to: 2.32 Personnel Qualifications (it is clear that the researcher was untrained and unqualified to administer the anesthesia), 2.31 Institutional Animal Care & Use Committee (it is clear that the University of Pennsylvania IACUC is not adequately supervising research protocols), etc.

Therefore, I officially request that you initiate an investigation of this situation, and that at the conclusion of your investigation of the University of Pennsylvania, your office issue the largest fine allowable under the Animal Welfare Act, \$10,000 per infraction.

I look forward to hearing from you in the near future about the fate of this facility.

Sincerely,

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

Attachments: University of Pennsylvania Inspection report