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**Re: PETITION FOR RULEMAKING )**  
**U.S. DEPARTMENT OF HEALTH )**  
**& HUMAN SERVICES )**  
**)**  
**TO SET CRITERIA FOR DETERMINING WHEN )**  
**CHIMPANZEES ARE NO LONGER NEEDED FOR )**  
**RESEARCH AND MUST BE RETIRED AND SENT TO )**  
**SANTUARY AS REQUIRED BY THE CHIMPANZEE )**  
**HEALTH IMPROVEMENT, MAINTENANCE, AND )**  
**PROTECTION ACT )**

**Declaration of Jocelyn Bezner, VMD**

1. I am submitting this declaration in support of the above referenced Rulemaking Petition. My expert opinion is based on my 26 years of veterinary experience, nearly half of which have been focused on chimpanzees, predominantly from research, who are now in sanctuary.
  
2. I received my veterinary medical degree from the University of Pennsylvania Veterinary School in 1986. I am the senior veterinarian at Save the Chimps Sanctuary. For the past 10 years I have provided full-time veterinary care for over 270 retired research chimpanzees. In addition, I have consulted on and worked with chimpanzees from other labs who are now retired in other private sanctuaries. A copy of my curriculum vitae is attached.
  
3. I am very familiar with the physiological and psychological problems these chimpanzees face. I respectfully request that the Secretary of Health and Human Services consider my extensive knowledge and opinion when fulfilling her

responsibility to formulate and oversee the application of criteria for when a chimpanzee should be released from research.

4. Below are some of the health problems I have encountered frequently in our chimpanzees, and which I believe should be considered reasons for retirement.

The categories below speak not only to how a specific disease makes a chimpanzee an unfit research subject, but also to how the combined degree of suffering they sustain both physically and psychologically should make them ineligible for further use and therefore eligible for retirement.

- A. Cardiac disease: Cardiac disease is the most common cause of death in captive chimpanzees. (From: Heart disease is common in humans and chimpanzees, but is caused by different pathological processes; Nissi Varki,<sup>1</sup> Dan Anderson,<sup>2</sup> James G. Herndon,<sup>2</sup> Tho Pham,<sup>1</sup> Christopher J. Gregg,<sup>1</sup> Monica Cheriyan,<sup>1</sup> James Murphy,<sup>3</sup> Elizabeth Strobert,<sup>2</sup> Jo Fritz,<sup>3</sup> James G. Else<sup>2</sup> and Ajit Varki,<sup>1</sup> Center for Academic Research and Training in Anthropogeny (CARTA), University of California, San Diego, La Jolla, CA, USA; <sup>2</sup>Yerkes National Primate Research Center, Emory University, Atlanta, GA, USA; <sup>3</sup>Primate Foundation of Arizona, Mesa, AZ, USA)

There are two presenting forms of cardiac disease: sudden death and progressive dilated cardiomyopathy. Both forms share the same histological findings on the necropsy. Normal cardiac muscle is replaced by fibrosis or scar tissue. If this abnormal tissue is close to the electrical system of the heart it results in an arrhythmia and sudden death, similar to a young athlete collapsing during a game. If the abnormal tissue does not interfere with the conductivity of the heart, the heart function deteriorates more slowly resulting in a form of heart disease known as dilated cardiomyopathy.

There is no definitive ante-mortem test to diagnose fibrosis in heart muscle. What an echocardiogram can diagnose are the secondary changes that occur with a diseased heart along with valvular or congenital problems. Each chamber and wall thickness is measured. The flow of the blood and the ejection fraction are evaluated to determine how well the heart is pumping blood through the body.

It could be argued that any male chimp over 15 years of age is at risk of sudden death and therefore should not be used in any research protocol. At a minimum, all male chimpanzees should have echocardiograms beginning at 15 years old and removed from research if there are any abnormal findings.

Other cardiac problems that should preclude the use of chimp are arrhythmias and murmurs.

- B. Geriatric diseases: (including strokes, renal failure, cataracts, glaucoma, endometriosis and diabetes)

In addition to the physiological deterioration and the symptoms that accompany age related, progressive disease come the added risks of sedation for chimpanzees who are elderly. Sedations for protocols or diagnostics become a high risk issue in this age group. (Even in young healthy chimpanzees, ketamine alone causes muscle rigidity, laryngospasm and hallucinations on recovery. These side effects can be avoided by the use of benzodiazepines, yet most lab knockdowns use ketamine alone, even after it is noted in the records that a particular chimp had a reaction to it.) Anesthesia predisposes elderly individuals to greater cardiac instability and blood pressure issues, both hypertension and hypotension. Ketamine, as a form of sedation, is a phencycline derivative used most frequently in research chimps because of its low cost and relative safety. However, there are pharmacodynamic consequences to all anesthetics, especially in the elderly. Used alone it has a cardiostimulatory that is detrimental in cardiac cases. I have seen elderly chimps become extremely hypotensive and hypertensive when sedated.

Elderly chimpanzees, as defined by the research community itself (females 30 years or older and males 25 years or older) should be retired from research as unsuitable, high risk subjects.

- C. Infections and inflammation: Chronic infection and inflammation can be hard to determine in chimpanzees. In my opinion, chronic low-grade anemia is a better marker of disease than changes in the leukocyte count. Any chimpanzee with changes in the blood chemistry or CBC is not a good candidate for a research study.
- D. Psychological stress: Psychological problems have been the most difficult to treat and chimpanzees suffering from them can take years to recover. Self-mutilation ranges from occasional picking to extreme and relentless trauma to their bodies. These cases require trial and error of psychotropic drugs and I often rely on a combination of anti-depressants, anxiolytics and /or antipsychotics. Many of the records I've read from the laboratories using these chimps before retirement have a documented and often long standing history of self-trauma during their time in the research labs. Many chimps returned from other labs have a history of self- trauma prior

to retirement. Any stress behavior such as screaming, banging their heads, self-mutilating, or picking should exempt them from further research.

A chimpanzee who exhibits chronic, re-occurring or severe psychological symptoms is an inappropriate model to study any disease as that level of psychological stress has major physiological consequences which confound research findings.

16. Some examples of the stressors chimpanzees are subjected to, either in their laboratory housing or in their use in protocols, are included here and taken from our records of chimpanzees from Coulston (Coulston's chimpanzees were used by other labs as well) and NIH labs:

**Torian** had only visual contact with any other chimpanzee and was depressed and lethargic.

**Pumpkin** repeatedly traumatized his surgery site for years, yet was continued to be used in research. He had parts of his liver and lymph nodes removed and consistently traumatized the surgery sites. Someone who is stressed and prone to self-mutilating behaviors should be removed from any current and all future studies.

**Millie** was 1 year and 3 months old when she was shipped with another chimp, Theo, to Bioqual. The record says Millie likes to hold Theo most of the time. At this young age, clinging comforted her otherwise fearful state. Millie was then sent to the CDC.

Her record entries note that Millie:

“lives next to theo when he started screaming she refused her juice or to let me touch her, rocking in back of cage.”

“ Millie and \_\_\_\_\_ ( name illegible) are screaming this morning. No apparent reason.”

“Millie's roommate died, apparent heart attack.”

Two days later her record note: “Millie is not eating chow-- depressed. Stressed out.”

One year later:

“highly agitated and screaming all afternoon -- gave attention , fruit, treats and koolaid-- nothing helps. Gave 2 mg valium PO”

Millie's progressive psychological deterioration, while noted, was never deemed reason to retire her from research. In 1997 one private lab did consider chimpanzees who had reached this state of being unable to tolerate lab conditions and protocol use as reason to end their "work" in research.

Still today in sanctuary with us, Millie continues to have psychological problems and is on anti-anxiety medications. Any attempt to wean her off the medications causes recurrence of her self-mutilating behavior. When injured, we must intervene and medicate her heavily to prevent her from digging at the wound excessively. Fortunately, because the lab she was used in was closed, and she was, by default, retired in her rescue to sanctuary, Millie is healing both physically and psychologically. In fact she is finally able to live comfortably and with appreciated pleasures in her small group of gentle and friendly chimpanzees.

17. It is my professional opinion, that it is without either scientific merit or ethical defense that chimpanzees like Millie continue to be housed for possible future use. There is neither scientific nor economic advantage to doing so.

18. In my years as a veterinarian, I have seen myriad examples of disturbing hardships that chimpanzees have endured in laboratories. I am, as a scientist, equally disturbed by the notion that in today's world of better research methods, there are those who continue to keep chimpanzees whose physiological and psychological health is so deteriorated or deteriorating that the only prudent, compassionate and informed course of action should be to retire them. Yet, they are allowed to remain in U.S. labs.

19. In December, 2011 the prestigious Institute of Medicine concluded that most current research on chimpanzees was unnecessary. However, the report did not endorse an outright ban nor did it provide uniform criteria outlining when and why chimpanzees should be retired because they are not needed. While such recommendations were outside the scope of their study, the nature of their assigned task and the conclusions they drew, beg that these questions be asked and answered. It is my hope therefore that the Secretary of Health and Human Services will define strict, measurable criteria that are both

scientifically and ethically based and impose that criteria on any and all labs holding federally owned or supported chimpanzees. I ask that the Secretary pick up the mantle of responsibility and retire U.S. chimpanzees who are more than deserving of their day in sanctuary.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.

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

Jocelyn Bezner, VMD

**Senior Veterinarian  
Save the Chimps Sanctuary**

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**July 17, 2012**



## ***VETERINARY CONSULTING***

Chimp Haven  
Keithville, Louisiana

Fauna Foundation  
Quebec, Canada

Chimps, Inc  
Bend, Oregon

Elephant Nature Park  
Chiang Mai, Thailand

Heifer Project International,  
Chicago, Illinois

Sweetbriar Nature Center  
Smithtown, New York

League for Animal Protection  
Huntington, New York

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**DECLARATION OF LAURA BONAR, RN**

1. I am the Program Director for Animal Protection of New Mexico (APNM)—a New-Mexico-based nonprofit organization that has been working for the humane treatment of animals since 1979. APNM accomplishes its work through education, outreach, and campaigns for change. APNM has worked to protect chimpanzees used in research for over 20 years.
2. APNM is writing in support of retiring chimpanzees not needed in biomedical research, including all of the chimpanzees at New Mexico’s Alamogordo Primate Facility (APF) on Holloman Air Force Base, under the Chimpanzee Health Improvement, Maintenance, and Protection (CHIMP) Act. The nearly 200 government-owned chimpanzees at the APF are survivors of cruel, egregious conditions in laboratories and have not been used in invasive research since at least 2001. An Institute of Medicine study published in December 2011 found that “most current use of chimpanzees for biomedical research is unnecessary.”

3. In the 1950s, the United States Air Force shipped 65 infant chimpanzees to New Mexico's Holloman Air Force Base for use in research. These chimpanzees were taken from the wild—a violent act involving the killing of multiple adults for every infant captured. Breeding programs were established, and the chimpanzees were trained using negative-reinforcement techniques. Testing included sleep deprivation and crash tests.
4. In 1961, two of these chimpanzees were used to test suborbital and space flight prior to Alan Shepard's, Gus Grissom's, and John Glenn's flight. One chimp, Enos, performed his space mission perfectly, but an equipment error caused him to be shocked for performing correct actions. Enos died shortly after returning from space. The second chimpanzee, called HAM after the program Holloman AeroMedical, survived the flight and was eventually transferred to a zoo, where he died alone in 1983.
5. In the 1970s, the chimpanzees at Holloman Air Force Base began to be leased and sold to a variety of research institutions. In 1980, toxicologist Dr. Frederick Coulston opened a private primate-research laboratory near Holloman Air Force Base. The federal government invested over \$10 million to build new housing for the growing population of chimpanzees in research in New Mexico.
6. In the 1990s, The Coulston Foundation (Coulston) continued to breed chimps and took ownership of captive chimps from labs getting out of the expensive, dangerous business of chimp research. Coulston received chimps from New

York University's Laboratory for Experimental Medicine and Surgery in Primates, and it became the world's largest captive chimpanzee colony, with over 600 primates at two locations in Alamogordo. Coulston violated numerous animal, drug, and worker-safety policies, rules, and laws. Regardless, federal government support for the lab continued, and chimpanzees were used in research protocols involving insecticides, street drugs, and experimental surgical procedures, among others.

7. In 1999, Coulston settled formal United States Department of Agriculture (USDA) charges and an investigation into chimpanzee deaths by signing a Consent Decision and Order under which the lab agreed to comply with federal animal welfare laws; maintain disease control and prevention programs, euthanasia programs, and adequate veterinary care programs under supervision of a doctor of veterinary medicine; cease breeding chimpanzees; and divest of 300 chimpanzees by January 2, 2002. The USDA held in abeyance a \$100,000 fine, pending compliance with the order. Within four months, Coulston violated the Order by breeding chimpanzees. The USDA never levied the fine.
8. In 2000, the Association for Assessment and Accreditation of Laboratory Animal Care issued a report finding 100 percent turnover in veterinary staff at Coulston and blamed inadequate veterinary care for the deaths of 17 chimpanzees over a two-year period. Coulston denied USDA inspectors access to their facilities and sold chimpanzees to animal trainers and zoos.

9. In May 2000, the National Institutes of Health (NIH) seized 288 chimpanzees from Coulston. An inventory states, “All of these animals have been reported to be either purposely or incidentally exposed/infected with various hepatitis viruses and/or HIV and need appropriate biocontainment and specialized veterinary care.”
10. In December 2000, Congress passed the Chimpanzee Health Improvement, Maintenance, and Protection Act, which mandated the creation of a publicly and privately financed sanctuary system to provide lifetime care for chimpanzees retired from federal biomedical research programs.
11. In 2001, the NIH accepted a cost-plus, fixed-fee bid from the biomedical research corporation Charles River Laboratories to manage the APF for ten years as a research reserve colony. No invasive research is allowed at the APF as part of the NIH’s agreement with Holloman Air Force Base.
12. In 2001, the USDA issued a fourth set of formal charges against Coulston following chimpanzee Gina’s death from heat exposure after she was left locked outside. The NIH cancelled Coulston’s Animal Welfare Assurance, making the lab ineligible for further research funds. The following year, 266 chimpanzees at Coulston’s remaining location in Alamogordo were provided with permanent sanctuary care by the nonprofit Save the Chimps.
13. In 2004, Otero County District Attorney Scot Key filed criminal animal cruelty charges against Charles River Laboratories and director Dr. Rick Lee after the deaths of Rex and Ashley and the near-death of Topsy at the APF.

Whistleblowers allege that Charles River Laboratories ceased treatment on sick APF chimpanzees outside of business hours as a money-saving practice. Charles River Laboratories claimed that the three sick chimps were left without veterinary care as part of the practice of veterinary medicine. The case is appealed to the New Mexico Supreme Court but was never heard due to an exemption in the state animal cruelty statute for the practice of veterinary medicine.

14. In 2008, the NIH responded in writing to a request from New Mexico Senator Jeff Bingaman about the potential future of the APF chimpanzees at Chimp Haven, the federal chimpanzee sanctuary. The NIH wrote, “The current contract with Charles River Laboratories to manage and house the chimpanzees at APF ends in 2011. NCRR [National Center for Research Resources, a Center of the NIH] has not yet made any decisions regarding what will happen after the contract ends. Since Chimp Haven is a sanctuary and only houses chimpanzees no longer needed for biomedical research, it would not be eligible to house the chimpanzees from the APF. The chimpanzees from APF would need to be available for research studies.” Thus, these chimpanzees were denied a pathway to retirement.

15. In 2010, New Mexico Senator Tom Udall wrote to the NIH about the future of the APF. On June 24, 2010, the NIH responded to Senator Udall that “there is unused space at other facilities that could be used to house the APF chimpanzees” and indicated their plans to close the facility and ship the surviving 202 chimpanzees to a lab in Texas. Massive public outcry highlights

the plight of the APF chimpanzees, who are mostly elderly and suffer from multiple chronic illnesses. In addition, records show that the NIH gave at least four additional grants to the laboratory Texas Biomed in anticipation of sending the APF chimpanzees there, despite the agency's statement that the chimps were being moved due to "extra space" at another facility.

16. In December 2010, Senators Tom Udall, Jeff Bingaman, and Tom Harkin requested an independent analysis of the need for chimpanzees in research. The Institute of Medicine studied the issue with input from scientists across the world and published "Chimpanzees in Biomedical and Behavioral Research: Assessing the Necessity" in December of 2011. The report finds that "most current use of chimpanzees for biomedical research is unnecessary." NIH Director Francis Collins accepts the report findings stating that chimps, as the closest human relatives, deserve "special consideration and respect."

17. The February 2012 APF census shows 176 chimpanzees alive. Dozens of these chimpanzees were observed by APNM during a 2010 tour of the APF, once regularly available to the public. The observed chimps were living in sex-segregated social groups in indoor/outdoor housing with areas of grass and climbing structures. Following a summer 2010 visit by a journalist with *The New York Times*, public access to the facility has been denied, and the NIH has delayed access to local officials for many months at a time.

18. The chimpanzees at the APF range in age from 14 to 55. To date, all medical records of APF chimps examined by APNM show multiple documented examples of both physical and psychological suffering as a result of government-support research, including escape attempts ending in shooting, coprophagia, self-mutilation, amputation following injury and gangrene related to chronic disease, and death. Many of the APF chimpanzees were used in research at multiple laboratories around the country, and many of these individuals have already died. It is highly likely that every surviving APF chimpanzee has a documented medical history of physical and psychological harm. Complete medical records may help determine the level of suffering, but because these records are not available for the majority of chimpanzees in captivity in the United States, they cannot be the only criteria considered.
19. The APF chimpanzees are not needed in scientific research, and continued classification of these individuals as a research reserve colony is unacceptable, especially given the level and duration of suffering that they have endured. The North American Primate Sanctuary Association (NAPSA) member sanctuaries have the skill and expertise to provide superior care for the APF chimpanzees, and managing the APF chimpanzees with a NAPSA-accredited sanctuary would likely result in significant savings to taxpayers. Additionally, laboratories would be better able to pursue humane, effective research after the APF chimpanzees are granted permanent retirement and sanctuary care.

20. APNM respectfully requests that the Department of Health and Human Services grant the filed Rulemaking Petition and establish clear criteria for retirement of chimpanzees under the CHIMP Act. Clear criteria that considers, among other factors, the physical and psychological health and suffering of each individual chimpanzee should benefit the surviving chimps. Developing and implementing clear criteria for the retirement of chimpanzees will benefit research that improves human health as resources for research may be allocated away from chimpanzees and toward a more productive and ethical project.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'Laura Bonar', with a long horizontal flourish extending to the right.

Laura Bonar, RN  
**Program Director**  
**Animal Protection of New Mexico**

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07/17/2012

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**DECLARATION OF G.A. BRADSHAW**

1. I hold two doctorates in ecology and psychology and have been a research scientist for more than 25 years. My research first diagnosed Post-Traumatic Stress Disorder (PTSD) in free-ranging wildlife and led to the establishment of trans-species psychology, a new field built on science accumulated since Charles Darwin one century and a half ago. This science is based on convergent findings in neurosciences, psychology, and ethology and demonstrates that human and nonhuman animals share common brain structures and processes that govern cognition, emotion, and consciousness. Critically, science shows that nonhuman animals have the capacity to suffer psychologically and emotionally comparable to humans. Both chimpanzees, who are our closest genetic relatives, as well avian species considered to be significantly different evolutionarily from humans, have been the subject of my research. I have found both susceptible to psychological trauma comparable to humans. A copy of my curriculum vitae is attached.

2. I am author of numerous scientific articles and the book, *Elephants on the Edge: What Animals Teach Us About Humanity* (Yale 2009), that analyze and discuss psychophysiological effects on nonhumans animals from wild capture, loss of family, unnatural and exacting conditions of captivity, captive breeding, and the diverse methods of control and experimentation to which animals in captivity are subjected. My research and that of my colleagues have shown that a diagnosis of Complex PTSD accurately applies to chimpanzees used in biomedical research and experiments. The category of Complex PTSD was developed to describe the effects of severe and sustained trauma experienced through incarceration and deprivation.
3. I am lead or sole author on multiple articles pertaining specifically to great ape neuropsychology, emotional and psychological capacity, PTSD and Complex PTSD, and consciousness, including: *Developmental Context Effects on Bicultural Post-Trauma Self Repair In Chimpanzees* published in *Developmental Psychology* and *Building an Inner Sanctuary: Complex PTSD in Chimpanzees*, published in the *Journal of Trauma and Dissociation*; *Mirror, Mirror*, published in *American Scientist*, *Natural symmetry*, published in *Nature*, *An ape among many: Animal co-authorship and trans-species epistemic authority*, published in *Configurations*, and *We, Matata: Bicultural living amongst apes*, published in *Spring*. I am also the co-author of *The Bioethics of Great Ape Wellbeing: Psychiatric Injury and Duty of Care*, a policy paper for the *Animals in Society Institute* that documents the

- discrepancy between standing science and ethics and law relating to great ape well being.
4. My own work and the corpus of standing science provide theory and data documenting the compromise to psychological wellbeing sustained by chimpanzees in captivity as biomedical and experimental subjects.
  5. Recent diagnosis of PTSD in chimpanzees used in biomedical research requires us to re-examine regulatory status and to establish criteria by which psychological injury is assessed and deemed reason for retirement. It is my opinion that the American Psychiatric Association (APA) criteria codified for assessing human mental states provides clear guidelines to identify psychological injury in chimpanzees. Similar to how modern psychology and psychiatry use APA diagnostic criteria to diagnose PTSD and other psychological conditions in nonverbal humans, so too may they be, and have been, used to assess chimpanzees.
  6. The acknowledgement and scientific evidence of psychiatric damage in great ape biomedical research subjects indicates that the institutions within which they are held are not fulfilling their duty of care. This clearly suggests that the Secretary correct this long-standing omission and neglect.
  7. I offer my Declaration in support of the Rulemaking Petition to establish criteria for retirement that include criteria for psychological wellbeing. Chimpanzees suffering from, likely to suffer from, or relentlessly suffering from the severe effects of stress and trauma experienced in laboratory use

and confinement must be deemed “not needed” and retired to sanctuary. These individuals are inappropriate to serve as research subjects. Our scientific knowledge compels ethical and legal rectification: the retirement to sanctuary of those who have suffered for decades without recourse to the rehabilitative interventions of good sanctuary care. A restorative environment can only be achieved in a naturalist sanctuary environment in which the needs of the chimpanzees always come first, staffed by caregivers skilled in psychological healing. Retirement must allow for a chimpanzee to benefit from the same individualized approach to healing that we seek for humans who have suffered similarly.

8. I respectfully request that the Secretary of Health and Human Services give the above referenced Rulemaking Petition to establish criteria for retirement of chimpanzees under the CHIMP Act her immediate attention and therefore fulfill her responsibilities to the intention and mandates of the CHIMP Act.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.



G.A. Bradshaw, Ph.D, Ph.D.

**Executive Director**

**The Kerulos Center**

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07/16/2012

Curriculum Vitae  
**G.A. Bradshaw, PhD, PhD**

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**PERSONAL**

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Married: O. Mein Gans

**PROFESSIONAL POSITIONS**

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2006—present	Executive Director and founder, The Kerulos Center ( <a href="http://www.kerulos.org">www.kerulos.org</a> )
2008—present	Adjunct Faculty, Psychology, Southern Oregon University
2006—present	Adjunct Faculty, Psychology, Pacifica Graduate Institute, CA
1991—present	Adjunct Faculty, Environmental Sciences Graduate Program
1991—2005	Adjunct Faculty, Forest Sciences, Oregon State University
1991—2005	Adjunct Faculty, Electrical Engineering, Oregon State University
2001—2002	Research and Monitoring Coordinator, Rogue River National Forest, OR
2000—2002	Community-Science Liaison, Applegate AMA, OR
1991—2001	Research Mathematician, PNW Research Station, USDA
1999—2000	Fellow, National Science Foundation Fellow (NCEAS)
2002—present	Tournière de Plat Scholar

**EDUCATION**

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1972-1980	University coursework in language studies: University of Copenhagen, Monterey Institute of Foreign Studies, Taiwan Normal University
B.A., 1978	Linguistics (Chinese), University of California, Santa Barbara
M.Sc., 1988	Geophysics, Stanford University
Ph.D., 1991	Forest Ecology, Oregon State University (dissertation: <i>Analysis of hierarchical pattern and process in Douglas-forests using the wavelet transform</i> )
Ph.D., 2005	Depth Psychology, Pacifica Graduate Institute, Santa Barbara (dissertation: <i>Elephant trauma and recovery: from human violence to trans-species psychology</i> ).

**TEACHING EXPERIENCE**

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For the past thirty years, in addition to formal undergraduate and graduate courses and professional presentations, Dr. Bradshaw has lectured, given seminars, participated in distance and onsite courses, and workshops at University of California, Stanford University, Oregon State

University, and Pacifica Graduate Institute and given master's classes at veterinary and human mental health conferences. She serves as adviser to and committee member of master and doctoral students members at diverse campuses.

## OTHER PROFESSIONAL EXPERIENCE

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- Science advisor, 2007 Scientific Assessment of Elephant Management in South Africa
- Panel Review Team, Sierra Nevada Framework for Conservation and Collaboration, *Inter-agency Draft Environmental Impact Statement*. 1999.
- Steering Committee Member. *AMIGO (Americas Inter-Hemispheric Geo-biosphere Organization)*. Stanford, California.
- Consultant, Monitoring Design for the Federal Interior Columbia Basin Assessment, USDA/UDI Boise, ID. 1998.
- Member, *Inter-Agency Team of the Northwest Forest Plan Monitoring Plan for Biodiversity*.
- U.S. Lead, International Long Term Ecological Research (*LTER: South Africa*). 1999.
- Steering Committee Member and Sub-Committee Chair, *Science Implementation, LAI (Inter Americas Institute for Global Change)*. Duke University, North Carolina. 1994.
- National Science Foundation Fellow (1999-2000)
- Associate, the New Zealand Centre for Human-Animal Studies, 2008.
- Advisory Board, Spring Journal 2010
- Board Member, Midwest Avian Adoption and Rescue Services, Inc 2009
- Board Member, The Toby Fund, 2009
- Board (Secretary), The Great Ape Trust and Bonobo Hope

## AWARDS

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- ◆ 2009 Book of the Year (BOTYA) Gold Medal Award, Winner in Psychology.
- ◆ Favorite Science Books of 2009, *Scientific American*
- ◆ Nominated for Pulitzer Prize 2009
- ◆ Honorable Mention Award 2009 PROSE, Psychology (Professional and Scholarly Publishing Division of the Association of American Publishers)
- ◆ Honorable Mention, 2010 Green Book Festival

## SELECTED PUBLICATIONS

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### *Books*

- Bradshaw, G.A. 2009. *Elephants on the edge: What animals teach us about humanity*. New Haven: Yale University Press. (Translated into Spanish and Korean)
- Bradshaw, G.A. 2010. *Minding the Animal Psyche* (Editor). *Spring*, 83
- Bradshaw, G.A., and P. Marquet. (eds). 2002. *How landscapes change: Human disturbance and ecosystem disruptions in the Americas*. New York: Springer-Verlag.

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- Bradshaw, G.A. 2011. Animal Ways. in *Speaking Up for Animals*. L. Kemmerer (ed). Paradigm Publications.
- Bradshaw, G.A. 2012. Restoring our daemons. in *Vital Signs*. (ed) Mary-Jayne Rust & Nick Totton. Karnac Publications.
- Bradshaw, G.A. in press. Living out of our minds. in P. Kahn and P. Hasbach (eds). *Rediscovery of the Wild*. MIT Press.
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#### *Other Academic & Professional Publications*

- Bradshaw, G.A and M. Engebretson, (2011) A scientific evaluation of captive breeding and possession of parrots (psittacines) in captivity referent to the Norwegian Animal Welfare Act (2010). A report prepared for the Norwegian Animal Protection Alliance.
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- Bradshaw, G.A. & Jill Robinson. 2010. The Journey Home: Recovery and Renewal in Sanctuaries. *American Anti-vivisection Society Magazine*, Special Issue: Animal Sanctuaries - A Place to Call Home, Volumes 3 and 4, p. 18-20.
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- Bradshaw, G.A. 2009. Bear in mind, *Psychology Today* blog. (Five new essays to date in 2011) (<http://www.psychologytoday.com/blog/bear-in-mind>)
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### *Media Coverage*

#### Radio and Print

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#### Film and television

- Elephant on the couch*. Vetenskapens Värld, SVT 2, *Skandinavian Television*, May 23, 2011.
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### **CONFERENCES (LEAD ORGANIZER)**

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- *Trans-species psychology: Theory and Practice*. Southern Oregon University. 16-18 June 2008.
- *Statistical inference and environmental policy*. 2001. NSF/USDA Forest Service. Santa Barbara, CA.

**Re: PETITION FOR RULEMAKING )**  
**U.S. DEPARTMENT OF HEALTH )**  
**& HUMAN SERVICES )**  
**)**  
**TO SET CRITERIA FOR DETERMINING WHEN )**  
**CHIMPANZEES ARE NO LONGER NEEDED FOR )**  
**RESEARCH AND MUST BE RETIRED AND SENT TO )**  
**SANTUARY AS REQUIRED BY THE CHIMPANZEE )**  
**HEALTH IMPROVEMENT, MAINTENANCE, AND )**  
**PROTECTION ACT )**

**DECLARATION OF THEODORA CAPALDO, Ed.D.**

1. I am a Massachusetts licensed psychologist with more than 30 years of experience treating patients with a variety of psychological disorders, including Post Traumatic Stress Disorders (PTSD), Anxiety Disorders, and Depression. Included in my professional affiliations is membership in the American Psychological Association. Among other publications, I have co-authored several papers on various psychological components of humane care of chimpanzees in laboratories, including the first paper to be published regarding PTSD in chimpanzees. The clinical case studies were published in the *Journal of Trauma and Dissociation*, *Building an Inner Sanctuary: Complex PTSD in Chimpanzees* and in *Developmental Psychology*, *Developmental Context Effects on Bicultural Post-Trauma Self Repair In Chimpanzees*—both esteemed journals within the field of psychiatry and psychology. Further, I co-authored a Policy Paper, *The Bioethics of Great Ape Wellbeing: Psychiatric Injury and Duty of Care* for the Animals in Society Institute. I have served for the past 15 years as President and Executive Director of the New England Anti-Vivisection Society, a 117-year-old animal protection organization dedicated exclusively to helping animals in labs. Under my tenure, the Board of Directors is committed to taking a science-based

- *Decision Strategies for Complexity and Uncertainty in Natural Resource Management in British Columbia*, Canada. Workshop. 2000. Southern Interior Forest Extension and Research Partnership. Kelowna, B.C., Canada.
- *Re-thinking the "and" in humans and nature: ecology at the boundary of the human dimension*. 2000. Ecological Society of America Annual Meeting. Snowbird, Utah.
- *Human-Nature Boundaries*. 2000. National for Ecological Analysis and Synthesis. Workshop, Santa Barbara, California, USA.
- *Habitat Fragmentation Effects Across Biomes in the Americas*. 1997. Maitencillo, Chile. Inter-Americas Institute for Global Change and National Science Foundation (IAI-NSF; co-chair P. Marquet).
- *Biological Invaders, Fire and Fragmentation in the Americas*. 1996. Inter-Americas Institute for Global Change and National Science Foundation (IAI-NSF). Silver Falls, Oregon. USA (co-chair, H. Mooney).
- *Sampling Aquatic Network and Watersheds Across Scales* 1995. Center for the Analysis of Environmental Change Consortium. Timberline, Oregon

## SELECTED INVITED PRESENTATIONS \*

*\*Since 2002, Dr. Bradshaw accepts only limited speaking engagements*

- Bradshaw, G.A. 2011. Dissolving Caliban's Line: the emergence of trans-species science and identity. Arcus Foundation Roundtable, *Rethinking the species interface*. August 10-12, 2011, Desmond Tutu Center, New York.
- Oriel, E. & G.A. Bradshaw. (Forthcoming). Alaskan Indigenous Carvings of Wolves Reflect Cosmology that Parallels Complexity Theory, *Religion, Nature and Art Conference* Sponsored and in Cooperation with the Vatican Museums 13-14 October 2011, Vatican Museums (Vatican City State)
- Bradshaw, G.A. & E. Oriel. (Forthcoming ). Restoring our daemons. *Interactive Futures Conference: Animal Influences*. November 17-19, 2001, Emily Carr University of Arts + Design, BC, Canada.
- Bradshaw, G.A. 2010. Now we are one: the Human-Animal-Bond/Bondage. *Animal Grantmakers Conference*, Baton Rouge LA.
- Bradshaw, G.A. 2010. Living like animals: Sustainability and Animal self-determination. *2nd International Conference on Sustainability Science*. Rome, Italy. 23-25 June 2010.
- McCarthy, E. and G.A. Bradshaw. 2010. The role of patient consent in psychotherapy: A discussion on the ethics of flooding. *Proceedings of the Association of Avian Veterinarians. 29th Annual Conference, San Diego, CA*.
- Bradshaw, G.A. and E. McCarthy. 2010. Affect dysregulation: mechanisms and treatment. Avian affect *Proceedings of the Association of Avian Veterinarians. 29th Annual Conference, San Diego, CA*.
- Yenkosky, J., G.A. Bradshaw, and E. McCarthy. 2010. Post traumatic stress disorder among parrots in captivity: treatment considerations. *Proceedings of the Association of Avian Veterinarians. 29th Annual Conference, San Diego, CA*.
- Ferdowsian, H., L. Brent L, D. Durham D, G.A. Bradshaw. 2008. Effects and Prevalence of Psychological Trauma in Chimpanzees in Captivity. *International Primatological Society Congress*. Edinburgh, Scotland.
- Bradshaw, G.A , Linden, P. G.,& Schore, A.N. 2005. Behavioural and physiological effects of trauma on *Psittacines*. *Proceedings of the Association of Avian Veterinarians. 26th Annual Conference, August 9-11, 2005, Monterey, CA*.

- Bradshaw, G.A. Of pachyderms and people: Trans-species psychology theory (Workshop). *Annual UC Davis National Child Abuse and Neglect Conference*. October 27-29, 2008.
- Bradshaw, G.A. 2008. Of kin under the skin: What we are learning about human trauma from animal experiences. (Workshop). *Annual UC Davis National Child Abuse and Neglect Conference*.
- Bradshaw, G.A. 2001 Red Herrings: the American Indian in the Discourse of Ecology and Conservation. *American Heritage Institute*. Wyoming.
- Bradshaw, G.A. 2000. Re-thinking the "and" in humans and nature: ecology at the boundary of the human dimension. (Symposium). *Ecological Society of America Annual Meeting*.
- Bradshaw, G.A. 2000. Implicate ecology: a relational approach to integrating indigenous and Euro-American sciences. *National Centre for Ecological Analysis and Synthesis (NCEAS)*.
- Bradshaw, G.A. J. G. Borchers, & G. Weaver. 2000. Building bridges between science and forest policy: Methods and tools. 7 - 12 August 2000. *XXI IUFRO World Congress*. Kuala Lumpur, Malaysia.
- Bradshaw, G.A. 1999. Using scientific uncertainty to shape forest policy. *United Nations. International Forum on Forestry*, Geneva, Switzerland
- Bradshaw, G.A. Two-D Wavelet Analysis. Institute of Mathematics and Physics. Royal Institute of Agriculture and Veterinary Sciences. University of Copenhagen, Denmark.
- Bradshaw, G.A. 1- and 2-D Wavelet analysis for environmental analysis. *Centre National d'Etudes Spatiales (CNES)*, Toulouse, France.
- Bradshaw, G.A. and Jill Anthony. 1999. Two-dimensional analysis for characterizing multi-scale species range data. (Symposium) *Ecological Society of America Annual Meeting*, Snowbird, Utah.
- Bradshaw, G.A. & J.G. Borchers. Scientific uncertainty and environmental policy formulation. *Oregon State Legislature*, Joint Committee on Stream Restoration and Species Recovery, February 5, 1999.
- Bradshaw, G.A. and J.G. Borchers. Scientific uncertainty, risk, and decision-making. *Oregon State Legislature*, Senate Committee on Agriculture and Natural Resources, February 8, 1999.
- Bradshaw, G.A. 1998. Articulating the science-policy gap: models, perception and uncertainty. *Université de Laval*. Quebec City. Quebec. Canada. March, 1998.
- Bradshaw, G.A. 2000. Integrating Indian and non-Indian approaches to conservation and decision making. *California Tribes and Federal Land Agency Consultation*. USDA Forest Service Province Planning for Southern California. Buellton, California.
- Bradshaw, G.A. Integrated monitoring and landscape implementation design using Bayesian belief networks and objectives hierarchies for stakeholder modeling. *Grand Canyon Research and Monitoring Center*. December 2000.
- Bradshaw, G.A. Uncertainty, perception, and scaling. Implications for large-scale monitoring. *Université de Laval, Québec*, 7 April, 1999.
- Bradshaw, G.A. and J.G. Borchers. 1998. Global climate change and the Columbia River basin: The Science-policy gap and model uncertainty, Oregon Chapter American Fisheries Society, 34th Annual Meeting: Population, Economics, and Ecosystems: Is Sustainability Attainable? February 11-13, 1998, Sunriver, Oregon.
- Bradshaw, G.A., J.G. Borchers and R.P. Neilson. 1997. Articulating the science-policy gap: Models, uncertainty, and perception. Invited talk, Annual Meeting of the Ecological Society of Chile, 18-22 November, 1997, Pucón, Chile.
- Bradshaw, G. A., M. Fiorella, P. Ringold and J. Barker. 1998. Characterizing ecological signatures across scales: assessing data-capture methods for riparian ecosystem monitoring. 3rd Intl. Symposium: Spatial Accuracy Assessment Proc., Quebec, Canada.
- Bradshaw, G.A. Land-use and land conversion patterns: examples from the western US. IAI-NSF AMIGO Conference on Biological Invaders, Silver Falls, OR. 1997.

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- Bradshaw, G.A. and G. Weaver. 1997. A stochastic-GIS based watershed model examining the effects of spatial pattern on the large woody debris dynamics in PNW streams. Ecological Society of America. Providence, Rhode Island
- Bradshaw, G.A. Habitat alteration effects on landscapes across biomes in the Americas. IAI- NSF Principal Investigators Conference, Long Beach. CA.
- Bradshaw, G.A. 1997. Underlying land-use patterns and processes in western USA. IAI-AMIGO Conference on Habitat Fragmentation in the Americas. Maitencillo, Chile. November.
- Bradshaw, G.A. and M.-J. Fortin. 1997. Effects of landscape anisotropy on sampling designs in aquatic and forested systems. (Symposium). Ecological Society of America Conference. Albuquerque, New Mexico.
- Bradshaw, G.A., 1997. Data compression and pattern analysis: comparing wavelet and Fourier analysis. University of British Columbia (Department of Mathematics).
- Bradshaw, G.A., 1997. Characterizing canopy gap structure in forests using the wavelet transform. Ministry of Forestry, British Columbia, Canada.

## **FUNDING**

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approach to our arguments in support of our ethical and humane concerns. We believe we are at a point in protecting animals in labs where scientific progress in the development and validation of alternatives, lack of necessity and scientific understanding of the limitations of the animal model make our work on behalf of animals progressive and promising. I offer this by way of explanation for why we have focused on chimpanzees in recent years. A copy of my curriculum vitae is attached.

2. Extensive research was the foundation for our decision to focus on helping chimpanzees. We found ever decreasing use of chimpanzees—an indication from the scientific community of lessening current need; increasing use of alternatives in important areas of research like Hepatitis C—an indication of lack of future necessity; progressive laws and policies, like the CHIMP Act—a response to the “surplus” available for ever decreasing need; and the Act’s parameters regarding retirement and prohibition of euthanasia for anything other than the chimpanzee’s best interests—a confirmation of a changing moral status for a species identified as most like humans; withdrawal of federal funds for breeding—a policy change which addresses NIH’s growing fiscal burden for a population of “research resources” neither useful nor needed; and other indications that the scientific, administrative and legislative community are critically evaluating the *status quo* of chimpanzee use in research and that such a critique is leading to accumulating evidence that chimpanzees may not be the appropriate or chosen model for current or future research given its scientific limitations, excessive costs and growing societal concerns for chimpanzee well-being. All that said, it is also

glaringly apparent that the CHIMP Act is failing in its directive to retire chimpanzees “no longer needed” and that part of the reason for this lies in the lack of clear criteria by which to measure when retirement should be put in place. As such, I offer my Declaration, in support of the above identified Rulemaking Petition, to specifically address the need for strict and enforceable criteria regarding psychological well being—criteria which once in place will retire large numbers of chimpanzees and prevent further circumvention of the Animal Welfare Act’s mandate to “promote the psychological well being of primates.” Chimpanzees for whom further laboratory confinement and use will cause, perpetuate or enhance symptoms of psychological stress and suffering must be considered inappropriate research subjects, “not needed,” and therefore, must be retired.

