



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 11, 2025

Noelle Sanfilippo
Regulatory Affairs Specialist
Wellmark International
1501 East Woodfield Road, 200W
Schaumburg, Illinois 60173

Subject: Label Amendment - Registration Review Mitigation for Etofenprox
Product Name: RF2170 A/T COMBO FOR CATS
EPA Registration Number: 2724-813
Application Date: May 6, 2024
Decision Number: 595769

Dear Noelle Sanfilippo:

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.

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 Koger by phone at (202)-566-2288 or via email at koger.demariah@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Linda Arrington', with a stylized flourish at the end.

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

ENCLOSURE: Stamped label

Text within braces { } denotes notes to reviewer.
Text within brackets [] denotes optional language.
Text within parentheses () is meant to be included on the label
Text within carets < > is not optional, but is replaceable

| | | | |
|-------------|-------|----|-------------|
| ETOFPENPROX | GROUP | 3A | INSECTICIDE |
|-------------|-------|----|-------------|

RF2170 A/T COMBO for CATS

{Include “Cat” in product name and Text for "Cat" must be 75% the height of largest letter in primary Brand Name}

{A large, clear picture of a cat in the weight range for the product as packages will appear on the front panel of the label.}

{Front Panel }- For Use Only on Cats and Kittens [5 lbs. and over] [over 2.5 lbs but under 5 lbs] & 12 weeks of age or older

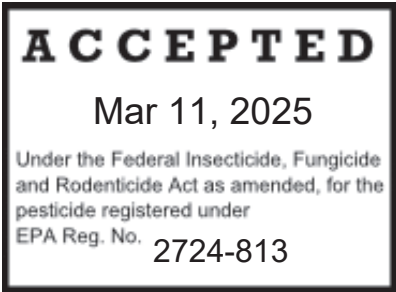
| | |
|---------------------------------|--------|
| {FRONT PANEL} | |
| ACTIVE INGREDIENTS: | |
| (S)-Methoprene | 3.6% |
| Etofenprox) | 40.0% |
| OTHER INGREDIENTS: | 56.4% |
| Total | 100.0% |

KEEP OUT OF REACH OF CHILDREN
See back panel for First Aid and additional Precautionary Statements

EPA Reg. No. 2724-813
EPA Est. No.

Net Contents:
1, 3 or 6x [0.034 fl oz (1 mL)] [tubes][vials][cartridges] Cats/Kittens over 2.5 lbs and under 5 lbs) and 12 weeks of age or older/{or}
1, 3 or 6x [0.061 fl oz (1.8 mL)].[tubes][vials][cartridges] (Cats/Kittens 5 lbs and over) and 12 weeks of age or older

Lot Number



{SUBLABEL A – APPLICATOR DEVICE PACKAGE}

{BACK PANEL}

{References to [tube][vial] or [cartridge] will be consistent in the printed label}

{1.} DIRECTIONS FOR USE WITH APPLICATOR

READ ENTIRE LABEL BEFORE USE

USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]

[formulated for cats [& kittens]][For use on cats only][Do not use on animals other than cats or kittens]

INTRODUCTION:

A unique, convenient applicator for you.

The [RF2170 AT Combo for Cats] Applicator is specially designed to make applying flea and deer tick control easier, more

precise -- and neater - than ever before. You simply insert the appropriate [brand] [tube] [vial][cartridge] for your cat/kitten into the applicator, close it and squeeze to apply. The applicator's ergonomic, contoured shape [design] makes it easy to grip and a built-in fin [tip] [comb] helps to spread [part] the [your] cat's/kitten's hair to allow the liquid to more readily [better] reach [apply] the [to] [your cat's/kitten's] skin. The [tube] [vial] [cartridge] is sealed inside, so you can be confident that the liquid goes onto your cat/kitten - and not your hand.

<RF2170 A/T Combo for Cats> is a topically applied [flea and deer tick treatment] product specifically formulated for cats and kittens with [containing] [it also contains] an insect growth regulator (IGR)[S-Methoprene][*InfestStop™] [to prevent and control flea infestations on cats][to kill fleas before they hatch][which prevents flea eggs from maturing into biting adults]. It [This product] also contains the flea, deer tick, and mosquito killing agent [Etofenprox], which kills biting adult fleas, deer ticks, and mosquitoes your cat/kitten may acquire from its surroundings. A single application of <RF2170 A/T Combo for Cats > will provide flea egg hatch inhibition for up to 30 days [1 month][4 weeks]. Each package contains enough product for [1][3][6] monthly applications ([30][90][180] days of protection [control]). <RF2170 A/T Combo for Cats > provides relief from flea infestations for up to 1 month [4 weeks][30 days] by killing adult fleas and flea eggs. Adult fleas can live on your cat while producing vast numbers of eggs, which drop off your cat and develop in the surrounding environment. <RF2170 A/T Combo for Cats > [is designed to] kill(s) adult fleas and flea eggs, breaking the flea life cycle and providing your cat/kitten relief from flea bites at the same time.

