

December 1, 2003

BY FEDERAL EXPRESS

Dockets Management Branch (HFA - 305) Food and Drug Administration 5630 Fishers Lane Room 1061 Rockville, MD 20852

> Re: <u>Docket No. 03N-0344</u>; Request for Comment on Direct-to-Consumer Promotion of Prescription Drugs

Dear Sir/Madam:

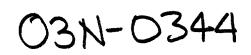
Attachments

Catalina Health Resource (CHR) submits the attached to the above docket. I made a presentation on behalf of CHR at the Food and Drug Administration's public meeting on September 23, 2003 regarding alternatives to the current brief summary requirements. During that presentation, I referenced a January issue of the <u>TV Guide</u> as an illustrative comparison of the requirements applicable to the print advertising of different FDA-regulated products. Those advertisements are now attached for submission to this docket.

Sincerely,

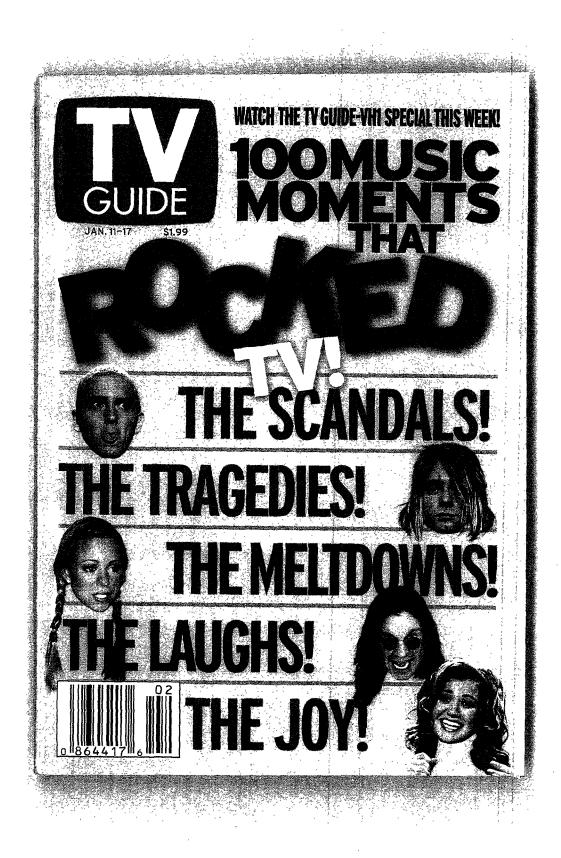
Michael Roberts / Tel

Michael Roberts Vice President, Retail and Clinical Services Catalina Health Resource



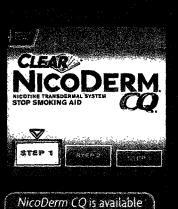


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NicoDerm CQ is available in Opaque and Clear for a more personal way to quit.

Kicking the habit can be difficult. but it's one of the most important things you'll ever do. Just planning to quit may seem daunting right now, but with a stop-smoking strategy that fits your needs, you have a greater chance of success. *NicoDerm[®] CQ[®]* is committed to giving you the tools to help you quit smoking and break the chain of cigarette addiction.

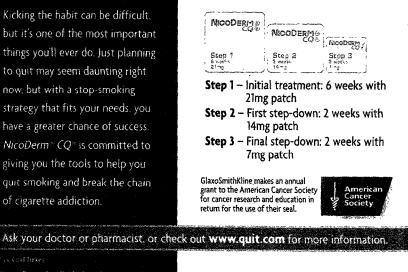
Use as directed, Individual results may vary.

Support program can improve the chance of success.