3. For the past 12 years, I have been working with founders of sanctuaries for chimpanzees rescued from research. We have shared substantial information about the symptoms their chimpanzees exhibit, what such symptoms would be considered if they existed in a human, and what the course of action would be to alleviate or minimize symptoms that had reached a level that interfered with the quality of life. I met and spent a great deal of time with the chimpanzees who these sanctuary directors felt were “always depressed,” “couldn’t be comforted,” “went into trance like states,” “seemed to be reacting to something that wasn’t there,” “treated a hand or arm like it didn’t belong to them,” and myriad other symptoms which indicated that the chimpanzees’ ability to cope with the reality of their laboratory life and use had been depleted leaving them in a progressively

deteriorating state. Neither of these sanctuaries with which I worked had chimpanzees retired under the CHIMP Act. Rather, their chimpanzees came from private labs that had closed. Otherwise, likely both populations would have continued to be cycled through further research—with one exception, a chimpanzee who was considered for euthanasia because the veterinarian felt she could not be sent on to further research to the lab where others were being transferred, could not be rehabilitated, was “too far gone” and would not make a suitable sanctuary “candidate”. That same veterinarian spoke with me years later about how “pleased [he] was with her progress in sanctuary...” noting he “could not believe it!”

4. Over the course of lengthy and frequent discussions with sanctuary directors and visits to the sanctuaries to witness first-hand the particular behaviors described to me, it became apparent that many of the chimpanzees exhibited symptoms which, had they been occurring in a human, would have led to a diagnosis of PTSD, or Depression or Anxiety Disorder. It has been established that chimpanzees’ cognitive function, social needs, emotional needs, and ability to suffer not just physically but psychologically are similar to that in human primates. Why then would it not also be the case that their psychological and cognitive dysfunctioning could progress to the same level of disturbance that would make their disorder diagnosable, just as blood sugar level dysfunction, thyroid over or under activity, or other physiological maladies? That chimpanzees suffer the same way as do humans who are confined, used in research, separated from their family or friends arbitrarily, stripped of all self determination and agency, and other hardships and

stressors that come with captivity and use is now established in the literature.

Admittedly some chimpanzees are better able to cope than others, but it is clear that criteria for retirement must include a thorough assessment of an individual's cognitive, behavioral and social functioning, and that any chronic or severe symptoms of stress must be defined as making that individual ineligible for further research and therefore eligible to be retired. When "normal" functioning of affect, cognition, and social behaviors become severely compromised, an individual in this state is an inappropriate subject for research scientifically, ethically and legally (labs must be held to AWA requirements to "promote psychological well being") and must be retired.

5. Unfortunately, from conversations with veterinarians and other staff previously or still working in chimpanzee labs, I came to understand that there is an apparent tolerance for and acceptance of aberrant chimpanzee behavior as normative for the lab. As such, much suffering and the implications of that suffering for the suitability of research use remains unexamined. These conditions, not unlike similar conditions for human captives, make aberrant behavior the norm. Like prison guards, caregivers can come to expect certain behaviors and no longer see them as reason for intervention within the system, because they are frequently occurring and therefore accepted as common. However, caregivers and veterinarians must be required by the Secretary to recognize, evaluate and intervene when chimpanzees are displaying signs of severe, relentless stress and all of the behavioral and psychological aberrant behavior that goes with it. Self-imposed isolation, anorexia, persistent diarrhea, self-mutilation, over-grooming,

ritualistic stereotypic behaviors, inability to be soothed, refusal to groom or be groomed, flattened affect, high incidences of infanticide, and other indicators of psychological dysfunction must be part of the criteria for determining that a chimpanzee is no longer needed—or indeed suitable—for research.

6. While I am in full support of all the suggested criteria for retirement proposed in the Rulemaking Petition, as a psychologist and expert in chimpanzee well-being, I am focusing my Declaration on my professional opinion as to why psychological well-being must be elevated to the same degree of ethical care-giving concern as would such physical symptoms such as a gaping, infected wound that would not heal in a diabetic chimpanzee, excessive weight loss in a chimpanzee whose thyroid function could not be effectively adjusted, etc. Chimpanzees can endure incredible assault to their bodies, e.g., losing a finger, yet still be able to eat lunch, having an ear torn in a fight and showing no indication of pain. However, their psychological, social and behavioral needs are far more fragile than their robust ability to mask even severe physical symptoms and leave them highly vulnerable to “break downs” —chronic debilitating symptoms that seriously affect their well being and ability to cope. In addition to the severe behavioral manifestations caused by stress, stress’ bio-physiological effects compromise their suitability as research subjects and is a confounding variable in research. Criteria for retirement must not only include retirement for chimpanzees who are psychologically, behaviorally or cognitively symptomatic but also require that such chimpanzees be retired to the rehabilitative safety of lifelong sanctuary care.

7. I respectfully request that the Secretary of Health and Human Services give the above referenced Rulemaking Petition to establish criteria for retirement of chimpanzees under the CHIMP Act immediate and prioritized commitment to rectify a problem that has gone on no less than 12 years since this law was enacted. In establishing such criteria and overseeing its enforcement and the resulting retirement of large numbers of chimpanzees, the spirit and mandates of the CHIMP Act can finally be realized.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.



Theodora Capaldo, Ed.D.  
**MA Licensed Psychologist**  
**President and Executive Director of**  
**The New England Anti-Vivisection Society**

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**07/17/2012**

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## **EDUCATION**

- Doctorate of Education, Boston University, Humanistic and Behavioral Studies, 1979
- Master of Arts, University of Hartford, Clinical Practices in Psychology, 1973
- Bachelor of Arts, Merrimack College, psychology/philosophy, 1970

## **CLINICAL EXPERIENCE**

- Private Practice, 1981 – present
- Director of Counseling, Bradford College, 1979-1983
- Clinical Supervisor, 1979- 1990
  - Doctoral and Master's level psychology students and clinical social workers
- Staff Psychologist and Psychology Internships, 1972 – 1981
  - ACCESS, A Counseling Collaborative and Educational Service System, Greater Newburyport, Haverhill, Lawrence and The Andovers
  - Human Resource Institute, Lawrence, MA
  - Greater Lawrence Mental Health Center, Lawrence, MA
  - Advisory Resource Center, Boston University
  - Alysa Counseling Services, Methuen, MA
  - University Community Clinic, University of Hartford
  - Norwich State Hospital, Norwich, CT
  - Hartford Regional Center (MR), Newington, CT
  - Connecticut Valley State Hospital Middleton, CT
- Other Clinical Experience, 1966-1972
  - St. Dymphna's Psychiatric Unit, Bon Secours Hospital, Methuen, MA
  - Essex County Correctional School, Lawrence, MA
  - Greater Lawrence Vocational and Career Center, Lawrence, MA
  - St. Ann's Residential Treatment Center, Methuen, MA

## **TEACHING EXPERIENCE**

- College Teaching, psychology department, full and part time 1972 –1979
  - Bradford College, Bradford, MA, Associate Professor 1979-1983
  - North Shore Community College, Beverly, MA, Assistant Professor, 1973-1976
  - Merrimack College, North Andover, MA, Lecturer
  - Northern Essex Community College, Haverhill, MA, Instructor
  - Asnuntuck Community College, Enfield, CT

### **ANIMAL PROTECTION EXPERIENCE**

- President/Executive Director, New England Anti-Vivisection Society, 1997-present
- Trustee, American Fund for Alternatives to Animal Research
- Director, the Psychologist the Ethical Treatment of Animals, President 1996-1998
- Massachusetts Department of Public Health Committee for Establishing Rules and Regulations for the Care and Use of Laboratory Animals, Invited Member
- New York Bar Association, Legal Issues Pertaining to Animals, Invited Presentation
- Fourth World Congress on the Use of Animals and Alternatives in the Life Sciences, Invited Presentation
- Public Responsibility in Medicine and Research (PRIM&R), Panel on Chimpanzees
- Tufts School of Veterinary Medicine ,1st Animals & Society Conference, Invited Panel
- Advisory Boards: Fauna Sanctuary and Laboratory Advocacy Primate Group

### **RESEARCH AND PAPERS**

- Women and the Internalization of Blame in Rape, Boston University, 1976
- A Quantitative and Qualitative Investigation of Women's Preferences for the Sex of a Therapist, Boston University, 1978
- The Effects of Maternal Deprivation on Later Affectional and Behavioral Responses, A Literature Review, University of Hartford, 1970
- Evaluation of the Use and Usefulness of Maternal Deprivation Studies in Clinical Settings, 1985
- Testing the Water of a Human-Dolphin Bond Project, Psychologist for the Ethical Treatment of Animals, 1988

- Research Assistant, Infant Child Research Laboratory, University of Hartford, 1971-1973
- The Development of Compassion as a Psychotherapeutic Goal of Moral Development,
- An Analysis of the Relationship Between Violence Toward Women and Children and Non-Human Animals: Practice and Policy Implications and Solutions, 2001
- Realms and Realities of the Possibility of 100% Replacement of the Harmful Use of Animals in Education, First InterNICHE International Conference, 2001

## **PUBLICATIONS**

- Using Psychology, A Test Manual, Little Brown and Co.,
- Consultant to Market Research on Feminist Studies, Addison-Wesley Publishers,
- Re-sensitizing Society: Understanding the Connection Between Violence Toward Human and Nonhuman Animals. Theodora Capaldo, Ed.D., DABPS, DABFE and Lorin Lindner, Ph.D., M.P.H. *The Forensic Examiner*. Oct./Nov.,1999.
- The Psychological Effects on Students of Using Animals in Ways that They See as Ethically, Morally or Religiously Wrong. Theodora Capaldo, Ed.D. Fourth World Congress on the Use of Animals and Alternatives in the Life Sciences, *ATLA*. 2004, 32, Supp.1: 525-531.
- Building an Inner Sanctuary: Complex PTSD in Chimpanzees. G.A. Bradshaw, Ph.D., Ph.D, Theodora Capaldo, Ed.D., Lorin Lindner, Ph.D., M.P.H., and Gloria Grow, Sanctuary Director. *Journal of Trauma and Dissociation*. 2008, 9(1), 9-34.
- Developmental Context Effects on Bicultural Post-Trauma Self Repair In Chimpanzees. G.A. Bradshaw, Ph.D., Ph.D. Theodora Capaldo, Ed.D., Lorin Lindner, Ph.D., M.P.H., Gloria Grow. *Developmental Psychology*, 2009, 45(5). 1376-1388
- The Bioethics of Great Ape Well-Being: Psychiatric Injury and Duty of Care. Theodora Capaldo, Ed.D., and Gay Bradshaw, Ph.D., Ph.D., Animals and Society Institute Policy Paper, 2011.

## **CONSULTATION and INVITED TALKS**

- Consultation, Workshops, Lectures, Evaluations, 1971-present for:

- The United States Civil Service Training Commission
- Federally Employed Women
- Digital Equipment Corporation
- AT&T, Executive Coaching
- Environmental Protection Agency
- Greater Lawrence Chamber of Commerce and Community Action Council
- YWCA
- Forum for the Massachusetts Community College Behavioral Science Teachers
- National Organization of Women
- Intercollegiate Program of the Massachusetts' Community College
- Psychologist for the Ethical Treatment of Animals
- The American Guild of Organists
- MIT, Harvard, Phillips Academy, U of Rhode Island, U of Massachusetts, U of Vermont, Tufts University, Boston College, and others
- Ethical Science Education Coalition of Massachusetts and New York
- Massachusetts Public Safety Commission
- Massachusetts Legislative Committee on Public Safety
- Massachusetts Department of Public Health
- Massachusetts Committee on Education
- A Collaborative Counseling and Educational Service System, co-founder

## **PROFESSIONAL MEMBERSHIP, LICENSURE, AND CERTIFICATION**

- Past and Present Affiliations, from 1972-present
  - Massachusetts Licensed Psychologist, #2638
  - Commonwealth of Massachusetts Health Service Provider
  - The Commonwealth of Massachusetts, Department Mental Health, Psychologist Cert # 47
  - The Commonwealth of Massachusetts, Department of Education, School Psychologist, Cert # 202578
  - The Commonwealth of Massachusetts, Department of Education, Social Studies Teacher, 7-12 level
  - The American Psychological Association (APA), Member since 1983
  - The Psychology of Women, Div 35 of the APA (past)
  - The Massachusetts Psychological Association (MPA), Fellow
  - The Woman's Interest Group of the MPA (past)
  - The Massachusetts Regional Community College Faculty Association (past)

- The Ethical Science and Education Coalition, President, 1998-present

### **HONORS AND AWARDS**

- Presidential Scholar, Merrimack College
- Graduate Cum Laude, Merrimack College
- Graduate Scholar Award, Boston University
- Alpha Gamma Chapter, National Honor and Professional Society in Education

**Re: PETITION FOR RULEMAKING )**  
**U.S. DEPARTMENT OF HEALTH )**  
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**TO SET CRITERIA FOR DETERMINING WHEN )**  
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**HEALTH IMPROVEMENT, MAINTENANCE, AND )**  
**PROTECTION ACT )**

**Declaration of Jennifer Feuerstein**

1. As an Animal Care Technician at Yerkes National Primate Research Center (YNPRC) Field Station from November 1997- February 2003, a registered Animal Laboratory Technologist (RLATg), and current Sanctuary Director for Save the Chimps, Inc (STC), the world’s largest chimpanzee sanctuary, I am personally acquainted with approximately 350 chimpanzees who were or are residents of biomedical research laboratories. With fourteen years of experience caring for captive chimpanzees, including five years at YNPRC, I have witnessed the deleterious effects of biomedical research, social isolation, and social separation.
2. In 2000, the Secretary of Health and Human Services (HHS) was given an opportunity with the passage of the CHIMP Act to improve the lives of hundreds of chimpanzees. However, in the nearly twelve years since the passage of the CHIMP Act, no criteria have been established to determine when a chimpanzee is eligible for retirement from biomedical research. As a result, the retirement of chimpanzees from research has been haphazard at best, and has resulted in far

fewer chimpanzees being retired under the CHIMP Act than anticipated at the time the law was passed. This lack of criteria has resulted in the languishing of chimps, many with illnesses and psychological trauma, in barren laboratory cages, robbing them of the richer life in sanctuary that they need and deserve.

