

10/29/2013

1/25



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 29, 2013

Ms. Ann M. Tillman, Ph.D.
Regulatory Agent for Tru Prodigy
c/o Plyxis Regulatory Consulting, Inc.
4110 136th Street NW
Cig Harbor, WA 98332-9122

**Subject: Label Notification(s); Pesticide Registration Notification (PRN) 98-10
VETGUARD FOR CATS, EPA Reg. No. 88966-1
Your Submission Dated September 20, 0213**

Dear Ms. Tillman:

The Agency is in receipt of your application for Pesticide Notification under Pesticide Registration Notification (PRN) 98-10 (New Alternate Brand Name), dated September 20, 2013, for the referenced product. The Registration Division has conducted a review of this request for its applicability under PRN 98-10, and finds that the action(s) requested fall within the scope of PRN 98-10.

Please be reminded that 40 CFR §156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label (and can be added by non-Notification/PRN 98-10) or durably marked on the container itself.

The label submitted with this application has been date-stamped "Notification," and will be placed within the administrative file for this product. If you have any questions, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Carmen Rodia", with a stylized flourish at the end.

Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

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United States
Environmental Protection Agency
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Tru Prodigy/88966-1	2. EPA Product Manager R. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tru Prodigy/VetGuard for Cats	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Tru Prodigy c/o Pyxis Regulatory Consulting 4110 136th St. NW Cig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: NOTIFICATION EPA Reg. No. Product Name OCT 29 2013	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Notification of alternate brand name per PRN 98-10. The alternate brand name is "PetLock for Cats". This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 0.017 oz.	No. per container 3	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 0.051 fl. oz.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other on box and on insert in box			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann M. Tillman	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ann M. Tillman	5. Date 9/20/13	

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PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

September 20, 2013

COURIER DELIVERY

Richard Gebken (PM 10)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

NOTIFICATION

OCT 29 2013

RE: Tru Prodigy
VetGuard for Cats (EPA Reg. No. 88966-1)
Submission of Alternate Brand Name per PRN 98-10

Dear Mr. Gebken,


On behalf of Tru Prodigy please find the enclosed notification of an alternate brand name for VetGuard for Cats. The alternate brand name, PetLock for Cats, is inserted in brackets under the primary brand name on the master label.

In support of this notification please find the enclosed documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the VetGuard for Cats label with the alternate brand name in brackets beneath the primary brand name
3. Certification with Respect to Label Integrity
4. One (1) copy of the VetGuard for Cats label on CD
5. Letter of Authorization

Please feel free to contact me by phone at (253) 853-7369 or by email at Ann@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

1. Package Insert
2. Carton (front, back, inside and side panels)
3. [Optional text for front or Optional text for back of cardboard insert if security packaging used]
4. Optional card with tips for use
5. Reminder Stickers
6. Text for back of blister
7. Text for back of pipette (applicator)

NOTIFICATION

OCT 29 2013

Note to reviewer: optional text is placed in brackets

1. Package Insert, Text

VETGUARD FOR CATS

[Alternate brand name: **PETLOCK FOR CATS** (logo below)]



For use **ONLY** on **CATS & KITTENS** 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:.....9.7%

INERT INGREDIENTS:.....90.3%

TOTAL:100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

[Optional marketing claims]

[Quick-acting]

[Long-lasting]

[Waterproof]

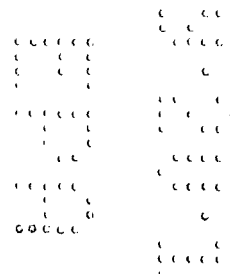
[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills adult fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*), and deer ticks (*Ixodes scapularis*)]

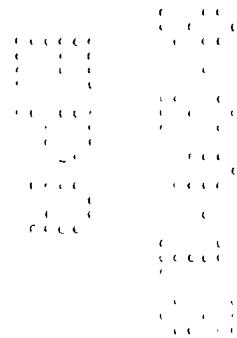


[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

[Kills adult mosquitoes]



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Package Insert, Text

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED: Immediately call a poison control center or doctor 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 treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARDS TO HUMANS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Have the product container label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-888-314-8588 for emergency medical treatment information.

