

## FINANCIAL DISCLOSURE

Under 21 CFR 54, an applicant is required to certify all investigators and consultants have disclosed any financial arrangements that could influence the study outcome.

In this regard, investigators and consultants were asked to provide information pertaining to:

1. Any financial arrangement between the sponsor and the individual that could influence the outcome of the study
2. Any significant payments of other sorts (eg: grants, honoraria, retainer fees, equipment, etc) made on or after February 2, 1999
3. Any proprietary interest held in the product tested
4. Any individual, spousal, or dependent children equity interest exceeding a value of \$50,000.

## CERTIFICATION: FINANCIAL INTERESTS AND ARRANGEMENTS OF CLINICAL INVESTIGATORS

The sponsor has filed to the BLA certification (Form FDA 3454) of the collection of retroactive financial disclosure information from 21 principal/co-principal investigators, and 24 sub-investigators. By filing this form, the sponsor certifies the following:

1. the sponsor has not entered into any financial arrangement with these investigators whereby the value of compensation to the investigator could be affected by the outcome of the study as defined in 21 CFR 54.2(a).
2. these clinical investigators are required to disclose to the sponsor whether the investigator had a proprietary interest in this product or a significant equity in the sponsor as defined in 21 CFR 54.2(b) did not disclose any such interests.
3. no investigator was the recipient of significant payments of other sorts as defined in 21 CFR 54.2(f).

### DUE DILIGENCE WITHOUT FINANCIAL DISCLOSURE

The sponsor has filed to the BLA, and fully described the process, that due diligence was performed for the following 61 clinical sub-investigators who have not responded to the request for financial disclosure. The sponsor has verified that no financial arrangements occurred as defined in 21 CFR 54.2(a), (c) or (f).

**TABLE FD1: SUB-INVESTIGATORS NOT PROVIDING FINANCIAL DISCLOSURE**

Study	Firm/Organization	Investigator Name
<b>Study RIT-II-001</b>		
	University of Nebraska Medical Center	[REDACTED]
	University of Alabama at Birmingham	[REDACTED]
	Memorial Sloan-Kettering Cancer Center	[REDACTED]
	Stanford University Medical Center	[REDACTED]
	St. Bartholomew's Hospital	[REDACTED]
	Christie Hospital NHS Trust	[REDACTED]
<b>Study RIT-II-002</b>		
	Stanford University Medical Center	[REDACTED]
	Yale University School of Medicine	[REDACTED]
	Rush-Presbyterian-St. Luke's Medical Center	[REDACTED]
	Fairfax Hospital	[REDACTED]
	Cornell University School of Medicine	[REDACTED]

Study	Firm/Organization	Investigator Name
Study RIT-II-002 (cont'd)	Vincent T. Lombardi Cancer Center	[REDACTED]
Study RIT-II-004	University of Michigan Medical Center	[REDACTED]
	St. Bartholomew's Hospital	[REDACTED]
	University of Nebraska Medical Center	[REDACTED]
	University of Washington Medical Center	[REDACTED]
	Memorial Sloan-Kettering Cancer Center	[REDACTED]
	Kaiser Permanente Medical Center	[REDACTED]

## DISCLOSURE: FINANCIAL INTERESTS AND ARRANGEMENTS OF CLINICAL INVESTIGATORS

Listed in the following table are investigators disclosing (Form FDA 3455) any significant payments of other sorts made on or after February 2, 1999 from the sponsor of the covered study such as a grant to fund ongoing research, compensation in the form of equipment, retainer for ongoing consultation, or honoraria.

**TABLE FD2: INVESTIGATORS DISCLOSING ANY SIGNIFICANT PAYMENTS**

Investigator With Financial Disclosure Information	Institution/Location	Comments
Mark Kaminski, M.D.	University of Michigan	Principal investigator for RIT-I-000, RIT-II-001, RIT-II-002, RIT-II-003, RIT-II-004, CP-97-014c, CP-97-016c, CP-98-023c
Richard Wahl, M.D.	University of Michigan	Principal investigator for RIT-I-000, RIT-II-001, RIT-II-002, RIT-II-003, RIT-II-004
Susan Knox, M.D.	Stanford University	Principal investigator for RIT-II-001, RIT-II-002, RIT-II-004
David Colcher, Ph.D	University of Nebraska	Investigator for RIT-II-001, RIT-II-004

Listed in the following table are investigators disclosing (Form FDA 3455) the following:

1. Any financial arrangement entered into between the sponsor of the covered study and the clinical investigator involved in the conduct of the covered study, whereby the value of the compensation to the clinical investigator for conducting the study could be influenced by the outcome of the study.

and

2. Any proprietary interest in the product tested in the covered study held by the clinical investigator.

**TABLE FD3: INVESTIGATORS DISCLOSING FINANCIAL ARRANGEMENTS WITH THE SPONSOR AND PROPRIETARY INTERESTS IN THE PRODUCT**

Investigator With Financial Disclosure Information	Institution/Location	Comments
Mark Kaminski, M.D.	University of Michigan	Principal investigator for RIT-I-000, RIT-II-001, RIT-II-002, RIT-II-003, RIT-II-004, CP-97-014c, CP-97-016c, CP-98-023c
Richard Wahl, M.D.	University of Michigan	Principal investigator for RIT-I-000, RIT-II-001, RIT-II-002, RIT-II-003, RIT-II-004

**TABLE FD4: INVESTIGATORS DISCLOSING STOCK POSITIONS IN THE SPONSOR**

Investigator With Financial Disclosure Information	Institution/Location	Comments
_____	University of Nebraska	Owns shares of stock that were worth over \$50,000.
_____	Arizona Cancer Center	Owns shares of stock that were worth over \$50,000.

## **INDEPENDENT PHYSICIAN REVIEWERS: FINANCIAL DISCLOSURE**

The sponsor has filed to the BLA certification of collection of retroactive financial disclosure information from the 11 participating physicians on the independent panel assessments including the MIRROR panel.

The sponsor has stated that none of these individuals have any of the following:

1. Financial interest whereby the value of their compensation could be influenced by the outcome of the study
2. Any proprietary interest
3. Any significant equity interest

The sponsor has provided information in the following table on any payments made to these individuals to determine if the payments made exceeded \$25,000 since February 2, 1999.

### TABLE FD5: DISCLOSURE OF SIGNIFICANT PAYMENTS TO INDEPENDENT PHYSICIAN REVIEWERS

#### Disclosure of Significant Payments

Name	Significant Payment (≥\$25,000)	Amount	Description
<b>MIRROR PANEL</b>			
_____	Yes	\$57,700	Consulting
_____	Yes	\$41,050	Consulting
_____	No	NA	NA
_____	No	NA	NA
<b>PATHOLOGY REVIEW</b>			
_____	No	NA	NA
John Bennett	No	NA	NA
Elaine Jaffe	No	NA	NA
<b>INDEPENDENT READERS</b>			
_____	No	NA	NA
_____	No	NA	NA
<b>INDEPENDENT REVIEWERS</b>			
_____	Yes	\$104,875	Consulting
_____	Yes	\$54,062	Consulting

NA = Not applicable - no financial information to disclose.

### SPONSOR EFFORTS TO MINIMIZE BIAS

The sponsor has described the following steps to minimize bias of the clinical study results by any of the disclosed arrangements or interests.

1. Clinical Site Monitoring
2. Clinical Audits
3. Independent Assessment of efficacy response data
4. Statistical Analysis of the contribution of clinical sites to detect introduction of bias at one or more clinical sites.

**CBER Review Comment:**

Study results from sites involving investigators who had disclosed significant equity interest were similar to other study sites and did not significantly impact or alter the efficacy results.