

Danny Jacobs, M.D., M.P.H., F.A.C.S.  
President  
Oregon Health & Science University  
3181 S.W. Sam Jackson Park Rd.  
Portland, OR 97239-3098

Nancy L. Haigwood, Ph.D.  
Director  
Oregon National Primate Research Center  
505 NW 185th Avenue, L584  
Beaverton, OR 97006-3448

Via email to [jacobsda@ohsu.edu](mailto:jacobsda@ohsu.edu); [haigwoon@ohsu.edu](mailto:haigwoon@ohsu.edu);  
[gordondi@ohsu.edu](mailto:gordondi@ohsu.edu)

October 24, 2022

Dear Dr. Jacobs and Dr. Haigwood,

I am Director of Litigation for the PETA Foundation. I write to demand that you immediately cease, retract, and issue an apology for maliciously false and defamatory statements that have come to PETA's attention.

Specifically, PETA understands that on October 21, 2022, a representative for Oregon National Primate Research Center ("ONPRC"), Diana Gordon, spoke to a sixth grade class at the Cottonwood School of Civics and Science in Portland, Oregon in advance of an upcoming student field trip to ONPRC, scheduled for Wednesday, October 26, 2022. PETA further understands, and has been reliably informed, that, during Ms. Gordon's presentation, she told the class, in response to well-founded student concerns, that undercover footage taken by a PETA investigator had been manipulated and deceptively edited. Ms. Gordon reportedly elaborated that such manipulation included efforts to make cages holding primates appear smaller than they actually were.

Such statements are blatantly intended to convey a false and defamatory representation of PETA, its investigator, and its investigations. As with every PETA investigation, footage captured and published by PETA shows only the truth—here, a true and accurate depiction of conditions at ONPRC.

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS  
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Los Angeles, CA 90026  
323-644-PETA

Norfolk  
501 Front St.  
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NAME OF THE FOUNDATION TO  
SUPPORT ANIMAL PROTECTION.

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- PETA U.S.
- PETA Asia
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That footage published by PETA showed primates at ONPRC confined to small, barren cages; displaying observable psychological injury such as frantic pacing, spinning, and rocking; forced to eat food out of waste-filled trays; denied adequate veterinary care and pain relief; sprayed with high-pressure hoses; and subjected to rough handling in addition to other traumatizing conditions is due, as you are aware, exclusively to ONPRC's actual and knowing conduct. Indeed, many of these precise same conditions are apparent in [videos](#) taken by ONPRC personnel, subsequently obtained by PETA through the public records process. Likewise, as Oregon Health & Science University ("OHSU") itself has recently admitted, and been reminded by regulators, [egregious neglect and mistreatment](#) of primates has persisted.

PETA's cognizable injuries are exacerbated by the manner of Ms. Gordon's dissemination of these defamatory statements—to young students, whom OHSU apparently hopes to persuade to support experiments on primates, and against animal advocacy, through deceptive and defamatory means. To this end, it is relevant that Ms. Gordon, as PETA is further informed, repeated other falsehoods concerning conditions at ONPRC. It is also not lost on PETA that the context for such statements was preparation for a sanitized tour of ONPRC facilities, during which students would see only a small area that ONPRC uses primarily for public relations purposes and that houses just a fraction of the primates caged on site.

Accordingly, PETA demands that OHSU, including through both yourselves and Ms. Gordon, immediately cease and desist from these and any similar defamatory statements about PETA, its investigators, and investigations, and retract and apologize for these maliciously defamatory statements. The safest course of action, and my expectation, is that you will cancel the upcoming visit by the Cottonwood School of Civics and Science. Furthermore, I expect that, upon receipt of this correspondence, you will draft a retraction and apology for PETA's review and return the same to me. We can then discuss the proper venue(s) for dissemination of this retraction and apology.

Failure to comply with this letter will require PETA to consider alternative means of protecting itself. PETA reserves all rights in this regard.

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I expect to hear from you sufficiently in advance of Wednesday, October 26, 2022. PETA considers this an urgent matter.

Sincerely,

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Asher Smith  
AsherS@petaf.org

cc: Ms. Diana Gordon, Education Outreach Specialist, ONPRC

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