HAZARDS TO DOMESTIC ANIMALS

For external use only on cats. Do not use on kittens under 8 weeks of age. Individual sensitivities, while rare, may occur after using **ANY** pesticide product. Pets may experience some temporary irritation 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 animals. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

Side Effects. After applying VetGuard for Cats, check your cat for side-effects such as redness from skin irritation, scratching or other signs of discomfort. In some cases, vomiting or diarrhea have been reported from grooming after treatment. If you observe these signs or symptoms in your treated cat, contact your veterinarian. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

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 PET, READ THE ENTIRE LABEL AND DIRECTIONS BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.

VetGuard for Cats is approved for use on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks.

VetGuard for Cats keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

Package Insert, Text

Frequency of Application

Monthly application of VetGuard for Cats controls flea, tick and chewing lice infestations. You can reapply VetGuard for Cats once every 30 days.

Fleas: VetGuard for Cats kills adult fleas for up to six weeks. If your cat becomes reinfested with fleas, or if your cat is in situations where reinfestation may occur, you may apply VetGuard for Cats every 30 days.

Ticks: VetGuard for Cats kills ticks for at least one month. Apply VetGuard for Cats every 30 days to control ticks (larva, nymph and adult) that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, and anaplasmosis.

Chewing Lice: VetGuard for Cats kills chewing lice for at least one month. Apply VetGuard for Cats every 30 days to control chewing lice.

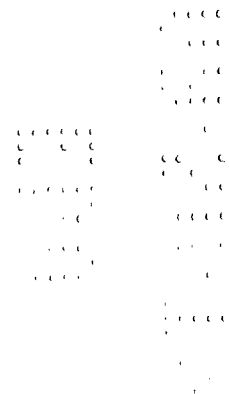
Mosquitoes: Apply VetGuard for Cats every 30 days to kill mosquitoes. Mosquitoes are killed within 24 hours for up to 7 days, and within 48 hours for up to 28 days.

Use VetGuard for Cats on all cats including breeding, pregnant and lactating queens, and on kittens 8 weeks or older.

A one-spot application is convenient and easy for effective treatment of fleas, ticks, chewing lice, and mosquitoes. Apply VetGuard for Cats when your cat is dry.

VetGuard for Cat is applied at a single point on the surface of the skin between the cat's shoulders and rapidly covers the entire cat by localizing in the hair, on the surface of the skin and in the sebaceous glands.

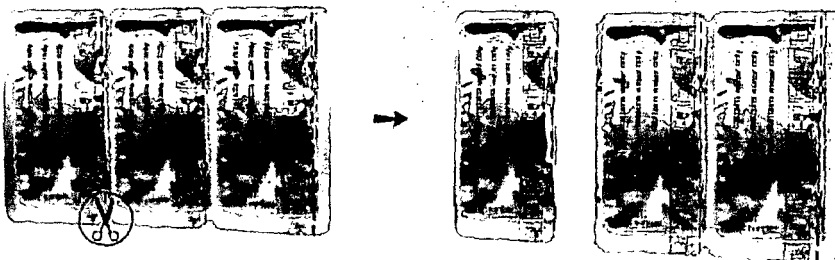
Soon after coming into contact with a treated cat, fleas, ticks, mosquitoes, and chewing lice are killed. To kill fleas, ticks, chewing lice and mosquitoes apply VetGuard for Cats as follows:



Package Insert, Text

Remove and Open Package

- 1 Cut along scissor cut line to separate unit



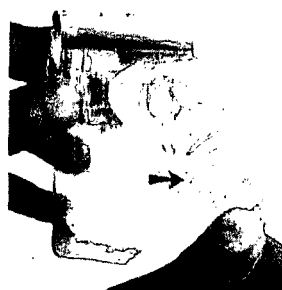
- 2 Turn unit over and cut corner at bulb end



- 3 From cut corner, peel backing completely off from bottom to top



- 4 Remove the applicator



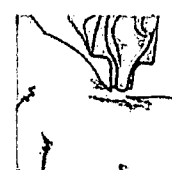
Package Insert, Text

Open Applicator

Hold upright with foil side away from you and snap applicator tip back to open.

