PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

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November 23, 2026

Dr. Axel Wolff, D.V.M., M.S.
Acting Director
Office of Laboratory Animal Welfare
National Institutes of Health

Via e-mail: [redacted]; [redacted]

Dear Dr. Wolff,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA)—whose entities have more than 10.4 million members and supporters worldwide—to request an urgent investigation into apparent deviations from an approved protocol, potential failures to implement humane endpoints, and deficiencies in animal monitoring and institutional oversight associated with the grant "Targeting purinergic signaling in Chagas disease" (5R01AI176457),[1] awarded to the Research Center in Clinical Biochemistry and Immunology (CIBICI-CONICET, F16-00193 [A5802-01]), in Argentina, by the National Institute of Allergy and Infectious Diseases (NIAID). Based on the evidence presented below, PETA urges you to:

1. Open a formal investigation into the animal experiments, including compliance with approved humane endpoints, methods of drug administration, the timing and scope of animal-use approvals, the deaths and unexplained loss of animals, and institutional monitoring and reporting practices.
2. Immediately assess whether ongoing animal experiments under the award should be suspended pending the investigation and take measures to protect any animals currently in use.
3. Determine the amount of PHS funding expended on any activities found to be noncompliant and seek reimbursement or recovery of improperly expended funds through the appropriate NIH grants-management authorities.
4. Review the institution's continued eligibility for PHS support and withdraw or terminate its PHS Animal Welfare Assurance (F16-00193) if the investigation substantiates serious or systemic noncompliance warranting that action.
5. Refer the findings to the appropriate NIH funding and enforcement officials and pursue suspension, debarment, or other legally available restrictions that would prevent the responsible investigator from receiving future PHS funding for animal experiments if substantiated findings justify such sanctions.

[1]RePORTER. Targeting purinergic signaling in Chagas disease. Accessed October 6, 2026.

Entities
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

6. Provide PETA with a written account of the investigation's findings, corrective actions, funding determinations, and any referrals, to the extent disclosure is permitted.

Apparent failure to implement approved humane endpoints

A preprint published on August 28, 2026, and coauthored by NIAID-funded principal investigator María Pilar Aoki, describes infected mice developing continuous whole-body tremors, bristled fur, and partial loss of hind-limb mobility, typically around days 14–15 after infection. It also reports an unexplained animal loss in an uninfected control group and states that none of the untreated infected mice survived to the 120-day experimental endpoint.[2]

The approved animal-use protocol explicitly requires euthanasia when mice exhibit reduced mobility.[3] The preprint's description of partial hind-limb mobility loss therefore raises an urgent question: Were affected animals promptly euthanized when this endpoint was reached, or were some left to deteriorate or die? The statement about survival to day 120 does not, by itself, establish when individual animals died or were euthanized.

Apparent unauthorized use of oral gavage

The preprint describes administering treatments by oral gavage,[4] whereas the approved protocol specifies delivery by pipette and expressly states that the drug-delivery systems are unsuitable for gavage.[5] These descriptions are inconsistent. None of the documents provided to PETA by the institution contain evidence that the approved protocol was amended, that authorization to replace pipette administration with oral gavage was requested, or that such a change was reviewed and approved by the institutional animal ethics committee.

This discrepancy is particularly concerning because oral gavage is an invasive administration technique associated with increased stress and risks of injury, including esophageal damage and potentially fatal complications, compared with voluntary oral administration methods.

Failure to generate animal monitoring and veterinary records

In response to PETA's request for animal medical histories, veterinary and monitoring records, necropsy reports, and photographic or video files, the principal investigator stated that the laboratory does not generate animal records and supplied none of the requested documentation, while asserting that trained personnel monitor the animals daily.[6] This is not merely a failure to produce existing records: the response indicates that the requested animal records are not generated. The apparent absence of animal monitoring and veterinary records raises serious concerns about compliance with the PHS Policy on Humane Care and Use of Laboratory Animals and applicable animal welfare standards, including the *Guide for the Care and Use of Laboratory Animals*. Without such documentation, it may be impossible to verify whether animals were

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[2]Rosso SD, Bergero G, Luciana Mazzocco Y, Mezzano L, García MC, Aoki MP. Multiparticulate drug delivery systems preserve the efficacy of reduced-dose intermittent benznidazole therapy in experimental Chagas Disease. Preprint. *Res Sq*. 2026;rs.3.rs-10424380. Published 2026 Aug 28. doi:10.21203/rs.3.rs-10424380/v1. Accessed October 1, 2026. [PDF available here]

[3]Aoki MP. Optimización de la eficacia y seguridad de nuevos sistemas de liberación modificada de fármacos para la terapia de la enfermedad de Chagas experimental. February 3, 2026.