Additionally, the lack of consideration for the social needs and family bonds of chimpanzees has resulted in the separation of chimpanzees from families and lifetime friends, even in some cases where chimps have been retired.

3. During my tenure at YNPRC, I was promoted twice to positions of increasing responsibility, and became a RLATg. I cared for approximately 60 chimpanzees who were used in behavioral, cognitive, malaria, and vaccine research, or in no research at all. Prior to the passage of the CHIMP Act, a number of chimpanzees at Yerkes were deemed “surplus” and were sent to New Iberia Primate Research Center. Among these chimpanzees were Jimoh and Gwennie, who had been members of a large social group from whom they were separated. Jimoh had been the alpha male, and Gwennie was mother to two males in the group including a young son, Claus. With their departure to New Iberia, they were separated from their family forever. From my firsthand and professional experience and given the Animal Welfare Act’s requirement to provide for the psychological well being of primates, retirement criteria must include respect for family and social bonds and allow for cage mates/friends or family to be retired with given individuals deemed “no longer needed” for research.
4. After the passage of the CHIMP Act, there was informal discussion among the staff at Yerkes about the existence of a list of chimps who were to be retired to

Chimp Haven, the recipient of CHIMP Act funding. I am unaware of what criteria, if any, were used to create this list. I was told of some individuals who were going on the list: a group of four males (Hunter, Lyons, Donald, and Brent) and Gwennie's son Claus were mentioned. I celebrated the thought of the retirement of the four males, who were not being used in protocols and who were residing in a small enclosure designed for gibbons. They were wonderful chimps, friendly and outgoing. Hunter and Lyons were twins who had been together since birth, and Lyons had terminal kidney disease. They could enjoy retirement together, and Hunter would have his friends Donald and Brent by his side if Lyons passed away. I despaired at the thought of Claus being separated from his family, because he had known only them and his quarter-acre enclosure since the day he was born; however, I hoped that Gwennie would be retired also given that she was "surplus" and that Claus would be reunited with his mother. Sadly, my imagined scenarios for these chimps' retirement never came to pass.

5. As it turned out, the list was not a list of chimps to be retired. It was simply a list of chimps whom Yerkes did not want anymore. The list was shared with at least one other laboratory, the Texas Biomedical Research Institute (known then as the Southwest Foundation, or simply Southwest.) A number of chimps were selected for transfer to Southwest. With what I would characterize as a callous indifference to the social bonds and emotions of chimpanzees—bonds and emotions that had been extensively studied and written about by Dr. Frans deWaal, head of the Living Links Center at Yerkes—the group of four males were broken up. Twins Hunter and Lyons were separated from each other. Hunter and Donald went to

Southwest. Lyons and Brent were more fortunate and went to Chimp Haven.

Despite public pleas for their reunion, the twins never saw each other again, and both Hunter and Lyons died.

6. Claus was also selected for transfer to Southwest. At approximately ten years old, he was taken from the only family he had ever known. No other chimps from his group were sent with him. Gwennie was fortunately retired to Chimp Haven, as was Jimoh, where she eventually passed away, but mother and son never saw each other again.
  
7. The lack of criteria for choosing chimps for retirement is also apparent when I consider who wasn't retired at Yerkes, or even put on the "surplus" list. Brodie, a chimp who mutilated herself following the removal of her spleen for malaria research, was not to my knowledge selected for retirement. Wenka, an elderly female who was born at Yerkes and among the eldest chimps there, was not given an opportunity to experience life outside of a cage. Jorg, a gentle elderly male who lived with an equally amiable companion, Duncan, was not chosen. Jorg was old, thin, and had chronic air sacculitis and polyps in his nasal passages. But when I knew him, he still had energy and interest in life. He and Duncan lived in a small concrete and steel indoor/outdoor run. They were not assigned to research protocols, and Jorg would not have been a candidate for research in any case given his health condition. Yet they were not retired, and both Jorg and Duncan died at Yerkes in their barren cage, when they could have spent their final years in retirement at a sanctuary.

8. In 2003, I took a position as Chimpanzee Caregiver at Save the Chimps, working with the late Dr. Carole Noon, who established Save the Chimps in 1997 (then known as the Center for Captive Chimpanzee Care) in order to provide a home for chimps no longer wanted by the US Air Force. After rescuing 21 Air Force chimps, Dr. Noon then went on to rescue 266 chimps surrendered by the bankrupt Coulston Foundation (TCF) in Alamogordo, NM. I traveled to Alamogordo in 2002 to volunteer for STC, and Dr. Noon offered me a position with the organization. In time I was promoted to Deputy Director and oversaw the care of the chimps at the former laboratory. I became extremely familiar with the chimps' personalities, health, and histories. In 2009, following Dr. Noon's death, I became Sanctuary Director.
9. When Save the Chimps took over TCF, we found chimps who could have and should have already been retired due to chronic health problems multi-use history, and psychological disorders. One chimp, Bobby, lived in social isolation, and had been used in at least 9 different research studies over a period of eighteen years, and engaged in serious self-mutilation, biting his own arm and tearing away the flesh. Another chimp, Ragan, was battling an untreated skin condition that left him itchy and raw. Many chimps had undiagnosed and untreated heart disease. Other chimps suffered seizures, but were not on any medication. It is only since their retirement that the chimps have received appropriate treatment. Bobby no longer bites his own arm. Ragan's skin is completely healed. Ultrasound is used to diagnose cardiac disease, and the chimps are treated with the appropriate medication, extending their lives. Chimps with seizures were treated.

10. The case of a chimpanzee named Vanna, now a resident of Save the Chimps, illustrates the need for retirement criteria for chimpanzees, criteria that include health status and social needs. Vanna's story also illustrates that laboratories do not necessarily consider individual health and social needs when making decisions regarding the chimpanzees' care and use. Vanna was born September 22, 1986 at Holloman Air Force Base (HAFB) in Alamogordo, NM. Her parents were Air Force chimps, Tinker and Lou. She was raised by her mother for three years, and then on November 1, 1989, she was "weaned" from Tinker—meaning Vanna and her mother were anesthetized and Vanna was removed and permanently separated from Tinker. Weaning in chimpanzees typically take place between the ages of 5-6 years old, is a gradual process that takes place over many months, and mothers and children may maintain lifetime relationships. Vanna's weaning happened in an instant, and she was taken from all that was familiar to her.
11. December 5, 1990, Vanna was anesthetized for a quarterly physical, and seized constantly in reaction to the ketamine used for anesthesia. In February 1991, she was anesthetized again with ketamine and had a "slight reaction." In March 1991 she "went into convulsion that lasted about 5 minutes. Lip & gums (*sic*) turned a purplish color." This seizure did not occur while under anesthesia. On December 18, 1991 Vanna was anesthetized with ketamine for a physical, and again experienced seizure with violent contractions. The laboratory veterinarian wrote on the record, "Put in chart that she seizures (*sic*) violently under ketamine (candidate for telazole [*sic*])." On March 5, 1992, Vanna was again given ketamine, and again experienced a seizure. On July 15, 1992, she was given

ketamine and valium, and experienced “violent seizures.” On February 19 & 20 1993, Vanna was witnessed having seizures. On March 8, 1993, she was anesthetized again with ketamine and valium, and had “minor seizures.” This pattern continued for the next decade. Vanna was anesthetized with and seized under ketamine repeatedly, despite her known reaction to the drug. She was also observed to have seizures while awake on multiple occasions. She was not prescribed regular anti-seizure medication.

12. In 1994, at the age of 8, Vanna was introduced to a breeding group. Female chimpanzees in the wild do not reproduce until between the ages of 11-14. The laboratory was also apparently unconcerned that Vanna’s seizure disorder could be passed onto her children. Vanna had repeated seizures while in this group; when she seized, she was at times the target of aggression by chimps who were confused or frightened by her seizures. Fortunately for Vanna, an adult female named Nadia protected and defended Vanna when she seized. Nadia would become Vanna’s surrogate mother and lifelong friend, since she was not reunited with her own mother Tinker.
13. Vanna was an Air Force chimp, and the Air Force had an opportunity to retire both Vanna and Nadia in 1997 when they put the entire chimpanzee colony up for bid. Multiple sanctuaries placed bids to retire the chimps. Vanna’s condition precluded her from being used in biomedical research protocols, and in fact it does not appear from her records that she was ever assigned to a research study. Despite Vanna being an excellent candidate for retirement, the Air Force instead opted to transfer her to The Coulston Foundation (TCF)—now custodians of

approximately 600 chimpanzees--where they kept her in the breeding program. Vanna became pregnant in 1997, and gave birth to a son, Kioki, on February 21, 1998. She was not a skilled mother, so Kioki was removed to be raised by humans in the laboratory nursery. Vanna became pregnant again and gave birth to a daughter Kira, on December 11, 1998. Kira was also removed at birth. Incredibly, she had given birth twice within the same calendar year. December 12, 2000, Vanna gave birth to her third child, Teá.

14. In 2001, the NIH took custody of 288 chimps from TCF due to animal welfare violations, but Vanna was not among them. The majority of the 288 chimps taken from Coulston had been used in infectious disease protocols, some in multiple studies at multiple labs over the years, but these chimps were not retired. Instead they were warehoused at Holloman Air Force Base with an uncertain future ahead of them. On December 20, 2000, the CHIMP Act was signed, providing funding and a framework to retire chimpanzees. The warehoused chimps would have been excellent candidates for retirement, but instead their care was contracted to a for-profit organization, Charles River Corporation, and the chimps remained warehoused at HAFB, where the facility was renamed Alamogordo Primate Facility (APF). The NIH has to date refused to retire the remaining chimps who are at APF, despite the fact that the contract with Charles River has expired, many of the chimps have multi-use histories, and the chimps have not been used (and therefore not needed for research) for more than ten years.
15. TCF, which still had well over 250 chimpanzees in its possession, was no longer eligible for NIH grants due to the aforementioned animal welfare violations.

Desperate for funds, TCF sold several infant chimps, including Vanna's daughter Teá, to private individuals in the entertainment industry. TCF eventually declared bankruptcy. The remaining 266 chimps were rescued by Save the Chimps, Inc., thanks to generous funding from the Arcus Foundation and other animal protection groups. No funds for the chimps' lifetime care were provided by the US government. Funds that were to have been held in reserve by TCF for the chimps' lifetime care vanished, and although there was a brief investigation by the State of New Mexico Attorney General, no funds were ever recovered.

16. When Save the Chimps, under the leadership of Dr. Carole Noon, took custody of the Coulston chimps in September 2002, we found 54 chimps living in the building that we dubbed "The Dungeon" to reflect its dismal conditions. The vast majority of the chimps in the Dungeon were living in social isolation, separated from contact with other chimps by 6 inches of concrete wall. The cages provided just 100 square feet of floor space, 50 square feet inside and 50 square feet outside. Vanna was one of 12 chimps in the Dungeon who were paired with a social partner—in her case, Nadia.

17. I will never forget when I met Vanna and Nadia in 2002, just 2 months after their retirement. 16-year-old Vanna was clinging desperately to Nadia as an infant chimp clings to her mother. I could barely make out where Nadia ended and Vanna began. I also recall the first time we witnessed Vanna having a seizure. She was on her side, convulsing, drooling, and her mucous membranes were blue. We attempted to intervene to provide medical care, but as Coulston employees had observed, Nadia stood over Vanna and refused to leave her side. Her devotion to

Vanna was clear and absolute. We knew that when the time came to integrate Vanna into a chimpanzee family and move her to Florida, Nadia would have to be with her also. As long as both were alive, separation of the two of them was not an option.

18. Save the Chimps' veterinarian prescribed anti-seizure medication to Vanna, with remarkable results. Vanna did not have a seizure for four years, allowing her and Nadia to join a social group. Her medication was adjusted when she experienced a brief seizure in which Nadia again stayed by Vanna's side. She remained seizure free for another four years. Vanna was also not anesthetized unless absolutely necessary, and when she was anesthetized, she did not seize. In fact, Vanna has never experienced a seizure while under anesthesia at Save the Chimps. Vanna has been closely monitored by our veterinary team, has been given an MRI to look for brain abnormalities, and has had her anti-seizure medications adjusted and changed when necessary. Because her condition is so well-controlled and closely monitored, Vanna is able to enjoy life on a three-acre island with a large chimpanzee family. The days of confinement in a small concrete and steel cage are behind her. Most significantly, Vanna no longer clings to Nadia in distress. Quite the opposite—Vanna is now a confident, robust chimp. She and Nadia remain dear friends, but Vanna's insecurity has vanished.