Apply VetGuard for Cats

Find a spot between the cat's shoulder blades and part hair. Place the open end of the applicator just above the skin and squeeze. Apply the entire contents of the applicator in a single spot directly onto the cat's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.



PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE

Store unused product in original container only, out of reach of children and animals.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or 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.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire *Directions for Use, Conditions of Warranties and Limitations of Liability* before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Tru Prodigy. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Tru Prodigy makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Tru Prodigy, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages

Package Insert, Text

resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

EPA Reg. No.: 88966-1

[EPA Est. No.:]

Manufactured for:

Tru Prodigy
500 E. Shore Drive, Suite 130
Eagle, ID 83616

[Made in Germany]

[VetGuard for Cats is a registered trade name of Tru Prodigy]

[Optional Bar Code]

11/25

2. Carton Text – Front Panel

VETGUARD FOR CATS

[Alternate brand name: PETLOCK FOR CATS (logo below)]



For use ONLY on CATS & KITTENS 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:.....9.7%

INERT INGREDIENTS:.....90.3%

TOTAL:.....100.0%

Net Contents [3-pak] 0.051 fl. oz. (1.5 mL) (3 tubes containing 0.017 fl. oz. each)

[3 Doses]

KEEP OUT OF REACH OF CHILDREN

CAUTION

See label insert for First Aid and Precautionary Statements.

[Optional marketing claims]

[Quick-acting]

[Long-lasting]

[Waterproof]

[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)]

[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

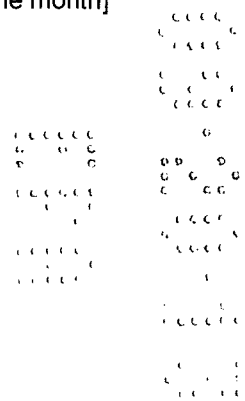
[Kills adult mosquitoes]

[Kills fleas, ticks, chewing lice and mosquitoes]

[3 Month Supply]

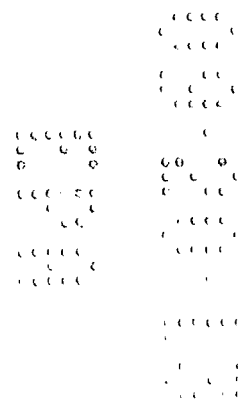
[3 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]





[Photo for Alternate Brand Name is below.]



2. Carton Text – Back Panel

VETGUARD FOR CATS

[Alternate brand name: **PETLOCK FOR CATS** (logo below)]



[Quick-acting]

[Long-lasting]

[Waterproof]

[3 Month Supply]

[FREE APP AT www.VETGUARDPLUS.com]

KEEP OUT OF REACH OF CHILDREN

CAUTION

READ ENTIRE LABEL AND ENCLOSED DIRECTIONS BEFORE EACH USE.

Manufactured for:

Tru Prodigy
500 E. Shore Drive, Suite 130
Eagle, ID 83616

EPA Reg. No. 88966-1

EPA Est. No.

[Made in Germany]

[Batch/Lot No.]

[Bar Code]

[VetGuard for Cats is a registered trade name of Tru Prodigy]

VetGuard for Cats can be used on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks. VetGuard for Cats controls fleas, ticks, chewing lice and mosquitoes and keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

DIRECTIONS FOR USE

It is a violation of 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 THE ENTIRE LABEL AND DIRECTIONS BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON CATS ONLY. DO NOT USE ON RABBITS OR ON OTHER ANIMALS.**

Side Effects. See package insert for side effects.

To kill fleas, ticks, chewing lice and mosquitoes apply VetGuard for Cats as follows:

Remove and Open Package

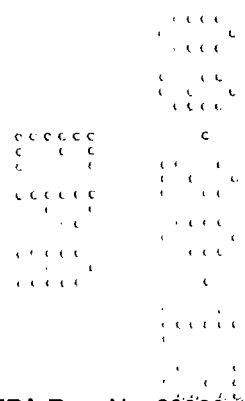
See package insert for opening instructions.

