

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 28, 2025

Prince M. Bamaze Regulatory Affairs Sergeant's Pet Care Products, LLC 10077 South 134th Street Omaha, NE 68138-3710

Subject: Label Amendment - Registration Review Mitigation for Etofenprox

Product Name: SERGEANT'S FIPRONIL + ETOFENPROX SQUEEZE-ON FOR DOGS

EPA Registration Number: 2517-153

Application Date: 04/30/2024 Decision Number: 595726

Dear Prince M. Bamaze:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Etofenprox Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact DeMariah Cotton by phone at (202)-566-2288 or via email at cotton.demariah@epa.gov.

Sincerely,

Linda Arrington, Branch Chief Risk Management and Implementation Branch 4 Pesticide Re-Evaluation Division Office of Pesticide Programs

ENCLOSURE: Stamped label

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FRONT PANEL

DOG SQUEEZE ON FIPRONIL+ETOFENPROX

[Optional text appears in brackets – the final product label may include some or all of the optional text on front, back or side label panels. The CRP required text and format will not change from current label.] {Information is instructional}

Sergeant's Fipronil + Etofenprox Squeeze-On for Dogs

{Market Label-the word Dog will be at least 40-75% in height of the largest letter in the primary brand name.} {Market Label-a large clear picture of a dog in the respective weight range will be on the front panel of the label}

{One of the statements below will appear prominently on the front panel of market label as required}

For use ONLY on dogs [&] [and] [puppies] [weighing] [4-22][23-44] [45-88][89-132] lbs. [&] [and] 13 weeks [of age] or older.

{OR}

ONLY For dogs [&] [and] [puppies] 13 weeks or older [&][and][weighing] [4-22][23-44][45-88][89-132] lbs.

{A minimum of 1.5 cm x 1.5 cm icon as indicated Black cat, black text, red circle and line through cat, on white background to ensure easy spotting, in lower right-hand corner of front label panel}



{box only designates Vet Only language}

(SUBLABEL: FOR USE ONLY BY LICENSED VETERINARIANS ON ANIMALS IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION)

FOR USE ONLY BY LICENSED VETERINARIANS ON ANIMALS IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION

For use in veterinarian clinics, animal shelters, grooming facilities and boarding kennels. Not for residential use. Do not repackage.

[Ideal for shelter use when under direct supervision of veterinarian]

[Professional Roll Pack]

[Convenient roll pack for in clinic use]

[Convenient roll pack for animal facility use]

[For use only by licensed veterinarians]

ACTIVE INGREDIENTS:

 Fipronil
 9.80%

 Etofenprox
 15.00%

 OTHER INGREDIENTS:
 75.20%

 TOTAL
 100.00%

ACCEPTED

Feb 28, 2025

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 2517-153

KEEP OUT OF REACH OF CHILDREN CAUTION

See [Back][or][Side] [Label[s]] [Panel[s]][and Insert] for First Aid [and] [Additional] Precautionary Statements

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{Note to reviewer: First "X" = the total volume for the container as required by law. "Y" = the number of tubes in the container as required by law. Second "X" = the tube fill volume as listed below and required by law.}

Net Contents: X fl oz ([Y – X fl oz [tube][vial][s]]) {applies to all packaging except single tube packages} [1][One][2][Two][3][Three][4][Four][5][Five][6][Six][12][Twelve][24][Twenty-Four]

OR {box only designates Vet Only language}

Net Contents: X fl oz [Y – X fl oz [tube][vial][s]]

[Thirty-five] 35[Fifty][50][Seventy-five][75][One hundred][100] [One hundred sixty 160]

[0.023 fl oz (0.67 mL) [tube][vial] [s]]

[0.045 fl oz (1.34 mL) [tube][vial] [s]]

[0.091 fl oz (2.68 mL) [tube][vial] [s]]

[0.136 fl oz (4.02 mL) [tube][vial] [s]]

{END - FRONT PANEL}

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BACK /SIDE PANEL

DOG SQUEEZE ON FIPRONIL+ETOFENPROX

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[[Brand Name] [This product] contains fipronil to effectively kill fleas and ticks [(including those that may transmit Lyme disease).] [The active ingredient in [Brand Name][this product] features a sustained release formula developed for fast acting (starts killing within 30 minutes, 48 hours after application) [and long lasting (up to [1 month] [30 days] [[4] [four] weeks])] control of fleas, ticks, [mosquitoes] and chewing lice.]