[4]Rosso SD *et al*. Multiparticulate drug delivery systems. 2026.

[5]Aoki MP. Optimización de la eficacia y seguridad de nuevos sistemas de liberación modificada de fármacos. 2026.

[6]Aoki MP. Correspondence with the University Nacional de Córdoba's legal team. October 6, 2026.

adequately monitored, whether humane endpoints were observed, or when and why animals died, including the unexplained loss of a control animal.

Unresolved authorization chronology
The principal investigator acknowledged that the animal-use approval cited in the preprint was incorrect[7] and instead identified an approval resolution dated February 23, 2026.[8] That date is nearly three years after the NIH award began.[9] The records supplied do not clarify when the experiments on animals began or what authorization, if any, covered earlier procedures.

Apparent gaps in institutional reporting and NIH oversight
PETA requested noncompliance reports and other oversight records for the PHS-assured institution covering January 2020 through October 2026. NIH produced no noncompliance reports addressing the apparent discrepancies or unexplained animal loss identified in the experimenters' own materials.

The timeline raises additional concerns. The animal-use protocol was approved on February 23, 2026, and the experimenters' preprint was published on August 28, 2026, just over six months later. Within this relatively short period, they apparently conducted the animal experiments, analyzed the results, prepared the manuscript, and made their findings publicly available. Yet the records produced by NIH contain no corresponding reports addressing the apparent protocol deviations or unexplained animal loss documented in the experimenters' materials.

The apparent speed with which this research progressed to publication, coupled with the absence of corresponding noncompliance reports, raises serious concerns about the rigor of institutional oversight. The institution's responsibility to identify, investigate, and report applicable noncompliance is not diminished by the pace of research or publication.

Inadequate justification for animal use in the institutionally approved protocol
The animal-use protocol approved by the institution contains a remarkably superficial scientific justification for subjecting mice to experimental *Trypanosoma cruzi* infection. The justification consists largely of broad, unsupported assertions about the relevance of animal models, the complexity of Chagas disease, and the anticipated benefits of the proposed research. Despite invoking previous research and making sweeping claims about the necessity of animal experimentation, it cites only one publication, dating from 2012, that addresses a specific mechanism of cardiomyocyte protection during murine infection.[10] The justification provides no meaningful discussion of the scientific evidence supporting the proposed experiments, nor does it adequately explain why the specific research objectives warrant the use of animals.

Of particular concern is that the institution approved a protocol containing such a poorly substantiated justification. The committee entrusted with reviewing and authorizing animal experimentation is expected to exercise meaningful scientific and ethical scrutiny, not merely accept generalized assertions of scientific merit and anticipated benefits. The approval of this

[7]Aoki MP. Correspondence with the University Nacional de Córdoba's legal team. October 6, 2026.
[8]Universidad Nacional de Córdoba. Resolución Decanal RD-2026-146-E-UNC-DEC#FCQ. February 23, 2026.
[9]RePORTER. Targeting purinergic signaling in Chagas disease. Accessed October 6, 2026.
[10]Aoki MP. Optimización de la eficacia y seguridad de nuevos sistemas de liberación modificada de fármacos. 2026.

protocol raises serious questions about the rigor of the institution's review process and the adequacy of its oversight of animal research supported by U.S. taxpayer funds.

Requested actions
Given the seriousness of the apparent noncompliance described above and the questions it raises about the adequacy of institutional oversight, we urge OLAW to conduct a thorough investigation that includes: obtaining the complete approved protocol history, institutional animal-care and ethics committee records, any monitoring systems or logs, animal-level survival and euthanasia data, veterinary assessments, gavage training and procedure records, grant progress reports, and the institution's communications concerning reportable noncompliance.

Experimenters should be required to reconcile each discrepancy in writing, and NIH should assess the allowability of associated grant expenditures and the institution's capacity to meet its Assurance commitments. If serious violations are substantiated, NIH should pursue recovery of improperly expended funds, appropriate action concerning the institution's PHS Assurance, and restrictions on the responsible investigators' eligibility for future federal funding, through the appropriate authorities and applicable procedures.

Thank you for your time and careful consideration of these concerns. I look forward to your response.

Sincerely,



Magnolia Martínez, Ph.D.
Lead Projects Manager and Congressional Liaison
Laboratory Investigations Department

Copy: John H. Powers III, M.D., Acting Director, National Institute of Allergy and Infectious Diseases (Office of Laboratory Animal Welfare (OLAW), National Institutes of Health ([redacted])