*(S)-Methoprene

After application, your cat's/kitten's [ordinary] [innate] skin oils [disperse] carry <RF2170 A/T Combo for Cats > over your cat's/kitten's body for protection against biting adult fleas and the development of flea eggs. [(This product) may stain leather and suede fabrics for (24)(24 to 48) hours after application.] Once adult fleas are evident on your cat/kitten, there is likely an infestation of flea eggs and flea larvae in your home. To completely kill the existing flea population, you may need to treat your home and your cat's bedding (home sprays, foggers), as well as your yard (yard spray/outdoor fogger) with traditional flea products approved for use on pets, around the home, or in your yard. <RF2170 A/T Combo for Cats > can be used in conjunction with other [Brand Name] premise products. As with all flea products, [they are] [<RF2170 A/T Combo for Cats is>] most effective when used as part of a total program aimed at reducing all stages of fleas in the cat's/kitten's environment. [Brand Name – Adams, Adams Plus] products [They] are designed to complement each other in an integrated program for flea, deer tick, and mosquito management. To assure proper treatment, we recommend use of [Brand Name Adams, Adams Plus] products as directed to treat all pets in the household, as well as the indoor and outdoor home environments.]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. [If you choose to apply treatment directly to cat without using the applicator device, read and follow the Directions For Use for Direct Application to Cat on this package.]

This product contains [1][3][6] monthly dosages [one monthly dose], each [1 [0.034 fl oz] 1.8 ml [cc] [0.061 fl oz]].

USE RESTRICTIONS:

For indoor use only. Application of product on pets must only be done indoors. Do not apply more than once every month. Do not use more than one [tube][vial][cartridge] per cat. Do not use more than one [tube][vial][cartridge] on cats over 20 lbs. Do not use on kittens less than 12 weeks old. Do not get this product in your cat's eyes or mouth. Do not allow your cat to ingest this product. Do not apply to cats weighing less than [2.5 lbs][5 lbs.]. In multiple cat households, do not allow the cats to groom each other until the product has dried. Do not allow children to apply this product. Do not spread <RF2170 A/T COMBO for Cats > by hand over the cat/kitten. Do not bathe the cat/kitten within the first 24 hours after Spot On® [squeeze on] has been applied.

<RF2170 A/T COMBO for Cats > works by application directly to the cat's/kitten's skin, not to the hair. When applying, use applicator device tip to push aside cat's/kitten's hair to allow direct application to the skin.

{(Note: Application now assumes one [tube][vial] [cartridge] per cat per application)}

<The RF2170 A/T COMBO for Cats > provides a unique applicator device that allows cat/kitten owners to treat

their cats/kittens more securely, and dispose of liquid cartridges [tubes][vials] with less mess.

[Note: Each package contains sufficient [tubes][vials][cartridges] for [1][3][6] applications]

[1 mL [0.034 fl oz] dose for use on cats and kittens over 2.5 lbs and under 5 lbs only and 12 weeks of age or older.

1.8 mL [0.061 fl oz] dose for use on cats and kittens 5 lbs. and over only and 12 weeks of age or older. {Same size applicators with different fill amounts}

To apply the <RF2170 A/T COMBO for Cats > treatment, use one disposable liquid [tube][vial][cartridge] [for each application] with the applicator device. Do not use more than one [tube][vial][cartridge] per cat.

1. OPEN [icon]

Use finger scoop to lift open [color] door [of applicator device].

2. LOAD [icon]

[To Load, place [tube][cartridge] [vial] white side up [under the [color] tabs] into the applicator] [with [tip end][front] of [tube][vial][cartridge] placed under tab on door] [Tip end of [tube][vial] [cartridge] must fit under the [U-shaped] [notch][tab] in the [color] [lid] [door]]. [Ensure that [tube][vial][cartridge] fits securely in the applicator.]

3. CLOSE [icon]

[Gently] close the [color, e.g. green] door of the applicator [and] the [tube][vial][cartridge] will snap open.

4. APPLY [icon]

The cat/kitten should be dry and standing for easy application.

[To apply, use tip to part hair and get next to cat's/kitten's skin at the base of the skull. Press [shape e.g. square] [thumb pad][button] on [color] door of applicator and squeeze out the entire contents of the applicator [tube][vial] [cartridge] onto the cat's/kitten's skin.]

-OR-

[To **APPLY** Use front edge of applicator to part fur and get next to cat's/kitten's skin at one spot at the base of the skull. Press [shape e.g. square] [button] on applicator door. Repeat until [tube][vial][cartridge] is empty.]

-OR-

[To **APPLY** Use tip to part fur and get next to cat's/kitten's skin. **Press** [shape e.g. square] [button] on applicator door [3 times to empty [tube][vial][cartridge]] at one spot at the base of the skull.]

Households with more than one cat/kitten should prevent cats/kittens from grooming each other until solution has dried. [Although the cat's/kitten's skin and hair oils will [over time] distribute the application over the entire cat/kitten, brushing the cat/kitten 12-24 hours after treatment will help to distribute the material over the skin.]

5. DISPOSE [icon]

To dispose of empty [tube][vial][cartridge], open [color, e.g. green] applicator door and drop [empty] [tube][vial][cartridge] into trash or offer for recycling if available. Close applicator device door and [return applicator to package until next use][store in original package.]

6. RETREAT AFTER [30 DAYS] [4 weeks][1 month]

Do not reapply product for 30 days. Do not treat more than once per month.

{Note: Each package contains sufficient [tubes]/[vials][cartridges] for [1][3][6] applications}

<RF2170 A/T COMBO for Cats > is most effective when used as part of a total flea and deer tick management program. Use other [Brand Name -Adams, Adams Plus] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for control and prevention of fleas.[The successive feeding activity of fleas on cats may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of cats with <RF2170 A/T COMBO for Cats > kills fleas that may cause this condition. .]

[TREATMENT SCHEDULE

Dosage: Use only 1 applicator every [30 days][4 weeks][1 month] per cat/kitten

| Cat's/Kitten's Name | First Treatment Date | Second Treatment Date (30 Days From 1 st) | Third Treatment Date (30 Days From 2nd) |
|---------------------|----------------------|--|--|
| | | | |
| | | | |

NOTES:

REMINDER: I purchased [Brand Name – Adams, Adams Plus]
from []

{Treatment table can be expanded based on package size, but will not exceed 6 months.}

STORAGE AND DISPOSAL: **Storage:** Store in a cool, dry (preferably locked) area away from children and animals. Do not store unused applicator [tubes][vials]cartridges separately from their packaging. **Pesticide Disposal and Container Handling:** **If empty:** Do not reuse empty [tube][vial]cartridge]. Place in trash or 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.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARDS TO HUMANS: Repeated exposure to etofenprox can cause skin irritation. 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 Cats Only. **Do not use on kittens weighing less than [2.5] [5] pounds. Do not use on kittens less than 12 weeks old.** Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing cats. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated cats. Sensitivities may occur after using ANY pesticide product for cats. If signs of sensitivity occur, bathe your cat with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Due to the bitter taste of the product, oral exposure could result in salivation. Be careful not to get any product in the cat's mouth during application. For multiple cat households, prevent the cats from grooming each other until the product has dried. If the salivation continues or other clinical signs are noted, please call 1- 800-234-2269.

{This box will appear in lower right hand corner of back panel.}

SIDE EFFECTS: Monitor your cat after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or [brand name] at 1- 800-234-2269

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1- 800-234-2269 or contact your veterinarian if your cat/kitten is experiencing an adverse event.

To learn more about treating current infestations and preventing future outbreaks, please, visit our website: [www.adamspetcare.com]

[For more information, call our experts at 1- 800-234-2269 (weekdays, 9am – 5 pm EST)]

To learn more, visit [www.adamspetcare.com]

For product use information, call 800-234-2269r] or visit our Web site: [www.adamspetcare.com]

InfestStop is a trademark of Farnam Companies inc.

Wellmark International
1501 East Woodfield Road 200W
Schaumburg, IL 60173
Made in USA

{TEXT FOR LIQUID TUBE / CARTRIDGE / VIAL}

<Product name>

Etofenprox 40%, (S)-Methoprene 3.6%

KEEP OUT OF REACH OF CHILDREN

READ ENTIRE DIRECTIONS BEFORE EACH USE

EPA Reg. No. 2724-813

Net Contents [0.034 fl oz (1 mL)] [tubes][vials][cartridges] or [0.061 fl oz (1.8 mL)].[tubes][vials][cartridges]

Lot Number

For External Use Only on Cats/Kittens [5 lbs. and over] [over 2.5 lbs but under 5 lbs] & 12 weeks of age or older

{BACK PANEL}

Directions for Use/Icons

To apply the treatment, use applicator device with ONLY ONE liquid tube per application / per cat

Use finger scoop to lift **OPEN** pink door



To **LOAD** place tube WHITE side UP into applicator with tip end of tube placed under tab on door



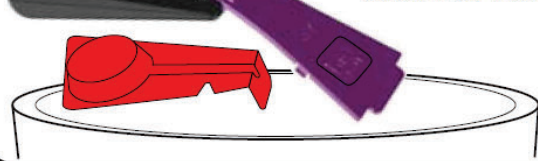
Gently **CLOSE** door the tube will snap open.

To **APPLY** Use tip to part fur and get next to cat's skin.



Press square on door at one spot between shoulders

To **DISPOSE** of empty tube open door and drop tube into trash



{2.} DIRECTIONS FOR USE FOR DIRECT APPLICATION TO CAT

READ ENTIRE LABEL BEFORE USE**USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]**

[formulated for cats [& kittens]][For use on cats only][Do not use on animals other than cats or kittens]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

This product contains [1][3][6] monthly dosages [one monthly dose], each [1 mL [0.034 fl oz]] {or} [1.8 mL [0.061 fl oz]].

USE RESTRICTIONS:

For indoor use only. Application of product on pets must only be done indoors. Do not apply more than once every month. Do not use more than one [tube][vial][cartridge] per cat. Do not use more than one [tube][vial][cartridge] on cats over 20 lbs. Do not use on kittens less than 12 weeks old. Do not get this product in your cat's eyes or mouth. Do not allow your cat to ingest this product. Do not apply to cats weighing less than [2.5 lbs.][5 lbs.] In multiple cat households, do not allow the cats to groom each other until the product has dried. Do not allow children to apply this product. Do not spread <RF2170 A/T COMBO> by hand over the cat/kitten. Do not bathe the cat/kitten within the first 24 hours after Spot On® [squeeze on] has been applied.

<RF2170 A/T COMBO for Cats> works by application directly to the cat's/kitten's skin, not to the hair. {Note: Application now assumes one [tube][vial] [cartridge] per cat per application}

[APPLICATION METHOD]

1. **OPEN** [icon]: [Remove one [tube][vial][cartridge] from the package and hold in an upright position (pointed away from your face).] [Bend at perforation and tear off 1st month's [tube][vial][cartridge].] [Hold [tube][vial][cartridge] upright] and snap tip back, away from face and body.
2. **APPLY** [icon]: The cat/kitten should be dry and standing for easy application. Use tip of [tube][vial] [cartridge] prior to application of the product, to gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the tip of the [tube][vial] [cartridge] on the cat's exposed skin and squeeze out the [entire] contents of the [tube][vial] [cartridge] onto the cat's skin.

Households with more than one cat should prevent cats from grooming each other until solution has dried. [Although the cat's/kitten's skin and hair oils will [over time] distribute the application over the entire cat/kitten, brushing the cat/kitten 12-24 hours after treatment will help to distribute the material over the skin.]

3. **DISPOSE** [icon]: To dispose of empty [tube][vial][cartridge], drop [empty] [tube] [vial][cartridge] into trash or offer for recycling if available.
4. **RETREAT**: Repeat application once [monthly][every 30 days][every 4 weeks].

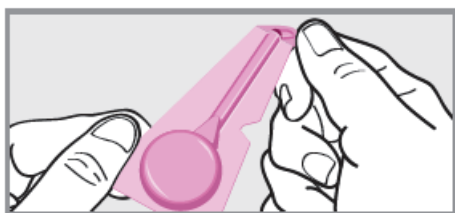
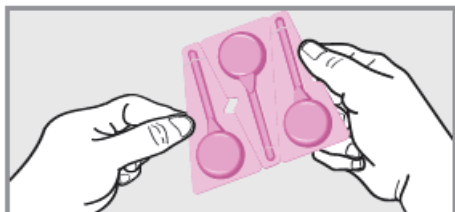
{Note: Each package contains sufficient cartridges/tubes/vials for [1][3][4][6] applications [1 ml [cc] [0.034 fl oz] dose for use on cats and kittens over 2.5 lbs and under 5 lbs only and 12 weeks of age or older. }

1.8 ml [cc] [0.061 fl oz] dose for use on cats and kittens 5 lbs. and over only and 12 weeks of age or older.} {Same size applicators with different fill amounts}

<RF2170 A/T COMBO for Cats> is most effective when used as part of a total flea and deer tick management program. Use other [Brand Name – Adams, Adams Plus] products registered for

residential area control of these pests in conjunction with this treatment. Monthly treatments are required for control and prevention of fleas.[The successive feeding activity of fleas on cats may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of cats with <RF2170 A/T COMBO> kills fleas that may cause this condition.]

OPTIONAL GRAPHICS



[TREATMENT SCHEDULE

Dosage: Use only 1 applicator every [30 days][4 weeks][1 month] per cat/kitten

| Cat's/Kitten's Name | First Treatment Date | Second Treatment Date ([30 Days][4 weeks][1 month] From 1 st) | Third Treatment Date ([30 Days][4 weeks][1 month] From 2 nd) |
|---------------------|----------------------|--|---|
| | | | |
| | | | |
| | | | |

NOTES: _____

REMINDER: I purchased [Brand Name] from _____

{Treatment table can be expanded based on package size, but will not exceed 6 months.}

{SUBLABEL B FOR REFILL PACKAGE }

{For use with applicator device or direct application to cat without applicator device}

| | | | |
|-------------------|--------------|-----------|--------------------|
| ETOFENPROX | GROUP | 3A | INSECTICIDE |
|-------------------|--------------|-----------|--------------------|

{Front Panel}

RF2170 A/T Combo for Cats {Text for "Cat" must be 75% the height of largest letter in primary Brand Name}

{A large, clear picture of a cat in the weight range for the product as packages will appear on the front panel of the label.}

For Use Only on Cats and Kittens [5 lbs. and over] [over 2.5 lbs but under 5 lbs] & 12 weeks of age or older

[Flea & Deer Tick] [Treatment] [and] [Control]

ACTIVE INGREDIENTS:

(S)-Methoprene (CAS # 65733-16-6).....3.6%

Etofenprox (CAS # 80844-07-1).....40.0%

OTHER INGREDIENTS:56.4%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

See back panel for First Aid and additional Precautionary Statements

EPA Reg. No. 2724-813

EPA Est. No.

Net Contents:

1, 3 or 6x [0.034 fl oz (1 mL)] [tubes][vials][cartridges] Cats/Kittens over 2.5 lbs and under 5 lbs) and 12 weeks of age or older/{or}

1, 3 or 6x [0.061 fl oz (1.8 mL)].[tubes][vials][cartridges] (Cats/Kittens 5 lbs and over) and 12 weeks of age or older

Lot No.

{Back Panel}

READ ENTIRE LABEL BEFORE USE

USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]

[formulated for cats [& kittens]][For external use on cats only][Do not use on animals other than cats and kittens]

INTRODUCTION:

A unique, convenient applicator for you.

The RF2170 A/T Combo for Cats Applicator is specially designed to make applying flea and deer tick control easier, more

precise -- and neater - than ever before. You simply insert the appropriate [brand] [tube] [vial][cartridge] for your cat/kitten into the applicator, close it and squeeze to apply. The applicator's ergonomic, contoured shape [design] makes it easy to grip and a built-in fin [tip] [comb] helps to spread [part] the [your] cat's/kitten's hair to allow the liquid to more readily [better] reach [apply] the [to] [your cat's/kitten's] skin. The [tube] [vial] [cartridge] is sealed inside, so you can be confident that the liquid goes onto your cat/kitten - and not your hand.

<RF2170 A/T Combo> is a topically applied [flea and deer tick treatment] product specifically formulated for cats and kittens with [containing] [it also contains] an insect growth regulator (IGR)[S-Methoprene][*InfestStop™][to prevent and control flea infestations][to kill fleas before they hatch][which prevents flea eggs from maturing into biting adults]. It [This product] also contains the flea, deer tick, and mosquito killing agent [Etofenprox], which kills biting adult fleas, deer ticks, and mosquitoes your cat/kitten may acquire from its surroundings. A single application of <RF2170 A/T Combo for Cats> will provide flea egg hatch inhibition for up to 30 days [1 month][4 weeks]. Each package contains enough product for [1][3][6] monthly applications ([30][90][180] days of protection [control]). <RF2170 A/T Combo for Cats > provides relief from flea infestations for up to 1 month [4 weeks][30 days] by killing adult fleas and flea eggs. Adult fleas can live on your cat while producing vast numbers of eggs, which drop off your cat and develop in the surrounding environment. <RF2170 A/T Combo for Cats > [is designed to] kill(s) adult fleas and flea eggs, breaking the flea life cycle and providing your cat/kitten relief from flea bites at the same time.

*(S)-Methoprene)

After application, your cat's/kitten's [ordinary] [innate skin oils [disperse] carry <RF2170 A/T Combo for Cats > over your cat's/kitten's body for protection against biting adult fleas and the development of flea eggs. [(This product) may stain leather and suede fabrics for (24)(24 to 48) hours after application.] Once adult fleas are evident on your cat/kitten, there is likely an infestation of flea eggs and flea larvae in your home. To completely kill the existing flea population, you may need to treat your home and your cat's bedding (home sprays, foggers), as well as your yard (yard spray/outdoor fogger) with traditional flea products approved for use on pets, around the home, or in your yard. <RF2170 A/T Combo for Cats > can be used in conjunction with other [Brand Name – Adams, Adams Plus] premise products. As with all flea products, [they are] [<RF2170 A/T Combo for Cats > is] most effective when used as part of a total program aimed at reducing all stages of fleas in the cat's/kitten's environment. [Brand Name] products [They] are designed to complement each other in an integrated program for flea, deer tick, and mosquito management. To assure proper treatment, we recommend use of [Brand Name] products as directed to treat all pets in the household, as well as the indoor and outdoor home environments.]

{Note: full Directions for Use to be used if space allows}

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

{1.} DIRECTIONS FOR USE WITH APPLICATOR

[To apply the <RF2170 A/T Combo for Cats> treatment with the {Brand Name} applicator, use one disposable liquid [cartridge][tube][vial][for each application] with the applicator device.]

[Remove one refill [cartridge][tube][vial] from the package and insert into opened [Brand Name] applicator device. Make application according to label directions supplied with the [Brand Name] applicator device.] If you need directions for application, please call 1-800-234-2269.

[If you choose to apply directly to cat without using the applicator device, read and follow the Directions For Use for Direct Application to Cat on this package.]

{2.} DIRECTIONS FOR USE FOR DIRECT APPLICATION TO CAT

READ ENTIRE LABEL BEFORE USE

USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]

[formulated for cats [& kittens] only][For use on cats only][Do not use on animals other than cats and kittens]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

This product contains [1][3][6] monthly dosages [one monthly dose], each [1 mL [0.034 fl oz]] {or} [1.8 mL [0.061 fl oz]].

USE RESTRICTIONS:

For indoor use only. Application of product on pets must only be done indoors. Do not apply more than once every month. Do not use more than one [tube][vial][cartridge] per cat. Do not use more than one [tube][vial][cartridge] on cats over 20 lbs. Do not use on kittens less than 12 weeks old. Do not get this product in your cat's eyes or mouth. Do not allow your cat to ingest this product. Do not apply to cats weighing less than [2.5 lbs] [5 lbs].. In multiple cat households, do not allow the cats to groom each other until the product has dried. Do not allow children to apply this product. Do not spread <RF2170 A/T COMBO for Cats> by hand over the cat/kitten. Do not bathe the cat/kitten within the first 24 hours after Spot On® [squeeze on] has been applied.

<RF2170 A/T COMBO for Cats> works by application directly to the cat's/kitten's skin, not to the hair. {Note: Application now assumes one tube[vial] [cartridge] per cat per application}

[APPLICATION METHOD]

1. **OPEN** [icon]: [Remove one [tube][vial][cartridge] from the package and hold in an upright position (pointed away from your face).] [Bend at perforation and tear off 1st month's[tube][vial]cartridge].] [Hold the [tube][vial]cartridge upright] and snap tip back, away from face and body.
2. **APPLY** [icon]: The cat/kitten should be dry and standing for easy application. Use tip of [tube][vial] [cartridge] prior to application of the product, to gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the tip of the [tube][vial] [cartridge] on the cat's exposed skin and squeeze out the [entire] contents of the [tube][vial] [cartridge] onto the cat's skin.