19. This is the hope and promise that retirement to a quality, professional sanctuary, such as those represented by the North American Primate Sanctuary Alliance (NAPSA), can provide to chimpanzees like Vanna. Too many chimps have been denied this opportunity because of the lack of criteria by which laboratories and

the NIH must abide when determining which chimpanzees should be retired under the CHIMP Act. With the establishment of criteria that include health status, years in research, years unused in research protocols, and inclusion of social companions, the needless separation of family members and the arbitrary retirement of some chimps but not others could have been avoided. With nearly a thousand chimpanzees still in research labs, the Secretary has an opportunity to establish criteria that will ensure the responsible retirement these chimpanzees deserve.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.



Jennifer Feuerstein

**Sanctuary Director  
Save the Chimps Sanctuary**

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**July 17, 2012**

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Fort Pierce, FL 34979  
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**Education:** Bachelor of Arts, Kalamazoo College, 1993. Major: Biology. Senior thesis on capuchin monkey behavior

Graduate study, University of Georgia, 1993-1997. Major: Zoology, with a focus on primatology. Master's thesis research on capuchin monkey behavior.

**Experience:** Save the Chimps, Inc, Fort Pierce, FL & Alamogordo, NM, 2003-Present. Sanctuary Director, 2009-Present; Deputy Director 2005-2009; Chimpanzee Caregiver, 2003-2004. Manage a staff of 45 employees responsible for the care and management of chimpanzees retired from biomedical research, entertainment, and the pet trade to a sanctuary setting.

Yerkes National Primate Research Center, Lawrenceville, GA, 1997-2003, Animal Care Technician III, RALATg certification. Responsible for the care, feeding, handling, and husbandry of non-human primates in a laboratory setting. Species: Rhesus macaque, Pig-tail macaque, Sooty mangabey, Orangutan, Chimpanzee

Cincinnati Zoo, Cincinnati, Ohio, April-June 1991, Zookeeper Intern. Responsible for the care, feeding, handling, and husbandry of multiple species in a zoological setting. Species: Lemurs, Pottos, Galagos, Marmosets, Callimico monkeys, Pythons, Boa constrictors, Aardvarks, Fruit bats, Barn Owls

**Publications:** Transfers of food from adults to infants in tufted capuchins (*Cebus apella*). Fragaszy, Dorothy M.; Feuerstein, Jennifer M.; Mitra, Devjani. *Journal of Comparative Psychology*, 1997, Volume 111 (2): 194

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**Male reunion displays in tufted capuchin monkeys (*Cebus apella*).**  
**Matheson, Megan D.; Johnson, Julie S.; Feuerstein, Jennifer M.**  
**American Journal of Primatology, 1996, Volume 40 (2): 183**

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**Re: PETITION FOR RULEMAKING )**  
**U.S. DEPARTMENT OF HEALTH )**  
**& HUMAN SERVICES )**  
**)**  
**TO SET CRITERIA FOR DETERMINING WHEN )**  
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**SANTUARY AS REQUIRED BY THE CHIMPANZEE )**  
**HEALTH IMPROVEMENT, MAINTENANCE, AND )**  
**PROTECTION ACT )**

**DECLARATION OF GLORIA GROW**

1. I am the founder and director of Fauna Foundation Sanctuary (Fauna), Carignan, Quebec. We are accredited by the Global Federation of Sanctuaries (GFAS), a member of the North American Primate Sanctuary Alliance (NAPSA), and accredited/licensed by the following Canadian authorities: Ministère des Ressources naturelles et de la Faune-Québec, Commission de protection du territoire agricole du Québec, and Environment Canada-Canadian Wildlife Service. I wish to offer insights from more than 15 years of experience and expertise in the physical and psychological well-being of chimpanzees from research in support of this HHS Rulemaking Petition on behalf of chimpanzees not yet retired from research. Attached is my curriculum vitae, as well as a list of articles and broadcast media that have relied on our expertise over the years.
2. Though located in Canada, all of our chimpanzee residents with biomedical research histories were retired from a U.S. laboratory. Fauna has a unique history in that we were one of four sanctuaries to receive chimpanzees upon the closing of the Laboratory for Experimental Medicine and Surgery in Primates (LEMSIP) at New York University, one of the first private labs to end their use of

chimpanzees. We accepted 15 chimpanzees, among who were the first HIV chimpanzees to ever be retired. All but the four youngest (who were born at LEMSIP) had multi-lab histories and were used in multiple areas of research and /or for breeding. Some were wild caught, some born and raised in a lab and others, cross fostered in human homes before being sent into research.

3. I am writing in support of the urgent need to establish criteria for retirement of the chimpanzees now remaining and held by the U.S. government. When our chimpanzees arrived in 1997, we saw the serious toll research use and laboratory confinement had taken on them. When the CHIMP Act was passed in 2000, we had anticipated that it would herald the retirement of hundreds more, who, likely, were in the same or similar condition to our chimpanzees. Sadly, this has not been the case.
4. Key to the position put forth in the Rulemaking Petition is the fact that when LEMSIP closed, the veterinarian had essentially established triaged criteria as to who would be transferred into further research and who would be retired. Head veterinarian, Dr. James Mahoney, was not in a position to retire all the LEMSIP chimpanzees, some were going to the Coulston Foundation to be used in or leased for further research and, at the time, there were not enough sanctuaries to accommodate the entire LEMSIP population even if he had been able to retire them all. Simply stated, Dr. Mahoney expressed to me that he needed to retire “those who [he knew] could not tolerate more research.” His decision was a professional opinion that suggested a recognition that an individual chimpanzee is not an infinite “research resource” but rather a living being with physical and

psychological limitations regarding how much hardship he/she can endure prior to being physically and/or psychologically in collapse.

5. Among the 100 LEMSIP chimpanzees retired were those who, like the ones who arrived at Fauna: had reached the end of their ability to tolerate research protocols as assessed by the resident veterinarian and care staff; had serious and multiple physical symptoms such as involuntary and un-resolvable gagging, diarrhea, anorexia, liver, kidney or heart compromise, and/or bodily damage including injury which limited mobility or balance; had been used “hard” in multiple labs; and/or who had psychological damage that led to chronic anxiety, withdrawal and self-injurious or dissociative behavior.
6. I offer two examples, with more available at [faunafoundation.org](http://faunafoundation.org).

A) **Billy Jo (Ch-447)**

Billy, a male chimpanzee born around 1968, arrived from LEMSIP at the age of approximately 29 years. Billy died suddenly and unexpectedly from degenerative heart disease in 2006 while playing. He was only about 38 years old.

Billy was purchased by LEMSIP in 1983 after being used for some 15 years in entertainment. He was owned by a trainer and used in circuses and private parties with a companion chimpanzee, [Sue Ellen](#). He was then transferred to another owner with whom he lived in New York State. When his last owner could no longer afford to keep him, he was sold to LEMSIP. It is unclear from records and verbal reports just how many transfers of private ownership Billy experienced. What is clear is that in his early life, Billy lived in a human world. As someone’s “sidekick,” he spent his days going fishing, to malls, or for ice cream.



At night, he was in a cage in a shed with Sue Ellen. They performed at parties and remained together until he was 15 years old. They were then sold to LEMSIP and thereafter, except for failed attempts to force them to mate, they were housed in solitary cages. At LEMSIP, Billy underwent continuous research protocols including numerous invasive procedures. Although most of his teeth had been knocked out during his performing years to make him “safer” to handle, he managed to chew off his thumbs in a violent reaction to an anesthetic and bit off his index finger during an anxiety attack. Billy’s anxiety had been so severe that it sometimes left him choking, gagging, and convulsing, and likely triggered these cardiac symptoms.

Billy was walked into the LEMSIP cage at the age of 15 years old, still manageable despite his strength and testimony to his gentle nature. Yet, from his arrival at LEMSIP forward Billy showed progressive symptoms of volatile aggression and depression.

Billy spent 14 years in research. According to lab records, of the 289 times he was anesthetized, 65 were by dart gun. His knock downs typically involved four or five lab personnel surrounding his cage, holding syringes prepared with anesthesia, while one aimed and shot darts filled with anesthesia. Most of the knockdowns occurred for routine blood draws required of the various protocols in which he was used. In the lab, he would violently shake his cage trying desperately and futilely to prevent anyone from approaching. Throughout his life in sanctuary, Billy could not bear to have strangers grouped in front of him or around his enclosure.

Anxious, aggressive, and fearful, Billy’s life in his lab consisted of banging incessantly on his cage, rocking or staring into space. Throughout the rest of his life, Billy was plagued by anxiety attacks and depression.

Records do not indicate whether Billy was captive-born or wild-caught. Still we know that in his early life, Billy lived in a human world. How his owner came into contact with LEMSIP is unclear. The owner had pursued options including animal dealers and trainers but he was unwilling to place Billy and Sue Ellen there. There were no sanctuaries at the time available to him. In discussions with the lab, he agreed to send them there given their promise that they would be

“looked after.” They would be fed and housed but there was no promise to not use them in research. However, the veterinarian did promise that Billy and Sue Ellen would one day be retired from research. This promise was made years before such a promise of retirement was made into law for federally owned chimpanzees via the CHIMP Act.

According to the attending veterinarian’s account of the day of the transfer from the private home to the lab, Billy’s owner took him and Sue Ellen by the hand. They walked along side him bipedally, up a hill, toward a pine knoll, with one on each side of him. The owner, a young man, was sobbing.



From this point on, Billy’s world changed in a way from which he never recovered. From his embrace in the human world (however wrong that is) he went to the solitary confinement of a lab cage. Humans were no longer predictably friends. Instead they infected him with HIV and other viruses and subjected him to more than 50 liver punch and wedge biopsies; bone marrow and lymph node biopsies; hepatitis B, measles, polio and tetanus vaccine studies; and other research.

From what I know of Billy’s suffering, I believe that it is morally wrong that chimpanzees whose identities have been destroyed by being reared in a human world or as a human are later considered appropriate research subjects. While they are still, after all, chimpanzees, what I learned about Billy is that he could never resolve why he was suddenly in a cage, while humans—his identified family—were now on the other side of the bars. Billy and others like him were betrayed in the worse way imaginable. A just society must deem chimpanzees who were cross-fostered inappropriate for lab confinement and research use. Of course, the change should start with forbidding private ownership of exotic species like chimpanzees and ending all cross-fostering research. But for now, there are chimpanzees in the U.S. laboratory population whose histories, like

Billy's, make the psychological toll taken on them in research more chilling, more devastating.

Billy was essentially condemned to living between two worlds...the human world into which he could never again enter except through bars and the world of his own species where, a stranger to their culture, his lack of "chimpanzee-ness" nearly cost him his life. His relentless anxiety coupled with a complete ignorance of chimpanzee behavioral language or cultural norms triggered attacks from other chimpanzees so severe that the only solution was to house Billy mostly alone, or at most with one or two other chimpanzees for short periods of time. Billy's failing health and stolen identity as a chimpanzee is an example of how and why others who share Billy's life history should be deemed unsuitable and therefore not needed for research and retired immediately.

### B) Jeannie (Ch 562)



In 1981, Merck, Sharpe & Dohme pharmaceuticals sent Jeannie to the Buckshire Corporation research facility. She was six years old. Seven years later, Buckshire sent her to LEMSIP. There, she was subjected to years of research including being inoculated with HIV, continual vaginal washes and cervical biopsies. She was often treated for self-inflicted wounds—a sign of severe stress. Following a 1995 experiment, Jeannie had what the veterinarian and other lab staff described as a "nervous breakdown." She was no longer of use to research. For the next two years she was left alone, heavily medicated, in her slightly less than 5'x5'x7' cage. The drugs did little to prevent her from screaming continually, ripping her fingernails off, thrashing out of control or huddling against the floor in the back of her cage. That is where I met her, looking more terrified than anyone I had ever seen.

That day at LEMSIP I met chimps captured in Africa; youngsters and teenagers born and raised in a lab; and older chimps who knew no reality but lab life. I experienced echoing screams, clanging metal, pungent smells and the chimpanzees' faces behind endless rows of bars.

As we were escorted around, we were told not to react. Not to cry. And to please "not mention the size of the cages." To be honest, I couldn't react. I was left speechless, frozen, watching but not quite a part of what I was seeing. It was

surreal. Nothing was right about the way the chimps were living. Nothing could have prepared me for what I saw. The only thought that crept into the back of my throat was, “No one should ever have to live like this.”

The buildings were long trailers, with no windows—white, sterile and efficient. There were doors at either end with two rows of chimpanzees in cages suspended off the ground to make cleaning easier. They ate, slept, urinated, defecated and were “knocked-down” in these small cages that held only a rubber tire hanging in the middle and a food shoot. This was their world. My hands, mouth, and eyes were completely covered with protective gear. I looked at those with me and down at my covered hands and the surreal feeling intensified. We looked scary and threatening and I could see the terror and alarm in the chimps’ faces. Then from where I stood, it was as though all hell had broken loose. I wanted to run. The intensity of their screams and the banging was unbearable. The cages were shaking and rocking. The chimpanzees were spitting large mouthfuls of water. The others in my group walked in. I stayed at the door, feeling this was better for them and for me. I was frozen in that threshold. I backed up further knowing we were the cause of this reaction.

Then, as I turned to look to my left, she was right there in the first cage—this chimpanzee that just kept spinning and spinning and banging herself against the sides of her cage. Her arms banging into her aluminum cage sent piercing sounds reverberating throughout the building, shaking her cage and all those along the long row. She was defecating. Saliva was spewing out of her mouth. Her eyes were rolling back in her head. She spun. And spun. And spun.

That was how I met Jeannie.

We were told to back out of the area. Dr. Mahoney closed the doors and called for Mike, a technician. He came quickly when he heard Jeannie’s name. He quietly went into the unit. We stayed outside. I was able to peek in through a small window in the steel door.

Mike walked right over to her cage and wrapped his arms around it as though embracing the cage with Jeannie inside it. She wasn’t a small chimpanzee and she was out of control. She could have seriously injured him but she didn’t. Instead she was hurting herself.

