

CENTER FOR DRUG EVALUATION AND RESEARCH

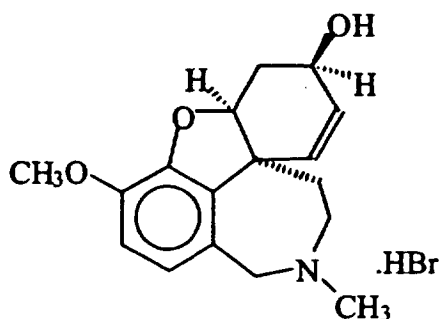
APPROVAL PACKAGE FOR:

**APPLICATION NUMBER
21-224**

Final Printed Labeling

DESCRIPTION

REMINYL® (galantamine hydrobromide), extracted from the bulbs of the daffodil, *Narcissus pseudonarcissus*, is a reversible, competitive acetylcholinesterase inhibitor. It is known chemically as (4a*S*,6*R*,8a*S*)-4a,5,9,10,11,12-hexahydro-3-methoxy-11-methyl-6*H*-benzofuro[3a,3,2-*ef*][2]benzazepin-6-ol hydrobromide. It has an empirical formula of $C_{17}H_{21}NO_3 \cdot HBr$ and a molecular weight of 368.27. Galantamine hydrobromide is a white to almost white powder and is sparingly soluble in water. The structural formula for galantamine hydrobromide is:



REMINYL® for oral use is available in circular biconvex film-coated tablets of 4 mg (off-white), 8 mg (pink), and 12 mg (orange-brown). Each 4, 8, and 12 mg (base equivalent) tablet contains 5.126, 10.253, and 15.379 mg of galantamine hydrobromide, respectively. Inactive ingredients include colloidal silicon dioxide, crospovidone, hydroxypropyl methylcellulose, lactose monohydrate, magnesium stearate, microcrystalline cellulose, propylene glycol, talc, and titanium dioxide. The 4 mg tablets contain yellow ferric oxide. The 8 mg tablets contain red ferric oxide. The 12 mg tablets contain red ferric oxide and FD&C yellow #6 aluminum lake.

REMINYL® is also available as a 4 mg/mL oral solution. The inactive ingredients for this solution are methyl parahydroxybenzoate, propyl parahydroxybenzoate, sodium saccharin, sodium hydroxide and purified water.

CLINICAL PHARMACOLOGY

Mechanism of Action

Although the etiology of cognitive impairment in Alzheimer's disease (AD) is not fully understood, it has been reported that acetylcholine-producing neurons degenerate in the brains of patients with Alzheimer's disease. The degree of this cholinergic loss has been correlated with degree of cognitive impairment and density of amyloid plaques (a neuropathological hallmark of Alzheimer's disease).

Galantamine, a tertiary alkaloid, is a competitive and reversible inhibitor of acetylcholinesterase. While the precise mechanism of galantamine's action is unknown, it is postulated to exert its therapeutic effect by enhancing cholinergic function. This is accomplished by increasing the concentration of acetylcholine

through reversible inhibition of its hydrolysis by cholinesterase. If this mechanism is correct, galantamine's effect may lessen as the disease process advances and fewer cholinergic neurons remain functionally intact. There is no evidence that galantamine alters the course of the underlying dementing process.

Pharmacokinetics

Galantamine is well absorbed with absolute oral bioavailability of about 90%. It has a terminal elimination half-life of about 7 hours and pharmacokinetics are linear over the range of 8-32 mg /day.

The maximum inhibition of anticholinesterase activity of about 40% was achieved about one hour after a single oral dose of 8 mg galantamine in healthy male subjects.

Absorption and Distribution

Galantamine is rapidly and completely absorbed with time to peak concentration about 1 hour. Bioavailability of the tablet was the same as the bioavailability of an oral solution. Food did not affect the AUC of galantamine but C_{max} decreased by 25% and T_{max} was delayed by 1.5 hours. The mean volume of distribution of galantamine is 175 L.

The plasma protein binding of galantamine is 18% at therapeutically relevant concentrations. In whole blood, galantamine is mainly distributed to blood cells (52.7%). The blood to plasma concentration ratio of galantamine is 1.2.

Metabolism and Elimination

Galantamine is metabolized by hepatic cytochrome P450 enzymes, glucuronidated, and excreted unchanged in the urine. *In vitro* studies indicate that cytochrome CYP2D6 and CYP3A4 were the major cytochrome P450 isoenzymes involved in the metabolism of galantamine, and inhibitors of both pathways increase oral bioavailability of galantamine modestly (See PRECAUTIONS, Drug-Drug Interactions). O-demethylation, mediated by CYP2D6 was greater in extensive metabolizers of CYP2D6 than in poor metabolizers. In plasma from both poor and extensive metabolizers, however, unchanged galantamine and its glucuronide accounted for most of the sample radioactivity.

In studies of oral ^3H -galantamine, unchanged galantamine and its glucuronide, accounted for most plasma radioactivity in poor and extensive CYP2D6 metabolizers. Up to 8 hours post-dose, unchanged galantamine accounted for 39-77% of the total radioactivity in the plasma, and galantamine glucuronide for 14-24%. By 7 days, 93-99% of the radioactivity had been recovered, with about 95% in urine and about 5% in the feces. Total urinary recovery of unchanged galantamine accounted for, on average, 32% of the dose and that of galantamine glucuronide for another 12% on average.

After i.v. or oral administration, about 20% of the dose was excreted as unchanged galantamine in the urine in 24 hours, representing a renal clearance of about 65 mL/min, about 20-25% of the total plasma clearance of about 300 mL/min.

Special Populations

CYP2D6 poor metabolizers

Approximately 7% of the normal population has a genetic variation that leads to reduced levels of activity of CYP2D6 isozyme. Such individuals have been referred to as poor metabolizers. After a single oral dose of 4 mg or 8 mg galantamine, CYP2D6 poor metabolizers demonstrated a similar C_{max} and

about 35% AUC, increase of unchanged galantamine compared to extensive metabolizers.

A total of 356 patients with Alzheimer's disease enrolled in two phase 3 studies were genotyped with respect to CYP2D6 (n=210 hetero-extensive metabolizers, 126 homo-extensive metabolizers, and 20 poor metabolizers). Population pharmacokinetic analysis indicated that there was a 25% decrease in median clearance in poor metabolizers compared to extensive metabolizers. Dosage adjustment is not necessary in patients identified as poor metabolizers as the dose of drug is individually titrated to tolerability.

Hepatic Impairment: Following a single 4 mg dose of galantamine, the pharmacokinetics of galantamine in subjects with mild hepatic impairment (n=8; Child-Pugh score of 5-6) were similar to those in healthy subjects. In patients with moderate hepatic impairment (n=8; Child-Pugh score of 7-9), galantamine clearance was decreased by about 25 % compared to normal volunteers. Exposure would be expected to increase further with increasing degree of hepatic impairment (See PRECAUTIONS and DOSAGE AND ADMINISTRATION).

Renal Impairment: Following a single 8 mg dose of galantamine, AUC increased by 37 % and 67 % in moderate and severely renal-impaired patients compared to normal volunteers. (See PRECAUTIONS and DOSAGE AND ADMINISTRATION).

Elderly: Data from clinical trials in patients with Alzheimer's disease indicate that galantamine concentrations are 30-40% higher than in healthy young subjects.

Gender and Race: No specific pharmacokinetic study was conducted to investigate the effect of gender and race on the disposition of REMINYL[®] (galantamine hydrobromide), but a population pharmacokinetic analysis indicates (n= 539 males and 550 females) that galantamine clearance is about 20% lower in females than in males (explained by lower body weight in females) and race (n= 1029 White, 24 Black, 13 Asian and 23 other) did not affect the clearance of REMINYL[®].

Drug-Drug Interactions

Multiple metabolic pathways and renal excretion are involved in the elimination of galantamine so no single pathway appears predominant. Based on *in vitro* studies, CYP2D6 and CYP3A4 were the major enzymes involved in the metabolism of galantamine. CYP2D6 was involved in the formation of O-desmethyl-galantamine, whereas CYP3A4 mediated the formation of galantamine-N-oxide. Galantamine is also glucuronidated and excreted unchanged in urine.

(A) Effect of other drugs on the metabolism of REMINYL[®]: Drugs that are potent inhibitors for CYP2D6 or CYP3A4 may increase the AUC of galantamine. Multiple dose pharmacokinetic studies demonstrated that the AUC of galantamine increased 30% and 40%, respectively, during coadministration of ketoconazole and paroxetine. As coadministered with erythromycin, another CYP3A4 inhibitor, the galantamine AUC increased only 10%. Population PK analysis with a database of 852 patients with Alzheimer's disease showed that the clearance of galantamine was decreased about 25-33% by concurrent administration of amitriptyline (n = 17), fluoxetine (n = 48), fluvoxamine (n = 14), and quinidine (n = 7), known inhibitors of CYP2D6.