Households with more than one cat should prevent cats from grooming each other until solution has dried. [Although the cat's/kitten's skin and hair oils will [over time] distribute the application over the

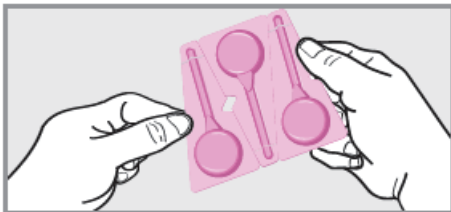
entire cat/kitten, brushing the cat/kitten 12-24 hours after treatment will help to distribute the material over the skin.]

3. **DISPOSE** [icon]: To dispose of empty [tube][vial][cartridge], drop [empty] [tube] [vial][cartridge] into trash or offer for recycling if available.
4. **RETREAT**: Repeat application once [monthly][every 4 weeks][every 30 days].

{Note: Each package contains sufficient cartridges/tubes/vials for [1][3][6] applications}
{[1 mL [0.034 fl oz] dose for use on cats and kittens over 2.5 lbs and under 5 lbs only and 12 weeks of age or older.
1.8 mL [0.061 fl oz] dose for use on cats and kittens 5 lbs. and over only and 12 weeks of age or older.} {Same size applicators with different fill amounts}}

<RF2170 A/T COMBO for Cats> is most effective when used as part of a total flea and deer tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for control and prevention of fleas.[The successive feeding activity of fleas on cats may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of cats with <RF2170 A/T COMBO for Cats> kills fleas that may cause this condition .]

{OPTIONAL GRAPHICS}



[TREATMENT SCHEDULE

Dosage: Use only 1 applicator every [30 days][4 weeks][1 month] per cat/kitten

| Cat's/Kitten's Name | First Treatment Date | Second Treatment Date ([30 Days][4 weeks][1 month] From 1 st) | Third Treatment Date ([30 Days][4 weeks][1 month] From 2nd) |
|---------------------|----------------------|--|--|
| | | | |
| | | | |
| | | | |

NOTES: _____

REMINDER: I purchased [Brand Name] from _____]

{Treatment table can be expanded based on package size, but will not exceed 6 months.}

{Precautionary/First Aid and Storage/Disposal) text included as on Sub-label A}

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-234-2269 or contact your veterinarian if your cat/kitten is experiencing an adverse event.

To learn more about treating current infestations and preventing future outbreaks, please, visit our website: www.adamspetcare.com

[For more information, call our experts at 1-800-234-2269 (weekdays, 9am – 5 pm EST)]

To learn more, visit www.adamspetcare.com

For product use information, call 800-234-2269 or visit our Web site:www.adamspetcare.com

InfestStop is a trademark of Farnam Companies inc.

Wellmark International
1501 East Woodfield Road 200W
Schaumburg, IL 60173
Made in USA

{TEXT FOR LIQUID TUBE / CARTRIDGE / VIAL}

<Product name>

Etofenprox 40%, (S)-Methoprene 3.6%

KEEP OUT OF REACH OF CHILDREN

READ ENTIRE DIRECTIONS BEFORE EACH USE

EPA Reg. No. 2724-813

Net Contents [0.034 fl oz (1 mL)] [tubes][vials][cartridges] or [0.061 fl oz (1.8 mL)].[tubes][vials][cartridges]

Lot Number

For External Use Only on Cats/Kittens [5 lbs. and over] [over 2.5 lbs but under 5 lbs] & 12 weeks of age or older

{OPTIONAL MARKETING CLAIMS}

{General/Protection claims}

1 mL [0.034 fl oz] for cats [kittens] over 2.5 lbs and under 5 lbs and 12 weeks of age or older.; 1.8 mL [0.061 fl oz] for cats/kittens 5 lbs. and over and 12 weeks of age or older.

Do not use more than one [tube][vial][cartridge] per cat

For use only on cats/kittens [weighing] [over 2.5 lbs and under 5 lbs.][5 lbs. and over] and 12 weeks of age or older.

[Flea & deer tick] treatment for cats [& kittens]

Flea & Deer Tick [Protective] for cats [& kittens]

[formula for cats/kittens][flea prevention and treatment specially formulated for use only on cats and kittens [12 weeks of age and older]

Spot On® [Topical][Non-systemic] treatment for cats/kittens

Spreads [over time] with cat's movement (skin and hair oils)

Flea, Deer Tick, and Mosquito Treatment [Control][Prevention][Relief] for Cats & Kittens

5 in 1 Control [Protection][Treatment] (Fleas, Flea Eggs, flea larvae, Deer Ticks, and Mosquitoes)

)

[1 month][monthly][1][30 day] protection from [fleas, deer ticks, & flea eggs]

[Monthly] [4 week][30 day] treatment for [fleas, flea eggs, & deer ticks]

Flea [and deer tick][and mosquito] control for your cat/kitten

A smart approach to flea control

[Brand] Provides a [smart] approach to flea, deer tick, and mosquito control

Keeps fleas, deer ticks, and mosquitoes under control

Spot On® [Plus] Insect Control [Treatment and Prevention]