[[Brand Name] [This product] for dogs provides [[four] [three] way] protection that kills fleas, ticks, [mosquitoes] and chewing lice. Aids in control of mites that may cause sarcoptic mange. Kills deer ticks that transmit Lyme disease. Kills brown dog ticks, American dog ticks, and lone star ticks. Prevents flea reinfestation for [[4][four] weeks] [[1] [one]month] [30 days].]

READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON DOGS [AND][&] [PUPPIES] 13 WEEKS [OF AGE] OR OLDER [AND][&][4-22][23-44][45-88][89-132] LBS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS. CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate 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. Remove and wash contaminated clothing before reuse.

HAZARDS TO DOMESTIC ANIMALS. For external use on dogs only. Individual sensitivities, while rare, may occur after using any pesticide product on dogs. Certain medications can interact with pesticides. Do not treat your dog with more than one pesticide product at a time. Overdosing your dog can result in serious illness and even death. Consult a veterinarian before using on medicated, debilitated, aged, pregnant or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. If your dog is exhibiting signs of and/or is being treated for skin dermatitis, talk to your veterinarian before applying any topical flea and tick control product. This product is not a substitute for prescribed heartworm preventative.

OR {box only designates Vet Only language}

HAZARDS TO DOMESTIC ANIMALS. For external use on dogs only. Individual sensitivities, while rare, may occur after using any pesticide product on dogs. Certain medications can interact with pesticides. Do not treat a dog with more than one pesticide product at a time. Overdosing a dog can result in serious illness and even death. Use caution before using on medicated, debilitated, aged, pregnant, nursing dogs or dogs with known organ dysfunction. If the dog is exhibiting signs of and/or is being treated for skin dermatitis, use caution before applying any topical flea and tick control product. This product is not a substitute for prescribed heartworm preventative.

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FIRST AID				
If On Skin	Take off contaminated clothing.			
Or Clothing	Rinse skin immediately with plenty of water for 15-20 minutes.			
	Call a poison control center or doctor for treatment advice.			
If Swallowed	Call a poison control center or 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.			
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 further treatment advice.			
HOT LINE NUMBER				
Have the produc	Have the product container or label with you when calling a poison control center or doctor, or going			
for treatment. For more information on this pesticide product (including health concerns, medical				
emergencies or pesticide incidents), you may call 1-800-781-4738.				
NOTE TO PHYSICIAN OR VETERINARIAN				
Treat patient symptomatically				

DIRECTIONS FOR USE

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

For indoor use only. Do not allow children to apply product. To prevent harm to you and your dog, read entire label before each use. Follow all directions and precautionary statements carefully. Dog must be dry at time of application and remain dry for 24 hours after application. Application of product on pets must only be done indoors.

RESTRICTIONS: Do not use on cats, rabbits or animals other than dogs. Do not allow [your] dog to ingest this product. Do not use on puppies under 13 weeks of age or less than [4][23][45][89] lbs. Do not bathe or allow dog to swim for 24 hours after application. Use entire contents of [tube] [vial] on each dog. [Do not split one [tube] [vial] between dogs.] [Do not use multiple [tube] [vial] on one dog.] Do not apply more than one [tube][vial] per treatment for one dog regardless of dog's weight. Weigh [your] dog to be sure you are applying the right dose formulated for the weight of [your] dog. Separate the treated dog from all other dogs and cats for 24 hours after treatment has been applied. Do not apply more often than once every [4 weeks][30 days][month].

{Side Effects box to be located immediately above the cat warning box on the back label panel}

Side Effects: Monitor your dog after application. [Some dogs may experience temporary startle effects when any product is applied.] Dogs may experience [some] temporary irritation at the site of product application such as redness, scratching or other signs of discomfort. If signs of sensitivity occur, bathe your dog with a mild soap and rinse with large amounts of water. If any side effects occur or your dog has an unusual reaction to the application, consult your veterinarian or call 1-800-781-4738. Consult your veterinarian before repeating application.

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{A minimum of 1.5cm x 1.5cm cat prohibition icon and warning text will be in a box in the lower right-hand corner of the back panel, with a black cat + red circle and line through the cat, black text, on white background to ensure easy spotting.}

DO NOT USE ON CATS. Keep cats away from treated dogs for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian.



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

{Either the paragraph or number format presented below will be used on the market label}

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

[How to open:

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

{Either the paragraph or number format presented below will be used on the market label}

[How to apply: Invert [tube][vial] over dog and use open end to part dog's hair. Squeeze [tube][vial] firmly to apply all of the solution to the dog's skin, as directed below. Do not apply more often than once every [4 weeks][30 days][month].]

Apply one [tube][vial] [directly to skin] [from the back of the neck to a point midway between the neck and tail.] [as a spot [on] [to] the dog's back between the shoulder blades] [as a [stripe][line] starting [at the middle of the back][at a midway point between the neck and tail] and ending [at a spot] between the shoulder blades]. [This allows for a more direct application to the skin.]

[How to apply:

- 1. Invert [tube][vial] over dog and use open end to part dog's hair.
- 2. Squeeze [tube][vial] firmly to apply all of the solution to the dog's skin [as a spot [on] [to] the dog's back between the shoulder blades.] [or] [from the back of the neck to a point midway between the neck and tail.] [Optional drawings that may or may not appear anywhere on finished label]]

FREOUENCY OF APPLICATION

Use [Brand Name] [this product] monthly for control of flea, tick [and] chewing lice [and mosquito] infestations. [Studies show that] [Brand Name] [this product] kills adult fleas for up to three months. Apply monthly if your dog is at high risk for flea reinfestation [, or in a highly infested environment]. Apply monthly to control ticks[,] [mosquitoes] and chewing lice. [Brand Name] [This product] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry for 24 hours. Do not reapply for [30 days] [4 weeks].

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. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. **If empty:** Offer for recycling if available. **If partly filled:** Do not pour or dispose down the drain or sewer. Call your local solid waste agency for local disposal options.

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[WARRANTY

Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. The 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. 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)

[Coupon(s) inside or on outside of box]
{When outside of the box, the coupon will not cover or distract consumer from required text}

[Distributed by:][Manufactured by:] Sergeant's Pet Care Products, LLC Omaha, NE 68138-3710 [BAR CODE AREA][Lot code] EPA Reg. No. 2517-153 EPA Est. No. [2517-NE-02] [2517-NE-03] [XXX-XX-XXX]

{END - BACK / SIDE PANEL}

TUBE/VIAL LABEL

DOG SQUEEZE ON FIPRONIL+ETOFENPROX

{Front Label}

{Back Label}

{Brand Name} For dogs [4-22][23-44][45-88] [89-132] lbs. ≥13 wks

Fipronil 9.8%, Etofenprox 15.0%, [0.023][0.045][0.091][0.136] fl. oz.

[XXXXX]

{Xs refer to internal code for tracking purposes}

{EPA REG No may be on either the front or back label} {LOT No. is debossed on the crimp portion of the tube}

KEEP OUT OF REACH OF CHILDREN CAUTION: Read entire label before each use. Use scissors to open.

EPA REG. No. 2517-153 [XXXXX]

{Xs refer to internal code for tracking purposes }

{END – TUBE/VIAL COPY}

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INSERT

DOG SQUEEZE ON FIPRONIL+ETOFENPROX

Sergeant's Fipronil + Etofenprox Squeeze-On for Dogs

{Market Label - the word Dog will be at least 40-75% in height of the largest letter in the primary brand name.}



{One of the statements below will appear prominently on the front page of the insert}

For use ONLY on dogs [&] [and] [puppies][weighing] [4-22][23-44] [45-88][89-132] lbs. [&] [and] 13 weeks [of age] or older.

{OR}

ONLY For dogs [&] [and] [puppies] 13 weeks or older [&][and] [weighing] [4-22][23-44][45-88][89-132] lbs

{box only designates Vet Only language}

(SUBLABEL: FOR USE ONLY BY LICENSED VETERINARIANS ON DOGS IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION)

FOR USE ONLY BY LICENSED VETERINARIANS ON DOGS IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION

For use in veterinarian clinics, animal shelters, grooming facilities and boarding kennels. Not for residential use. Do not repackage.

[Ideal for shelter use when under direct supervision of veterinarian]

[Professional Roll Pack]

[Convenient roll pack for in clinic use]

[Convenient roll pack for animal facility use]

[For use only by licensed veterinarians]

ACTIVE INGREDIENTS:

Fipronil	9.80%
Etofenprox	
OTHER INGREDIENTS:	
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

See [Back][or][Side] [Label[s]] [Panel[s]] [and Insert] for First Aid [and] [Additional] Precautionary Statements

{Note to reviewer: First "X" = the total volume for the container as required by law. "Y" = the number of tubes in the container as required by law. Second "X" = the tube fill volume as listed below and required by law.}

Net Contents: X fl oz ([Y – X fl oz [tube][vial][s]]) {applies to all packaging except single tube packages} [1][One][2][Two][3][Three][4][Four][5][Five][6][Six][12][Twelve][24][Twenty-Four]

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OR {box only designates Vet Only language}

Net Contents: X fl oz X count [Y – X fl oz [tube][vial][s]]

[Thirty-five] [35][Fifty][50][Seventy-five][75][One hundred][100] [One hundred sixty][160]

[0.023 fl oz (0.67 ml) [tube][vial][s]] [0.045 fl oz (1.34 ml) [tube][vial][s]] [0.091 fl oz (2.68 ml) [tube][vial][s]] [0.136 fl oz (4.02 ml) [tube][vial][s]]

[[Brand Name] [This product] contains fipronil to effectively kill fleas and ticks [(including those that may transmit Lyme disease).] [The active ingredient in [Brand Name][this product] features a sustained release formula developed for fast acting (starts killing within 30 minutes, 48 hours after application) [and long lasting (up to [1 month] [30 days] [[4] [four] weeks])] control of fleas, ticks, [mosquitoes] and chewing lice.]

[[Brand Name] [This product] for dogs provides [[four] [three] way] protection that kills fleas, ticks, [mosquitoes] and chewing lice. Aids in control of mites that may cause sarcoptic mange. Kills deer ticks that transmit Lyme disease. Kills brown dog ticks, American dog ticks, and lone star ticks. Prevents flea reinfestation for [[4][four] weeks] [[1] [one]month] [30 days].]

READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON DOGS [AND][&] [PUPPIES] 13 WEEKS [OF AGE] OR OLDER [AND][&][4-22][23-44][45-88][89-132] LBS

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS. CAUTION. Harmful if swallowed or absorbed through skin. Causes moderate 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. Remove and wash contaminated clothing before reuse.

HAZARDS TO DOMESTIC ANIMALS. For external use on dogs only. Individual sensitivities, while rare, may occur after using any pesticide product on dogs. Certain medications can interact with pesticides. Do not treat your dog with more than one pesticide product at a time. Overdosing your dog can result in serious illness and even death. Consult a veterinarian before using on medicated, debilitated, aged, pregnant or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. If your dog is exhibiting signs of and/or is being treated for skin dermatitis, talk to your veterinarian before applying any topical flea and tick control product. This product is not a substitute for prescribed heartworm preventative.

OR {box only designates Vet Only language}

HAZARDS TO DOMESTIC ANIMALS. For external use on dogs only. Individual sensitivities, while rare, may occur after using any pesticide product on dogs. Certain medications can interact with pesticides. Do not treat a dog with more than one pesticide product at a time. Overdosing a dog can result in serious illness and even death. Use caution before using on medicated, debilitated, aged, pregnant, nursing dogs or dogs with known organ dysfunction. If the dog is exhibiting signs of and/or is being treated for skin dermatitis, use caution before applying any topical flea and tick control product. This product is not a substitute for prescribed heartworm preventative.

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FIRST AID				
If On Skin Or	Take off contaminated clothing.			
Clothing	Rinse skin immediately with plenty of water for 15-20 minutes.			
	Call a poison control center or doctor for treatment advice.			
If Swallowed	Call a poison control center or 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.			
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 further treatment advice.			
HOT LINE NUMBER				

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-781-4738.

NOTE TO PHYSICIAN OR VETERINARIAN

Treat patient symptomatically

DIRECTIONS FOR USE

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

For indoor use only. Do not allow children to apply product. To prevent harm to you and your dog, read entire label before each use. Follow all directions and precautionary statements carefully. Dog must be dry at time of application and remain dry for 24 hours after application. Application of product on pets must only be done indoors.

RESTRICTIONS: Do not use on cats, rabbits or animals other than dogs. Do not allow [your] dog to ingest this product. Do not use on puppies under 13 weeks of age or less than [4][23][45][89] lbs. Do not bathe or allow dog to swim for 24 hours after application. Use entire contents of [tube] [vial] on each dog. [Do not split one [tube] [vial] between dogs.] [Do not use multiple [tube] [vial] on one dog.] Do not apply more than one [tube][vial] per treatment for one dog regardless of dog's weight. Weigh [your] dog to be sure you are applying the right dose formulated for the weight of [your] dog. Separate the treated dog from all other dogs and cats for 24 hours after treatment has been applied. Do not apply more often than once every [4 weeks][30] days][month].

Side Effects: Monitor your dog after application. [Some dogs may experience temporary startle effects when any product is applied.] Dogs may experience [some] temporary irritation at the site of product application such as redness, scratching or other signs of discomfort. If signs of sensitivity occur, bathe your dog with a mild soap and rinse with large amounts of water. If any side effects occur or your dog has an unusual reaction to the application, consult your veterinarian or call 1-800-781-4738. Consult your veterinarian before repeating application.

DO NOT USE ON CATS. Keep cats away from treated dogs for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian.



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

{Either the paragraph or number format presented below will be used on the market label}

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

[How to open:

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

{Either the paragraph or number format presented below will be used on the market label}

[How to apply: Invert [tube][vial] over dog and use open end to part dog's hair. Squeeze [tube][vial] firmly to apply all of the solution to the dog's skin, as directed below. Do not apply more often than once every [4 weeks][30 days][month].]

Apply one [tube][vial] [directly to skin] [from the back of the neck to a point midway between the neck and tail.] [as a spot [on] [to] the dog's back between the shoulder blades] [as a [stripe][line] starting [at the middle of the back][at a midway point between the neck and tail] and ending [at a spot] between the shoulder blades]. [This allows for a more direct application to the skin.]

[How to apply:

- 1. Invert [tube][vial] over dog and use open end to part dog's hair.
- 2. Squeeze [tube][vial] firmly to apply all of the solution to the dog's skin [as a spot [on] [to] the dog's back between the shoulder blades.] [or] [from the back of the neck to a point midway between the neck and tail.] [Optional drawings that may or may not appear anywhere on finished label]]

FREQUENCY OF APPLICATION

Use [Brand Name] [this product] monthly for control of flea, tick [and] chewing lice [and mosquito] infestations. [Studies show that] [Brand Name][this product] kills adult fleas for up to three months. Apply monthly if your dog is at high risk for flea reinfestation [, or in a highly infested environment]. Apply monthly to control ticks[,] [mosquitoes] and chewing lice. [Brand Name] [This product] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry for 24 hours. Do not reapply for [1 month] [30 days] [4 weeks].

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. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. **If empty:** Offer for recycling if available. **If partly filled:** Do not pour or dispose down the drain or sewer. Call your local solid waste agency for local disposal options.

