2517-137

1/28/2011





U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7504P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460 EPA Registration No.

Date of Issuance:

2517-137

January 28, 2011

NOTICE OF PESTICIDE:

☑ Registration ☐ Reregistration

(under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)

Term of Issuance:

Conditional Registration

Time-limited: see conditions below

Name of Pesticide Product:

Sergeant's Fipronil Spot-on for Cats

Name and Address of Registrant (include ZIP Code):

Sergeant's Pet Care Products, Inc. c/o Exponent, Inc. 2625 South 158th Plaza Omaha, NE 68130

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA §3(c)(7)(a) provided that:

- 1. This registration is time-limited and expires two years from the date this product is first released for shipment.
 - You must provide the Agency with a projected release for shipment date within 30 days of the date of this Notice of Registration. The Agency will calculate the expiration date based on the projected release for shipment date until an actual release for shipment date is provided in writing.
- 2. Consider limiting the formulations of each product to one basic confidential statement of formula. The Agency may require this in the future. It is possible that no additional alternate formulations or minor formulation amendments will be approved for this product in the future.
- 3. As a condition of registration for this product, within one year from the date of this registration, you must submit the results of Storage Stability and Corrosion Characteristics studies, corresponding to OCSPP Guidelines 830.6317 and 830.6320, respectively, including interim reports made at 0, 3, 6, 9, and 12 month intervals.

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- 4. The approval of this registration is contingent on the Agency's review to determine that the study submitted on June 15, 2010, to fulfill OCSPP Guideline 830.1800 Enforcement Analytical Method, is acceptable to support the registration.
- 5. Within one year of the date on this Notice of Registration, and prior to formulating this product, you must provide the Agency the following:
 - a. The registration number and establishment number of the manufacturing or technical product(s) from which the active ingredient is derived.
 - b. The name and address of the entity from which the manufacturing product(s) was obtained; and
 - c. A copy of the bill of sale for this manufacturing product(s).
- 6. Within 30 days from the date of this registration, in accordance with FIFRA §3(c)(1)(F) and 3(c)(2)(B), you must submit a copy of all offers to pay compensation and evidence of their delivery, used to support the data required for this product.
- 7. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product for the quarter that begins on April 1, 2011. The quarterly reports are due two months after each quarter ends.

Please flag any Confidential Business Information as such. Enhanced incident reporting should be submitted to the Product Manager. Quarterly sales information should be submitted to the Registration Division (7504P), Immediate Office (attn: Ms. Kimberly Nesci).

The following is a list of information that must be included in the quarterly reports for each incident:

EPA Registration Number
Product name (brand name)
Lot #
Where purchased: internet, store, veterinarian
Active Ingredient(s)
Weight range for product

Date on which incident occurred. (mm/dd/yyyy)
State in which the incident occurred. (standard 2 letter abbreviation)
Registrant case #

Species: dog, cat, other (specify)
Breed: (as reported by pet owner)

Age: months or years Sex: M, F, or neutered Weight: pounds

Primary Route of Exposure: dermal, oral, other animal, inhalation, other Body System: neurological, dermatological, GI, respiratory, ocular, other

Major signs noted with separate column for each sign, using standard terminology

Time to Onset: (hours, days)
Treated by veterinarian: yes or no
First time product used: yes or no

Misuse: use on incorrect species, overdose, too frequent dosing, other (describe)

Any known precondition

EPA Severity Code: death, major, moderate, minor Outcome: died, recovered, still treated, unknown

8. Along with the enhanced incident reporting, you must submit an analysis of the incidents seen, to include the following details:

- All incidents should be reported including all minor dermal and ocular irritation reports.
- Summary table for cats showing number of incidents of each severity code for each route of exposure. Each incident should only be reported once. If one incident has several routes of exposure, the order should be ocular > oral > dermal. In other words, an incident with both oral and dermal exposure would be reported as oral exposure, and an incident with both ocular and oral exposure would be reported as ocular exposure.
- A similar summary table for dogs (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.
- Summary table for dogs and table for cats showing number of incidents that are believed due to secondary exposure (e.g., multi-pet households).
- A summary table for cats showing number of incidents for each severity code for these age ranges: <3 months, 3-6 months, 6-9 months, 9-12 months, 1 yr, 2 yr, 3 yr, 4 yr, 5 yr, 6 yr, 7 yr, 8 yr, 9 yr, 10 yr, 11 yr, 12 yr, 13 yr, 14 yr, 15 yr, >15 yr.
- A summary table showing the number of cat incidents for each severity code for each pet weight range on the product label (if applicable).
- A summary table for cat weight showing number of incidents for each product weight range. This table should show number of incidents in cats weighing less than that product weight range, number of incidents in cats in lower half of weight range, number of incidents in cats in upper half of weight range, and cats weighing more than the product weight range (if applicable).
- Table showing number of incidents for each cat breed, where provided.
- Table showing number of incidents in cats for each clinical sign.
- Table showing number of incidents in cats for each organ system.
- Report aggregate incidents, but do not combine moderate and minor incidents.
- 9. You must submit and/or cite all data required for registration of your product under FIFRA §3(c)(5) when the Agency requires all registrants of similar products to submit such data, and submit acceptable responses required for reregistration of your product under FIFRA §4.

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All labeling comments below are in reference to the proposed master label, dated January 20, 2011. These comments apply to all submitted draft labeling, including the master label, the color mock-up labels, and the proposed text and graphics for the stickers and magnet:

- 10. On page 1 under Ticks, revise the claims (delete struck-out text and/or add underlined words) to read as follows:
 - "[Kills-[all stages of] (deer) ticks-[before they can] [that] [may transmit Lyme disease,] [for up to [4 weeks] [1 month] [30 days]]]]"
- 11. On page 2 under Multiple Infestations, delete struck-out text in the claims to read as follows:
 - "Kills chewing lice and controls mites that may cause sarcoptic mange"
 - "[Four][4] Way [Action] [Control] Protection, [kills fleas, ticks, mosquitoes, chewing lice]"
 - "[Four (4) Week] [1 month] [30 day] [Flea, Tick, Mosquito, and Chewing Lice Control]"
- 12. On page 2 under All Others, delete struck-out text in the claims to read as follows:
 - "[Controls mites that may cause sarcoptic mange [infestations]]"
 - "ff3} applications]"
- 13. On page 4 under Back Panel, replace "30 days" from the second claim with "[1 month] [4 weeks]" because the data does not support mosquito control for up to 30 days.
- 14. On page 5, delete "[and enclosed directions]" from the Directions for Use because this insert has not been submitted to the Agency for review.
- 15. On pages 5 and 7 under How to Apply, delete "[0.017 fl oz] [0.50 mL]" so that the use directions are more clear by stating "one tube..." per application.
- 16. On page 6 under the Warranty, delete the optional brackets between "All such risks shall be assumed by the user or buyer" and "Sergeant's is committed to providing..." so that the warranty is presented (along with the user's/purchaser's rights) in its entirety.
- 17. On pages 7 and 8, per our discussion, delete "insert" since this text is part of the outer packaging, instead of a separate insert to accompany the product.
- 18. For the text to be printed on the front of the tube, the net weight must be expressed in English units, i.e., "0.017 fl oz." Metric units may be expressed in addition to (adjacent) to the English unit weight expression.
- 19. Revise the EPA Registration Number to read: "EPA Registration No. 2517-137."

If the Agency determines that future mitigation measures are necessary for all pet spot-on products, you will be informed, and be expected to comply. If mitigation measures are necessary, the Agency may take appropriate regulatory actions. Two copies of the finished labeling must be submitted prior to releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please contact Rosanna Louie-Juzwiak at (703) 308-0037 with any questions.

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Enclosure: Sergeant's Fipronil Spot-on for Cats Label, Stamp	ed Accepted with Comments
Signature of Approving Official: Ac Richard Gebken, Product Manager (10) Registration Division, Insecticide Branch	Date: 28 JANWARY ZOII

EPA Form 8570-6

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Sergeant's Master Label

20 January 2011 Information in [] is optional.

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FRONTPANICL

CATESPOITON FIPRONIL

[Optional text appears in brackets – the final label may include some or all of the optional text on front, back or side label panels]

Sergeant's Fipronil Spot-On for Cats

[ABNs]

[(Sergeant's®v) (Sentry®) Frontier Gold (Spot On) for cats]

[(Sergeant's®) (Sentry®) Ectoadvance (Spot On) for cats]

[(Sergeant's®) (Sentry®) Gold FrontSpot (Spot On) for cats]

[SentryProline (Spot On) for cats]

[[SENTRY®] FIPROGUARD™ for cats]

[[Sergeant's] PRONYL OTCTM for cats]

[For use ONLY on cats OF ALL WEIGHTS over 8 weeks of age]

[1 of use of the first of the weeks of the

[Apply to kittens over 8 weeks old] [Apply to kittens 8 weeks or older]

[Mosquitoes]

[• [Kills mosquitoes] [within 24 hours for up to 14 days] [and within 48 hours for up to 28 days]

[Adult Fleas]

- [•Kills adult fleas [for up to six weeks]]
- [•Kills fleas, which may be a source of flea allergy dermatitis] [or flea bite anemia]]
- [• If cat is a high risk for flea reinfestation apply once a month]
- [• Kills Fleas [Up to 4 weeks] [1 month] [30 days]!]

