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Approval Package for:

APPLICATION NUMBER:

21-902

Trade Name: Veregen Ointment

Generic Name: Kunecatechins

Sponsor: MediGene, Inc.

Approval Date: 10/31/2006

Indications: For the topical treatment of external and perianal warts (Condylomata acuminate) in immunocompetent patients 18 years and older

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APPLICATION NUMBER:

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APPROVAL LETTER

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-902

MediGene, Inc.
Attention: Pam Larson
Sr. Manager, Regulatory Affairs
10660 Scripps Ranch Blvd., Suite 200
San Diego, California 92131

Dear Ms. Larson

Please refer to your new drug application (NDA) dated September 23, 2005, received September 30, 2005, submitted under section 505(b)(1) of the Federal Food, Drug, and Cosmetic Act for Veregen™ (kunecatechins) Ointment, 15%.

We acknowledge receipt of your submissions dated December 9, 2005; January 6, 16 and 30; February 3, 16 (2), 22 and 28; March 2 and 6; April 17, 18 (2), 20 (2), 21 and 25; May 1, 3, 5, 18 and 26; June 2, 6 and 22; July 11 and 24; August 2, 9, 10, 14 (2), 16 and 18 (2); September 13, 14 (2) and 28; and October 4, 5, 6, 10, 13, 23, 24,26 (2), 27 and 30, 2006.

This new drug application provides for the use of Veregen™ (kunecatechins) Ointment, 15%, for the topical treatment of external genital and perianal warts (*Condylomata acuminata*) in immunocompetent patients 18 years and older.

We completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text, based on the agreed-upon drug specifications, provided in your October 4, 2006 amendment, and the raw material source and manufacturing process described in your NDA.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, text for the patient package insert and immediate container and carton labels). Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission "**FPL for approved NDA 21-902.**" Approval of this submission by FDA is not required before the labeling is used.

Within 21 days of the date of this letter, submit content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/oc/datacouncil/spl.html <http://www.fda.gov/oc/datacouncil/spl.html> , that is identical in content to the enclosed labeling text. Upon receipt and verification, we will transmit that version to the National Library of Medicine for public dissemination.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred. We are waiving the pediatric study requirement for this application because the number of pediatric patients is limited for this use.

We remind you of your postmarketing study commitment in your submission dated October 26, 2006. The commitment is listed below.

1. A phase 4 study comparing the pharmacokinetics of catechin following topical application of Veregen Ointment, 15%, with that obtained after oral administration of green tea solution. The two-arm study will be designed to enroll into one arm 20 evaluable patients ("completer") with external genital and perianal warts who will be treated 3 times daily for 7 days with Veregen Ointment, 15%, and into the second arm 20 evalualble healthy volunteers, who are to drink a green tea solution 3 times daily for 7 days. Blood samples for the analysis of catechin levels will be obtained prior to and at several sampling time points (over 12 hours) after oral intake of a green teal solution or topical application of Veregen Ointment, 15%, respectively, at Days 1 and 7. The study will be carried out with material from the final commercial source for API to be established in Japan and fulfilling the FDA-defined specifications for the botanical drug substance and drug product.

   Protocol to be submitted by July 2007.
   Study Start Date by January 2008
   Final Report Submission by January 2009.

Submit clinical protocols to your IND for this product. Under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii), you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies, number of patients entered into each study. All submissions, including supplements, relating to these postmarketing study commitments must be prominently labeled "**Postmarketing Study Commitment Protocol**", "**Postmarketing Study Commitment Final Report**", or "**Postmarketing Study Commitment Correspondence**."

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to the Division of Dermatology and Dental Products and two copies of both the promotional materials and the package insert directly to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

Please submit one market package of the drug product when it is available.

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at www.fda.gov/medwatch/report/mmp.htm.

If you have any questions, call Millie Wright, Project Manager at (301) 796-2110.

Sincerely,

(See appended electronic signature page)
Daniel Shames, M.D.
Deputy Division Director (Acting)
Office of Drug Evaluations III
Center for Drug Evaluation and Research

Enclosure

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Mildred Wright
10/16/2006 05:00:48 PM
CSO