Food and Drug Administration Rockville, MD 20857

TRANSMITTED BY FACSIMILE

Daniel T. Coleman, Ph.D. Associate Director, Drug Regulatory Affairs Boehringer Ingelheim Pharmaceuticals, Inc. 900 Ridgebury Road P.O. Box 368 Ridgefield, CT 06877-0368

RE: NDA # 20-884

Aggrenox® (aspirin/extended-release dipyridamole) Capsules

MACMIS ID # 12917

Dear Dr. Coleman:

The Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed a journal ad (AG-8951R) for Aggrenox® (aspirin/extended-release dipyridamole) Capsules submitted by Boehringer Ingelheim Pharmaceuticals, Inc. (Boehringer Ingelheim) under cover of Form FDA 2253 on September 19, 2004. The journal ad is false or misleading because it contains unsubstantiated superiority claims and fails to include pertinent information about risks associated with Aggrenox, and, therefore, misbrands the drug in violation of section 502(n) of the Federal Food, Drug, and Cosmetic Act (Act), 21 U.S.C. § 352(n), and FDA's implementing regulations, 21 CFR 202.1(e)(3)(i); (e)(5)(ii); (e)(6)(ii).

Background

According to the FDA-approved product labeling (PI), Aggrenox is an oral combination antiplatelet agent indicated "to reduce the risk of stroke in patients who have had transient ischemia of the brain or completed ischemic stroke due to thrombosis."

The PI for Aggrenox contains several Contraindications, Warnings, Precautions, and Adverse Reactions, including Warnings regarding the consumption of alcohol, coagulation abnormalities, gastrointestinal (GI) side effects (including ulceration and bleeding), peptic ulcer disease, and pregnancy, as well as a Precaution regarding the risk of gastrointestinal bleeding and intracranial hemorrhage.

Unsubstantiated Superiority Claim

The journal ad claims that "Based on indirect comparisons, [Aggrenox] may be more effective than clopidogrel, 75 mg..." This claim, in the context of the other claims in the ad, suggests that Aggrenox is more effective than Plavix (clopidogrel). As the journal ad states, this claim is based on "indirect comparisons" (a review of studies directly comparing ticlopidine, clopidogrel, and dipyridamole/aspirin with aspirin alone). Drug comparisons that represent or suggest that a

Daniel T. Coleman, Ph.D. Boehringer Ingelheim NDA 20-884/MACMIS 12917

drug is safer or more effective than another drug are misleading if the representation or suggestion has not been demonstrated by substantial evidence obtained from adequate and well-controlled head-to-head clinical trial(s). See 21 CFR 202.1(e)(6)(ii). The paper referenced in the ad as support for this claim is, in effect, a historically controlled trial that is inadequate to support a superiority claim. We are not aware of substantial evidence or substantial clinical experience demonstrating that Aggrenox is superior to Plavix.

Omission of Risk Information

The main part of the ad contains various safety and effectiveness claims for Aggrenox. The headline, "People With Prior Stroke Or TIA Have The Greatest Need For BIG Protection Against Stroke Recurrence" is followed by: "Aggrenox Prevents Twice As Many Strokes As Aspirin" and other efficacy claims regarding Aggrenox's ability to prevent strokes. The main part of the ad also includes a reference to the brief summary of prescribing information for Aggrenox on the adjacent page, and the following statement of risk information:

"The most common adverse event with Aggrenox was headache (39.2% vs 32.9% for placebo), which was more frequent at the onset of therapy, but diminished over time. GI bleeding with Aggrenox was comparable to aspirin (4.1% vs 3.2%)."

The main part of the ad fails to include information on the major risks associated with Aggrenox, including information about the Warnings concerning alcohol consumption, coagulation abnormalities, peptic ulcer disease, and pregnancy. Additionally, the ad fails to disclose the Precaution from the PI concerning the risks of intracranial hemorrhage. Although some of these risks relate to aspirin, this does not diminish the need to reflect them in promotion of Aggrenox, which contains aspirin as well as dipyridamole. See 21 CFR 202.1(e)(3)(i) and (e)(5)(ii).

Conclusion and Requested Action

The journal ad contains unsubstantiated superiority claims and omits information on the risks associated with Aggrenox, and, therefore, misbrands the drug in violation of section 502(n) of the Federal Food, Drug, and Cosmetic Act (Act), 21 U.S.C. § 352(n), and FDA's implementing regulations, 21 CFR 202.1(e)(3)(i); (e)(5)(ii); (e)(6)(ii).

DDMAC requests that Boehringer Ingelheim immediately cease the dissemination of promotional materials for Aggrenox the same as or similar to those described above. Please submit a written response to this letter on or before April 05, 2005, describing your intent to comply with this request, listing all promotional materials for Aggrenox the same as or similar to those described above, and explaining your plan for discontinuing use of such materials. Please direct your response to me at the Food and Drug Administration, Division of Drug Marketing, Advertising, and Communications, HFD-42, Rm. 8B-45, 5600 Fishers Lane, Rockville, MD 20857, facsimile at (301) 594-6771. In all future correspondence regarding this matter, please refer to MACMIS # 12917 in addition to the NDA numbers. We remind you that only written communications are considered official. If you choose to revise your promotional materials, DDMAC is willing to assist you with your revised materials by commenting on your revisions before you use them in promotion.

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

Sincerely,

{See appended electronic signature page}

Lance McLeroy, Pharm.D., M.S. Regulatory Review Officer Division of Drug Marketing, Advertising, and Communications

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

/s/

Lance McLeroy

3/22/05 02:52:27 PM

PEOPLE WITH PRIOR STROKE OR TIA HAVE THE GREATEST NEED FOR



PROTECTION AGAINST STROKE RECURRENCE

AGGRENOX° PREVENTS TWICE AS MANY STROKES AS ASPIRIN

When both Aggrenox and aspirin were compared vs placebo, aspirin prevented 44 strokes and Aggrenox prevented 93 strokes.

ACCORDING TO THE ACCP:

"[Aggrenox] is more effective than aspirin alone for the prevention of stroke..."

"Based on indirect comparisons, [Aggrenox] may be more effective than clopidogrel, 75 mg..."

 Sixth Consensus Conference on Antithrombotic Therapy, American College of Chest Physicians, 2001.

The most common adverse event with Aggrenox was headache (39.2% vs 32.9% for placebo), which was more frequent at the onset of therapy, but diminished over time.² GI bleeding with Aggrenox was comparable to aspirin (4.1% vs 3.2%).

Please see the Brief Summary of Prescribing Information on the following page.

References: 1. Albers GW, Amerenco P, Easton JD, et al. Antithrombotic and thrombolytic therapy for ischemic stroke. Sixth ACCP Consensus Conference on Antithrombotic Therapy. Chest. 2001;119(suppl.1):3005-3205. 2. Data on file, Boehringer Ingelheim Pharmaceuticals, Inc.

www.aggrenox.com and www.Stroke-TIA.org



(aspirin/extended-release dipyridamole) 25 mg/200 mg capsules

Big protection against stroke



Brief Sammany of Prescribing Information
CONTRAMPICATION
ADDRESS, Application of the Contrampication of the Contra

Report Syndrome: Applint should not be used in children or benagers for vital intections, with or without tever, because of the risk of Reyels syndrome with concomitant use of applint in certain viral literates.

WARNINGS

MANAMICS

Action of Rening-Palaces who consume these or more accordate drinks every day should be courseled about the bleeding risks involved with choosis. Newy should use while before applies to the choosis. Newy should use while before applies to the choosis. Deep should be a historial to the choosis of the choosis of

Peptic Utor Etisses: Patients with a history of active peptic ulor disease should avoid using aspirin, which can cause gastric mucosal inflation, and histories.

Programpy, NGETENIX can pause listel have when administered to a programt woman. Maternal aspirin use chaining later disease of may cause love brith weight, increased incidence for intercessed terreturings in primistage interface, still before and recordant death. By the above and because of the incoven effects of non-destinated and—informmethry drugs NGEADS) on the lessi cardioviscular system (in the dustion with incover), NGERMOX calculate awarded in his first interester of programmy.

The dustine state lessor), AGE/PINIX should be availed in the third trinnels of programmy. Against severe have the between being in their beginning the severe by the transpare in their programmy and consistent and consistent and consistent and appears are greenables report with realismetion of the head, and displanation siting at old costs of 330 mg/kg/lay and 110 mg/kg/lay, exceptionly. These does, which also researched in a high responding to their observable in the severe of the severe severe in the severe severe and the severe seve

PRECAUTIONS

General ADDERNOX (aspiris/scienced-release disyndernois) is not interchangeable with the includual components of aspiris and Persastion* labels.

Commany After Disease Dispridancials has a vascellatory effect and should be used with couldon in pallests with severe coronary aftery disease by a unbable angle or recently southered expounded injusticials inflation). Cheal pain may be approximated in patients with underlying commany safety disease who are patiently deplications.

For sholes or TAI patients for whom agoint is included by prevent incurrent representations (M) or angles pactority, the applica in this product may not provide designate thereafted for the catallic indications.

Hippath froutflowing: Devalors of hepatic engines and hapatic failure have been reported in association with disyndermin administration. Hippatersion: Dipyridemole should be used with couldon in patients with hippotension since it can produce peripheral vescribidion.

nul Failure: Avoid aspirts in patients with severe renal failure (glomonular filtration rate less than 10 mL/minute). Abit of Standary in ESFS: the Incidence of particulated in Mediciny and 80 pilot (4.1%) in the AGDERNOS group, 36 patients (2.2%) in the date-of-villates day/stancing group, 25 patients (2.2%) in the spring prop, and 34 patients (2.1%) in the spring group and 7 patients (0.2%) in the Spring Spring group, 6 patients (0.4%) in the spring group and 7 patients (0.4%) in the spring group and 7

Laboratory Texts
Applin has been associated with elevated hepatic enzymes, blood uses nitrogen and serum creatinine, hyperhalemia, proteinuris and
principata bracing time.
Dipyridamnie has been associated with elevated hepatic enzymes.

One Interactions
No pharmacticities that-drug interaction studies were conducted with the ASSPERICX formulation. The following information was obtained from the libration.

Adancein: Dipyridamole has been reported to increase the pleama levels and cardiovascular effects of adenceine. Adjustment of adenceine

dragating or investing. Applications of the property of the pr

competition at the renal tubule for secretion.

completion at the real business of sections. Actingation: Theory (Repairs and Heating): Patients on articoaguilation therapy are all increased risk for bivedting because of drug-drug interactions and effects on patients. Applies can displace weelfairs from pretain biology sites, saiding as prologation of both the postworthin their and the basility film. Applies an increase the authority patient activity of repairs, increasing basility grids.

Applicativestants: Satispile acts can displace protein-bound phosphoin and in deprint acts, leading to a decrease in the total concentration of phosphoin and in shorwer in earms separate solid.

See Blocker: The hypotensive effects of that blockers may be diministed by the concomitant administration of aspirin due to inhibition of real promatgandins, faulting to decreased may be of two wind set are fluid relieful.

Challestense inhibition: Dipridamole may countened the article insistense effect of challestense inhibitions, thereby potentially

aggreeding myasthenia gravia

Opportunity of victorium graphs of duration in patients with underlying med or continuescolar cheese may be desirabled by the occurribant administration of applicable on the inhibition of rend prostiguestine, say, single polessessed rend blood five are policy about the Administration of applicable and inhibit med clears used renderly access and to both manual blood five area for the obstray or rend impained.

Administration Studies can inhibit med clears used renderly access assistant to both manual business and the obstray or rend impained. Nonstroided Anti-Inflammatory Drugs (NSAIDs): The concurrent use of legicin with other NSAIDs may increase blooding or lead to decreased intell intelligence.