A flea control program

Controls flea, deer tick, and mosquito problems on your cat/kitten

Protection from Fleas, deer ticks, and mosquitoes

Provide your cat/kitten with protection from fleas, deer ticks, and mosquitoes

Direct on-animal protection from fleas, deer ticks, and mosquitoes

Provides relief [protection] from fleas, deer ticks, and mosquitoes

Once-a-month [topical][Spot On®] protection from fleas and deer ticks

[Reapply monthly] [Suitable for year-round use][Month] sticker for home calendar

Monthly application for most effective protection

When it comes to fleas and deer ticks, there's no room for compromise [Brand Name]

[Satisfaction guaranteed or your money back]

[money back guarantee]

[Applicator]

Kills/Repels/Controls Claims

[Actively] Kills [Controls] [adult] fleas, deer ticks, [flea larvae], and flea eggs for [up to][30 days]
[4 weeks][1 month][per application]
[Actively] Kills [fleas][deer ticks][flea eggs][larvae][&][and][mosquitoes][by contact]
[Protects for up to [30 days][Four/4] Weeks][One month][Four/4 Week [Flea] [Deer Tick][Mosquito]
Treatment]
[1 month][monthly][30 days][4 weeks]protection [from fleas, deer ticks, & flea eggs]
Controls fleas, deer ticks, and mosquitoes & prevents flea reinfestations on cats
[Kills deer ticks] (for up to 1 month [4 weeks][30 days][1 month]) [per application]
Starts killing fleas within 15 minutes
Starts working on contact
[Kills adult fleas, deer ticks, mosquitoes, flea eggs and flea larvae] [Dual protection (against fleas
and deer ticks)]
[Dual Action kills adult fleas and prevents flea development]
Kills [and/or Repels] mosquitoes [by contact]
[Kills Fleas and Deer Ticks by Contact]
controls fleas, deer ticks, and mosquitoes
Controls fleas, deer ticks, and mosquitoes & prevents flea reinfestations
[Kills deer ticks] (for up to 1 month [4 weeks][30 days]) [per application]
Protects your [cat][kitten] from fleas, deer ticks, and mosquitoes (which may transmit heartworm)
Kills [Controls] deer ticks that may transmit [Lyme disease][and Cytauxzoonosis] for up to
[1 month][4 weeks] [30 days]
Protect your [cat/kitten] from [against] deer ticks that may transmit Lyme disease
Kills [and repels] mosquitoes that may transmit heartworm
Prevents mosquitoes from feeding on cats
Kills fleas that may cause flea allergy dermatitis, flea bite anemia, and tapeworm infestation
Preventative treatment for fleas that may cause flea allergy dermatitis, flea bite anemia, and
tapeworm infestation
Controls fleas, deer ticks, and mosquitoes that cause highly irritating [insect] bites

[All text below represents one label statement with any selected line]

[Protect your family and cat/kitten from:]

[When your cat has fleas and deer ticks, your family and cat/kitten may be exposed to:]

Fleas that may cause:

Flea allergy dermatitis

Tapeworm infestation

IGR /Flea egg/life cycle Claims:

[Plus][Contains][With] PRECOR® [vIGRen®][S-Methoprene][*InfestStop™], the first insect growth
regulator for flea control

Contains [Features][*InfestStop™] an Insect Growth Regulator (IGR) to inhibit the development of
flea eggs

Flea control for cats with [PRECOR®][vIGRen®] [*InfestStop™] Insect Growth Regulator (IGR)
[(S)-Methoprene][*InfestStop™] Insect Growth Regulator (IGR) interrupts the development of the
flea life cycle [at the egg stage]

[(S)-Methoprene][*InfestStop™] Insect Growth Regulator (IGR) prevents the development of flea
eggs into adult fleas and [inhibits the development of flea eggs into adult fleas]

Controlling flea reproduction is the first step in controlling flea populations on your cat/kitten

[(S)-Methoprene][*InfestStop™] Insect Growth Regulator (IGR) prevents flea reinfestation on your
cat/kitten

Flea treatment and preventative with an [insecticide] adulticide and [*InfestStop™] Insect Growth
Regulator (IGR)

[With [S-Methoprene][*InfestStop™] Insect Growth Regulator [IGR] to Break Flea Life Cycle]

Controls[Kills][Lasts][Works][Protects] flea infestations for up to [1 month][4 weeks]
 [Contains [*InfestStop™] an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [1 month][30 days][4 weeks]
 [Controls flea reinfestation for [1 month][30 days][4 weeks]
 Breaks the flea life cycle for [up to] [1 month][4 weeks][30 days]
 Kills [Controls] flea eggs for up to [30 days][1 month][4 weeks][per application]
 Kills flea eggs, the source of home flea infestations and cat/kitten re-infestations, for up to [30 days][1 month][4 weeks]
 [Kills][Prevents][Keeps] flea eggs from hatching for up to [30 days][1 month][4 weeks]
 Prevents flea eggs from developing into biting adults for up to [30 days][1 month][4 weeks][per application]
 An effective flea topical [A Spot On®] product that kills adult fleas and halts the development of flea eggs [immature stages in the flea life cycle]
 Prevents re-infestation on cats for up to [1 month][30 days][4 weeks]
 Controls existing fleas and flea eggs, plus [and][prevents] future flea infestations
 Interrupts normal flea development [Stops the flea life cycle]
 Interrupts the flea life cycle
 Kills [flea] eggs before they hatch into biting adults
 Kills hatching [developing] flea eggs
 One-two punch controls fleas and flea eggs
 Plus kills flea eggs and larvae to prevent future infestations on cats
***(S)-Methoprene {Must occur on same panel wherever InfestStop™ is used}**