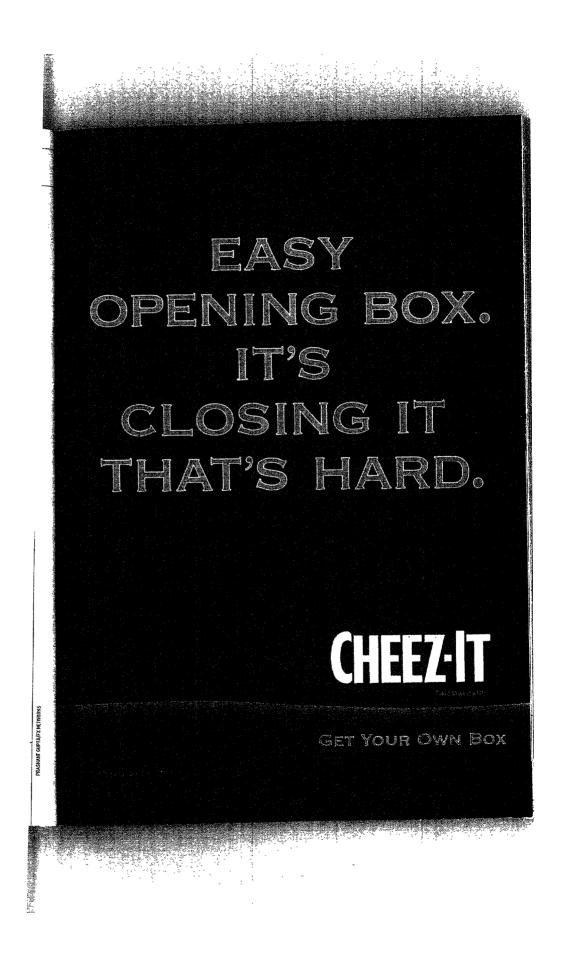
Step by Step

The NicoDerm® CQ® patch works by safely providing controlled doses of nicotine for 16 hours or 24 hours' if you need extra help fighting morning cravings. No matter how many cigarettes you smoke², you can use NicoDerm CQ's customized stopsmoking program to help ease the common cravings and irritability that result from withdrawal, allowing you to gradually wean yourself off nicotine entirely.

.



NOTE: I When worn for 24 hours. 2 if you smoke more than IO cigarettes a day, start with step 1. If you smoke 10 or less cigarettes a day, start with step 2.



Lose weight fast! One delicious bite at a time

Jacqui Davis

in 5 Weeks!

Before

Lost 32 Pounds

New from Xenadrine

A diet bar that works as good as it tastes? Unheard of! That's what Jacqui Davis thought until she lost 32 pounds in 5 weeks with the revolutionary new Xenadrine bar. Now she's a believer.

Xenadrine bars are unlike any other protein bar on the market because they're the only ones that contain Clarinol[™] CLA (Conjugated Linoleic Acid). This naturally occurring compound is clinically proven to significantly decrease body-fat, while simultaneously increasing lean

muscle. In a recent clinical study, the CLA group experienced significantly greater fat loss than the placebo group. (Just two bars per day provide more than enough CLA to yield similar results.) No other bar even comes remotely close to providing such amazing benefits. AURA CAVANAU.

Xenadrine bars are also the only ones in the category to earn the coveted Gold Medal for flavor from the American Tasting Institute. These sensational new bars are

available in four award-winning flavors: Cookies & Cream, Chocolate Peanut, Chocolate Almond and Chocolate Covered Strawberry.

Lose fat and gain muscle one delicious bite at a time with the revolutionary new Xenadrine High Protein Weight-Control Bar.

Available at **GNC**, Wal-Mart, Walgreens, Target and other fine health food and drug stores nationwide www.Xenadrine.com

వచించిగారి. 18 హెండి విల్లో కొండి సంత్ర సంఘటనం మండారాంతో కృ సాధారాత్ర పరిషేటించింది. విల్లో కార్లో కార్లో పరిషేటింది. 28 కి. ఈ పిర్దేజ్ 18 కి. సి. సామం 18 చేచింది. నిర్మేటించింది. What's standing between you and your life?

Depressed Mood Loss of Interest Sleep Problems Difficulty Concentrating Agitation

Restlessness

is to let another day go by feeling not quite "yourself." If you/velexperienced some of thes Iv every day, for at least two weeks a chemical imbalance could be to blame. And life cap

xil CR'Is a time-release tablet from the makers of Paxil. The CR means Controlled Release for Continuous Relief, Sympton

retilet usually requires two or more weeks of daily treatment. Prescription Paxil CR is not for every one Tell your doctor what medicines you're taking. People taking MADIs or thioridazine should not take Paxil CR. Paxil CR is generally well tolerated. Side effects may include nausea, diarchea, constipation, dizziness, sweating, tremor, sexual side effects, injury, yawn, abnormal vision or sleepiness. Patients should not stop taking Paxil CR before talking to their doctor. Feeling balanced, more like "yourself," is within reach. Call 1-866-PAXIL-CR or visit www.paxilcr.com Please see product information on following page-

MAN THERE'S MAL-OR CONTINUES.

PAROXETINE H CONTROLLED-RELEASE TARIETS

Your life is waiting!"

Ine @GlaxoSmithKline, 2002 PXC159R0 Sept. 2002

L DAY, That's why you need relief ALL DAY,

Advertisement PAXIL CRIM

(paroxetine hydrochloride) Controlled-Release Tablets See complete prescribing information in GlaxoSmithKline literature. The following is a brief summary.