[Ticks]

- [•Kills ticks including those that may transmit Lyme disease]
- [• Kills Ticks for Up to [4 weeks] [1 month] [30 days]!]
- [• Kills [all stages of] Deer Ticks [before they can] [that] [transmit Lyme disease,] [for up to [4 weeks] [1 month] [30 days]]]
- [• Kills Ticks (Including Deer Ticks) for up to [4 weeks] [1 month] [30 days]]
- [• Kills [brown dog ticks], [American dog ticks,] [and lone star ticks] [(Rhipicephalus sanguineus)] [for up to [4 weeks] [1 month] [30 days]]]
- [• Kills [Brown], [American,] [and Lone Star]Dog Ticks [(Rhipicephalus sanguineus)] [for up to [4 weeks] [1 month] [30 days]]]
- [• Kills American Dog Ticks [(Dermacentor variabilis)] for up to [4 weeks] [1 month] [30 days]!]

ACCEPTED with COMMENTS In EPA Letter Dated:

JAN 28 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

Sergeant's Master Label

20 January 2011 Information in [] is optional.

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FRONT PANEL

CATEPOTON
EPRONIE

[Multiple Infestations]

[•Kills chewing lice and controls mites that may cause sarcoptic mange]

[• Flea [&] [and] Tick Control for Cats [&] [and] Kittens 8 weeks old and older]

[•Kills fleas, ticks, mosquitoes [&] [and] [chewing lice]]

[•Kills fleas, ticks, chewing lice and mosquitoes]

[•Monthly flea, tick, mosquito, and chewing lice protection]

[• [Four] [4] Way Protection, kills fleas, ticks, mosquitoes and chewing lice]

[• [4 Week] [1 month] [30 day] [Flea and Tick [&] [and] Application]

[• [Four (4) Week] [1 month] [30 day] [Flea Tick, Mosquito and Chewing Lice Control]

[Once A Month Flea and Tick Application]

[•Use [brand name] monthly to control ticks and chewing lice]

[•Monthly flea, tick, mosquito, and chewing lice protection.]

[• Kills Fleas and Ticks for up to [4 weeks] [1 month] [30 days]!]

[(Brand Name) provides convenient and effective flea, tick, chewing lice and mosquito control for cats and kittens over 8 weeks of age.]

[All Others]

[•For Cats and Kittens 8 weeks of age or older]

[•Controls mites that may cause sarcoptic mange [infestations]]

[•Waterproof]

[•Fast Acting]

[•Long Lasting]

[•Fast Action against chewing lice infestations]

[• [Three] [3] Applications] and/or [3 Month Supply] or [12 Week Supply]

[• Best if used year round!]

[• (ICON Showing 4 Week Protection)]

[• 4 Week Dose!]

[• 1 Month Dose!]

[•30 day dose!]

[• Easy to Use [Application]]

[• Specially Formulated for Cats and Kittens Over 8 Weeks of Age]

[• [Free] Calendar Stickers Inside!]

[• Apply once every [4 weeks] [month] [30 days]!]

[f3] applications]

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Sergeant's Master Label

20 January 2011 Information in [] is optional.

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FRONT PANEL

CATSPOTON
FIPRONII

[•Rapid elimination of chewing lice infestations]

[•Effective after bathing and exposure to water and sunlight]

[•Effective even after bathing]

[•Can be used on breeding, pregnant and lactating [queens], [female] [cats]]

[• [Free with purchase] [Free inside] Monthly Application Reminder [Magnet] [clip] [inside]

[•Can be used on kittens 8 weeks of age and older]

[•Monthly application reminder inside]

[• Fipronil (9.7%)]

[• Lift [here] for more information]

[Contains Fipronil[,] [-] the active ingredient used in Frontline Top Spot®*for Cats]

[* [Brand Name] is not manufactured by or distributed by Merial. Frontline Top Spot® is a registered trademark of Merial.]

[For use ONLY on cats]

[of ALL weights]

[over 8 weeks of age]

[optional graphics: picture of all controlled pests with line through them]

ACTIVE INGREDIENT:

Fipronil......9.70%

OTHER INGREDIENT**90.30%

TOTAL 100.00%

[**diethylene glycol monoethyl ether]

KEEP OUT OF REACH OF CHILDREN CAUTION

See [Side] [or] [Back] Panel For Additional Precautionary Statements

NET CONTENTS:

[Three] [3][three] 0.017 fl oz (0.5 mL) applicators

{END - FRONT PANEL}

Sergeant's Master Label

20 January 2011 Information in [] is optional. Version 10.1 Page 4 of 8

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BACKPANEL



[[brand name] contains Fipronil to effectively kill fleas and ticks [(including those that may transmit Lyme Disease)].

[The active ingredient in [brand name] features a sustained release formula developed for fast acting [and long lasting] control of fleas, ticks, mosquitoes and chewing lice for 30 days on cats.]

[For use ONLY on cats OF ALL WEIGHTS over 8 weeks of age]

READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON CATS AND KITTENS OVER 8 WEEKS OF AGE

[[Brand Name] provides four way protection that kills fleas, ticks, mosquitoes and chewing lice. Kills deer ticks that may transmit Lyme disease. Kills brown dog ticks, American dog ticks, and lone star ticks. Prevents flea reinfestation.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS. CAUTION. Harmful if swallowed. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

HAZARDS TO DOMESTIC ANIMALS. For external use only. Do not use on kittens under 8 weeks of age. Individual sensitivities, while rare, may occur after using any pesticide product. [Some cats may experience temporary startle effects when any product is applied.] Cats may experience some temporary irritation at the site of product applications. If signs persist, or become more severe within a few days of application, consult a veterinarian immediately. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged cats. Call 1-800-781-4738 for 24-hour assistance.

FIRST AID					
If swallowed: Call a poison control center or a doctor immediately for treatment Have person sip a glass of water if able to swallow. Do not induct vomiting unless told to do so by a poison control center or doctor give anything by mouth to an unconscious person.					
If in eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.				
If on skin:	Wash with plenty of soap and water. Get medical attention if irritation persists.				
	HOTLINE NUMBER				

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-781-4738 for emergency medical treatment information.

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Sergeant's Master Label

20 January 2011 Information in [] is optional.

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BACKPANIEL

MUNOSISTEM MENOSISTEM

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

DO NOT ALLOW CHILDREN TO APPLY PRODUCT. TO PREVENT HARM TO YOU AND YOUR CAT, READ ENTIRE LABEL [AND ENCLOSED DIRECTIONS] BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. FOR EXTERNAL USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.

Do not use on kittens under 8 weeks of age. [Do not split one tube between cats.] [Do not use multiple tubes on one cat.] Consult a veterinarian before using this product on debilitated, aged, medicated cats. Can be used on breeding, pregnant, or lactating [cats] [female cats] [queens]. Consult a veterinarian before using on cats with known organ dysfunction. Cats may experience some temporary irritation at the site of product application. Certain medications can interact with pesticides. Sensitivities may occur after using ANY pesticide product on cats. If signs of sensitivity occur bathe your cat with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

(INSERT DIAGRAM THAT DEPICTS APPLICATION OF PRODUCT ON THE CAT)

[Optional diagram may or may not appear on finished label]



[{Outer Packaging}]

How to open: Remove product tubes [vial] from the package. Separate one tube from the others. Holding the tube [vial] with notched end pointing up and away from the face and body, cut off the narrow end at the notches with scissors.

How to apply: While holding the cat with one hand, use the other hand to apply the solution. Invert the tube [vial] and use the narrow end to part the cat's hair. Apply contents of one [0.017 fl oz] [0.50 mL] tube [vial] of {Product Name} [as a stripe, starting high on the back of the cat's neck to in front of the shoulder blades.][as a spot between the shoulder blades]. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat. When finished, wrap the tube [vial] in paper and put into the trash. Only one applicator per treatment is needed.

Sergeant's Master Label

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BACK PANEL

FREOUENCY OF APPLICATION

Use [brand name] monthly for complete control of flea, tick [and] chewing lice [and mosquito] infestations. [Studies show that] [brand name] kills adult fleas for up to six weeks. Apply monthly if your cat is at high risk for flea reinfestation [, or in a highly infested environment]. Apply monthly to control ticks, mosquitoes and chewing lice. [Brand name] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Do not reapply for 30 days. [(Brand Name) can be used on breeding, pregnant and lactating (queens) (female cats).]

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not remove tube from the pack until ready to use. Store in a cool (below 77°F [25°C]) dry place inaccessible to children and pets. Do not refrigerate. Protect from direct sunlight.