Cirel Mesophrannics: Moderate doses of again's may increase the offschioness of onal hypoghypernic drugs, leading to hypoghype Unicosouric Agends (probenecial and auffrograzione): Salicytates antagonize the unicosouric action of unicosouric agends

Continengements. Histogrammia. Impairment of Fertility in studies in which dignificance was definited with it is less than 111 weeks in males and breaks) and one jup to 128 weeks in makes and port year when the makes and one of the whole in the less than 128 weeks in makes and port year when the makes in the was no endoursed drug-related carcinogrammia. The highest dose administrated in these studies (fin ingligibely was, on a major? back, about applicated to the maximum recommended daily human and dose (WHHCI) in nice and about whose the HHEID in 128 weeks in makes and about whose the HHEID in 128 weeks in makes and about whose the HHEID in 128 weeks in makes and about whose the HHEID in 128 weeks in make and about whose the HHEID in 128 weeks in makes and about whose the HHEID in 128 weeks in makes and the property of the HHEID in 128 weeks in makes and the property of the HHEID in 128 weeks in makes and the property of the HHEID in 128 weeks in makes and the property of the HHEID in 128 weeks in makes and the property of the HHEID in 128 weeks in makes and the HHEID in 128 weeks in makes an

there are interest in max-combinations of diperiodennie and expirit (1.5 natio) tented respailve in the Arms test, in vivo discussores alternation tests (in mice a harmanic), real informacions tests (in mice and harmanical and conditional reliable test (in mice). Applie), allow, ladded discussores absentations is cultived lament filterotische Mulaquielly before of dispirational allow with bacterial and marmanism of systems seen expeller. Combinations of dispetialment and aspirits have not been evaluated for affects on bettility and exproductive performance. There was no evidence of impaired bettility when dispetialment was activitiested to make and female as all one does up to 500 mg/lightly blood 12 times the MRH-0 or is mg/hr? basis! a skylinizant reduction in number of coppose labely with coverage or execution in impairable and some and we festive west, towever, described in 1250 mg/lightly make than 30 times the MRH-0 on a mg/hr? basis!. A skylini inhibits ovuidion is set.

Programmy
Desirable Efficie: PREGNANCY CATEGORY D. San WARNINGS

Labor and Delivery
Again: on result in excessive blood loss at delivery as well as prolonged petation and prolonged labor. Recase of those effects on the
contex and because of adverse held effects seen with explicit during the labor stage of programmy loss WARRINGS, Programmy subsection).
AGGRENOX should be avoided in the third innestor of programmy and during labor and delivery.

Naming Mothers Both dipyridancia and aspirin are socieded in human milk. Caudien should be serviced when AGGRENCX is administrated to a nursing woman.

Cost opportunities as against an accusate or material resident and the second of the s

A 24-month, multicenter, double-blind, minternited study (ESFSC) was conducted to compan the efficacy and solely of ASSPENIX.

A 24-month, multicenter, double-blind, minternited study (ESFSC) was conducted to compan the efficacy and solely was conducted in a total effold: make and femile pollwise who had opprisond a previous buffers to strate or transfer? suchenite of the front widthin these months prior to materialized and series.

Table 2 presents the incidence of advecte events that occurred in 1% or more of patients treated with AGGRENCE where the incidence was also greater than in those polarists healed with placabo. There is no dear benefit of the disperied more benefit in continuation over administration of the property of the property of the property of the property of the desired over administration of the property of the Table 1: Incidence of Adverse Events in ESP\$2*

Individual Treatment Gr ER-DP Alone 1954 Body System/Profested Term AGGRENOIX
Total Number of Patients With at Least
One On-Treatment Advance Event 1719 (75.9%)
Contral & Periphecal Nervous System Disorders ASA Alone 1649 1305 (78.9%) 1923 (90.2%) 1304 (79.1%)