INDICATIONS AND USAGE: Paxil CR (paroxetine hydro-chloride) is indicated for the treatment of major depressive disorder and panic disorder as defined in DSIV-IV

alsorder and panic obsorder as defined in Dolvery **CONTRAINDICATIONS:** Concomitant use in patients taking either monoamine oxidase inhibitors (MAOIs) or thioridazine is contraindicated (see WARNINGS and PRECAUTIONS) Contraindicated in patients with a hypersensitivity to paroxe-tine or to any of the inactive ingredients in *Paxil CR*.

WARNINGS: Interactions with MAOIs may occur. Given WARNINGS: interactions with MAOIs may occur. Given the fatal interactions reported with concomitant or immediately consecutive administration of MAOIs and other SSRIs, do not use *Paxil CR* in combination with an MAOI, or within 2 weeks of discontinuing MAOI treat-ment. Allow at least 2 weeks after stopping *Paxil CR* before starting an MAOI.

Potential Interaction with Thioridazine

Thioridazine administration alone produces prolonga-tion of the QTc interval, which is associated with serious ventricular arrhythmias, such as torsade de pointes-type arrhythmias, and sudden death. This effect appears to be dony thicked. dose related.

An *in vivo* study suggests that drugs which inhibit $P_{\text{atol}}|ID_{\theta}$, such as paroxetine, will elevate plasma levels of thiorid-azine. Therefore, it is recommended that paroxetine not be used in combination with thioridazine

PRECAUTIONS: Among 760 patients with major depressive disorder or panic disorder treated with *Paxil CR* in controlled clinical studies, there were no reports of maina or hycoma-nia. As with all drugs effective in the treatment of major depressive disorder, use *Paxil CR* cautiously in patients with a history of mania.

Among 760 patients who received *Paxil CR* in controlled clinical trials in major depressive disorder or panic disorder, one patient (0.1%) experienced a seizure. Use *Paxil CR* cau-tiously in patients with a history of seizures Discontinue it in any patient who develops seizures

The possibility of suicide attempt is inherent in major depres-The possibility of suicide attempt is inherent in major depres-sive disorder and may persist until significant remission occurs. Close supervision of high-risk patients should accom-pany initial drug therapy. Write *Paxil CR* prescriptions for the smallest quantity of tablets consistent with good patient management in order to reduce the risk of overdose. Use the same precautions when treating patients with major depres-sive disorder as when treating patients with other psychiat-ric disorders. ric disorders

During clinical trials with the ang baterins with other baychine inc disorders During clinical trials with immediate-release paroxétine, the following adverse events were reported at an incidence of 2% or greater for immediate-release paroxetine hydrochlo-ride and were at least twice that reported for placebo while discontinuing therapy with *Paxil* (*Df*: abnormal dreams, par-esthesia, and dizriness. In the majority of patients, these events were mild to moderate and were self-limiting and did not,require medical intervention. During marketing of imme-diate-release paroxetine hydrochloride, there have been spontaneous reports of similar adverse events, which may have no causal relationship to the drug, upon the discontinu-tation of immediate-release paroxetine hydrochloride (particu-larly when abrupt), including the following: dizziness, sensory disturbances (e.g., paresthesias such as electric shock sen-sations), agitation, axitety, nause, and sweating. These events are generally self-limiting. Similar events have been reported for other selective serotonin reuotake inhibitors tMonitor patients for these symptoms when discontinuing

Monitor patients for these symptoms when discontinuing treatment, regardless of the indication for which *Paxil CR* is being prescribed. A gradual reduction in the dose rather than being prescribed Agracean eduction into dose rather that abrupt cessation is recommended whenever possible. If intolerable symptoms occur following a decrease in the dose or upon discontinuation of treatment, then consider resum-ing the previously prescribed dose. Subsequently, the physi-cian may continue decreasing the dose but at a more grad-ual rate (see DOSAGE AND ADMINISTRATION in complete prescribing information).

Reversible hyponatremia has been reported with immedi-ate-release paroxetine hydrochloride, mainly in elderly indi-

viduals, patients taking auretics or those who were other-wise volume depleted.

