

88966-1

2/19/2014

1/23



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

FEB 19 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Ms. Ann M. Tillman, Agent
Tru Prodigy c/o
Pyxis Consulting
4110 136 St. NW
Gig Harbor, WA 98332

Subject: Product Name: Tru Prodigy/VetGuard for Cats
EPA Reg. No. 88966-1
Submission date: January 16, 2014
Amendment: Label Notification to add Alternate Brand Name: "TripleGuard for Cats"

Dear Registrant:

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is unconditionally acceptable under 3(c)(5).

One copy of the label stamped "Accepted" is enclosed for your records. Please submit one copy of the final printed label before the product is released for shipment.

If you have questions concerning this letter, please call Owen Beeder at 703-308-8899 or via e-mail at beeder.owen@epa.gov or you may call me at 703-305-6701.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

2/23

Please read instructions on reverse before completing form.

Form Approved, GSA No. 2070-0080, Approval expires 2-28-8



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ 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 Gig 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: EPA Reg. No. _____ Product Name _____	

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 "TripleGuard 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 type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt. 0.017 oz.	No. per container 3	If "Yes" Package wgt	Other (Specify) _____
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 type="checkbox"/> On Label <input checked="" 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) 353-7369
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.		8. Date Application Received (Stamped)
Signature 	3. Title Agent	
Typed Name Ann M. Tillman	5. Date 1/16/14	

3/23

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

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

January 16, 2014

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

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 (EPA Reg. No. 88966-1). The alternate brand name, TripleGuard for Cats, is inserted in brackets under the primary brand name on the master label. The line of products to which TripleGuard belongs is also added (PetBalance). An alternate photo of a cat is provided for this brand name.

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

4/23

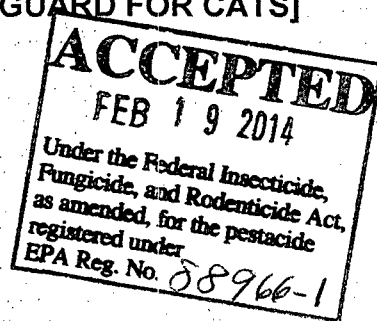
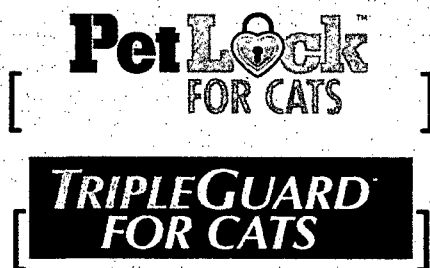
1. Package Insert
2. