



DATE October 14, 2021

FROM Haecin Chun, M.S., Consumer Safety Officer  
Bioresearch Monitoring Branch (BMB)  
Division of Inspections and Surveillance (DIS)  
Office of Compliance and Biologics Quality (OCBQ)

THROUGH Dennis T. Cato, Branch Chief, BMB

THROUGH Carrie Mampilly, M.P.H., Director, DIS

TO Zhaohui Ye, Ph.D., Chair, BLA 125746/0  
Kavita Natrajan, M.D., Clinical Reviewer  
Megha Kaushal, M.D., Clinical Reviewer  
Nadia Whitt, RPM  
Rachel Blasdel, RPM

SUBJECT: Bioresearch Monitoring Final Discipline Review Memo  
SPONSOR: Janssen Biotech, Inc.  
PRODUCT: Carvykti [ciltacabtagene autoleucel (Cilta-cel)]  
Application: STN 125746/0

**FINAL SUMMARY STATEMENT:**

Bioresearch Monitoring (BIMO) inspection assignments were issued for five domestic clinical study sites participating in the conduct of study Protocol 68284528MMY2001. The inspections did not reveal substantive findings that impact the data submitted in this Biologics License Application (BLA).

**BACKGROUND:**

Five BIMO clinical investigator inspection assignments were issued in support of this BLA. The pivotal study identified for BIMO inspections was *A Phase 1b-2, Open-Label Study of JNJ-68284528, a Chimeric Antigen Receptor T cell (CAR-T) Therapy Directed Against BCMA in Subjects with Relapsed or Refractory Multiple Myeloma* (Protocol 68284528MMY2001). The clinical sites were selected based on subject enrollment, previous inspection history, as well as the data and other information submitted in the BLA.

Protocol 68284528MMY2001 was a multi-center study planned for a total of 17 clinical study sites in the United States, but 16 study sites actually enrolled subjects for the study. An on-site BIMO inspection was conducted for all five clinical study sites despite the COVID-19 pandemic travel restrictions, given that Carvykti was granted Orphan Drug and Breakthrough Therapy designations.

The inspections were conducted in accordance with FDA's Compliance Program (CP) 7348.811, Inspection Program for Clinical Investigators. Information submitted in the BLA was compared to source documents at each inspected site. The inspection assignments also included specific questions concerning the clinical study.

#### BIMO INSPECTION SUMMARY:

The table below summarizes the inspected sites and outcome from the BIMO inspections issued to review the study conduct of Protocol 68284528MMY2001:

Site #	Study Site Location	FDA Form 483 Issued?	Inspection Classification
US10001	Sarah Cannon Research Institute Nashville, TN	No	No Action Indicated (NAI)
US10003	University of Chicago Chicago, IL	No	NAI
US10007	University of California, San Francisco San Francisco, CA	No	NAI
US10021	Mayo Clinic Rochester Rochester, MN	No	NAI
US10026	University of Pittsburgh Medical Center Pittsburgh, PA	No	NAI

#### SIGNIFICANT INSPECTIONAL FINDINGS:

No significant inspectional findings were observed; however, several discrepancies were observed during the inspection of Study Site # US10003:

Study Site # US10003:

- The sponsor provided medical history records of stroke and seizure for two study subjects, but the study site had no records of obtaining these medical histories for the two study subjects. The sponsor submitted lab data for one subject when there was no sample collection made by the study site.
- The study site reported an incorrect dose of a conditioning regimen for one study subject (60 mg was reported when 57 mg was actually given); and did not report two adverse events that were unrelated to the treatment with Cilta-cel.

These discrepancies were shared with the BLA review committee.

#### FINANCIAL DISCLOSURE:

The Clinical Investigator Compliance Program directs the FDA investigator to ask the clinical investigator if and when he/she disclosed information about his/her financial interests to the sponsor and/or interests of any sub-investigators, spouse(s) and dependent children, and if and when the information was updated. The information submitted to the BLA was verified for each of the inspected clinical sites.

ADMINISTRATIVE FOLLOW-UP:

Should you have any questions or comments about the contents of this memo or any aspect of Bioresearch Monitoring, please contact me at 240-402-8038.

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Haecin Chun  
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**History:**

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