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Abnormal bleeding (mostly ecchymosis and purpura) associ ated with immediate-release paroxims and purpural associ-ated with immediate-release paroxetine hydrochloride treat-ment, including a report of impaired platelet aggregation has been reported; the relationship to paroxetine is unclear

been reported; the relationship to paroxetine is unclear Clinical experience with immediate-release paroxetine hydro-chloride in patients with concomitant systemic illness is limited. Use Paxil CR cautious/s in patients with diseases or conditions that could affect metabolism or hemodynamic responses. As with other SSRIs, mydriasis has been infre-quently recorted in premarketing studies with paroxetine hydrochloride. A few cases of acute angle closure glaucoma associated with immediate-release paroxetine therapy have been reported As mydriasis can cause acute angle closure in attempt with paroxy angle advances use caution when prebeen reported As mydriesis can cause acute angle closure imp patients with narrow angle glaucoma, use caution when pre-scribing *Paxil CR* for these patients. In patients with severe renal impairment (creatinine clearance <30 mL/min) or; severe hepatic impairment, a lower starting dose (10 mg) should be used

Observe the usual cautions in cardiac patients

Paxil CR tablets should not be chewed or crushed, and should be swallowed whole

Caution patients about operating hazardous machinery, includ-ing automobiles, until they are reasonably sure that *Paxil CP* therapy does not affect their ability to engage in such activities.

Tell patients 1) to continue therapy as directed, 2) to inform physicians about other medications they are taking, or plan to take; 3) to avoid alcohol while taking *Paxil CR*; 4) to notify their physicians if they become pregnant or intend to become pregnant during therapy or if they are nursing

Concomitant use of *Pavil CR* with tryptophan is not recom-mended Use cautiously with warfarin Weakness, hypere-flexia, and incoordination following the use of an SSRI and sumatriptan have been rarely reported When administering *Pavil CR* with cimetidine, dosage adjustment of *Paxil CR* after; the 25 mg starting dose should be guided by clinical effect

When co-administering *Paxil CR* with phenobarbital or phe-nytoin, no initial *Paxil CR* dosage adjustment is needed, changes should be based on clinical effect

Conconstant use of Paxil CR with drugs metabolized by the cytochrome $P_{450}IID_4$ (those used to treat major depressive disorder such as nortriptyline, amitriptyline, imigramine, desipramine and fluoxetine, phenothiazines, Type 1C antiarrhythmics such as propatenone, fecanide and encanide) or with drugs that inhibit this isozyme (e.g., quinidine) may require lower doses than usually prescribed for either Paxil CR or the other drug; approach concomitant use cautiously

However, due to the risk of serious ventricular arrhythmias and sudden death potentially associated with elevated plasma levels of thioridazine, paroxetine and thioridazine should not be co-administered.

An *in vivo* interaction study revealed that paroxetine had no effect on terfenadine pharmacokinetics. Additional *in vitro* studies showed that the inhibitory effects of paroxetine on other IIIA, substrates (astemizide, cisapride, triazolarn, and cyclosporin) was at least 100 times less potent than keto-conazole, a potent IIIA, inhibitor Assuming that the relation-ship between paroxetine's *in vitro* K, and its lack of effect on terfenadine's *in vivo* clearance predicts its effect on other IIIA₂ substrates, paroxetine's inhibition of IIIA₄ activity should have little clinical significance.

Use caution when co-administering Paxil CR with tricyclic antidepressants (TCAs) TCA plasma concentrations may need monitoring, and the TCA dose may need to be reduced Administration of *Paxil CR* with another tightly protein-bound drug may snift plasma concentrations, resulting in adverse effects from either drug

Concomitant use of Paxil CR and alcohol in depressed patients is not advised. Undertake concurrent use of Paxil CR and lith-ium of digoxin cautiously. If adverse effects are seen when co-administering Paxil CR with procyclidine, reduce the pro-cyclidine dose. Elevated theophylline levels have been report-duth proceedings of the processing theory of the pro-duction of the processing theory of the pro-tion of the processing theory of the pro-tion of the processing theory of the pro-tion of the pro-duction of the processing theory of the pro-tion of the processing the pro-tion of the processing theory of the pro-tion of the protion of the pro-tion of the pro-tion of the protion of the pro-tion of the pro-tion of the protion of the pro-tion of ed with immediate-release paroxetine treatment co-admin istration, monitoring theophylline levels is recommended A significantly greater number of male rats in the 20 mg/kg/

day group developed retriculum cell sarcomas vs animels given doses of 1 or 5 mg/kg/day. There was also a signif-cantly increased linear trend across dose groups for the occurrence of lymphoreticular turnors in male rats. Female rats were not affected. Although there was a dose-related increase in the number of turnors in mice, there was no drug-related increase in the number of mice with turnors. The clinical significance of these findings is unknown There is no evidence of mutagenetity with *Paxil CR*.

