



Edward Timm, President & CEO
Mobius Therapeutics, LLC
4041 Forest Park Avenue
St. Louis, MO 63108

RE: NDA #022572
Mitosol[®] (mitomycin for solution)
MA #15

Dear Mr. Timm:

The Office of Prescription Drug Promotion (OPDP) of the U.S. Food and Drug Administration (FDA) has reviewed a professional email (2012 0011) (email) for Mitosol[®] (mitomycin for solution) (Mitosol) submitted by Mobius Therapeutics, LLC (Mobius) under cover of Form FDA 2253. The email is misleading because it makes representations regarding the use of Mitosol, but omits the full indication and omits and minimizes risks associated with Mitosol use. The email also omits important material facts regarding Mitosol's dosage and administration. Thus, the email misbrands Mitosol in violation of the Federal, Food, Drug, and Cosmetic Act (the FD&C Act), 21 U.S.C. 352(a), (n); 321(n). See 21 CFR 1.21(a); 202.1(e)(3)(ii); (e)(5); (e)(6)(i).

Background

Below is the indication and summary of the most serious and most common risks associated with the use of Mitosol.¹

Mitosol is indicated as an adjunct to ab externo glaucoma surgery.

According to the FDA-approved product labeling (PI), Mitosol is contraindicated in patients that have demonstrated a hypersensitivity to mitomycin, and in women who are or may become pregnant during therapy. Mitosol is also associated with several serious risks, including warnings and precautions regarding cell death, increased risk of post-operative hypotony, and higher instances of lenticular change and cataract formation in phakic patients.

In addition, the most frequent adverse reactions to Mitosol occur locally and include hypotony, hypotony maculopathy, blebitis, endophthalmitis, vascular reactions, corneal reactions, and cataract.

¹ This information is for background purposes only and does not necessarily represent the risk information that should be included in the promotional piece cited in this letter.

Omission and Minimization of Risk Information/ Omission of Material Facts

Promotional materials are misleading if they fail to reveal facts that are material in light of the representations made by the materials or with respect to the consequences that may result from the use of the drug as recommended or suggested by the materials.

The email presents the following claims and presentations (bolded emphasis in original):

- “**Remove the Variables**” with the following words surrounding the claim: “Dosing,” “Consistency,” and “Potency.”
- “**Eliminate Your Concerns**” with the following words surrounding the claim: “Shelf Life,” “Safety,” and “Sterility.”
- “Assured sterility, potency, and dosing along with closed transfer and qualified disposal reinvents mitomycin for ophthalmology.”
- “Mitosol® is the only FDA approved ophthalmic formulation of mitomycin.”
- “1-877-EYE-MITO.”

The email misleadingly makes representations about Mitosol’s safety, effectiveness, and use but fails to disclose Mitosol’s full approved indication or **any** risk information associated with the drug. The failure to disclose any risk information associated with Mitosol use suggests that the drug is safer than has been demonstrated by substantial evidence or substantial clinical experience. We note the statement on the bottom of the email, “Please see full prescribing information attached,” but the inclusion of this statement does not mitigate the misleading representations.

These claims and presentations are particularly concerning since claims such as “Remove the Variables” and “Eliminate Your Concerns” grossly minimize the risks associated with Mitosol by suggesting that there are **no** safety concerns associated with the use of the drug. According to the Warnings and Precautions section of the PI, Mitosol is associated with several serious risks including cell death, hypotony, and cataract formation.

The email is also misleading because it makes claims regarding the benefits of Mitosol’s dosing, but fails to reveal dosing information that is material to the safe use of the drug. Specifically, the email includes the following claims and presentations (emphasis in original):

- “**Remove the Variables**” with the word “Dosing” in conjunction with the claim.
- “Assured Dosing - Yes”

The email fails to disclose that according to the Dosage and Administration section of the PI, Mitosol requires reconstitution and that the reconstituted product is then fully saturated on sponges and applied and kept on the treatment area for a total of two minutes. Furthermore, the email fails to communicate that Mitosol must be used within one hour of reconstitution.

Conclusion and Requested Action

For the reasons discussed above, the email misbrands Mitosol in violation of the FD&C Act, 21 U.S.C. 352(a), (n); 321(n). See 21 CFR 1.21(a); 202.1(e)(3)(ii); (e)(5); (e)(6)(i).

OPDP requests that Mobius immediately cease the dissemination of violative promotional materials for Mitosol such as those described above. Please submit a written response to this letter on or before May 16, 2013, stating whether you intend to comply with this request, listing all promotional materials (with the 2253 submission date) for Mitosol that contain violations such as those described above, and explaining your plan for discontinuing use of such violative materials.

Please direct your response to the undersigned at the **Food and Drug Administration, Center for Drug Evaluation and Research, Office of Prescription Drug Promotion, 5901-B Ammendale Road, Beltsville, Maryland 20705-1266** or by facsimile at (301) 847-8444. To ensure timely delivery of your submissions, please use the full address above and include a prominent directional notation (e.g. a sticker) to indicate that the submission is intended for OPDP. Please refer to MA #15 in addition to the NDA number in all future correspondence relating to this particular matter. OPDP reminds you that only written communications are considered official.

The violations discussed in this letter do not necessarily constitute an exhaustive list. It is your responsibility to ensure that your promotional materials for Mitosol comply with each applicable requirement of the FD&C Act and FDA implementing regulations.

Sincerely,

{See appended electronic signature page}

Christine Corser, Pharm.D.
Regulatory Review Officer
Office of Prescription Drug Promotion

{See appended electronic signature page}

Lisa Hubbard, R.Ph.
Acting Deputy Division Director
Office of Prescription Drug Promotion

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

/s/

CHRISTINE G CORSER
05/02/2013

LISA M HUBBARD
05/02/2013