Concurrent administration of H₂-antagonists demonstrated that ranitidine did not affect the pharmacokinetics of galantamine, and cimetidine increased the galantamine AUC by approximately 16%.

(B) Effect of REMINYL[®] on the metabolism of other drugs: *In vitro* studies show that galantamine

did not inhibit the metabolic pathways catalyzed by CYP1A2, CYP2A6, CYP3A4, CYP4A, CYP2C, CYP2D6 and CYP2E1. This indicated that the inhibitory potential of galantamine towards the major forms of cytochrome P450 is very low. Multiple doses of galantamine (24 mg/day) had no effect on the pharmacokinetics of digoxin and warfarin (R- and S- forms). Galantamine had no effect on the increased prothrombin time induced by warfarin.

CLINICAL TRIALS

The effectiveness of REMINYL® (galantamine hydrobromide) as a treatment for Alzheimer's disease is demonstrated by the results of 4 randomized, double-blind, placebo-controlled clinical investigations in patients with probable Alzheimer's disease [diagnosed by NINCDS-ADRDA criteria, with Mini-Mental State Examination scores that were ≥ 10 and ≤ 24]. Doses studied were 8-32 mg/day given as twice daily doses. In 3 of the 4 studies patients were started on a low dose of 8 mg, then titrated weekly by 8 mg/day to 24 or 32 mg as assigned. In the fourth study (USA 4-week Dose-Escalation Fixed-Dose Study) dose escalation of 8 mg/day occurred over 4 week intervals. The mean age of patients participating in the 4 REMINYL® trials was 75 years with a range of 41 to 100. Approximately 62% of patients were women and 38% were men. The racial distribution was White 94%, Black 3% and other races 3%. Two other studies examined a three times daily dosing regimen; these also showed or suggested benefit but did not suggest an advantage over twice daily dosing.

Study Outcome Measures: In each study, the primary effectiveness of REMINYL® was evaluated using a dual outcome assessment strategy as measured by the Alzheimer's Disease Assessment Scale (ADAS-cog) and the Clinician's Interview Based Impression of Change (CIBIC-plus).

The ability of REMINYL® to improve cognitive performance was assessed with the cognitive sub-scale of the Alzheimer's Disease Assessment Scale (ADAS-cog), a multi-item instrument that has been extensively validated in longitudinal cohorts of Alzheimer's disease patients. The ADAS-cog examines selected aspects of cognitive performance including elements of memory, orientation, attention, reasoning, language and praxis. The ADAS-cog scoring range is from 0 to 70, with higher scores indicating greater cognitive impairment. Elderly normal adults may score as low as 0 or 1, but it is not unusual for non-demented adults to score slightly higher.

The patients recruited as participants in each study had mean scores on ADAS-cog of approximately 27 units, with a range from 5 to 69. Experience gained in longitudinal studies of ambulatory patients with mild to moderate Alzheimer's disease suggests that they gain 6 to 12 units a year on the ADAS-cog. Lesser degrees of change, however, are seen in patients with very mild or very advanced disease because the ADAS-cog is not uniformly sensitive to change over the course of the disease. The annualized rate of decline in the placebo patients participating in REMINYL® trials was approximately 4.5 units per year.

The ability of REMINYL® to produce an overall clinical effect was assessed using a Clinician's Interview Based Impression of Change that required the use of caregiver information, the CIBIC-plus. The CIBIC-plus is not a single instrument and is not a standardized instrument like the ADAS-cog. Clinical trials for investigational drugs have used a variety of CIBIC formats, each different in terms of depth and structure. As such, results from a CIBIC-plus reflect clinical experience from the trial or trials in which it was used and can not be compared directly with the results of CIBIC-plus evaluations from other clinical trials. The CIBIC-plus used in the trials was a semi-structured instrument based on a comprehensive evaluation at baseline and subsequent time-points of 4 major areas of patient function: general, cognitive, behavioral and activities of daily living. It represents the assessment of a skilled clinician based on his/her observation at an interview with the patient, in combination with information

supplied by a caregiver familiar with the behavior of the patient over the interval rated. The CIBIC-plus is scored as a seven point categorical rating, ranging from a score of 1, indicating "markedly improved", to a score of 4, indicating "no change" to a score of 7, indicating "marked worsening". The CIBIC-plus has not been systematically compared directly to assessments not using information from caregivers (CIBIC) or other global methods.

U.S. Twenty-One-Week Fixed-Dose Study

In a study of 21 weeks duration, 978 patients were randomized to doses of 8, 16, or 24 mg of REMINYL[®] per day, or to placebo, each given in 2 divided doses. Treatment was initiated at 8 mg/day for all patients randomized to REMINYL[®], and increased by 8 mg/day every 4 weeks. Therefore, the maximum titration phase was 8 weeks and the minimum maintenance phase was 13 weeks (in patients randomized to 24 mg/day of REMINYL[®]).

Effects on the ADAS-cog: Figure 1 illustrates the time course for the change from baseline in ADAS-cog scores for all four dose groups over the 21 weeks of the study. At 21 weeks of treatment, the mean differences in the ADAS-cog change scores for the REMINYL[®]-treated patients compared to the patients on placebo were 1.7, 3.3, and 3.6 units for the 8, 16 and 24 mg/day treatments, respectively. The 16 mg/day and 24 mg/day treatments were statistically significantly superior to placebo and to the 8 mg/day treatment. There was no statistically significant difference between the 16 mg/day and 24 mg/day dose groups.

Figure 1: Time-course of the Change from Baseline in ADAS-cog Score for Patients Completing 21 Weeks (5 Months) of Treatment

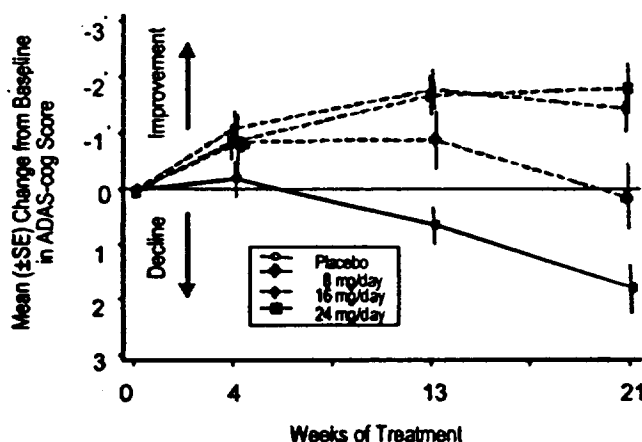
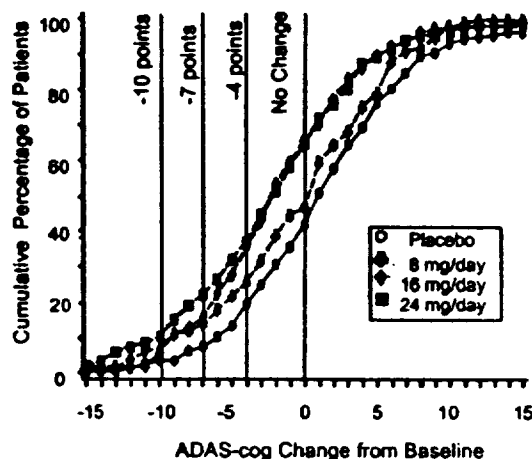


Figure 2 illustrates the cumulative percentages of patients from each of the four treatment groups who had attained at least the measure of improvement in ADAS-cog score shown on the X axis. Three change scores (10-point, 7-point and 4-point reductions) and no change in score from baseline have been identified for illustrative purposes, and the percent of patients in each group achieving that result is shown in the inset table.

The curves demonstrate that both patients assigned to galantamine and placebo have a wide range of responses, but that the REMINYL[®] groups are more likely to show the greater improvements.