Rats receiving paroxetine at 15 mg/kg/day (2.4 times the MRHD on a mg/m² basis) showed a reduced pregnancy rate

MRHD on a mg/m² basis's showed a reduced pregnancy rate **Pregnancy Category C:** Reproduction studies performed at doese up to 50 mg/kg/day in rate and 6 mg/kg/day in rabbits, approximately 8 (rat) and 2 (rabbit) times the MRHD on a mg/m² basis, have revealed no evidence of teratogenic effects or of selective toxicity to the fetus. However, rat pup deaths increased during the first 4 days of lactation when dosing occurred during the first 4 days of lactation and contlin-ued throughout lactation. The cause of these deaths is not known. There are no adequate and well-controlled studies in pregnant women. *Pawl CR* should be used in pregnancy only if the potential benefit ustifies the potential insk to the fetus. The effect of parcxetine on labor and delivery in humans is unknown. Parcetire is secreted in human milk; exercise caution when *Paxl CR* is administered to a nursing woman. Safety and effectiveness in the pediatic population have not been established. been established.

been established. In worldwide premarketing clinical trials with immediate-release paroxetine hydrochloride, 17% of paroxetine-treated patients (approximately 700) were 65 years of age or older Pharmacokinetic studies revealed a decreased clearance in the elderly, and a lower starting dose is recommended. How-ever, there were no overall differences in the adverse event profile between elderly and younger patients, and effec-tiveness wes similar in younger and older patients (see CLINICAL PHARMACOLOGY and DOSAGE AND ADMINIS-TRATION in complete prescribing information) in a con-trolled study focusing specifically on elderly patients with major depressive disorder, *Paxill CR* was demonstrated to be safe and effective in the treatment of elderly patients (>60 safe and effective in the treatment of elderly patients (>60 years of age) with major depressive disorder (See CLINICAL TRIALS and ADVERSE REACTIONS—Table 2 in complete prescribing information.)

ADVERSE REACTIONS: Adverse Findings Observed in Short-Term, Placebo-Controlled Trials with Paxil CR: Adverse Events Associated with Discontinuation of Treatment

Ten percent (21/212) of Paxil CR patients discontinued treatment due to an adverse event in a pool of two studies of patients with major depressive disorder. The most common events [2194] associated with discontinuation and considered to be drug related (i.e., those events associated with dropout to be drug related (i e., those events associated with dropout at a rate approximately twice or greater for *Paxil CR* com-pared to placebo) included: nausea (3.7% vs. 0.5%); asthe-nia (19% vs. 0.5%); dizziness (14% vs. 0.0%), somnolence (14% vs. 0.0%), respectively. In a placebo-controlled study of elderly patients with major depressive disorder, 13% (13/104) of *Paxil CR* patients discontinued due to these adverse events. nausea (2.9% vs. 0.0%), headache (1.9% vs. 0.9%), *for Paxil CR* patients in panic disorder studies discontinued treatment due to an adverse event. Fvents meeting the above criteria included: nausea (2.9% vs. 0.4%); insomnia (1.8% vs. 0.0%); headache (1.4% vs. 0.2%), asthemia (1.1% vs. 0.0%) for *Paxil CR* and placebo, respectively.

The most commonly observed adverse events associated with Paxil CR in a pool of two trials for major depressive dis-order (incidence of 5 0% or greater and incidence for Paxil CR at least twice that for placebo) were abnormal ejaculation, abnormal vision, constipation, decreased libido, diarrhea, dizziness, female genital disorders, nausea, somnolence, sweatzness, female genital disorders, nausea, sormolence, sweat-ing, trauma, tremor, and yawning Using the same critena, the adverse events associated with the use of *Paxil CR* in a study of elderly patients with major depressive disorder were: abnormal ejaculation, constipation, decreased appetite, dry mouth, impotence, infection, libido decreased, sweating, and tremor

In the pool of panic disorder studies, the adverse events meeting these criteria were: abnormal ejaculation, somno-

lence, impotence, libido decreased, tremor, sweating, and female genital disorders (generally anorgasmia or difficulty achieving orgasm).

Incidence in Controlled Clinical Trials

Incidence in Controlled Clinical Trials The most commonly observed treatment-emergent adverse events associated with *Pswl CR*, occurring in 2% of patients with major depressive disorder were: **Body as a Whole**: Headache (27% vs. 20%), asthema (14% vs. 9%), infecton (8% vs. 5%), abdomnal pain (7% vs. 4%), badk pain (5% vs. 3%), trauma (5% vs. 1%), pain (3% vs. 1%), allergic reac-tion (2% vs. 5%), abdomnal pain (7% vs. 9%), infecton (1% vs. 5%), abdomnal pain (7% vs. 9%), ingestive System: Nausea (22% vs. 10%), diarrhea (18% vs. 7%), dy mouth (15% vs. 5%), constipation (10% vs. 4%), ifatulence (6% vs. 4%), decreased appetite (4% vs. 2%), vonting (2% vs. 1%), **Nervous System**: somolence (22% vs. 1%), insomma (17% vs. 9%), dizriness (14% vs. 4%), libido decreased (7% vs. 3%), tremor (7% vs. 1%), agritation (2% vs. 1%), confusion (1% vs. 0%), **Bisinator System**: yewn (5% vs. 0%), hinitis (4% vs. 1%), cough increased (2% vs. 1%), bronchitis (1% vs. 0%), **Skin and Appendages**: sweating (6% vs. 2%), photo-sensitivity (2% vs. 0%), **Boetial Senses**: abnormal vision (5% vs. 1%), insotence (5% vs. 3%), unnary tract infec-tion (3% vs. 1%), monstrual disorder (2% vs. 1%), vaginitis (2% vs. 0%) (2% vs 0%)