AGGRENOX #60

Sig: 1 cap BID

		individual Treatment Group							
Body System/Preferred Term	AGGRENOX		ER-DP Alone		ASA Alone		Placebo		
Gastro-Intectinal System Disorders	1								
Despensie	303	(18.4%)	258	(17.4%)	299	(18.1%)	275	(16.7%	
Abdominal Pale	289	(17.5%)	255	(15.4%)	252	(15.9%)	239	14.5%	
Names	264	(15.0%)	254	(35.4%)	210	(12.7%)	232	[14.19	
Diamhos	210	(12.7%)	267	(15.5%)	112	(6.8%)	161	(9.8%)	
Vomiting	138	(84%)	129	(7.8%)	101	(6.1%)	118	(7.2%)	
Homovrhage Rockum	. 26	(1.8%)	22	(1.3%)	15	(1.0%)	13	[28%]	
Melena	31	(1.9%)	10	(0.6%)	20	(1.2%)	13	(38%)	
Hemorrholds	16	(1.0%)	13	(0.8%)	10	(0.6%)	10	(18%)	
GI Hemorrhage	20	(1.2%)	5	(0.3%)	. 15	(0.9%)	. 1	(0.4%)	
Body as a Whole - General Disords	int								
Pala	105	(6.4%)	88	(5.3%)	103	(8.2%)	99	(80%)	
Fatigue	95	(5.8%)	93	(5.6%)	97	(5.9%)	90	(5.5%)	
Back Pain	78	(48%)	77	(4.7%)	74	(45%)	65	(3.9%)	
Accidental Injury	42	(25%)	24	(1.5%)	. 51	(2.7%)	37	(2.2%)	
Molaina	27	(1.6%)	23	(1.4%)	26	(1.6%)	- 22	(13%)	
Astheriti	29	(1.8%)	19	(1.1%)	17	(1.0%)	18	(1.1%)	
Synoope	17	(10%)	. 13	(0.0%)	16	(10%)	8	(0.5%)	
Psychiatric Disorders				-					
Activities	39	(2.4%)	40	12.4%	57	(3.5%)	34	0.5%	
Contaion	18	(1.1%)	. 9	(0.5%)	22	(1.3%)	15	(0.9%)	
Annesia	19	(12%)	17	(1.0%)	10	(1.6%)	15	(0.9%)	
Sommolompe	20	(12%)	13	(0.8%)	16	(1.1%)	9	(0.5%)	
Museuloskoletai Systam Disorders									
Athraicia	91	(55%)	75	(45%)	91	(5.5%)	76	(4.6%)	
Afficia	34	(2.1%)	25	(1.5%)	17	(1.0%)	19	(1.2%)	
Attrain	18	(1.1%)	72	(1.3%)	13	(0.8%)	14	478.00	
Morpia	20	(12%)	16	(1.0%)	11	(0.7%)	- 11	00.7%	
Respiratory System Disorders									
Coughing	25	(15%)	18	(1.1%)	32	(1.9%)	21	(1.3%)	
Upper Respiratory Tract Infection	16	(10%)	9	(0.5%)	16	(1.0%)	14	(0.8%)	
Cardievascular Disorders, Gasera		-							
Cardiac Failure	26	(1.8%)	17	(1.0%)	30	(1.8%)	25	(1.5%)	
Platelet, Bleeding & Cicting Disc.	rders	-		-					
Hemorrhage NDS	52	(32%)	24	(1.5%)	45	(2.8%)	24	(1.5%)	
Epistasis	39	(24%)	16	(1.0%)	45	(2.7%)	25	(1.5%	
Purpura	23	(1.4%)	8	(0.5%)	9	(0.5%)	7	£2.4%	
Necplann			-						
Neoplasm NOS	28	(1.7%)	15	(1.0%)	23	(1.4%)	20	0.2%	
Red Blood Call Disorders		-1	-						
Anemia	57	(1.9%)	16	(1.0%)	19	(12%)	. 9	(0.5%)	

"Reported by ≥1% of patients duting ADDRANDX treatment where the incidence was greater than its focus treated with placebo. Natic EH.2P = extension-interest opportunities 200 mg, ASA = aspira; 25 mg. The dissage regimen for all treatment groups is b1.0. MOS = not otherwise sportflow.

Discontinuation due to adverse events in ESPS2 was 25% for AGGRENCK, 25% for extensivel-release dipyridamicle, 19% for asplirin, and 21% for placebo (refer to faller 2).