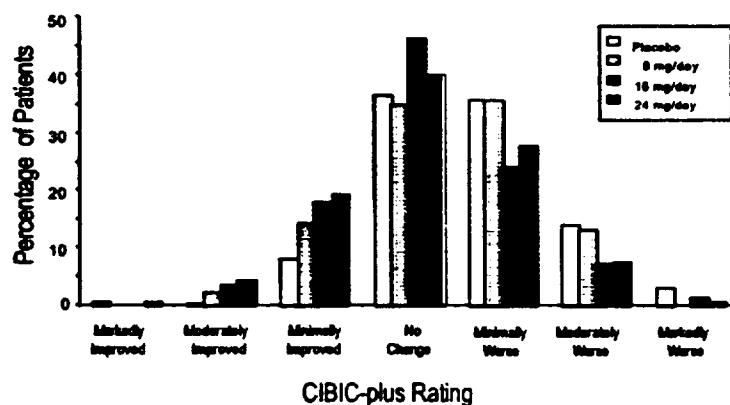
Figure 2: Cumulative Percentage of Patients Completing 21 Weeks of Double-blind Treatment with Specified Changes from Baseline in ADAS-cog Scores. The Percentages of Randomized Patients who Completed the Study were: Placebo 84%, 8 mg/day 77%, 16 mg/day 78% and 24 mg/day 78%.



Treatment	Change in ADAS-cog			
	-10	-7	-4	0
Placebo	3.6%	7.6%	19.6%	41.8%
8 mg/day	5.9%	13.9%	25.7%	46.5%
16 mg/day	7.2%	15.9%	35.6%	65.4%
24 mg/day	10.4%	22.3%	37.0%	64.9%

Effects on the CIBIC-plus: Figure 3 is a histogram of the percentage distribution of CIBIC-plus scores attained by patients assigned to each of the four treatment groups who completed 21 weeks of treatment. The REMINYL®-placebo differences for these groups of patients in mean rating were 0.15, 0.41 and 0.44 units for the 8, 16 and 24 mg/day treatments, respectively. The 16 mg/day and 24 mg/day treatments were statistically significantly superior to placebo. The differences vs. the 8 mg/day treatment for the 16 and 24 mg/day treatments were 0.26 and 0.29, respectively. There were no statistically significant differences between the 16 mg/day and 24 mg/day dose groups.

Figure 3: Distribution of CIBIC-plus Ratings at Week 21



U.S. Twenty-Six-Week Fixed-Dose Study

In a study of 26 weeks duration, 636 patients were randomized to either a dose of 24 mg or 32 mg of REMINYL[®] per day, or to placebo, each given in two divided doses. The 26-week study was divided into a 3-week dose titration phase and a 23-week maintenance phase.

Effects on the ADAS-cog: Figure 4 illustrates the time course for the change from baseline in ADAS-cog scores for all three dose groups over the 26 weeks of the study. At 26 weeks of treatment, the mean differences in the ADAS-cog change scores for the REMINYL[®]-treated patients compared to the patients on placebo were 3.9 and 3.8 units for the 24 mg/day and 32 mg/day treatments, respectively. Both treatments were statistically significantly superior to placebo, but were not significantly different from each other.

Figure 4: Time-course of the Change from Baseline in ADAS-cog Score for Patients Completing 26 Weeks of Treatment

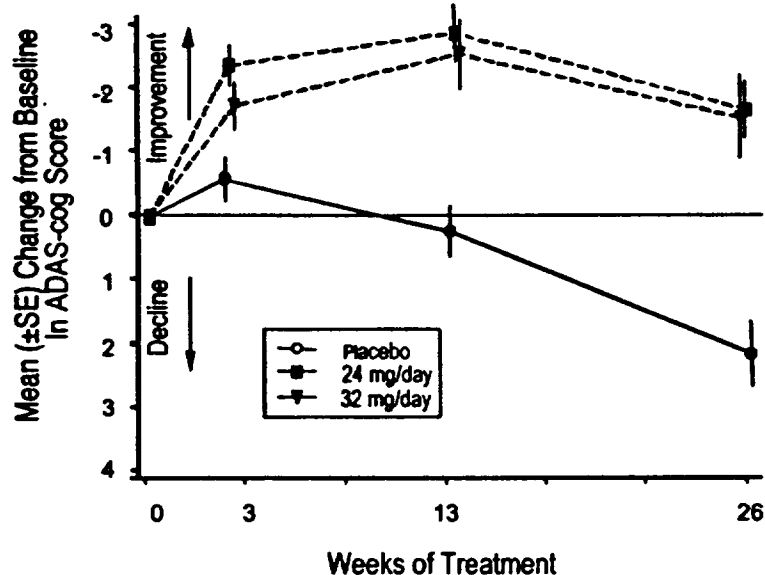
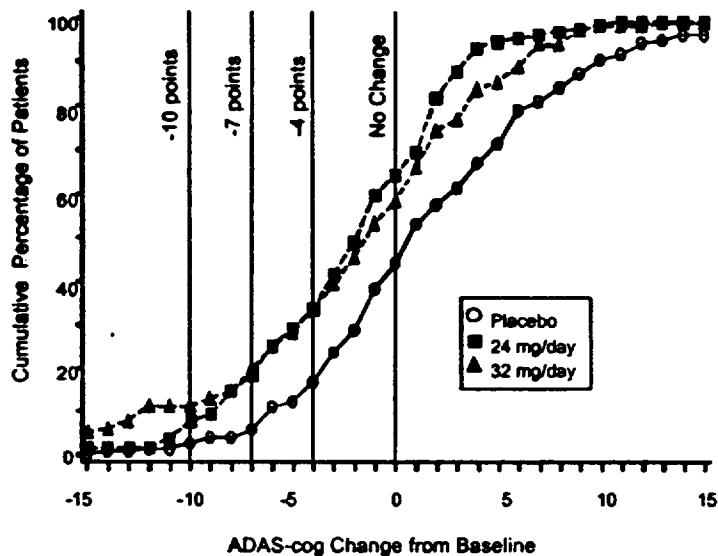


Figure 5 illustrates the cumulative percentages of patients from each of the three treatment groups who had attained at least the measure of improvement in ADAS-cog score shown on the X axis. Three change scores (10-point, 7-point and 4-point reductions) and no change in score from baseline have been identified for illustrative purposes, and the percent of patients in each group achieving that result is shown in the inset table.

The curves demonstrate that both patients assigned to REMINYL® and placebo have a wide range of responses, but that the REMINYL® groups are more likely to show the greater improvements. A curve for an effective treatment would be shifted to the left of the curve for placebo, while an ineffective or deleterious treatment would be superimposed upon, or shifted to the right of the curve for placebo, respectively.

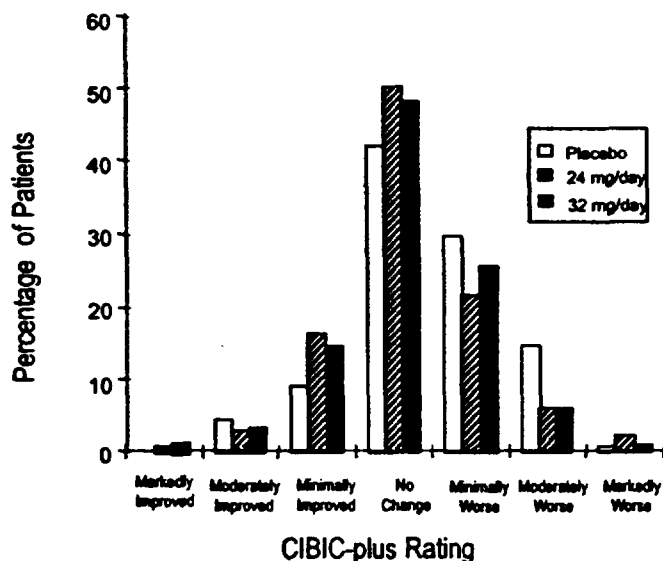
Figure 5: Cumulative Percentage of Patients Completing 26 Weeks of Double-blind Treatment with Specified Changes from Baseline in ADAS-cog Scores. The Percentages of Randomized Patients who Completed the Study were: Placebo 81%, 24 mg/day 68%, and 32 mg/day 58%.



Treatment	Change in ADAS-cog			
	-10	-7	-4	0
Placebo	2.1%	5.7%	16.6%	43.9%
24 mg/day	7.6%	18.3%	33.6%	64.1%
32 mg/day	11.1%	19.7%	33.3%	58.1%

Effects on the CIBIC-plus: Figure 6 is a histogram of the percentage distribution of CIBIC-plus scores attained by patients assigned to each of the three treatment groups who completed 26 weeks of treatment. The mean REMINYL[®]-placebo differences for these groups of patients in the mean rating were 0.28 and 0.29 units for 24 and 32 mg/day of REMINYL[®], respectively. The mean ratings for both groups were statistically significantly superior to placebo, but were not significantly different from each other.