Open Applicator and Apply VetGuard for Cats

Hold upright with foil side away from you and snap applicator tip back to open.



Find a spot between the cat's shoulder blades and part hair. Place the open end of the applicator just above the skin and squeeze. Apply the entire contents of the applicator in a single spot directly onto the cat's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.



2. Carton Text - Inside Panel

[3 Month Supply]

READ ENTIRE LABEL AND ENCLOSED DIRECTIONS BEFORE EACH USE.

USE ONLY ON CATS & KITTENS 8 WEEKS AND OLDER

KEEP OUT OF REACH OF CHILDREN

CAUTION

VetGuard for Cats can be used on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks. VetGuard for Cats controls fleas, ticks, chewing lice and mosquitoes and keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

Frequency of Application

Monthly application of VetGuard for Cats controls flea, tick and chewing lice infestations. You can reapply VetGuard for Cats once every 30 days.

Fleas: VetGuard for Cats kills adult fleas for up to six weeks. If your cat becomes reinfested with fleas, or if your cat is in situations where reinfestation may occur, you may apply VetGuard for Cats every 30 days.

Ticks: VetGuard for Cats kills ticks for at least one month. Apply VetGuard for Cats every 30 days to control ticks (larva, nymph and adult) that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, and anaplasmosis.

Chewing Lice: VetGuard for Cats kills chewing lice for at least one month. Apply VetGuard for Cats every 30 days to control chewing lice.

Adult Mosquitoes: Apply VetGuard for Cats every 30 days to kill mosquitoes. Mosquitoes are killed within 24 hours for up to 7 days, and within 48 hours for up to 28 days.

PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE

Store unused product in original container only, out of reach of children and animals.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash, or 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.

2. Carton Text –Side Panel

VetGuard for cats

[3 Month Supply]

[EPA Reg. No. 88966-1]

[EPA Est. No.]

3. [Optional text for front of cardboard insert if security packaging used]

VETGUARD FOR CATS

[Alternate brand name: PETLOCK FOR CATS (logo below)]



For use ONLY on CATS & KITTENS 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:.....9.7%

INERT INGREDIENTS:.....90.3%

TOTAL:.....100.0%

Net Contents (one box) [0.051 fl. oz. (1.5 mL), 3 tubes containing 0.017 fl. oz. each, 3 doses]

Net Contents (two boxes) [1.02 fl. oz. (3.0 mL), each box has 3 tubes containing 0.017 fl. oz. each, 6 doses]

KEEP OUT OF REACH OF CHILDREN

CAUTION

See label insert for First Aid and Precautionary Statements.

[Optional marketing claims]

[Quick-acting]

[Long-lasting]

[Waterproof]

[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)]

[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

[Kills adult mosquitoes]

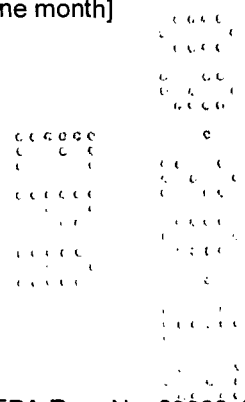
[Kills fleas, ticks, chewing lice and mosquitoes]

[3 Month Supply]

[3 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]

EPA Reg. No. 88966-1



EPA Est. No.

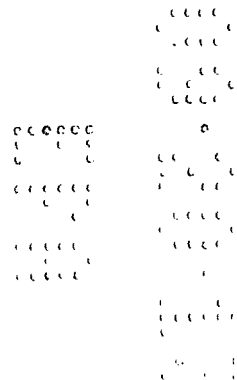
Manufactured for:

Tru Prodigy
500 E. Shore Drive, Suite 130
Eagle, ID 83616

[Bar code]



[Photo for Alternate Brand Name is below.]



3. [Optional text for for back of cardboard insert if security packaging used]

VETGUARD FOR CATS

[Alternate brand name: PETLOCK FOR CATS (logo below)]



For use ONLY on CATS & KITTENS 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:.....9.7%

INERT INGREDIENTS:.....90.3%

TOTAL:.....100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

[Quick-acting]

[Long-lasting]

[Waterproof]

[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills adult fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)]

[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

[Kills adult mosquitoes]

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF SWALLOWED: Immediately call a poison control center or doctor 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 treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARDS TO HUMANS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Have the product container label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-888-314-8588 for emergency medical treatment information.