(2% vs 0%) The most commonly observed treatment-emergent adverse events associated with *Paxil CR*, occurring in 25% of elderly patients with major depressive disorder were: **Body as a Whole:** headache (17% vs 13%), asthenia (15% vs 14%), trauma (8% vs 5%), infection (6% vs. 2%), **Digestive System:** dry mouth (16% vs. 7%), diarrhea (15% vs. 9%), constipation (13% vs. 5%), dyspepsia (13% vs. 10%), decreased appetite (12% vs 5%), flatulence (8% vs. 7%), tearcours **System:** sonnolence (21% vs. 12%), insomnia (10% vs. 8%), dizrness (9% vs. 5%), hibid decreased (8% vs. 1%), tremor (7% vs. 0%), **Skin and Appendages:** sweating (10% vs. <1%), **Urogenital System:** abnormal ejaculation (17% vs. 3%), impotence (9% vs. 3%).

Sweating (10% vs. (1%), importance (9% vs. (3%)). The most commonly observed treatment-emergent adverse events associated with Paxl CR, occurring in 21% of patients with panic disorder viewer: Body as a Whole: sathenia (15% vs. 10%), abdominal pani (6% vs. 4%); trauma (5% vs. 4%), Cardiovascular System: vasocilation (3% vs. 2%); Digestive System: nausea (23% vs. 17%), dry mouth (13% vs. 9%), diarrhea (12% vs. 9%), constipation (9% vs. 6%), decreased appetite (6% vs. 6%), Metabolic/Nutritional Disorders: veight loss (1% vs. 0%), Ibiodo decreased (9% vs. 4%), nervousness (8% vs. 7%), itemor (8% vs. 2%), anxiety (5% vs. 4%), agration (3% vs. 2%), hypertonia (2% vs. 4%), movocinus (2% vs. 41%), Respiratory System: sinusitis (8% vs. 5%), yawn (3% vs. 0%), Skin and Appendages: sweating (7% vs. 2%), Special Senses: abnormal vision (3% vs. 4%), importence (10% vs. 1%), emale genital dis-orders (7% vs. 1%), unnary frequency (2% vs. <1%), unna-tion impaired (2% vs. 4%), vaginitis (1% vs. <1%), unna-tion impaired (2% vs. 4%), vaginitis (1% vs. <1%), unna-tion impaired (2% vs. 4%), vaginitis (1% vs. <1%), unna-tion impaired (2% vs. 4%), vaginitis (1% vs. <1%), unnary Studies; in major depressive disorder show a clear dose-

Studies in major depressive disorder show a clear dose-dependent relationship for some of the more common dependent relationship for some of the more common adverse events associated with the use of immediate-release paroxetine The percentage of patients in clinical tri-als reporting symptoms of sexual dysfunction in non-elderly patients with major depressive disorder and in patients with panic disorder are in males: decreased libido (10% and 9%), ejaculatory disturbance (26% and 27%), impotence (5% and 10%), in females: decreased libido (4% and 8%), orgasmic disturbance (10% and 7%).

Significant weight loss may be an undesirable result of treatment with paroxetine for some patients but, on average, patients in controlled trials with Paxil CR, or the immediaterelease formulation, had minimal weight loss (about 1 pound) In a study of eiderly patients with major depressive disorder, three of 104 Paxil CR patients and none of 109 placebo patients experienced liver transaminase elevations of poten-tial clinical concern. Two of the Paxil CR patients dropped out of the study due to abnormal liver function tests; the third

Advertisement

patient experienced normalization of transaminase lavels with continued treatment. Also, in the pool of three studies of patients with panc disorder, four of 444 Paxil CR patients and none of 445 placebo patients experienced liver transaminase elevations of potential clinical concern. Elevations in all four patients decreased substantially after discontinuation of Paxil CR. The clinical significance of these findings is unknown. In placebo-controlled clinical trails with the immediate release formulation of paroxetine, patients exhibited abnormal values on liver function tests at no greater rate than that seen in placebo-treated patients

Other Events Observed During the Clinical Development of Paroxetine: During premarketing assessment in major depressive disorder and panc disorder, multiple doses of *Paxil CR* were administered to 760 patients in phase 3 doubleblind, controlled, outpatient studies. The following adverse events were reported. Note: "frequent" = events occurring in at least 1/100 patients; "infrequent" = 1/100 to 1/1000 patients.