Prevention Claims

Preventing fleas and deer ticks from infesting your cat/kitten is much easier than treating an existing problem
 Flea prevention has never been easier
 Prevents flea, deer tick, and mosquito infestations on cats
 Prevents flea recurrence on cats
 Control flea infestations on cats by preventing them
 Flea prevention on cats is the best flea control strategy
 A quick and sure way to avert a flea problem is to [prevent it] use a preventative
 It is far easier to prevent fleas than to control them
 Flea control involves [requires] preventative measures [for your cat/kitten][and]
 [Year-round][Flea Treatment][Preventative]
 Use a flea preventative year-round (to prevent painful bites, itching and scratching, discomfort)

Application claims

[#] pack [# days'] [#] doses [1//3//6] months supply {# = 1, 3 or 6}
 One [tube][vial][cartridge] gives [1 month][4 weeks][30 days] of protection
 [Pre-measured][Convenient][and][&][No mess][easy][simple] to [use][handle][apply] disposable [tube][vial][cartridge]
 Convenient [and effective], once-a-month [liquid][topical][Spot On] solution
 Practical solution
 Simple choice [flea & deer tick control]
 A [One] simple application provides your cat/kitten with protection for up to [1 month]
 Apply to one spot for head to tail (total body) flea protection [control]
 Apply to 1 spot - spreads over the cat's/kitten's [entire] body [from head to tail] through [ordinary] [innate] [native] skin oils
 Spreads [over time] with cat's/kitten's [ordinary] [innate] skin oils
 [Plus] Contains a coat conditioner
 [Once][One] Monthly Application
 Easy to use [once] monthly application [liquid] prevents [and controls] fleas [& deer ticks]
 Reapply [Repeat] [once] monthly
 Repeat [treatment] every month

Monthly Control [Relief][treatment]

Applicator Claims

Unique shape [for cats & kittens 5 lbs and over] [for cats & kittens over 2.5 lbs and under 5 lbs] and 12 weeks of age or older.

[Exclusive][Pinpoint][Applicator] for [pinpoint][exact][direct][easy][direct to skin] application

For pinpoint accuracy

Helps provide accurate dosing

Provides just the right dose [in just the right place]{applicator facilitates putting dose on skin}

Direct to your cat's/kitten's skin

Easily penetrates hair

The [exclusive] [applicator] [easily penetrates hair][fur][coat] for [improved][direct] application [directly to your cat's/kitten's skin]

Easy to apply [identify][use] applicator

The right choice [applicator] for the right cat/kitten

Make [Select] the right choice applicator

Choice [selection] is simple

Easy choice

Simple choice delivery system

Easy to use applicator [provides direct on-animal protection]

EZ-squeeze [Easy squeeze] applicator

Contemporary design

[brand name] Applicator [helps to] prevent getting liquid on [your] hands

[brand name] Applicator tip parts hair to help [liquid][application] get down to [the][your][cat's/kitten's] skin

Ergonomically contoured [ergonomic][shape][design] for easy handling [ease of use] [easy use]

For use with [only][brand name][disposable][liquid dispensing] [tubes] [vials] [cartridges]

[brand name] [applicator][has][provides][allows for][delivers] better grip

[brand name][provides] re-closable [re-sealable] packaging for [easy] storage

Closing [the][brand name applicator] door automatically opens the [disposable][liquid dispensing] [tube] [vial][cartridge]

[Includes] unique [brand][applicator]

Puts the liquid on your cat/kitten - not your hands

Directs the liquid onto your cat/kitten - not your hands [away from your hands]

Applies liquid to your cat's/kitten's skin - not yours

A more confident, secure application

Convenient, easy to use ACCU-TIP [Applicator]

Will not drip after opening

[Easy to use] Longer applicator tip for easy application to long-haired cats

Longer applicator tip is ideal for long-haired cats/kittens

Thermoform claims

[disposable] [liquid dispensing] [tube] [cartridge][vial]

[brand name][disposable][liquid dispensing] [tube][vial][cartridge] tip [helps][to] spread out liquid [on your][cat/kitten]

Unique [cartridge] [tube][vial] with flow control

[no mess][application][tube][cartridge][vial]

Promotional Package Copy

One month free

One free month supply included

Bonus pack

Free [applicator device] [tube][vial][cartridge]][inside]

For use with [brand] applicator

Applicator [device] not included

[brand] Refill Pack [brand][applicator [device] not included]

Refill Claims

For use [only] with [brand name][Applicator]

[1][3][6] monthly treatments) [1][3][6] Months Supply
Easy to use [convenient] refills
[Can be used with][Use with][Brand Name] applicator
[Brand Name] applicator [Refills][Refill Pack]
Refill Pack [for][Brand Name] applicator
Refills [Refill Pack] available

Product Claims

Odorless
Effective Control [Relief][Prevention]
Starts working by contact
[Flea prevention] Helps stop itching and scratching [from flea bites]

Brand Claims

[Brand] protecting pets for over 30 years
We (Brand) put(s) your cat(s) first
Brand...putting [your cat] cats first
Smarter Pet Care
Perfect choice
Brand – caring & committed
Brand makes the choice simple