CONTAINER DISPOSAL: If empty: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain

[WARRANTY

Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. HThe directions for use of this product are believed to adequate and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Unintended consequences may result because of unknown factors. All such risks shall be assumed by the user or buyer. H Sergeant's is committed to providing high quality products. To the extent consistent with applicable law, Sergeant's makes no warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. To the extent consistent with applicable law, Sergeant's, the manufacturer, or the Seller shall not be liable for indirect, special, incidental or consequential damages. To the extent consistent with applicable law, the exclusive remedy of the user or buyer shall not exceed the purchase price paid.]

[If you have questions or comments about this product, please write: [Sergeant's] [SENTRY] Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399.]

In Case of Emergency, call: 1-800-781-4738 Non-Emergency call 1-800-224-PETS (7387) [Made in USA]

Distributed by: Sergeant's Pet Care Products, Inc. P.O. Box 540399 Omaha, NE 68154-0399 EPA Reg. No. 2517-RGT

EPA Est. No. XXXXX-XX-XXX

{END - BACK / SIDE PANEL}

[BAR CODE AREA]

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Sergeant's Master Label

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(START - OPTIONAL INSERT OR PACKAGE COPY)

[• How to Apply - May contain graphics illustrating product use, e.g., cat with a drop falling onto its neck from a vial on front, side, or back carton label and/or applicator labeling.]

[Application Instructions] [Directions for Use] [How to Open:

- 1. Remove product tubes [vial] from the package.
- 2. Separate one tube from the others. Holding the tube [vial] with notched end pointing up and away from the face and body, cut off the narrow end at the notches with scissors.

How to Apply:

- 1. Invert tube over cat and use open end to part cat's hair.
- 2. Apply contents of one [0.017 fl oz] [0.50 mL] tube [vial] of {Product Name} [as a stripe, starting high on the back of the cat's neck to in front of the shoulder blades.][as a spot between the shoulder blades]Squeeze tube firmly to apply all of the solution to the cat's skin.]

[Optional diagram may or may not appear on finished label]



[Look at the Label (Look at the Label icon) [Easy] 6 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist

- Read the label completely and follow directions
- Weigh your pet
- Do NOT use dog products on cats
- Do NOT treat with more than one pesticide product at a time
- Separate animals after treatment to avoid chance of ingestion
- Do NOT split tubes between pets]

[Brand Name]

[Monthly reminder card]

[3] [Month Treatment Tracker]

[3] [Month Application Tracker][

[For year-round protection, apply [Brand Name] monthly.]

[Pet's Name (Empty blank for owner to fill in name)]

[First] [1st] [Second] [2nd] [Third] [3rd]

[Dose] [Treatment] [Application](Empty blank for owner to fill in date)(Date: MM/DD/YY)]

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[calendar stickers with brand name] [Place stickers on your calendar as a reminder to reapply [brand name] in 30 days.][Monthly Application Reminder Magnet (image of reminder magnet)]

[Enclosed for your convenience is an application reminder magnet. Push the (reset) button, and the reminder light will blink twice. The reminder tag is now set for 30 days. At the end of 30 days the reminder light will blink, reminding you to reapply [Brand Name]. Press the button once and the blinking light will stop. Press the button again and this will reset the timer for another 30 days.]

{END - OPTIONAL INSERT OR PACKAGE COPY}

TUBE//VIALLABEL

Front Label	Back Lal			
Brand Name} [For use only on cats/kittens	KEEP OUT OF R			
weeks or older]	CAUTION: Read			
31 0 70/ /	11 6 . 77			

Fipronil 9.7% w/w 0.50 mL {label code} Back Label

REACH OF CHILDREN d directions and precautions before using. Use scissors to open. EPA REG. No. 2517-RGT {label code}