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WARRANTY

Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. The 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. 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) [Coupon(s) inside or on outside of box] {When outside of the box, the coupon will not cover or distract consumer from required text}

[Distributed by:][Manufactured by:] Sergeant's Pet Care Products, LLC Omaha, NE 68138-3710 [BAR CODE AREA][Lot code] EPA Reg. No. 2517-153 EPA Est. No. [2517-NE-02] [2517-NE-03] [XXX-XX-XXX]

{END - INSERT}

{Optional graphics and marketing statements below may appear anywhere on the market label}

[[Clip. Part. Squeeze.]

Easier-than-ever tube [vial] lets you *clip* the tip, *part* the fur and *apply* directly to the skin – putting proven fleas and ticks protection where it needs to be.]

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

- [1] Read the label completely and follow directions
- [2] Weigh [your] dog
- [3] Do NOT use dog products on cats
- [4] Do NOT treat with more than one pesticide product at a time
- [5] Separate treated dog from other pets to avoid chance of ingestion
- [6] Do NOT split [tube][vial] between dogs [and use the ENTIRE [tube] [vial] contents]

[Brand Name]

[1][2][3][4][5][6][12][24][Month [Application] Tracker] [Carecard]

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

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

[Dog's Weight (Empty blank for owner to fill in weight)]

 $[First][1st][Second][2nd][Third][3rd][Fourth][4^{th}][Fifth][5^{th}][Sixth][6^{th}][Seventh][7^{th}][Eighth][8^{th}][Ninth][9^{th}][Tenth][10^{th}][Eleventh][11^{th}][Twelfth][12^{th}]$

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

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[Application date][Date of Application]

[calendar stickers with **Brand Name**]

[Place stickers on your calendar as a reminder to reapply [Brand Name][this product] in 30 days.]

[Place sticker on your calendar or [refrigerator] to remind yourself to apply [Brand name][this product] to your dog]

[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][this product]. Press the button once and the blinking light will stop. Press the button again and this will reset the timer for another 30 days.]

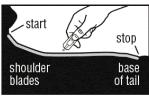
[Optional graphics above and below may or may not appear anywhere on finished label]

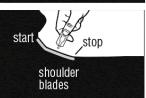












Total	Adult Flea	
*	Ticks	S
*	Brown Dog Tick	S
*	Deer Tick	
*	American Dog Tick	%
*	Chewing Lice	
*	Lone Star Tick	%
7)	Mosquitoes	
*	Mite	

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[Optional marketing statements below may appear anywhere on the market label]

[Mosquitoes]

[Kills mosquitoes within 48 hours for up to 28 days]

[Chewing Lice]

[Kills chewing lice]

[A once monthly application required]

[Apply monthly to control] [for] chewing lice]

[Fast Action (starts working within 30 minutes, 48 hours after application) against chewing lice infestations]

[Fleas]

[Kills fleas which may be a source of [flea allergy dermatitis] [flea bite anemia]]

[Kills fleas which may transmit tapeworm]

[Kills adult Fleas [for up to three months]]

[Kills newly emerged adult Fleas before they lay eggs]

[Kills Adult Fleas, which may be a source of [flea allergy dermatitis] [and] [, flea bite anemia]]

[Kills Fleas Up to [4 weeks] [1 month] [30 days]!]

[If dog is a high risk for flea reinfestation a once month application may be needed]

[Ticks]

[Kills ticks including those that may transmit Lyme disease]

[Kills Ticks for Up to [4 weeks] [1 month] [30 days]!]

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[Kills [all stages of] deer ticks [including those that may transmit Lyme disease,] [for up to [4 weeks] [1

[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][,][and deer 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]!]