Figure 6: Distribution of CIBIC-plus Ratings at Week 26



International Twenty-Six-Week Fixed-Dose Study

In a study of 26 weeks duration identical in design to the USA 26-Week Fixed-Dose Study, 653 patients were randomized to either a dose of 24 mg or 32 mg of REMINYL[®] per day, or to placebo, each given in two divided doses. The 26-week study was divided into a 3-week dose titration phase and a 23-week maintenance phase.

Effects on the ADAS-cog: Figure 7 illustrates the time course for the change from baseline in ADAS-cog scores for all three dose groups over the 26 weeks of the study. At 26 weeks of treatment, the mean differences in the ADAS-cog change scores for the REMINYL[®]-treated patients compared to the patients on placebo were 3.1 and 4.1 units for the 24 mg/day and 32 mg/day treatments, respectively. Both treatments were statistically significantly superior to placebo, but were not significantly different from each other.

Figure 7: Time-course of the Change from Baseline in ADAS-cog Score for Patients Completing 26 Weeks of Treatment

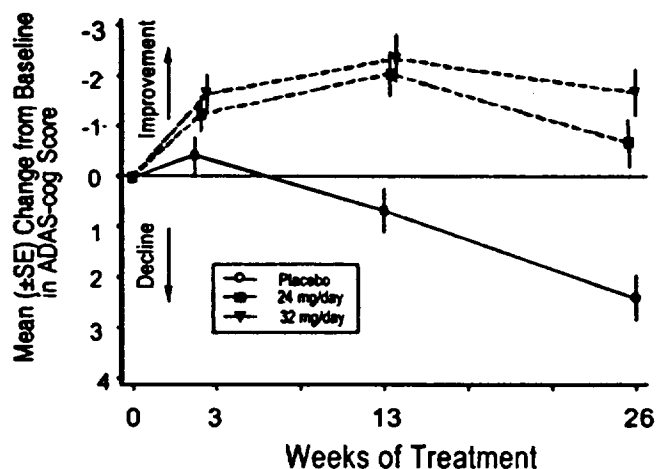
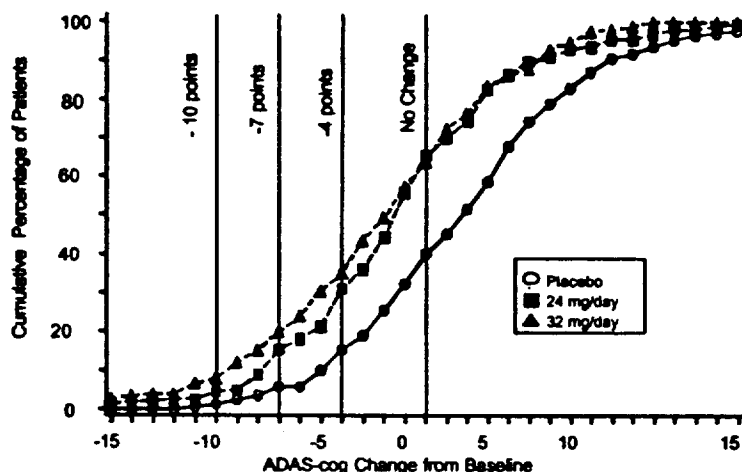


Figure 8 illustrates the cumulative percentages of patients from each of the three treatment groups who had attained at least the measure of improvement in ADAS-cog score shown on the X axis. Three change scores (10-point, 7-point and 4-point reductions) and no change in score from baseline have been identified for illustrative purposes, and the percent of patients in each group achieving that result is shown in the inset table.

The curves demonstrate that both patients assigned to REMINYL[®] and placebo have a wide range of responses, but that the REMINYL[®] groups are more likely to show the greater improvements.

Figure 8: Cumulative Percentage of Patients Completing 26 Weeks of Double-blind Treatment with Specified Changes from Baseline in ADAS-cog Scores. The Percentages of Randomized Patients who Completed the Study were: Placebo 87%, 24 mg/day 80%, and 32 mg/day 75%.

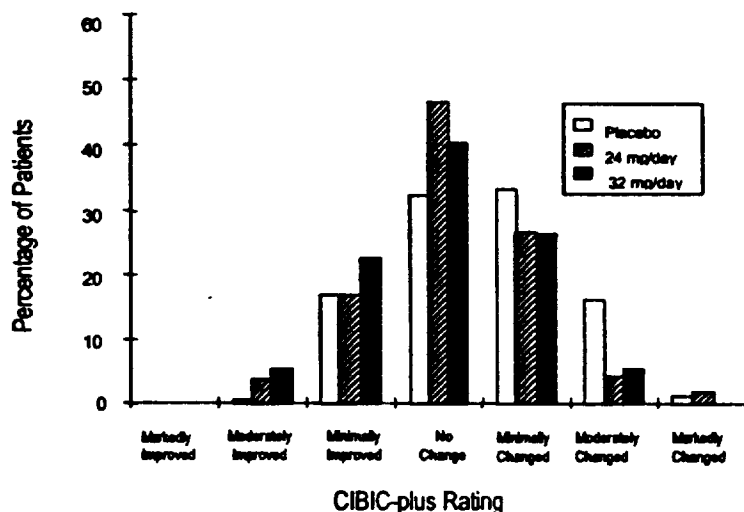


Treatment	Change in ADAS-cog			
	-10	-7	-4	0
Placebo	1.2%	5.8%	15.2%	39.8%
24 mg/day	4.5%	15.4%	30.8%	65.4%
32 mg/day	7.9%	19.7%	34.9%	63.8%

Effects on the CIBIC-plus: Figure 9 is a histogram of the percentage distribution of CIBIC-plus scores attained by patients assigned to each of the three treatment groups who completed 26 weeks of treatment.

The mean REMINYL[®]-placebo differences for these groups of patients in the mean rating of change from baseline were 0.34 and 0.47 for 24 and 32 mg/day of REMINYL[®], respectively. The mean ratings for the REMINYL[®] groups were statistically significantly superior to placebo, but were not significantly different from each other.

Figure 9: Distribution of CIBIC-plus Rating at Week 26



International Thirteen-Week Flexible-Dose Study

In a study of 13 weeks duration, 386 patients were randomized to either a flexible dose of 24-32 mg/day of REMINYL[®] or to placebo, each given in two divided doses. The 13-week study was divided into a 3-week dose titration phase and a 10-week maintenance phase. The patients in the active treatment arm of the study were maintained at either 24 mg/day or 32 mg/day at the discretion of the investigator.

Effects on the ADAS-cog: Figure 10 illustrates the time course for the change from baseline in ADAS-cog scores for both dose groups over the 13 weeks of the study. At 13 weeks of treatment, the mean difference in the ADAS-cog change scores for the treated patients compared to the patients on placebo was 1.9. REMINYL[®] at a dose of 24-32 mg/day was statistically significantly superior to placebo.

Figure 10: Time-course of the Change from Baseline in ADAS-cog Score for Patients Completing 13 Weeks of Treatment

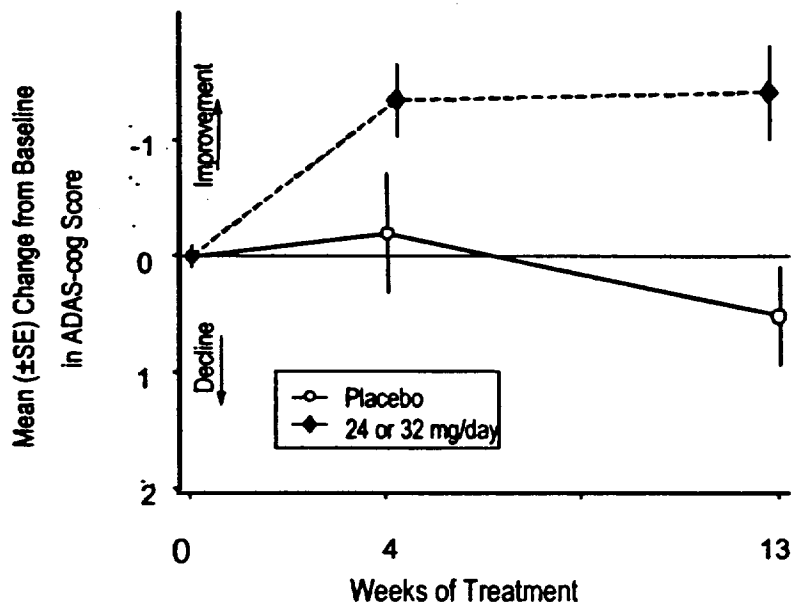
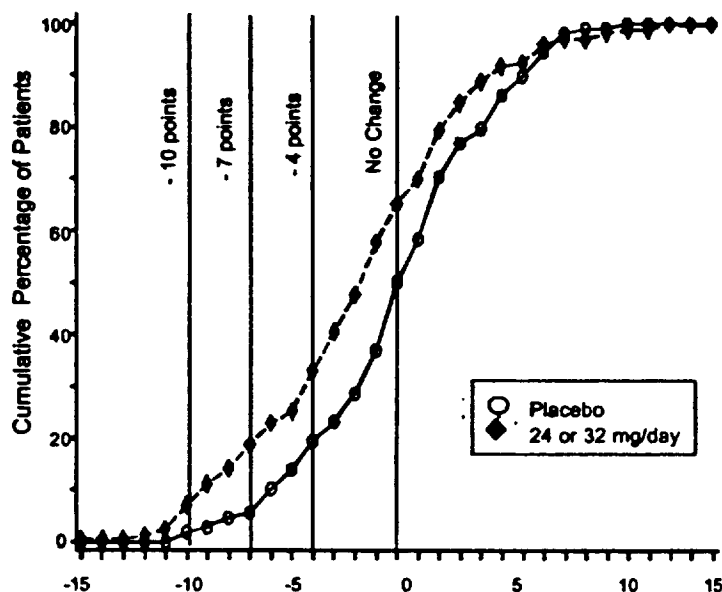


Figure 11 illustrates the cumulative percentages of patients from each of the two treatment groups who had attained at least the measure of improvement in ADAS-cog score shown on the X axis. Three change scores (10-point, 7-point and 4-point reductions) and no change in score from baseline have been identified for illustrative purposes, and the percent of patients in each group achieving that result is shown in the inset table.

The curves demonstrate that both patients assigned to REMINYL[®] and placebo have a wide range of responses, but that the REMINYL[®] group is more likely to show the greater improvement.

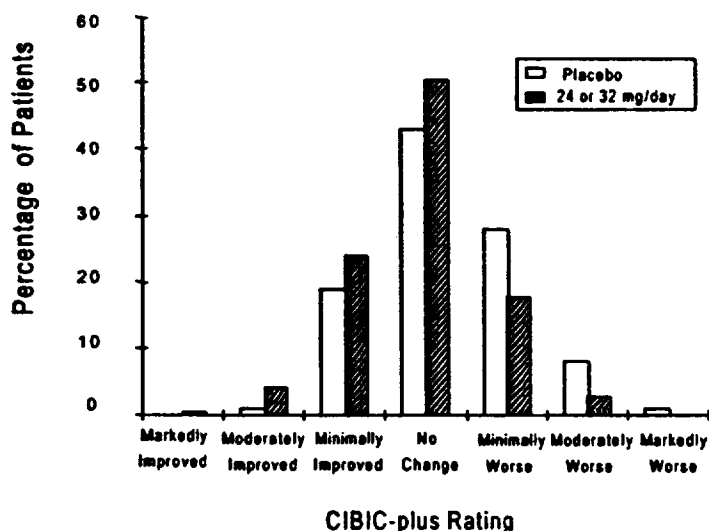
Figure 11: Cumulative Percentage of Patients Completing 13 Weeks of Double-blind Treatment with Specified Changes from Baseline in ADAS-cog Scores. The Percentages of Randomized Patients who Completed the Study were: Placebo 90%, 24-32 mg/day 67%.



ADAS-cog Change from Baseline				
Treatment	Change in ADAS-cog			
	-10	-7	-4	0
Placebo	1.9%	5.6%	19.4%	50.1%
24 or 32 mg/day	7.1%	18.8%	32.9%	65.3%

Effects on the CIBIC-plus: Figure 12 is a histogram of the percentage distribution of CIBIC-plus scores attained by patients assigned to each of the two treatment groups who completed 13 weeks of treatment. The mean REMINYL®-placebo differences for the group of patients in the mean rating of change from baseline was 0.37 units. The mean rating for the 24-32-mg/day group was statistically significantly superior to placebo.

Figure 12: Distribution of CIBIC-plus Ratings at Week 13



Age, gender and race: Patient's age, gender, or race did not predict clinical outcome of treatment.

INDICATIONS AND USAGE

REMINYL® (galantamine hydrobromide) is indicated for the treatment of mild to moderate dementia of the Alzheimer's type.

CONTRAINDICATIONS

REMINYL® (galantamine hydrobromide) is contraindicated in patients with known hypersensitivity to galantamine hydrobromide or to any excipients used in the formulation.

WARNINGS

Anesthesia

Galantamine, as a cholinesterase inhibitor, is likely to exaggerate the neuromuscular blockade effects of succinylcholine-type and similar neuromuscular blocking agents during anesthesia.

Cardiovascular Conditions

Because of their pharmacological action, cholinesterase inhibitors have vagotonic effects on the sinoatrial and atrioventricular nodes, leading to bradycardia and AV block. These actions may be particularly important to patients with supraventricular cardiac conduction disorders or to patients taking other drugs concomitantly that significantly slow heart rate. Postmarketing surveillance of marketed anticholinesterase inhibitors has shown, however, that, bradycardia and all types of heart block have been reported in patients both with and without known underlying cardiac conduction abnormalities. Therefore all patients should be considered at risk for adverse effects on cardiac conduction.

In randomized controlled trials, bradycardia was reported more frequently in galantamine-treated patients than in placebo-treated patients, but rarely led to treatment discontinuation. The overall frequency of this event was 2-3% for galantamine doses up to 24 mg/day compared with <1% for placebo. No increased incidence of heart block was observed at the recommended doses.

Patients treated with galantamine up to 24 mg/day using the recommended dosing schedule showed a dose-related increase in risk of syncope (placebo 0.7% [2/286]; 4 mg BID 0.4% [3/692]; 8 mg BID 1.3% [7/552]; 12 mg BID 2.2% [6/273]).

Gastrointestinal Conditions

Through their primary action, cholinomimetics may be expected to increase gastric acid secretion due to increased cholinergic activity. Therefore, patients should be monitored closely for symptoms of active or occult gastrointestinal bleeding, especially those with an increased risk for developing ulcers, e.g., those with a history of ulcer disease or patients using concurrent nonsteroidal anti-inflammatory drugs (NSAIDs). Clinical studies of REMINYL® (galantamine hydrobromide) have shown no increase, relative to placebo, in the incidence of either peptic ulcer disease or gastrointestinal bleeding.

REMINYL®, as a predictable consequence of its pharmacological properties, has been shown to produce nausea, vomiting, diarrhea, anorexia, and weight loss. (See ADVERSE REACTIONS)

Genitourinary

Although this was not observed in clinical trials with REMINYL®, cholinomimetics may cause bladder outflow obstruction.

Neurological Conditions

Seizures: Cholinesterase inhibitors are believed to have some potential to cause generalized convulsions. However, seizure activity may also be a manifestation of Alzheimer's disease. In clinical trials, there was no increase in the incidence of convulsions with REMINYL® compared to placebo.

Pulmonary Conditions

Because of its cholinomimetic action, galantamine should be prescribed with care to patients with a history of severe asthma or obstructive pulmonary disease.

PRECAUTIONS

Information for Patients and Caregivers: Caregivers should be instructed in the recommended administration (twice per day, preferably with morning and evening meal) and dose escalation (dose increases should follow minimum of four weeks at prior dose).

Patients and caregivers should be advised that the most frequent adverse events associated with use of the drug can be minimized by following the recommended dosage and administration.

Patients and caregivers should be informed that if therapy has been interrupted for several days or longer, the patient should be restarted at the lowest dose and the dose escalated to the current dose.

Caregivers should be instructed in the correct procedure for administering REMINYL® (galantamine hydrobromide) Oral Solution. In addition, they should be informed of the existence of an Instruction Sheet (included with the product) describing how the solution is to be administered. They should be urged to read this sheet prior to administering REMINYL® Oral Solution. Caregivers should direct questions about the administration of the solution to either their physician or pharmacist.

Special Populations

Hepatic Impairment

In patients with moderately impaired hepatic function, dose titration should proceed cautiously (See CLINICAL PHARMACOLOGY and DOSAGE AND ADMINISTRATION). The use of REMINYL® in patients with severe hepatic impairment is not recommended.-

Renal Impairment

In patients with moderately impaired renal function, dose titration should proceed cautiously (See **CLINICAL PHARMACOLOGY** and **DOSAGE AND ADMINISTRATION**). In patients with severely impaired renal function ($CL_{cr} < 9$ mL/min) the use of REMINYL[®] is not recommended.

Drug-Drug Interactions

Use with Anticholinergics

REMINYL[®] has the potential to interfere with the activity of anticholinergic medications.