He reached his hands into the small openings in her cage, as far as they could go, and pressed himself against her and the bars. In turn, she pressed herself into him with her belly fully against the bars, her head turned to the side as she screamed in fear. He hugged her and she hugged him back...the terror and steel cage could not separate these two friends in that moment.

After it was over, the doors opened. He came out. We didn’t go back in. I stood in the doorway. I looked at her. I had pulled my mask off. I could not bear the distance it put between us. I pulled off my gloves, and dropped to my knees in the doorway. Jeannie looked as if an exhausted calm had come over her. There was a look of despair in her eyes. Mike came over to me and whispered, “She needs to get out. Help her.”

It was mutually agreed that day that I would make a home for 15 of the chimps from LEMSIP. I learned later that Jeannie and some of the others were HIV positive. I was asked if this would be a problem. The question seemed incredulous

to me. “Not at all,” I answered. I was told that this was going to be the first time HIV positive chimpanzees were going to be released to sanctuary.

Before she could come to live at Fauna, a lot had to happen. After twenty years of living in a cage, she would have to be able to live in a social group...like a chimp again. In fact, she would have to be a chimp again in every way possible. While I hoped things would go smoothly, it was a difficult transition for some of the chimpanzees including Jeannie. I thought it would be joyful for them to be reunited with each other. I could never have imagined the damage done in the laboratory that would prevent them from being a chimp and from being able to be with others of their own kind.

The lab’s efforts to socialize the chimps into groups before releasing them to Fauna weren’t working out for Jeannie. Instead of learning to live with others, her “nervous breakdown” had left her totally incapable of tolerating others. She had reached a point where she just couldn’t do it anymore. She couldn’t take what was happening to her and she couldn’t witness what was happening to others. The lab concluded she had reached a point of no return. Since she was no longer considered a good research candidate and now no longer a candidate for sanctuary, they decided to euthanize her.

As the lab gave up hope for her, they moved her out of the unit I met her in. On my second visit I couldn’t find her. When I asked where she was, I was told she wasn’t doing well and had a throat infection. I believed them. The next time I went, she still wasn’t back. To replace her, two other chimps had been put in the group that was being sent to Fauna.

The list of chimpanzees going to Fauna kept changing. I didn’t understand what was going on. I didn’t get what was likely to happen to Jeannie. Their vulnerable lives were in limbo every day. Decisions were being made about their futures depending on how they worked out socially...on a given day... in a certain week. If they had a bad day or a fight, they could be pulled to go to research. Or in Jeannie’s case, euthanized. This was all unthinkable to me...this arbitrary, cold and clinical shuffling that meant life or death...or a life of more research or of safety for these chimpanzees who had already suffered so much.

I sensed they might remove Jeannie permanently—and I might never see her again. So on my next visit, I tried harder to find her. I snuck off and went searching. From one of the units, I could hear horrible screams that sounded like her. I waited for her screams to stop and then quietly went in.

She was lying on the floor of her cage as she always did, her face pressed against the bars. She was eating a carrot...something in the years I knew her, she never did again. She was heavily medicated and “out of it”. She wasn’t stressed, and I had a chance to talk to her.

Jeannie wasn’t going to make it to sanctuary. I was told she couldn’t go to Fauna...or to research. Dr. Mahoney felt the most humane thing was to end her life. I felt the most humane thing was to not let this happen. Fauna’s efforts to make special arrangements for Jeannie and Mike’s pleas convinced Dr. Mahoney to let her go to Fauna. Mike and I, and apparently Dr. Mahoney in the end, believed in Jeannie and knew she would be all right once she was out.

Once the chimpanzees arrived at Fauna, it was clear how hard it was going to be for them to adjust. Jeannie continued to huddle in her corner. There was no miraculous moment that changed everything for her. Instead, it was a long, slow and painful process as healing always is. I had to watch her suffering, her confusion and fears, and the bizarre and sad behaviors she had adopted to survive the realities of a lab. Like how she would hold the bars and spin herself around—perhaps soothing herself or releasing her panic or perhaps the only activity her cramped and captured body could achieve in that small cage. I would stand by helplessly for hours, holding my breath as I watched her enter that trance-like state that I came to learn was the same dissociation that human trauma patients suffer—that place where the mind and heart and body are separated from each other in a desperate attempt to be freed from the pain. I sat watching helplessly as she would build her inner sanctuary by withdrawing from reality and going somewhere inside where only she could go, a place that offers victims of abuse the only place on earth where they can feel safe. I attempted in vain to find ways to pull her back to reality. I struggled with how, unlike the others, Jeannie could not tolerate even the smallest change in what she came to define as her safe little world and responded with anxiety and agitation.

Soon others were wrapping themselves in the soft fleece blankets given to them to build night nests, sleeping in comfort instead of on cold steel bars. I saw how the emotional scars left her incapable of tolerating even the touch of soft blankets. Instead, she was reduced to being only able to tolerate sameness, even if it was a barren floor.

I watched and tried desperately to find ways to comfort her. To help her learn her world was different now. Despite the long road and slow progress, I knew Jeannie had not given up. We would do this, no matter what. I learned that she would teach me how to help her heal.

First she needed to find the broken and scattered pieces of herself and piece them back together. Our relationship would be an important part of her journey. I knew she could and would come to trust again.

I made a special place for Jeannie to live where she could live alone or with others if she wanted...a place where through choices and quiet and comfort, she could try to recover. Jeannie's recovery wasn't quick or easy. But each day she improved and her ability to live a comfortable and even enjoyable life was eventually successful.

With time and healing, she soon seemed to have a reason to get up and something to look forward to each day. Jeannie had people around her that cared deeply about her. Within months her outbursts lessened and she was eventually off all medications and starting to live to the best of her abilities. I knew she would never be without setbacks. When we first met, she seemed to have lost hope, but now she had a sparkle in her eyes. Jeannie was re-emerging with caution depending heavily on the support we gave her and the freedom to make decisions about her body, and her life for herself.

In hindsight, what I did to help Jeannie was simple: I sat quietly with her for days, months, years. I went to that place of tranquility with her. I expected nothing from her. I loved her unconditionally. And, for the first three years I never missed a day

with Jeannie or the others. Then slowly, they began to rely on and trust that things were different and better.

One year passed before Jeannie would let me touch her toe. Another year before I could touch her fingers. Then one day she did something that sent shivers over me...something she continued to do until she died. She gently took my hand in hers and placed it over her heart.



For someone so shattered, this pivotal moment spoke of her recovery, even with the limitations she struggled with still. Social beings, chimpanzees depend on touch as their primary way to communicate. Jeannie's exploitation and isolation had stolen all that from her. I will never know exactly what we did that helped Jeannie heal. Was it the place, the choices, the privacy, the variety of delicious food, the relative control she had over her life—sleeping in until she wanted to get up, moving only when and if she wanted to, living alone or with whom she chose? Or, was it because very simply, she could sit outside with her arms in the air, lifting her head to the sun and wind or mist...and let herself be soothed? No one, except Jeannie, will ever know.

The result was that the Jeannie who lived at Fauna for nearly 10 years was gentle, calm and beautiful, inside and out and very, very different than the Jeannie who desperately tried to hold on to life in terror in the lab.

Jeannie had heart problems, and two weeks before she died, she stopped drinking tea with us—one of the many pleasures she came to rely on for daily company. I felt Jeannie knew that these were her last days. For her last two months, we spent every night together in that special end of the day quiet.

It was New Year's Day. I was walking from my house to go back to spend more time with her. As I reached a small bridge just beside the chimp-house, I could hear what sounded like fighting, then, alarm calls from the chimps, strange sounds that I could not identify. Their voices were different. Their calls were not the same. My heart sank when suddenly I knew. It was Jeannie.

The next day, we had news that no lab wanted to touch Jeannie because she had been infected with HIV. This meant she could not go for the autopsy to help us know what had happened to her and the cause of death. It meant we would have to do it at Fauna. Tissue samples had to be taken and put into containers to be sent to the labs for analysis. Her heart needed to be removed and sent as well.

I was handed her heart to wash off and place in a bowl, then ever so carefully in the container it was to be sent in. Her heart was not only destroyed emotionally but here in my hands, I witnessed its physical destruction as well. Instead of the firm muscle of a healthy heart, it was soft, scarred and discolored.

I stood there fixed—holding her heart in my hands—the heart that so many times over the years I felt beat while she held our hands together over it.

Jeannie was taken from Fauna to be sent for cremation. It would be the last time I ever saw her. It is because of Jeannie that I am submitting this Declaration. To help you meet her and to see that her story is the story of so many now still held in U.S. labs.

Jeannie was destroyed by the trauma and suffering that accompanies research and life in a laboratory. All chimpanzees who suffer psychologically or who have or are reaching that point of utter psychological collapse must be deemed no longer needed for research, retired to federal sanctuary, and like Jeannie, allowed time to heal and have some remaining years of their life in the peace, comfort and care of sanctuary.

7. Autopsies on our deceased chimpanzees confirmed our concerns as to their overall health and the toll research had taken, and showed far more serious and compromising internal damage than their day to day symptoms indicated.



The autopsy reports from chimpanzees like Jeannie and Tom, tell a more complete story of their use and hardships. Their suffering, though in so many ways hinted at while alive, was fully disclosed once their bodies were opened.

The autopsies we have done on our deceased chimpanzees present compelling evidence of how decades of research simply cannot be endured without a price paid by even the strongest of chimps. Tom, a strong, alpha male, who lab workers said had “never given in and co-operated,” was a gentle and cooperative chimpanzee in sanctuary. So much so, that Tom was able to mask the severity of his symptoms for years. His death was sudden, though not entirely unexpected given he had been having progressive health problems which we could not resolve for him but only help keep him comfortable. We were quite shocked at what we found in Tom’s autopsy. Results revealed a thickened and scarred trachea...likely caused by more than 300 intubations in one lab alone—and Tom had been used in at least two prior to LEMSIP. The condition of his trachea gave us an answer to his persistent and unrelenting gagging every morning when he awoke. Tom seemed to have to go through this every day in what seemed his attempt to get himself going. Tom also loved soft foods and foods full of moisture. It was not unusual for him to chew a leafy vegetable, sucking all of the juices out of it, and then discarding any of the pulp. Tom was also plagued by nearly chronic diarrhea, which at its worst was like pure projective liquid. Analysis by several different top rate labs suggested various causes...but our treatments never led to complete resolution. Tom was filled with adhesions throughout his abdominal wall; in fact, sections of his intestines were actually adhered to his abdominal wall and to sections of itself. The cause of such massive numbers and spread of adhesions remain a mystery even after autopsy. Still likely possibilities include from the introduction of bacteria on an unsterile injection site countless biopsies, and

surgeries. Further internal damage included pieces of severed liver adhered to his pancreas...and so on. In one word, Tom was a mess. Upon seeing what Tom's internal organs and ill health looked like, our question changed from "why did he die?" to "how did he survive so long?" Chimpanzees who share Tom's history of multiple use by multiple labs must be evaluated and retired from research.

Holding individuals for current or possible future use who are in the condition or in a similar condition to that which Tom was in is bad science both ethically and scientifically. Tom's autopsy actually triggered a more methodical study of the autopsies of some 110 chimpanzees from two different labs and from two different sanctuaries' chimps from labs. Fauna was part of that study. It showed that 69% of the chimpanzees, including all those who died while still in a lab or in sanctuary and rescued because the lab closed, were suffering, as did Tom, from multi organ disease and seriously compromised health.

8. The Fauna chimpanzees are examples of why objective and measurable criteria are needed rather than leaving it up to individual laboratories to decide who is deemed no longer needed for research and retired. Allowing this practice to continue in the hands of labs who receive significant financial gains from housing and maintenance grants defies the spirit of the CHIMP Act and of good and ethical science.
9. The chimpanzees who were rescued from LEMSIP had previous research histories, just like those who are still in U.S. labs. The others from LEMSIP who were not fortunate enough to make the cut for sanctuary were sent on to further research. Many if not most are still languishing in labs and theoretically are still

available for research. This is not only untenable but in fact, knowing what I know, it is in my opinion, unethical on the part of laboratory directors to hold chimpanzees that any objective measure would have deemed them no longer useful to research and therefore eligible for retirement. Further, I believe the current practice results in the circumventing of the Secretary's authority and responsibility under the CHIMP Act.

10. My final insight is of a more practical matter. I am aware that private labs, like Coulston, LEMSIP and others, receive or received federal dollars to support their chimpanzees. As such, as the Secretary establishes criteria for retirement, it would be critical to include the caveat that no federal funds will be given to support privately owned chimpanzees who met the criteria as no longer needed or useful for research.
11. If I can be of further assistance in providing information, opinion, or evidence as to the condition of chimpanzees now or formerly held for research, I am available. Further, if reviewers of this Petition would like to visit the chimpanzees at Fauna, I am happy to provide for such a visit.
12. I respectfully request that the filed Rulemaking Petition to establish clear criteria for retirement of chimpanzees under the CHIMP Act be given HHS's full, immediate and prioritized commitment. For many of the chimpanzees for whom such criteria will make a world of difference, there may not be much time left.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.

Gloria Grow

Gloria Grow  
**Founder/Director**  
**Fauna Foundation Sanctuary**

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**July 17, 2012**

## Curriculum Vitae

### **Gloria Grow**

*Founder and Director*

Fauna Foundation

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Ms. Grow is the Founder and Director of the Fauna Foundation, Canada's only chimpanzee sanctuary. Fauna was the first sanctuary in the world to accept 15 HIV infected individuals who were retired and rescued from the Laboratory for Experimental Medicine and Surgery in Primates (LEMSIP).