Adverse events for which frequencies are not provided occurred during the premarketing assessment of immediaterelease paroxetine in phase 2 and 3 studies of major depressive disorder, obsessive compulsive disorder, panic disorder, social anxiety disorder, generalized anxiety disorder, and posttraumatic stress disorder. The conditions and duration of exposure to immediate-release paroxetine varied greatly and included (in overlapping categories) open and double-blind studies, uncontrolled and controlled studies, inpatient and outpatient studies, and fixed-dose and titration studies. Only those events not previously listed for controlled-release paroxetine are included. The extent to which these events may be associated with *Paxil CR* is unknown.

may be associated with Paxil CR is unknown Body as a Whole: Infrequent were anaphylactoid reaction, chills, file syndrome, malase; also observed were adrenergic syndrome, face edema, neck ngidity, sepsis. Cardiovascular System: Frequent were hypertension, hypotension: Infrequent were angina pectoris, bradycardia, bundle branch block, palpitation, postural hypotension, syncope; also observed were arrhythmia nodal, atnai fibrilation, cerebrovascular accident, congestive heart failure, hematoma, low cardiao output, myocardiai infract, myocardiai ischema, pallor, philebitis, pulmonary embolus, supraventricular extrasystoles. Digestive System: Infrequent were bruxism, dysphagia, erucation, gastroenteritis, gastroesophageal reflux, gingvitis, glossitis, gum hyperplasia, hemorthoids, hepatosplenomegaly, increased salivation, intestinal obstruction, melena, pancreatitis, peptic ulcer, rectal hemorthage, stomach ulcer, toothache, ulcerative stomattis; also observed were aphthous stomattis, leuts, ileuts, jaundice, mouth ulceration, salivary gland enlargement, sialadenits, stomattics, thost tightness, tongue discoloration, nogue edema Endocrine System: Infrequent were hyperthyroidism, ovarian cyst, testes pain, also observed were diabetes mellitus, poiter, hypothyroidism, thyroidits. Hemic and Lymphatic System: Infrequent were anemia, eosinophila, leukocytosis, leukopenia, lymphadenopathy, thrombocytopenia; also observed were anisocytosis, basophilia, bleedema, hypotkorosis, penpheral edema, SGOT increased, SGPT increased, pupothorosis, normocytic anemia, ktosis, lacit dehydrogenase increased, gamma globulins increased, gout, hypercalcemia, hypotkorenia, hypothypotienia, morage. Hessophatemia, hypocalcemia, hypothypotina, morrosis, teaton, salixari phosphateaia, hypochiorenia, incooroniation, neuralgia, neuropathy, nysathenia, myopathy, myositis, tendonitis, blursits, myasthenia, myopathy, myositis, tendonitis, blus observed were alkaine phosphatesia, incooroniation, neuralgia, neuropathy, nysathenia,

thria, dyskinesia, euphona, extrapyramidal syndrome, fasciculations, grand mal convulsion, hostility, hyperalgesa, irritability, libido increased, mainc reaction, manic-depressive reaction, meningitis, myelitis, peripherai neuritis, psychosis, psychotic depression, reflexes decreased, reflexes increased, stupor, toricollis, trismus. **Respiratory System:** Infrequent were asthma, dyspnea, epistaxis, laryngitis, pneumonia, stridor, also observed were dysphonia, emphysema, hemoptysis, hiccups, hyperventilation, lung fibrosis, pulmonary edema. respiratory flu, sputum increased. Skin and Appendages. Infrequent were ace, alopecia, dry skin, eczema, exfoliative dermatitis, furunculosis, puritus, sebornea, urticaria; also observed were angioedema, ecchymosis, erythema multiforme, erythema nodosum, hirsutism, maculopapular rash, skin discoloration, skin hypertrophy, skin ulcer, sweating decrassed, vesiculobullous rash. **Special Senses:** Infrequent were abnormality of accommodation, conjunctivitis, earache, keratoconjunctivitis, mydrasis, photophobia, retural hemorthage, turnitus, visual field defect; also observed were amblyopia, anisocoria, blepharitis, blurred vision, catract, conjunctival edema, corneal ulcer, deafness, exophthalmos, glaucoma, hyperacusis, mght blindness, parosmila, ptosis, taste loss. **Urogenital System:** Infrequent were albuminuna, amenorrhea*, breast enlargement*, breast pain*, cystits, postatitus*, urnary incontinence, urmary retention, also observed were breast atrophy, ejaculatory disturbance, endometrial disorder, epididymitis, female lactation, fibrocystic breast, leukorthea, mastitis, metrorrhagi, aphentis, oliguria, polyuna, pyuna, salpingitis, urethrits, urinary casts, urinary urgency, urolith, uterine spasm, vaginal hemorrhage.