HAZARDS TO DOMESTIC ANIMALS

For external use only on cats. Do not use on kittens under 8 weeks of age. Individual sensitivities, while rare, may occur after using **ANY** pesticide product. Pets may experience some temporary irritation 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 animals. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

Side Effects. After applying VetGuard for Cats, check your cat for side-effects such as redness from skin irritation, scratching or other signs of discomfort. In some cases, vomiting or diarrhea have been reported from grooming after treatment. If you observe these signs or symptoms in your treated cat, contact your veterinarian. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

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 PET, READ THE ENTIRE LABEL AND DIRECTIONS BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.**

VetGuard for Cats is approved for use on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks.

VetGuard for Cats keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

Frequency of Application

Monthly application of VetGuard for Cats controls flea, tick and chewing lice infestations. You can reapply VetGuard for Cats once every 30 days.

Fleas: VetGuard for Cats kills adult fleas for up to six weeks. If your cat becomes reinfested with fleas, or if your cat is in situations where reinfestation may occur, you may apply VetGuard for Cats every 30 days.

Ticks: VetGuard for Cats kills ticks for at least one month. Apply VetGuard for Cats every 30 days to control ticks (larva, nymph and adult) that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, and anaplasmosis.

Chewing Lice: VetGuard for Cats kills chewing lice for at least one month. Apply VetGuard for Cats every 30 days to control chewing lice.

Mosquitoes: Apply VetGuard for Cats every 30 days to kill mosquitoes. Mosquitoes are killed within 24 hours for up to 7 days, and within 48 hours for up to 28 days.

Use VetGuard for Cats on all cats including breeding, pregnant and lactating queens, and on kittens 8 weeks or older.

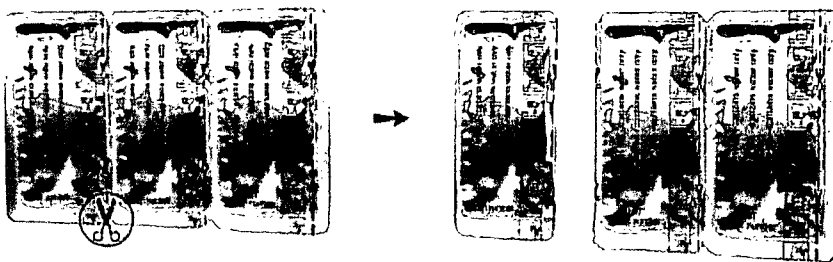
A one-spot application is convenient and easy for effective treatment of fleas, ticks, chewing lice, and mosquitoes. Apply VetGuard for Cats when your cat is dry.

VetGuard for Cat is applied at a single point on the surface of the skin between the cat's shoulders and rapidly covers the entire cat by localizing in the hair, on the surface of the skin and in the sebaceous glands.

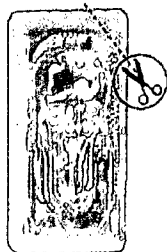
Soon after coming into contact with a treated cat, fleas, ticks, mosquitoes, and chewing lice are killed. To kill fleas, ticks, chewing lice and mosquitoes apply VetGuard for Cats as follows:

Remove and Open Package

- 1** Cut along scissor cut line to separate unit



- 2** Turn unit over and cut corner at bulb end



- 3** From cut corner, peel backing completely off from bottom to top



- 4** Remove the applicator

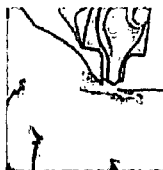


Open Applicator

Hold upright with foil side away from you and snap applicator tip back to open.

Apply VetGuard for Cats

Find a spot between the cat's shoulder blades and part hair. Place the open end of the applicator just above the skin and squeeze. Apply the entire contents of the applicator in a single spot directly onto the cat's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.



PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE

Store unused product in original container only, out of reach of children and animals.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or 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.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Tru Prodigy. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Tru Prodigy makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Tru Prodigy, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

4. [Optional Card with Tips, Text]

[Optional marketing claims]

[VetGuard for Cats]

[See other side for stickers to remind you it's time to reapply VetGuard for Cats.]

[Some Tips and Other Information for Using VetGuard for Cats]

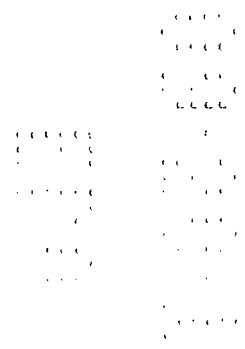
[Treat dogs and cats separately and only with the proper dose of VetGuard for Dogs or VetGuard for Cats.]

[Follow the label instructions for how to apply and be sure that VetGuard for Cats is applied to the skin, not on top of the fur and not near the collar. Removing the collar before application may help to prevent the collar from absorbing the VetGuard dose.]

[Apply VetGuard for Cats when your cat is dry. Make sure you apply all of the dose that is in the applicator.]

[Even indoor cats need flea and tick control if other household pets bring fleas into the home.]

[Fleas have many life stages and serious infestations can take up to 3 applications every 30 days for control. In fact, the flea life-cycle in the home can last as long as 21 days.]



5. Text for Reminder Stickers



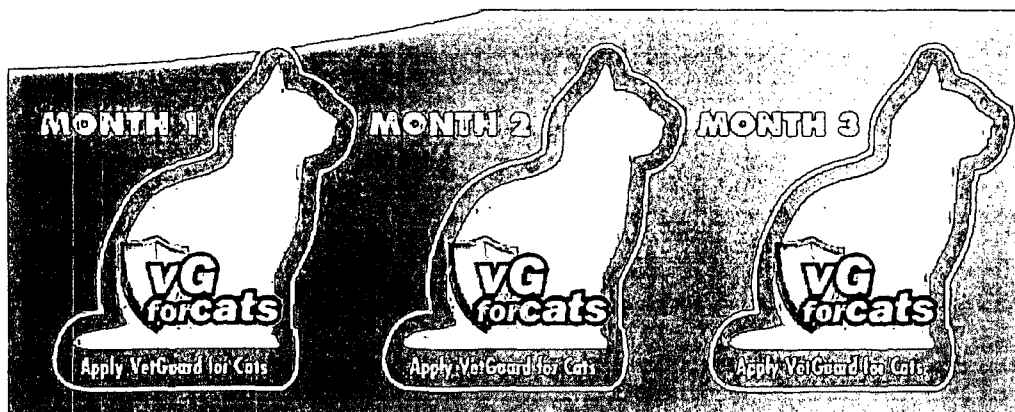
[Reminder: It's time to repurchase VetGuard for Cats!]

Use these stickers to remind you when to apply and to purchase VetGuard for Cats.

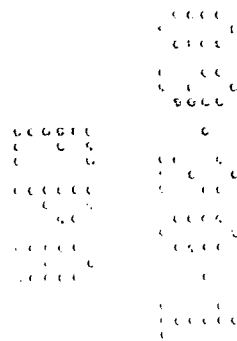
The first time you treat your cat, peel off the sticker and place on your calendar that day. To remind you when the next application is due, place the other two stickers on your calendar 1 and 2 months after the first application.

[For Customer Service call 1-888-314-8588.]

[For more information, visit www.xxxxx.com]



[Optional Bar code]



Pictogram of Back of Blister With Opening Instructions



6. Text for Back of Blister

KEEP OUT OF REACH OF CHILDREN

CAUTION: See full label for additional instructions and precautions before using

Only for Cats & Kittens

VetGuard for Cats

EPA Reg. No. 88966-1

Lot/Batch No.

0.017 fl. oz. (0.5 mL)

9.7% Fipronil

7. Text for back of pipette (applicator)

KEEP OUT OF REACH OF CHILDREN

CAUTION: See full label for additional instructions and precautions before using

Only for Cats & Kittens

VetGuard for Cats

EPA Reg. No. 88966-1

Lot/Batch No.

0.017 fl. oz. (0.5 mL)

9.7% Fipronil