For use ONLY on cats FIPROGUARD forcats Of ALL weights over 8 weeks of age For use ONLY on cats 3 Milli FIPROGUARD for cats Of **ALL** weights over 8 weeks of age SENTRY READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON CATS AND KITTENS OVER 8 WEEKS OF AGE. FIPROGUARD** provides four way pre tion that kills fleas, ticks, mosquitoes and chewing lice. Kills deer ticks that may FIPROGUARD transmit Lyme disease. Kills brown dog ticks, American dog ticks, and lone star ticks. Prevents flea reinfestation. PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS, CAUTION. Harmful if swallowed, Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using forcats HAZARDS TO DOMESTIC ANIMALS. For external use only. Do not use on kittens under 8 weeks of age. Individual forcats sensitivities, while rare, may occur after using any pesticide product. Some cats may experience temporary startle effects when any product is applied. Cats may experience some temporary imitation at the site of product application. If signs ► Contains Fipronil – persist, or become more severe within a few days of application, consult a veterinarian immediately. Certain medica can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged cats. (Call. 1-600-781-4738 for 24-hour assistance. the active ingredient used in Frontline Call a poison control center or a doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control Top Spot® for cats* center or doctor. Do not give anything by mouth to an unconscious person. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, If in eves: if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice KILLS Wash with plenty of soap and water. Get medical attention if irritation persists. **∌**fleas HOTLINE NUMBER may also contact 1-800-781-4738 for emergency medical treatment information. ticks mosquitoes It is a violation of Federal law to use this product in a manner inconsistent with its labeling. DO NOT ALLOW CHILDREN TO APPLY PRODUCT TO PREVENT HARM TO YOU AND YOUR CAT READ ENTIRE LABEL BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY, FOR * chewing lice EXTERNAL USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS. Do not use on kittens under 8 weeks of age. Do not split one tube between cats. Do not use multiple tubes on one cat. Consult a veterinarian before using this product on debitated, aged, or medicated cats. Can be used on breeding, pregnant, or lactating cats. Consult a veterinarian before using on cats with known organ dysfunction. Cats may Waterproof experience some temporary irritation at the site of product application. Certain medications can interact with pesticid Sensitivities may occur after using ANY pesticide product on cats. If signs of sensitivity occur bathe your cat with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. **ACTIVE INGREDIENT:** HOW TO OPEN: Remove product tubes from the package. Separate one tube from the others. Holding the tube with For use ONLY on cats notiched end pointing up and away from the face and body, cut off the narrow end at the notices with scissors. OTHER INGREDIENT: **... 90.30% HOW TO APPLY: While holding the cat with one hand, use the other hand to apply the solution. Invert the tube and use the narrow end to part the cat's hair. Apply contents of one (0.69 mL) tube of FIPROGUARD as a spot 100.00% weeks of age between the shoulder blades. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat. When finished, wrap the tube in paper and put into the trash. Only one applicator per treatment is needed FREQUENCY OF APPLICATION: Use FIPROGUARD monthly for complete control of flea, tick, chewing lice and mosquito infestations. Studies show that FIPROGUARD™ kills adult fleas for up to six weeks. Apply monthly if your cat is * FIPROGUARD™ for cats is not manufactured: at high risk for flea reinfestation. Apply monthly to control ticks, mosquitoes and chewing lice. FIPROGUARD remains by or distributed by Merial. Frontline Top Spot® effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Do not is a registered trademark of Merial. If you have questions or comments about this product, please write: SENTRY Consumer Response, KEEP OUT OF REACH OF CHILDREN P.O. Box 540399, Omaha, NE 68154-0399 CAUTION See Back Panel for Additional Distributed by: Sergeant's Pet Care Products, Inc. P.O. Box 540399. Omaha. NE 68154-0399 Net Contents: Three 0.017 fl oz In Case of Emergency, call: 1-800-781-4738 Non-Emergency call 1-800-224-PETS (7387) EPA Reg. No. 2517-137 (0.50 mL) applicators Made in USA EPA Est. No. 2517-TN-1 P003049 RDR/

IPROGUA

AND DISPOSAL

PRONYL OTC for cats

For use ONLY on cats
OF ALL WEIGHTS
over 8 weeks of age

For use ONLY on cats **OF ALL WEIGHTS** over 8 weeks of age

Sarjeanis

for cats

> Contains Fipronil, the active ingredient used in Frontline Top Spot® for cats'

KILLS

ticks

mosquitoes

chewing lice

Waterproof

PRONYL OTC™ for cats is not manufactured by or distributed by Merial. Frontline Top Spot®

ACTIVE INGREDIENT: Figronil Other ingredient:**.. ... 90.30% "diethylene glycol monoethyl ether

FIRST AID Call a poison control center or a doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, If in eyes: if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or Wash with plenty of soap and water. Get medical attention if imitation persists. HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-781-4738 for emergency medical treatment information.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

DO NOT ALLOW CHILDREN TO APPLY PRODUCT. TO PREVENT HARM TO YOU AND YOUR CAT, READ ENTIRE LABEL BEFORE FACH USE, FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY, FOR EXTERNAL USE ON CATS ONLY, DO NOT USE ON RABBITS, DO NOT USE ON OTHER ANIMALS.