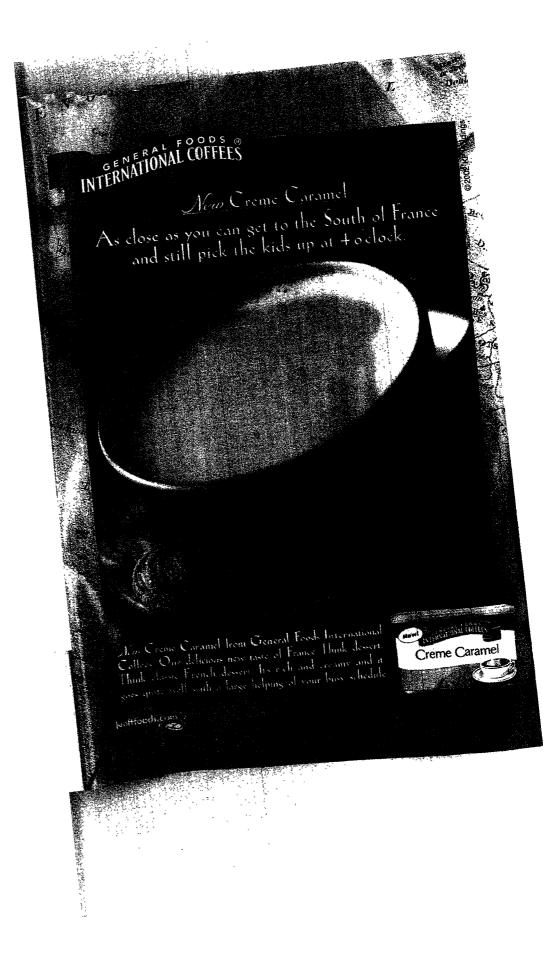
*Based on the number of men and women as appropriate Postmarketing Reports: Voluntary reports of adverse avents in patients taking immediate-release paroxetine hydrochloride that have been received since market introduction and not listed above that may have no causal relationship with the drug include acute pancreatitis, elevated liver function tests (the most severe cases were deaths due to liver necrosis, and grossly elevated transminases associated with severe liver dysfunction), Guillain-Barré syndrome, toxic epidermal necrolysis, priapism, syndrome of inappropriate ADH secretion, symptoms suggestive of prolactinemia and galactorrhea, neuroleptic malignant syndrome-like events, extrapyramidal symptoms which have included akthisia, bradykinesia, cogwheel rigidity, dystona, hypertonia, oculogync crisis which has been associated with concomitant use of pmozide, tremor and trismus, serotonin syndrome, associated in some cases with concomitant use of serotonergic drugs and with drugs which may have impaired paroxetine metabolism (symptoms have included akthisia, bradykinesis, edampsia, laryngismus, optic neurits, porphyna, ventricular finaliton, ventricular tacking-allergic alveolits, anaphylaxis, eclampsia, laryngismus, optic neurits, porphyna, ventruciar finaliton, bene marow glasa, and agranulocytosis), and vasculitic syndromes (such as Henoch-Schonlein purpura). There has been a report of an elevated phenyton level after 4 weeks of immediate-release paroxetine and phenyton co-administration. There has been a report of severe hypotension when immediate-release paroxetine was added to chronic metoproloi treatmet.

DRUG ABUSE AND DEPENDENCE: Controlled Substance Class; Paxil CR is not a controlled substance. Evaluate patients carefully for history of drug abuse and observe such patients closely for signs of Paxil CR misuse or abuse (e.g., development of tolerance, incrementations of dose, drugseeking behavior).

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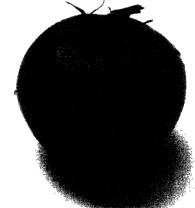
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THESE STATEMENTS HAVE NOT BEEN EVALUATED BY THE FOOD AND DRUG ADMINISTRATION. THESE PROD-UCTS ARE NOT INTENDED TO DIAGNOSE, TREAT, CURE, OR PREVENT ANY DISEASE.

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