CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

202088Orig1s000

Trade Name: Suprenza

Generic Name: Phentermine hydrochloride

Sponsor: Citius Pharmaceuticals, LLC

Approval Date: June 13, 2011

Indications: Suprenza is indicated as a short-term (a few weeks) adjunct in a regimen of weight reduction based on exercise, behavioral modification and caloric restriction in the management of exogenous obesity for patients with an intial body mass index ≥ 30 kg/m² or ≥27kg/ m² in the presence of other risk factors (e.g., controlled hypertension, diabetes, hyperlipidermia).

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APPROVAL LETTER

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 202088 / ORIGINAL-1

NDA APPROVAL

Citius Pharmaceuticals, LLC
Attention: Steven A. Kates, Ph.D.
Vice President
63 Great Road
Maynard, MA 01754

Dear Dr. Kates:

Please refer to your New Drug Application (NDA) dated August 11, 2010, received August 13, 2010, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Suprenza (phentermine hydrochloride) orally dissolving tablets, 15 mg and 30 mg.

We acknowledge receipt of your amendments dated September 29, October 11, 12, 13(2), and 28, Nov 15, 17, 18, 23 and 30, and December 9, 17, and 29, 2010, and January 28, February 4, 14, and 18, March 2, 11, 15, 25, and 28, April 7, 8, 13(2), and 21, May 4, 5, and 9, and June 6(3), and 8, 2011.

This new drug application provides for the use of Suprenza (phentermine hydrochloride), orally dissolving tablets, 15 and 30 mg as a short-term (a few weeks) adjunct in a regimen of weight reduction based on exercise, behavioral modification, and caloric restriction in the management of exogenous obesity for patients with an initial body mass index ≥30 kg/m^2, or ≥27 kg/m^2 in the presence of other risk factors (e.g., controlled hypertension, diabetes, hyperlipidemia).
.
We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the package insert). Information on submitting SPL files using eLIST may be found in the guidance for industry titled "SPL Standard for Content of Labeling Technical Qs and As" at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

IMMEDIATE CONTAINER LABELS

Submit final printed container labels that are identical to the enclosed immediate container labels and immediate container labels submitted on June 6, 2011, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled "Providing Regulatory Submissions in Electronic Format Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008)." Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission "**Final Printed Carton and Container Labels for approved NDA 202088**." Approval of this submission by FDA is not required before the labeling is used.

Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

PREA

We are waiving the pediatric study requirement for this application because there is evidence strongly suggesting that the drug product would be ineffective and unsafe in all pediatric age groups. Phentermine is an old drug that was approved for short-term use in adults prior to the currently accepted approach to obesity management. Obesity is not an acute condition, but a chronic condition that requires a lifetime of treatment. Adequate long-term data in adults are not available to support safely studying phentermine in children for chronic use.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of FDCA authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess a signal of a serious risk of abuse potential with phentermine hydrochloride orally dissolving tablets.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess this serious risk.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

1785-1 Nationally representative (or nationally projected) study of annual use of phentermine hydrochloride orally dissolving tablets for three years after product launch. This study must provide information on the distribution of age, sex, and BMI of patients treated with phentermine ODT, as well as the average duration of use, average size of prescriptions, average cumulative dose per patient, concomitant drug use and concomitant disease diagnoses.

The timetables you submitted on June 6 and 8, 2011, state that you will conduct this study according to the following schedule:

Final Protocol Submission:	09/30/2011
Interim Report Submission:	12/03/2012
	12/03/2013
Final Report Submission:	12/03/2014

Finally, we have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to assess a signal of a serious risk of increased drug exposure in patients with decreased renal function.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

1785-2 A clinical trial to assess the effect of mild, moderate and severe renal impairment and end stage renal disease (ESRD) on the pharmacokinetics of phentermine.

The timetable you submitted on June 6, 2011, states that you will conduct this trial according to the following schedule:

Final Protocol Submission:	07/13/2012
Trial Completion:	01/31/2014
Final Report Submission:	06/30/2014

Submit the protocols to your IND 076477, with a cross-reference letter to this NDA. Submit all final reports to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate: **"Required**

Postmarketing Protocol Under 505(o)", "Required Postmarketing Final Report Under 505(o)", "Required Postmarketing Correspondence Under 505(o)."

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert 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

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

REPORTING REQUIREMENTS

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

If you have any questions, call Patricia Madara, Regulatory Project Manager, at (301) 796-1249.

Sincerely,

{See appended electronic signature page}

Eric Colman, M.D.
Deputy Director
Division of Metabolism and Endocrinology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE:
Content of Labeling
Container Labeling

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

/s/

ERIC C COLMAN
06/13/2011