Use with Cholinomimetics and Other Cholinesterase Inhibitors

A synergistic effect is expected when cholinesterase inhibitors are given concurrently with succinylcholine, other cholinesterase inhibitors, similar neuromuscular blocking agents or cholinergic agonists such as bethanechol.

A) Effect of Other Drugs on Galantamine

In vitro

CYP3A4 and CYP2D6 are the major enzymes involved in the metabolism of galantamine. CYP3A4 mediates the formation of galantamine-N-oxide; CYP2D6 leads to the formation of O-desmethyl-galantamine. Because galantamine is also glucuronidated and excreted unchanged, no single pathway appears predominant.

In vivo

Cimetidine and Ranitidine: Galantamine was administered as a single dose of 4 mg on day 2 of a 3-day treatment with either cimetidine (800 mg daily) or ranitidine (300 mg daily). Cimetidine increased the bioavailability of galantamine by approximately 16%. Ranitidine had no effect on the PK of galantamine.

Ketoconazole: Ketoconazole, a strong inhibitor of CYP3A4 and an inhibitor of CYP2D6, at a dose of 200 mg BID for 4 days, increased the AUC of galantamine by 30%.

Erythromycin: Erythromycin, a moderate inhibitor of CYP3A4 at a dose of 500 mg QID for 4 days, affected the AUC of galantamine minimally (10% increase).

Paroxetine: Paroxetine, a strong inhibitor of CYP2D6, at 20 mg/day for 16 days, increased the oral bioavailability of galantamine by about 40%.

B) Effect of Galantamine on Other Drugs

In vitro

Galantamine did not inhibit the metabolic pathways catalyzed by CYP1A2, CYP2A6, CYP3A4, CYP4A, CYP2C, CYP2D6 or CYP2E1. This indicates that the inhibitory potential of galantamine towards the major forms of cytochrome P450 is very low.

In vivo

Warfarin: Galantamine at 24 mg/day had no effect on the pharmacokinetics of R-and-S-warfarin (25 mg single dose) or on the prothrombin time. The protein binding of warfarin was unaffected by galantamine.

Digoxin: Galantamine at 24 mg/day had no effect on the steady-state pharmacokinetics of digoxin (0.375

mg once daily) when they were coadministered. In this study, however, one healthy subject was hospitalized for 2nd and 3rd degree heart block and bradycardia.

Carcinogenesis, Mutagenesis and Impairment of Fertility

In a 24-month oral carcinogenicity study in rats, a slight increase in endometrial adenocarcinomas was observed at 10 mg/kg/day (4 times the Maximum Recommended Human Dose [MRHD] on a mg/m² basis or 6 times on an exposure [AUC] basis and 30 mg/kg/day (12 times MRHD on a mg/m² basis or 19 times on an AUC basis). No increase in neoplastic changes was observed in females at 2.5 mg/kg/day (equivalent to the MRHD on a mg/m² basis or 2 times on an AUC basis) or in males up to the highest dose tested of 30 mg/kg/day (12 times the MRHD on a mg/m² and AUC basis).

Galantamine was not carcinogenic in a 6-month oral carcinogenicity study in transgenic (P 53-deficient) mice up to 20 mg/kg/day, or in a 24-month oral carcinogenicity study in male and female mice up to 10 mg/kg/day (2 times the MRHD on a mg/m² basis and equivalent on an AUC basis).

Galantamine produced no evidence of genotoxic potential when evaluated in the *in vitro* Ames S. typhimurium or E. coli reverse mutation assay, *in vitro* mouse lymphoma assay, *in vivo* micronucleus test in mice, or *in vitro* chromosome aberration assay in Chinese hamster ovary cells.

No impairment of fertility was seen in rats given up to 16 mg/kg/day (7 times the MRHD on a mg/m² basis) for 14 days prior to mating in females and for 60 days prior to mating in males.

Pregnancy

Pregnancy Category B: In a study in which rats were dosed from day 14 (females) or day 60 (males) prior to mating through the period of organogenesis, a slightly increased incidence of skeletal variations was observed at doses of 8 mg/kg/day (3 times the Maximum Recommended Human Dose [MRHD] on a mg/m² basis) and 16 mg/kg/day. In a study in which pregnant rats were dosed from the beginning of organogenesis through day 21 post-partum, pup weights were decreased at 8 and 16 mg/kg/day, but no adverse effects on other postnatal developmental parameters were seen. The doses causing the above effects in rats produced slight maternal toxicity. No major malformations were caused in rats given up to 16 mg/kg/day. No drug related teratogenic effects were observed in rabbits given up to 40 mg/kg/day (32 times the MRHD on a mg/m² basis) during the period of organogenesis.

There are no adequate and well-controlled studies of REMINYL® in pregnant women. REMINYL® should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus.

Nursing Mothers

It is not known whether galantamine is excreted in human breast milk. REMINYL® has no indication for use in nursing mothers.

Pediatric Use

There are no adequate and well-controlled trials documenting the safety and efficacy of galantamine in any illness occurring in children. Therefore, use of REMINYL® in children is not recommended.

ADVERSE REACTIONS

Adverse Events Leading to Discontinuation: In two large scale, placebo-controlled trials of 6 months duration, in which patients were titrated weekly from 8 to 16 to 24, and to 32 mg/day, the risk of discontinuation because of an adverse event in the galantamine group exceeded that in the placebo group by about threefold. In contrast, in a 5-month trial with escalation of the dose by 8 mg/day every 4 weeks, the overall risk of discontinuation because of an adverse event was 7%, 7%, and 10% for the placebo, galantamine 16 mg/day, and galantamine 24 mg/day groups, respectively, with gastrointestinal adverse effects the principle reason for discontinuing galantamine. Table 1 shows the most frequent adverse

events leading to discontinuation in this study.

Table 1: Most Frequent Adverse Events Leading to Discontinuation in a Placebo-controlled, Double-blind Trial with a 4-Week Dose Escalation Schedule

	4-week Escalation		
Adverse Event	Placebo N=286	16 mg/day N=279	24 mg/day N=273
Nausea	<1%	2%	4%
Vomiting	0%	1%	3%
Anorexia	<1%	1%	<1%
Dizziness	<1%	2%	1%
Syncope	0%	0%	1%

Adverse Events Reported in Controlled Trials: The reported adverse events in REMINYL[®] (galantamine hydrobromide) trials reflect experience gained under closely monitored conditions in a highly selected patient population. In actual practice or in other clinical trials, these frequency estimates may not apply, as the conditions of use, reporting behavior and the types of patients treated may differ.

The majority of these adverse events occurred during the dose-escalation period. In those patients who experienced the most frequent adverse event, nausea, the median duration of the nausea was 5-7 days.

Administration of REMINYL[®] with food, the use of anti-emetic medication, and ensuring adequate fluid intake may reduce the impact of these events.

The most frequent adverse events, defined as those occurring at a frequency of at least 5% and at least twice the rate on placebo with the recommended maintenance dose of either 16 or 24 mg/day of REMINYL[®] under conditions of every 4 week dose-escalation for each dose increment of 8 mg/day, are shown in Table 2. These events were primarily gastrointestinal and tended to be less frequent with the 16 mg/day recommended initial maintenance dose.

Table 2: The Most Frequent Adverse Events in the Placebo-controlled Trial with Dose-Escalation every 4 Weeks Occurring in at Least 5% of Patients Receiving REMINYL[®] and at Least Twice the Rate on Placebo.

Adverse Event	Placebo N=286	REMINYL [®] 16 mg/day N=279	REMINYL [®] 24 mg/day N=273
Nausea	5%	13%	17%
Vomiting	1%	6%	10%
Diarrhea	6%	12%	6%
Anorexia	3%	7%	9%
Weight decrease	1%	5%	5%

Table 3: The most common adverse events (adverse events occurring with an incidence of at least 2%

with REMINYL[®] treatment and in which the incidence was greater than with placebo treatment) are listed in Table 3 for four placebo-controlled trials for patients treated with 16 or 24 mg/day of REMINYL[®].