Highly respected, Fauna has garnered the support of the world's top great ape and primate advocates. Begun in 1991 as a home for wildlife, farmed, and domestic animals, Fauna Foundation gained international visibility in 1997 when it accepted the LEMSIP chimpanzees. For more than a decade, Fauna has earned a respected reputation for outstanding care and retirement for former biomedical chimpanzees.

### **Mission Statement**

Fauna is a privately run, government certified, non-profit organization dedicated to creating a caring environment for neglected and abused farm, zoo, and companion animals and for former biomedical research chimpanzees and primates. The sanctuary is located on 150 acres of land and provides a home for approximately 150 other animals that have been abused, neglected, or abandoned.

### **Achievements**

- In 1997, the ***Fauna Foundation*** was established by Founder Gloria Grow and Co-Founder Dr. Richard Allan, DVM. With more than fifty (50) years of animal care experience combined, Ms. Grow and Dr. Allan (Fauna's full-time veterinarian) provide expert animal care. The chimpanzees arrived in the Fall of 1997. With a strong vision, determination, and devotion, Gloria has created a world renowned sanctuary that provides retirement to former biomedical

research chimpanzees who had been used in HIV/AIDS, Hepatitis C, and other studies. Due to the laboratory environment that the chimpanzees came from, they have specific medical, emotional and social needs. Living in 5x5x7' cages for most of their lives, they require encouragement, medication, and strong resocialization assistance. Many display psychological and emotional behaviors much like post-traumatic stress disorder.

- In 2004, Fauna's environmental protection work was recognized by the government of Quebec, and a portion of the land was designated as a natural reserve for wildlife conservation — the Ruisseau Robert Natural Reserve.

## Consultation

Gloria has served in consultative, advisory board, and practical capacities for other chimpanzee sanctuaries and facilities, including:

- Chimps, Inc., USA
- Stichting AAP, Netherlands and Spain
- The Center for Great Apes, USA
- Center for Captive Chimpanzee Care, USA
- International Primate Protection League, USA
- The Jane Goodall Institute, Ngamba Island Chimpanzee Sanctuary, Uganda
- Primate Rescue Center, Inc., USA
- Quebec City Zoo, Canada
- Parc Safari, Quebec, Canada
- ChimpanZoo, Jane Goodall Institute, USA
- Steve Ross, Chair, Species Survival Plan, Lincoln Park Zoo, Chicago, IL
- Laboratory Primate Advocacy Group, USA

## Presentations

- Zoocheck Canada Event – ***Chimpanzees and I*** – Toronto, ON, Nov 2001
- Animals Outreach Event – ***The Fauna Foundation*** – London, ON, Feb 2002
- ChimpanZoo Conference Keynote Speaker – ***Resocialization*** – Chicago, IL, Oct 2004
- Presented ***In Their Own Words: Stories of Chimpanzees Rescued from Research***, a multi-media program chronicling the journey of the Fauna

Foundation chimpanzees from their life in research to healing in sanctuary,  
to audiences ranging from 70-200 people to publicize the plight of chimpanzees

used in research and to inspire support for their release into sanctuaries.

April 2004 – Boston, MA

October 2004 – New York City, NY

July 2005 – Los Angeles, CA

December 2005 – Seattle, WA

April 2006 – Atlanta, GA

March 2007 – Chicago, IL

## Media

- The work of Gloria Grow and the Fauna Foundation has been featured in numerous documentaries, television programs, and media communications. See attached Media Coverage sheet.

## Awards

**Academy of Veterinary Medicine of Quebec 2005**  
**Award for Outstanding Care of Animals**  
Fauna Foundation

Animal Action Awards 2002  
International Fund for Animal Welfare  
Compassion in Action  
Fauna Foundation

The Fauna Foundation was nominated for the IFAW award by Barbara Cartwright (Board Member, Jane Goodall Institute, Canada) for outstanding compassion, dedication, and professionalism in their quest to provide sanctuary to animals of all kinds. In particular, Fauna Foundation's dedication to the chimpanzees was noted as most incredible.

## Education

1981 Graduated, Nash Academy of Animal Arts, New Jersey

1996 Certificate, **Caring for Chimpanzees** Program, Chimpanzee Human Communication Institute, Washington, DC

Ongoing Professional development workshops in primatology, trauma, and chimpanzee

care. Presenting and participating in programs with colleagues from

sanctuaries, zoos, and animal welfare organizations.

## Media Coverage

### Canada

#### Print

**Alive Magazine** March 2006 – *Gentle Giants*

**Biosphere** (Magazine) Winter 2004 – *De Retour de L'enfer*

**Calgary Herald** (Newspaper) Mar 7, 1998 – *Unique shelter gives long-suffering chimps a kind of Sanctuary*

**Canadian Wildlife** (Magazine) Winter 2004 – *To hell and back*

**Chatelaine** (Magazine) July 2004 – *Testing Compassion*

**Derniere Heure** (Magazine)

June 30, 2001 – *Nous sauvons les singes de la torture – Dr. Richard Allan et Gloria Grow*

June 27, 1998 – *“Mes singes on été Torturés pour la Science”*

**Dimanche** (Newspaper) Jan 12, 2003 – *Des chimpanzés s'improvisent peintres*

**Etcetera** (Newspaper) Jan 15, 2003 – *Monkeys shine on canvas*

**Guide Resources** (Magazine) Oct 2003 – *La vie après la labo*

**Journal L'Impact** (Newspaper)

Aug 10, 2004 – *Carignan aura sa réserve naturelle!*

Aug 17, 2004 – *La réserve naturelle du Ruisseau-Robert – La rêve réalisé de Richard Allan*

Jan 28, 2003 – *Des artistes à quatre pattes!*

**L'Actualité** (Magazine)

July 2002 – *La passionaria des éclopés*

June 1998 – *Des chimpanzés en retraite dorée*

**La Presse** (Newspaper)

April 7, 1999 – *Le MEF renouvelle le permis du refuge pour chimpanzés*

Feb 12, 1999 – *Les singes sidéens ne menacent pas la santé publique*

Mar 17, 1998 – *Retraite dorée pour chimpanzés*

Nov 26, 1998 – *Carignan: le refuge pour chimpanzés inquiète les autorités*

**La Semaine**, (Magazine) June 17, 2006 – *Le refuge des chimpanzés maltraités*

**Le Devoir** (Newspaper)

Jan 13, 2003 – *Portrait le l'artiste en chimpanzé*

Jan 7, 2002 – *La retraite des singes*

**Le Journal de Chambly** (Newspaper)

Jan 17, 2006 – *Par amour des “chimps”*

Oct 16, 2001 – *Carignan inaugure sa passerelle*

March 9, 1999 – *Carignan ne veut plus rien savoir des chimpanzés sidéens sur son territoire*

April 6, 1999 – *Québec renouvelle la permis de jardin zoologique pour le refuge de chimpanzés sidéens à Carignan*

Feb 9, 1999 – *La population de Carignan et des environs n'a rien à craindre des chimpanzés porteur du VIH*

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## Television

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## United States

### Print

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**Discover Magazine**, May 2002 – *An Embarrassment of Chimpanzees*  
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### Television

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### Radio

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## International

### Print

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### Television

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Re: PETITION FOR RULEMAKING )  
U.S. DEPARTMENT OF HEALTH )  
& HUMAN SERVICES )  
 )  
TO SET CRITERIA FOR DETERMINING WHEN )  
CHIMPANZEES ARE NO LONGER NEEDED FOR )  
RESEARCH AND MUST BE RETIRED AND SENT TO )  
SANTUARY AS REQUIRED BY THE CHIMPANZEE )  
HEALTH IMPROVEMENT, MAINTENANCE, AND )  
PROTECTION ACT )

**Declaration of Margaret Peppercorn, M.D.**

1. I am a graduate of Harvard Medical School and very familiar with both the methods used as well as the importance of scientific research. I have been a pediatrician for over 30 years and am also very familiar with human medical needs. I was therefore asked to help coordinate a review of 10 years of autopsy reports on chimpanzees who had died in laboratories or in sanctuaries who had come from laboratories.
2. The project started out as a simple scientific analysis of the data collected to determine causes of death and pre-morbid illnesses but quickly became something very disturbing. Some days it actually was hard for me to continue reading the autopsy reports at all because the findings on them were so horrifying.
3. The most disturbing finding was the fact that the vast majority of the chimpanzees had been extremely ill for months or years prior to death yet had continued to be held in a laboratory setting presumably to be available for possible future research. To me this was unscientific and cruel.

4. The lifetime suffering of the deceased chimpanzees couldn't be scientifically proven from their autopsies but to me was obvious. Some chimpanzees had gastrointestinal ulcerations. Many were riddled with adhesions. Some had enlarged fibrotic hearts, renal fibrosis, severe anemia, pneumonia, or hepatitis. In most cases, the chimpanzees actually had a combination of all these problems.
5. Additionally, helpless infant chimpanzees were time and again noted to have been torn apart by older chimpanzees with no indication of the laboratories having made any attempts to better protect them. As a pediatrician who has spent decades of her life dealing with infants, these violent newborn chimpanzee deaths were incredibly upsetting and reflective of the urgent need to get "unneeded" chimpanzees out of laboratories.
6. None of the sick or elderly chimpanzees in the study were being voluntarily retired, yet at the time of death most were still being help by laboratories for possible further use. As a scientist and physician this makes no sense--lab animal models cannot already have multisystem disease and still be appropriate research models. Also, subjecting intelligent sentient animals to the possibility of continued suffering when already elderly or seriously ill is contrary to all reasonable codes of ethics. From the autopsy study, however, it was clear that this was exactly what was being done and that the mandates of the Chimp Act were not being followed.

7. I therefore strongly support this petition for the Secretary to promptly accept the proposed criteria for deciding when a chimpanzee is “not needed” for research and must be retired to sanctuary, and to urgently implement these criteria as soon as possible to spare other elderly and/or sick chimpanzees from needlessly dying in a laboratory.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.



Margaret Peppercorn, M.D., F.A.A.P.

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**July 17, 2012**

CURRICULUM VITAE  
MARGARET PEPPERCORN M.D., F.A.A.P.

Address: 28 Sawmill Lane,  
Sudbury, Ma

Date of Birth: May 8, 1945

Education:

1966 B.A., Radcliffe College/ Harvard University, Cambridge, Ma

1970 M.D., Harvard Medical School, Boston, Ma

Internships and Residencies:

1970-72 Pediatric Intern, Junior Resident  
Children's Hospital National Medical Center,  
Washington, DC

1972-73 Pediatric Senior Resident  
Boston City Hospital, Boston, Ma

Fellowship:

1973-74 Pediatric Neurology Fellowship  
Boston City Hospital, Boston, Ma

Board Certified in Pediatrics 1982

Clinical Positions:

1974- 2007 Private Pediatric Practice, Sudbury, Ma:  
1974-1976- Drs. Adelson &Peppercorn  
1976-2007- Sudbury Pediatrics/Post Road Pediatrics

Hospital Affiliations:

1974-1982 active staff- Marlboro Hospital, Marlboro, Ma  
1976-2007 active staff- Metrowest Medical Center, Framingham,  
Ma  
(previously called Framingham Union Hospital)  
1979-1984 active staff- Emerson Hospital, Concord, Ma  
1987-2007 associate staff, New England medical Center, Boston, Ma  
1995-2000 active staff- Lahey Clinic, Burlington, Ma

2000-2007      adjunct staff- Children's Hospital, Boston, Ma

Memberships:

Fellow American Academy of Pediatrics  
Massachusetts Medical Society

Re: **PETITION FOR RULEMAKING** )  
**U.S. DEPARTMENT OF HEALTH** )  
**& HUMAN SERVICES** )  
 )  
**TO SET CRITERIA FOR DETERMINING WHEN** )  
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**RESEARCH AND MUST BE RETIRED AND SENT TO** )  
**SANTUARY AS REQUIRED BY THE CHIMPANZEE )**  
**HEALTH IMPROVEMENT, MAINTENANCE, AND** )  
**PROTECTION ACT** )

**Declaration of Senator Robert C. Smith**

- 1) I served as a Representative and a Senator from New Hampshire. I was elected as a Republican to the Ninety-ninth and to the two succeeding Congresses (January 3, 1985-January 3, 1991). I was appointed to the United States Senate on December 7, 1990, to fill the vacancy caused by the resignation of Gordon Humphrey, and served for the remainder of the term ending January 3, 1991. I was elected to the United States Senate in 1990; reelected in 1996; and served from December 7, 1990, to January 3, 2003. I served as the Chair of the Select Committee on Ethics (One Hundred Fifth and One Hundred Sixth Congresses), Committee on Environment and Public Works (One Hundred Sixth Congress and One Hundred Seventh Congress [January 20-June 6, 2001]).
- 2) I introduced the Senate version of the Chimpanzee Health Improvement, Maintenance, and Protection Act (CHIMP Act) in June 2000 to provide sanctuary for chimpanzees abused in medical research and languishing in cages that deprive them of a physically suitable, socially enriched life.

- 3) Now, and when the CHIMP Act was passed, the federal government spends millions of dollars each year for the maintenance and care of chimpanzees who are no longer used in medical research, but are being warehoused in expensive taxpayer-funded laboratory cages. The CHIMP Act was meant to save taxpayers money because the sanctuary setting is less expensive to build and operate than laboratory facilities.
- 4) However, I have significant concerns that the intention of the CHIMP Act has not been fulfilled. Far too few chimpanzees have been retired under the Act. Thus, I urge the Secretary of Health and Human Services to determine criteria for when chimpanzees must be retired and not to allow the laboratories themselves – which have a clear conflict of interest in this regard -- to determine when to retire chimpanzees.

Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.



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Robert C. Smith

**Former U.S. Senator and Representative**

**07-17-2012**

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[date]