Do not use on kittens under 8 weeks of age. Do not split one tube between cats. Do not use multiple tubes on one cat. Consult a veterinarian before using this product on debilitated, aged or medicated cats. Can be used on breeding, pregnant, or lactating cats. Consult a veterinarian before using on cats with known organ dysfunction. Cats may experience some temporary irritation at the site of product application. Certain medications can interact with pesticides. Sensitivities may occur after using ANY pesticide product on cats. If signs of sensitivity occur bathe your cat with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

HOW TO OPEN: Remove product tubes from the package. Separate one tube from the others. Holding the tube with notched end pointing up and away from the face and body, cut off the narrow end at the notches with scissors

HOW TO APPLY: While holding the cat with one hand, use the other hand to apply the solution, Invert the tube and use the narrow end to part the cat's hair. Apply contents of one (0.017 flor) (0.50 mL) tube of PRONYL OTC™ as a spot between the shoulder blades. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat When finished, wrap the tube in paper and put into the trash. Only one applicator per treatment is needed.

FREQUENCY OF APPLICATION: Use PRONYL OTC™ monthly for complete control of flea, tick, chewing lice and mosquito infestations. Studies show that PRONYL OTCTM kills adult fleas for up to six weeks. Apply monthly if your cal is at high risk for flea reinfestation. Apply monthly to control ticks, mosquitoes and chewing lice. PRONYL OTC™ remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Do not reapply for 30 days.

> If you have questions or comments about this product, please write: Sergeant's Consumer Response,

P.O. Box 540399, Ornaha, NE 68154-0399

EPA Reg. No. 2517-137

EPA Est. No. 2517-TN-1

KEEP OUT OF REACH OF CHILDREN

Net Contents: Three 0.017 fl oz (0.50 mL) applicators

CAUTION



Distributed by: Sergeant's Pet Care Products, Inc. P.O. Box 540399, Omaha, NE 68154-0399

In Case of Emergency, call: 1-800-781-4738 Non-Emergency, call: 1-800-224-PETS (7387) CO

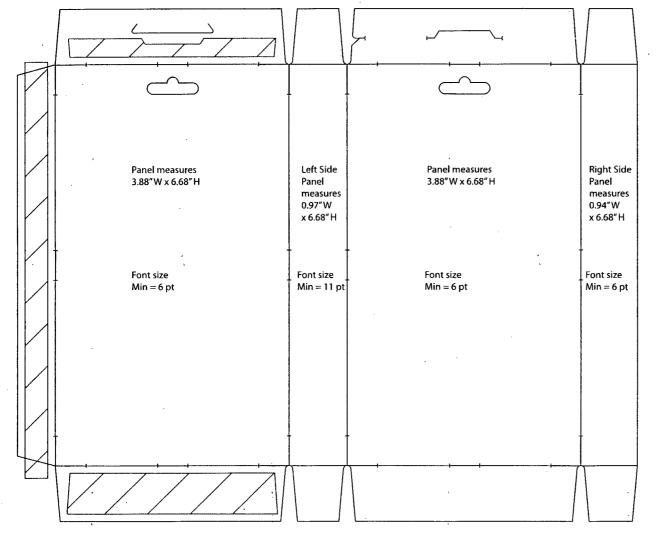
READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON CATS AND KITTENS OVER 8 WEEKS OF AGE.

PRONYL OTC™ provides four way protection that kills fleas, ticks, mosquitoes and chewing lice. Kills deer ticks that may

transmit Lyme disease. Kills brown dog ticks, American dog ticks, and lone star ticks. Prevents flea reinfestation. PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS. CAUTION. Harmful if swallowed. Causes eye irritation. Avoid contact with skin, eyes or

clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using HAZARDS TO DOMESTIC ANIMALS. For external use only, Do not use on kittens under 8 weeks of age. Individual sensitivities, while rare, may occur after using any pesticide product. Some cats may experience temporary startle effects when any product is applied. Cats may experience some temporary imitation at the site of product application. If signs persist, or become more severe

within a few days of application, consult a veterinarian immediately. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged cats. Call 1-800-781-4738 for 24-hour assistance.

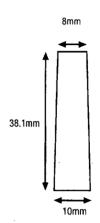


160823 2517-137

170f 23 2517-137 JAN 28 2011

Front Tube Labels

FIPROGUARD™ for cats
For use only on cats/kittens 8 weeks or older
Fipronil 9.7 % w/w
0.50 mL P003164



$FIPROGUARD^{TM}$

1	PROJECT NAME & PROJECT NUMBER FiproGuard Cat Tube Label	DATE 17DEC10	DRAFT#	DIMENSIONS	UPC CODE	PART#
	ART INSTRUCTION FOR THE PRINTER		-	Printer/Vendor: Additional Notes:	Date sent:	
		els adhere to	o White T	ubes	SI SI	Products Inc.

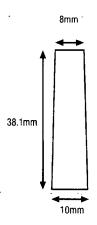
2517-137180f23

JAN 28 2011

Front

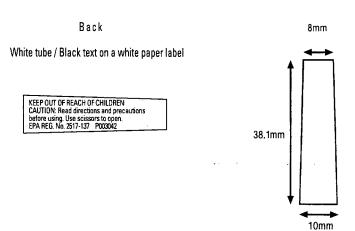
White tube / Black text on a white label / Colored Strip

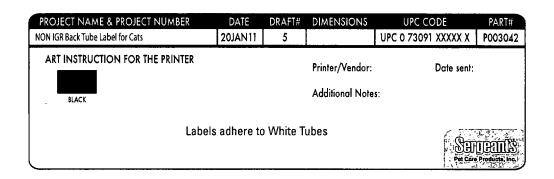
PRONYL OTC™ for cats
For use only on cats/kittens 8 weeks or older
Fipronil 9.7% w/w
0.50 mL P003169



$\textbf{PRONYL OTC}^{\text{TM}}$

PROJECT NAME & PROJECT NUMBER PRONYL OTC for cats Front Tube Label	DATE 17DEC10	DRAFT#	DIMENSIONS	UPC CODE UPC 0 73091 XXXXX X	PART# P003169
ART INSTRUCTION FOR THE PRINTER BLACK PMS 260			Printer/Vendor:	Date sent: s:	
Labels	Pol Care	IPIIS Producta Inc.			





JAN 28 2011



Fleas



Ticks



Mosquitoes



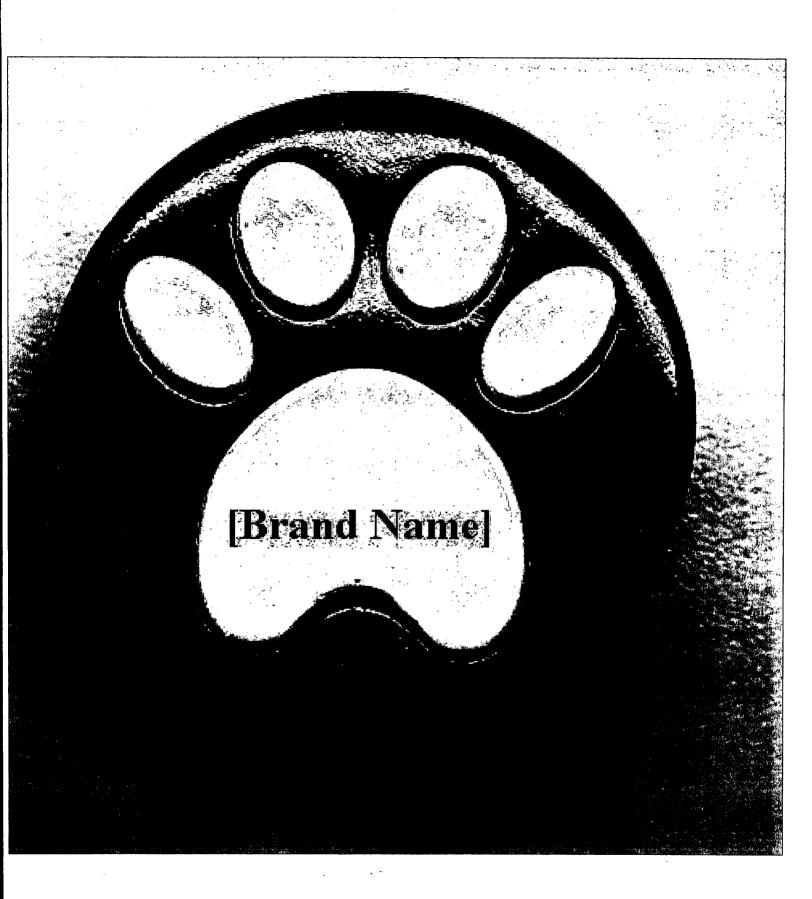
Chewing Lice

Fleas

Ticks

>> Mosquitoes

Chewing Lice



received 201AN 2011

JAN 28 2011



PROJECT NAME & PROJECT NUMBER Pawprint Sticker	DATE 02NOV10	DRAFT#	DIMENSIONS	UPC CODE UPC 0 73091 XXXXX X	PART# POOXXX
ART INSTRUCTION FOR THE PRINTER BLACK PMS 2738			Printer/Vendor: Additional Note	Date-sent:	
~				SHI Pai Care	I Full S Producta Inc.