Table 3: Adverse Events Reported in at Least 2% of Patients with Alzheimer's Disease Administered REMINYL[®] and at a Frequency Greater than with Placebo

Body System Adverse Event	Placebo (N=801)	REMINYL [®] ^a (N=1040)
Body as a whole - general disorders		
Fatigue	3%	5%
Syncope	1%	2%
Central & peripheral nervous system disorders		
Dizziness	6%	9%
Headache	5%	8%
Tremor	2%	3%
Gastro-intestinal system disorders		
Nausea	9%	24%
Vomiting	4%	13%
Diarrhea	7%	9%
Abdominal pain	4%	5%
Dyspepsia	2%	5%
Heart rate and rhythm disorders		
Bradycardia	1%	2%
Metabolic and nutritional disorders		
Weight decrease	2%	7%
Psychiatric disorders		
Anorexia	3%	9%
Depression	5%	7%
Insomnia	4%	5%
Somnolence	3%	4%
Red blood cell disorders		
Anemia	2%	3%
Respiratory system disorders		
Rhinitis	3%	4%
Urinary system disorders		
Urinary tract infection	7%	8%
Hematuria	2%	3%

a: Adverse events in patients treated with 16 or 24 mg/day of REMINYL[®] in four placebo-controlled trials are included

Adverse events occurring with an incidence of at least 2% in placebo-treated patients that was either equal to or greater than with REMINYL[®] treatment were constipation, agitation, confusion, anxiety, hallucination, injury, back pain, peripheral edema, asthenia, chest pain, urinary incontinence, upper respiratory tract infection, bronchitis, coughing, hypertension, fall, and purpura.

There were no important differences in adverse event rate related to dose or sex. There were too few non-Caucasian patients to assess the effects of race on adverse event rates.

No clinically relevant abnormalities in laboratory values were observed.

Other Adverse Events Observed During Clinical Trials

REMINYL[®] was administered to 3055 patients with Alzheimer's disease. A total of 2357 patients received galantamine in placebo-controlled trials and 761 patients with Alzheimer's disease received galantamine 24 mg/day, the maximum recommended maintenance dose. About 1000 patients received galantamine for at least one year and approximately 200 patients received galantamine for two years.

To establish the rate of adverse events, data from all patients receiving any dose of galantamine in 8 placebo-controlled trials and 6 open-label extension trials were pooled. The methodology to gather and codify these adverse events was standardized across trials, using WHO terminology. All adverse events occurring in approximately 0.1% are included, except for those already listed elsewhere in labeling, WHO terms too general to be informative, or events unlikely to be drug caused. Events are classified by body system and listed using the following definitions: frequent adverse events - those occurring in at least 1/100 patients; infrequent adverse events - those occurring in 1/100 to 1/1000 patients; rare adverse events - those occurring in fewer than 1/1000 patients. These adverse events are not necessarily related to REMINYL[®] treatment and in most cases were observed at a similar frequency in placebo-treated patients in the controlled studies.

Body As a Whole – General Disorders: *Frequent:* chest pain

Cardiovascular System Disorders: *Infrequent:* postural hypotension, hypotension, dependent edema, cardiac failure

Central & Peripheral Nervous System Disorders: *Infrequent:* vertigo, hypertonia, convulsions, involuntary muscle contractions, paresthesia, ataxia, hypokinesia, hyperkinesia, apraxia, aphasia

Gastrointestinal System Disorders: *Frequent:* flatulence; *Infrequent:* gastritis, melena, dysphagia, rectal hemorrhage, dry mouth, saliva increased, diverticulitis, gastroenteritis, hiccup; *rare:* esophageal perforation

Heart Rate & Rhythm Disorders: *Infrequent:* AV block, palpitation, atrial fibrillation, QT prolonged, bundle branch block, supraventricular tachycardia, T-wave inversion, ventricular tachycardia

Metabolic & Nutritional Disorders: *Infrequent:* hyperglycemia, alkaline phosphatase increased

Platelet, Bleeding & Clotting Disorders: *Infrequent:* purpura, epistaxis, thrombocytopenia

Psychiatric Disorders: *Infrequent:* apathy, paroniria, paranoid reaction, libido increased, delirium

Urinary System Disorders: *Frequent:* incontinence; *Infrequent:* hematuria, micturition frequency, cystitis, urinary retention, nocturia, renal calculi

OVERDOSAGE

Because strategies for the management of overdose are continually evolving, it is advisable to contact a poison control center to determine the latest recommendations for the management of an overdose of any drug.

As in any case of overdose, general supportive measures should be utilized. Signs and symptoms of

significant overdosing of galantamine are predicted to be similar to those of overdosing of other cholinomimetics. These effects generally involve the central nervous system, the parasympathetic nervous system, and the neuromuscular junction. In addition to muscle weakness or fasciculations, some or all of the following signs of cholinergic crisis may develop: severe nausea, vomiting, gastrointestinal cramping, salivation, lacrimation, urination, defecation, sweating, bradycardia, hypotension, respiratory depression, collapse and convulsions. Increasing muscle weakness is a possibility and may result in death if respiratory muscles are involved.

Tertiary anticholinergics such as atropine may be used as an antidote for REMINYL® (galantamine hydrobromide) overdosage. Intravenous atropine sulfate titrated to effect is recommended at an initial dose of 0.5 to 1.0 mg i.v. with subsequent doses based upon clinical response. Atypical responses in blood pressure and heart rate have been reported with other cholinomimetics when coadministered with quaternary anticholinergics. It is not known whether REMINYL® and/or its metabolites can be removed by dialysis (hemodialysis, peritoneal dialysis, or hemofiltration). Dose-related signs of toxicity in animals included hypoactivity, tremors, clonic convulsions, salivation, lacrimation, chromodacryorrhea, mucoid feces, and dyspnea.

DOSAGE AND ADMINISTRATION

The dosage of REMINYL® (galantamine hydrobromide) shown to be effective in controlled clinical trials is 16-32 mg/day given as twice daily dosing. As the dose of 32 mg/day is less well tolerated than lower doses and does not provide increased effectiveness, the recommended dose range is 16-24 mg/day given in a BID regimen. The dose of 24 mg/day did not provide a statistically significant greater clinical benefit than 16 mg/day. It is possible, however, that a daily dose of 24 mg of REMINYL® might provide additional benefit for some patients.

The recommended starting dose of REMINYL® is 4 mg twice a day (8 mg/day). After a minimum of 4 weeks of treatment, if this dose is well tolerated, the dose should be increased to 8 mg twice a day (16 mg/day). A further increase to 12 mg twice a day (24 mg/day) should be attempted only after a minimum of 4 weeks at the previous dose.

REMINYL® should be administered twice a day, preferably with morning and evening meals.

Patients and caregivers should be informed that if therapy has been interrupted for several days or longer, the patient should be restarted at the lowest dose and the dose escalated to the current dose.

Caregivers should be instructed in the correct procedure for administering REMINYL® Oral Solution. In addition, they should be informed of the existence of an Instruction Sheet (included with the product) describing how the solution is to be administered. They should be urged to read this sheet prior to administering REMINYL® Oral Solution. Caregivers should direct questions about the administration of the solution to either their physician or pharmacist.

The abrupt withdrawal of REMINYL® in those patients who had been receiving doses in the effective range was not associated with an increased frequency of adverse events in comparison with those continuing to receive the same doses of that drug. The beneficial effects of REMINYL® are lost, however, when the drug is discontinued.

Doses in Special Populations

Galantamine plasma concentrations may be increased in patients with moderate to severe hepatic impairment. In patients with moderately impaired hepatic function (Child-Pugh score of 7-9), the dose should generally not exceed 16 mg/day. The use of REMINYL® in patients with severe hepatic impairment (Child-Pugh score of 10-15) is not recommended.

For patients with moderate renal impairment the dose should generally not exceed 16 mg/day. In patients

with severe renal impairment (creatinine clearance < 9 mL/min), the use of REMINYL® is not recommended.

HOW SUPPLIED

REMINYL® (galantamine hydrobromide) tablets are imprinted "JANSSEN" on one side, and "G" and the strength "4", "8", or "12" on the other.

4 mg off-white tablet: bottles of 60 NDC 50458-390-60

8 mg pink, tablet: bottles of 60 NDC 50458-391-60

12 mg orange-brown tablet: bottles of 60 NDC 50458-392-60

REMINYL® (galantamine hydrobromide) 4 mg/mL oral solution (NDC 50458-399-10) is a clear colorless solution supplied in 100 mL bottles with a calibrated (in milligrams and milliliters) pipette. The minimum calibrated volume is 0.5 mL, while the maximum calibrated volume is 4 mL.

Storage and Handling

REMINYL® tablets should be stored at 25°C (77°F); excursions permitted to 15-30°C (59-86°F) [see USP Controlled Room Temperature].

REMINYL® oral solution should be stored at 25°C (77°F); excursions permitted to 15-30°C (59-86°F) [see USP Controlled Room Temperature]. DO NOT FREEZE.

Keep out of reach of children.

Part No. 75173XX

US Patent No. 4,663,318

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Manufactured by:

Janssen-Cilag SpA

Latina, Italy

Distributed by:

Janssen Pharmaceutica Products, L.P.