Table 2: Incidence of Adverse Events That Lod to the Discontinuation of Treatment:

	Treatment Groups											
		REMOX	ER-0P 1854		ASA 1649		Placebo 1649					
Total Number of Patients	1650											
Fallacts With at Least Ose Adverse Event That Led to Treatment Discontinuation 417 (25%) 419 (25%) 318 (19%) 302 (21%)												
Heatache	165	(10%)	166	(10%)	57	(F%)	69	(4%)				
Distiness	85	(5%)	W	(8%)	69	(4%)	- 50	(4%)				
Nausea	91	(8%)	96	(8%)	51	(2%)	53	(3%)				
Abdominal Poin	34	(4%)	. 64	(4%)	56	(2%)	52	(3%)				
Dyspepsia	59	(4%)	61	(4%)	49	(2%)	46	[3%]				
Vomiting	53	(2%)	52	(2%)	28	(2%)	24	(1%)				
Diarries	35	(2%)	41	(2%)	9	(4%)	16	(c1%)				
Stroke	33	(2%)	48	(8%)	57	(3%)	73	4%				
Transfert Ischemic Attack	35	(2%)	40	(2%)	25	(2%)	48	(3%)				
Angina Pectoris	23	(1%)	20	(1%)	16	(41%)	25	(2%)				

Note: ER-DP = autorated-release dipyridamois 200 reg. ASA = aspirin 25 mg. The desage regimen for all treatment groups is b.l.d.

Note: the PF — administer released object dancine 200 may ASA — apprint 25 mg. The design regimes for all treatment groups is bill. A Other and verse eventure.

Other and verse eventure is a common of the property of the p

The following is a lot of additional advance events that have been reported either in the literature or are from postwarteding operatorious reports to other deportation or reprint. The causes validate either of these authentia events has not been exploited accreeds, agreents, events, agreents events.

Laberatory Changes
Der Ter course of the 24-month study (ESPS2), patients treated with ABGRENIX showed a decline (meen change from baseline) in
templation of DES gird, hermation to 0.17%s, and eightnesses count of 0.15kt (Pylman).

OPERDIDANGE code of digeridancie to applin, overdooge of AGGREADIX (applin/locancie) related objections in like to be described by internated by internated related objections of digeridancies overdoor. In case of neal or suspected overdoor, seek medical attention or contact a Pulson Control Control Immediatoly. Careful medical management is occurried.

Dispressiones
Resel apon the known herodynamic utheds of disprehamole, symptoms such as wern fielding, flushes, sweating, restressions, being of weathers and discrete may occur. A draig is blood yearunn and subsyancial might also be observed.

Symptomatic treatment in recommendate, possibly including a wapoperson draig, Castric baseger should be considered. Administration of austric carried carried resigning protein bound, dispress in not fillary to a of breefit.

Collection brothly may result from scale ingestion (overdood) or chronic introduction. The early signs of salicytic overdood (as including lineable (including lineable) (inging in the card), occur of planes convenientions approaching 200 payles. Planes concentrations of against above 300 payles. Planes concentrations of against above 300 payles. An ingine letter door of expirits in adults to not known with containing but dools may be expected at 300 payles.

with custainty and doublinking the expectant and replaced in the increasing salicylate elimination, and connecting the acid-base disturbance. Gentlic transplant protects because are excramenated as soon as possible after ingestion, even if the patient has variable sportaneously. After invage and/or enters, somitted soon of adjoined collecture, as a submy, is branched, if less than 3 hours have passed since ingression. Charcost absorption should not be employed prior to enters and sharps. Secretly of applies introduction to additional and by instructing the board salicytical level. Acid-base status should be codely followed with serial blood gas are feature pill measurements. Field and which tells believe should also be maintained.

in severs case, in performing and injectories are fer reject intraction throat to the Christer should be sponged with legal value. Repairment finite alread to administrated instructionary are augmented with correction of auditors. Permit existing feet and feet feet and the control of auditors are administrated to provide a facility of a feet of the feet of the control of groups only the required to write the permit permit permit and the control of the control of groups only the required to write the permit permit permit and the control of the control of

AGGREMOX is not interchangeable with the Individual components of aspirts and Persentine* Tablets.

Marketed by: Bookringer Ingelheim Pharmaceudosis Inc., Ridgelleid, CT 06877 USA.

Manufactured by: Bootninger Ingelheim Phanna GmbH & Co KG, Blbenach, Germany

Rx only 42633/US/4 D Bookrings

AD-8951B