



U.S. FOOD & DRUG
ADMINISTRATION

Memorandum

DATE October 12, 2017

FROM Colonious King, Bioresearch Monitoring Branch
Division of Inspections and Surveillance
Office of Compliance and Biologics Quality
Telephone: 240-402-8759 Fax: 301-595-1304

THROUGH Dennis Cato, Chief, Bioresearch Monitoring Branch

THROUGH Carrie Mampilly, Director, Division of Inspections and Surveillance

TO Michael Havert Chair, Review Committee
R. Angelo de Claro Clinical Reviewer
Bindu George Clinical Reviewer
Mark Davidson RPM

SUBJECT Amended Bioresearch Monitoring Discipline Review Memo
BLA/STN: 125643/0
IND: 16278
Sponsor: Kite Pharma Inc.
Product: Axicabtagene ciloleucel (KTE-C19), anti-CD19 chimeric
antigen receptor T cell (Yescarta)

FINAL SUMMARY STATEMENT:

Bioresearch Monitoring (BIMO) inspections were completed at three domestic clinical study sites conducting study KTE-C19-101 in support of BLA 125643/0. The inspections did not reveal problems that impact the data submitted in this Biologics Licensing Application (BLA).

BACKGROUND

Three clinical investigators were inspected in support of the BLA and the inspections were conducted in accordance with FDA's Compliance Program Guidance Manual (CPGM) 7348.811, Inspection Program for Clinical Investigators. The inspection assignments were issued for protocol KTE-C19-101. The conduct of the protocol was reviewed during the BIMO inspections. Three clinical sites were selected based on a consultation with the clinical review team that centered on subject enrollment, adverse events, protocol deviations and subject response to the test article.

The inspection assignment included specific questions related to the study protocol and verification of the study data on safety and efficacy endpoints submitted by the sponsor in the BLA. Study Protocol KTE-C19-101 was conducted at 23 study sites in the United States, and www.fda.gov

one study site in Israel. 124 subjects were screened for the study and 111 subjects were treated in the study. The three inspected sites treated 47 subjects, which is 42% of the total subjects treated in the study. The information submitted in the BLA was compared to source documents at the inspection sites.

PROTOCOL REVIEWED

KTE-C19-101 *A Phase 1-2 Multi-Center Study Evaluating the Safety and Efficacy of KTE-C19 in Subjects with Refractory Aggressive Non-Hodgkin Lymphoma (NHL) (ZUMA-1)*

The table below summarizes the inspection results:

| Site Numbers | Study Site | Location | Enrolled Subjects | Form FDA 483 Issued | Classification |
|---------------------|--|-----------------|--------------------------|----------------------------|-----------------------|
| 002 | H. Lee Moffitt Cancer Center | Tampa, FL | 19 | No | NAI |
| 003 | The University of Texas MD Anderson Cancer Center | Houston, TX | 21 | No | NAI |
| 025 | Stanford Cancer Center, Blood and Marrow Transplantation | Stanford, CA | 7 | No | NAI |

NAI = No Action Indicated

FINANCIAL DISCLOSURE

The Clinical Investigator Compliance Program directs the FDA investigator to ask the clinical investigator if and when s/he disclosed information about her/his financial interests to the sponsor and/or interests of any sub-investigators, spouse(s) and dependent children including if and when the information was updated. The inspected study sites had a copy of the financial disclosure forms on hand for the clinical investigator and sub-investigators.

INSPECTIONAL FINDINGS

Sponsor/Monitor Issues

There were no sponsor/monitor issues identified at the study sites audited.

Clinical Investigator (CI) Study Site Issues

Study Site 002, 003, 025: A Form FDA 483 was not issued at close of the inspections and the inspections were classified as NAI. A review was conducted of testing records, regulatory binders, study specific standard operating procedures, and general study conduct. In addition, source documents were reviewed and the information was compared to the data tables

submitted by the sponsor in the application. No discrepancy was found between source documents at the site and the data submitted by the sponsor in the application.

BIMO ADMINISTRATIVE FOLLOW-UP

Information letters were issued for all study sites inspected. Please contact me should you have any questions about this memo or any aspect of Bioresearch Monitoring.

Colonious King
Consumer Safety Officer

Distribution

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|---------------------------|-------------------------|
| EDR | STN 125643/0 |
| Michael Havert | Chair, Review Committee |
| R. Angelo de Claro | Clinical Reviewer |
| Bindu George | RPM |
| Mark Davidson | RPM |
| Carrie Mampilly | |
| Dennis Cato | |
| ORAHQ BIMO Inspection POC | |
| Ladislav Kermet | FDA Investigator |
| Mark Babbitt | FDA Investigator |
| Jonathan Campos | FDA Investigator |

History of Changes

This memorandum was amended to reflect the following changes:

| Previous | Replaced with. |
|--|---|
| <p><u>Clinical Investigator (CI) Study Site Issues:</u></p> <p><u>Study Site 025:</u> A Form FDA 483 was not issued at close of the inspection. The EIR for this inspection is still pending receipt from ORA, but a summary of the inspection was reviewed and no significant issues were noted during the preliminary review. BIMO will update the file when the final EIR is reviewed and any other findings will be noted.</p> | <p>This section was deleted from the memorandum:</p> |
| <p><u>Study Site 002, 003:</u> A Form FDA 483 was not issued at close of the inspections and the inspections were classified as NAI. A review was conducted of testing records, regulatory binders, study specific standard operating procedures, and general study conduct. In addition, source documents were reviewed and the information was compared to the data tables submitted by the sponsor in the application. No discrepancy was found between source documents at the site and the data submitted by the sponsor in the application.</p> | <p><u>Study Site 002, 003, 025:</u> A Form FDA 483 was not issued at close of the inspections and the inspections were classified as NAI. A review was conducted of testing records, regulatory binders, study specific standard operating procedures, and general study conduct. In addition, source documents were reviewed and the information was compared to the data tables submitted by the sponsor in the application. No discrepancy was found between source documents at the site and the data submitted by the sponsor in the application.</p> |

Draft: King: October 10, 2017

Reviewed: Cato: October 10, 2017