Titusville, NJ 08560

USING YOUR REMINYL® DISPENSING-PIPETTE AND BOTTLE

Follow the directions below to use your REMINYL® Dispensing-Pipette and bottle, unless your doctor gave you different directions.

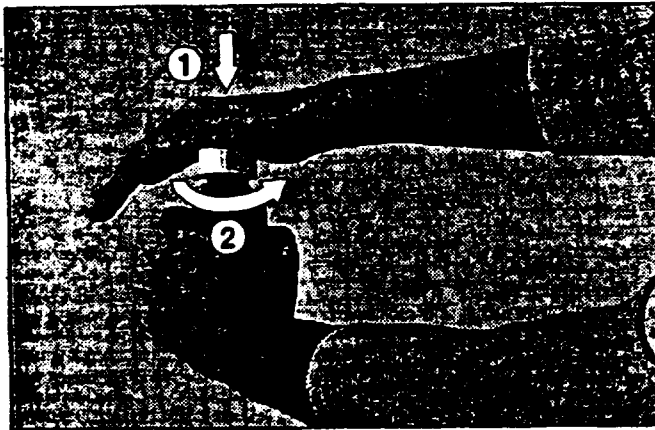
IMPORTANT: Read these instructions before using REMINYL® oral solution.

To open the bottle and use the pipette (plastic tube)

The bottle comes with a child-proof cap. Here is how to open it:

1. Push the plastic cap on the bottle down while turning the cap counter-clockwise (to the left) (Figure 1). Remove the unscrewed cap.

Fig. 1



2. Pull the pipette out of its case. The pipette is a tube that you use to measure your dose of REMINYL®. Place the pipette fully into the bottle of REMINYL®. (Figures 2a-2b)

Fig. 2a



Fig. 2b



3. While holding the bottom ring of the pipette, pull the pipette plunger up to the level that equals the dose prescribed by your doctor. Use the markings on the pipette to guide you. This will draw the medicine into the pipette. (Figures 3a-3b)

Fig. 3a

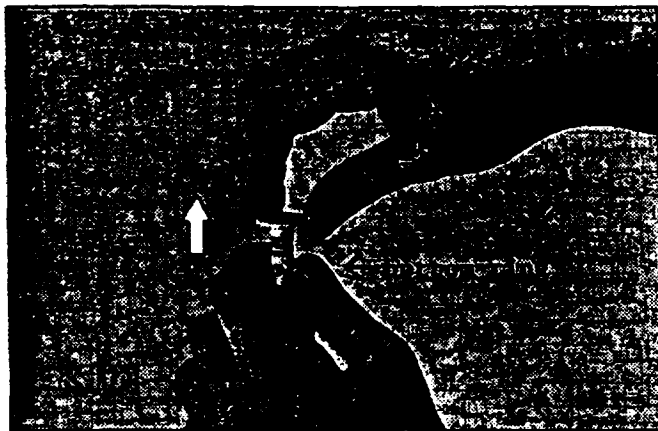


Fig. 3b



4. Be careful not to push the plunger in during this step. Hold the bottom ring of the pipette. Remove the entire pipette from the bottle. (Figures 4a-4b)

Fig. 4a

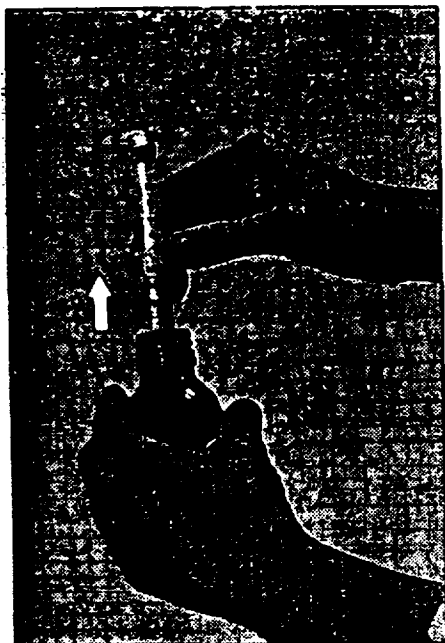


Fig. 4b



5. Empty all the medicine in the pipette into 3-4 ounces (100 mL) of any non-alcoholic drink. To do this, push the plunger all the way in. (Figures 5a-5b)

Fig. 5a



Fig. 5b



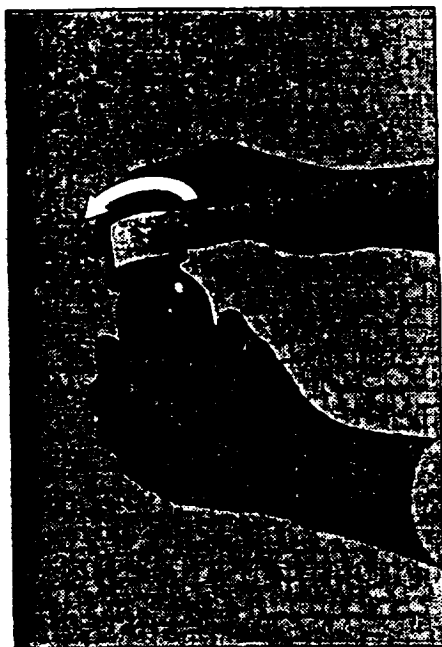
6. Stir the drink well (Figure 6). Drink all of the mixture right away.

Fig. 6



7. Replace the plastic cap on the bottle by turning it clockwise (to the right). (Figure 7)

Fig. 7



8. Rinse the empty pipette by inserting the open end of the pipette into a glass of water, pulling the plunger out, and pushing the plunger in to remove the water. (Figures 8a-8b)

Fig. 8a



Fig. 8b



For more information about REMINYL[®], see the leaflet that came with the package.

STORAGE: Store the bottle at room temperature (59°-77°F/15°-25°C) away from children. Avoid freezing and protect it from light.

NDC 50458-399-10 100 mL

REMINYL[®]

(galantamine hydrobromide) Oral Solution

4 mg/mL

Each 1 mL contains: 4 mg of galantamine hydrobromide in an aqueous solution.

JANSSEN PHARMACEUTICA, INC.

Titusville, NJ 08560

United States



JANSSEN



JANSSEN

NDC 50458-399-10

100 mL

REMINYL®
(GALANTAMINE HYDROBROMIDE)
ORAL SOLUTION

Rx only

Dosage: For information for use,
see accompanying Package Insert.

Dispensing: For information concerning
proper usage of the container and
dispensing-pipette, see accompanying
Patient Instructions.

Store at controlled room temperature
(59°-77°F/15°-25°C). Do not freeze.

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U.S. Patent No. 4,888,318

Distributed by:

Janssen Pharmaceuticals Products, L.P.
Titusville, NJ 08580

Manufactured by:

Janssen Pharmaceutica N.V.
Beerse, Belgium

REMINYL®
(GALANTAMINE HYDROBROMIDE)
ORAL SOLUTION

NDC 50458-399-10

100 mL

REMINYL®
(GALANTAMINE HYDROBROMIDE)
ORAL SOLUTION

4mg/mL

Each 1 mL contains the
equivalent of 4 mg galantamine
in an aqueous solution.



3 50458-399-10 3

USA
50458-399-10
014

JANSSEN

JANSSEN
PHARMACEUTICA
PRODUCTS, L.P.

USA - 50458-399-10 (014)

Master order : 014
Support order : 018
Refill order : 187

Printfile: 000078j

Datum : 28-NOV-00

V1_014a_00c

Operator : Marita

Mark : use

Cdn : 230435_V1

BLACK 107 100-22884-V1

CONTAINER

100 mL NDC 50458-399-10

REMINYL[®]

(GALANTAMINE HYDROBROMIDE)

ORAL SOLUTION

4mg/mL

Each 1 mL contains the equivalent of 4 mg galantamine in an aqueous solution.

Dispensing: For information concerning proper usage of the container and dispensing pipette, see accompanying Patient Instructions.

Use only

Store at controlled room temperature (20°-25°C/68°-77°F/15°-25°C). Do not freeze.

Dosage: For information for use, see accompanying Package Insert.

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U.S. Patent No. 4,883,795
Manufactured by:
Janssen Pharmaceutica
Newark, N.J.
Distributed by:
Janssen Pharmaceutica N.V.
Beerse, Belgium

JANSSEN

MANUFACTURED BY JANSSEN PHARMACEUTICALS



Product : Reminyl oral
Ref. Form : 100 mL
Trade : LBA
Code number : 50458-399-10
Ref. Form : 100 mL
Number of bottles : 1
Master Code : BLACK
Support Code : 107
Batch Code :
Reference : LBA 22884 V1 207007L OTC
Operator : SP231
Date : 10-05-06