[Multiple Infestations]

month] [30 days] [per application]]

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

[[4Week] [30 Day] [1 Month][Flea and Tick Treatment]]

[Kills chewing lice [and aids in control of mites that may cause sarcoptic mange]]

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

[Kills Fleas, Ticks [&] [and] [Mosquitoes]]

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

[Monthly flea, tick, [mosquito], and chewing lice [application] [treatment]

[[Four] [4] [Three] [3] Way [Action] [Effectiveness] [Control] to kill fleas, ticks, [mosquitoes,] and chewing lice]

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

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

[[Four (4) Week] [1 month] [Flea, Tick, [Mosquitoes] and Chewing Lice Control]

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

[Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice] [Application] [Treatment]]

[Use [Brand Name][this product] monthly to control ticks and chewing lice]

[Monthly fleas, ticks, [mosquitoes], and chewing lice protection.]

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

[Kills Fleas, [and] [&] Ticks [and Mosquitoes] for up to [4 weeks] [1 month]!]

[All Others]

[Fipronil (9.8%) + Etofenprox (15.0%)]

[[Brand Name] [This product] is a [registered] trademark of [Sergeant's®] [Company Name]]

[Only For [Small Dogs 4-22 lbs.] [Medium Dogs 23-44 lbs.] [Large Dogs 45-88 lbs.] [Extra Large Dogs 89-132 lbs.] [&][and] 13 weeks of age or older.

89-132 lbs.][&][and] 13 weeks of age or older.

[[Small [S] 4-22 lbs.] [Medium [M] 23-44 lbs.] [Large [L] 45-88 lbs.] [Extra Large [XL] 89-132 lbs.] [&] [and] 13 weeks of age or older.

[Fast Acting, starts killing within 30 minutes, 48 hours after application]

[Long Lasting, Effective for [1 month] [30 days] [4 weeks]]

[Convenient spot treatment]

[Easy to Use [Application]]

[Best if used year-round!]

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

[(ICON Showing 4 Week Protection)]

[Apply monthly]

[Prevents infestation of fleas, ticks, and chewing lice for [1 month][4 weeks]]

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

[4 Week Dose!] [1 Month Dose!] [30 Day Dose!]

[One Month Application] [Two Month Applications] [Three Month Applications] [Four Month

Applications][Five Month Applications] [Six Month Applications][Twelve Month Applications][Twenty-Four Month Applications] {and/or}

[1 Month Supply][2 Month Supply][3 Month Supply][4 Month Supply][5 Month Supply][6 Month

Supply][12 Month Supply][24 Month Supply] or [4 Week Supply][8 Week Supply][12 Week Supply][16

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Week Supply][Twenty Week Supply][24 Week Supply][48 Week Supply][52 Week Supply][104 Week

Supply]

[Aids in control of mites that may cause sarcoptic mange]

[Waterproof]

[Effective after bathing and exposure to water and sunlight]

[[Free] Calendar Stickers Inside!]

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

[[1][2][3][4][5][6][12][24] Applications]

[Stops and prevents infestation of listed pests for [4 weeks][1 month]

[Stops existing infestation and prevents establishment of additional infestation of listed pests]

[Direct to skin [tube][vial]]

[Easy to Use] [tube][vial]]

[Clean cut [open] [tube][vial]]

[No-mess [open] [tube][vial]]

[Clip-tip design [tube][vial][!]]

[Satisfaction Guaranteed. If you are not satisfied, we will make it right with a replacement or refund][If you are not satisfied, we will make it right with a replacement or refund.]

[Double-Action Formula - Contains fipronil and etofenprox]

{note to reviewer: X&Y is based on the number of tubes/vials or %. When additional [tube][vial] is provided, the extra tube or vial will not cover or distract consumer from required text}

[Save Now!] [Better Value] [Value Size] [Bonus Pack]

[Club Size] [Buy more and save!] [Bonus Size] [(x) Dose(s) Free!] [Club Pack] [(x) Day(s) (Free)!][Great Value] [(x) Month(s) Free!] [Buy X Get Y Free] [(x) + (x)bonus pack!] [Buy 3 get 1 free] [(x) Tube(s) Free!] [(x)% (More) (Free)!][(x) Application(s) Free!] [33% more free] [(x) tube [vial] (s) Free!]

[(x) Day(s) of treatment- Free!]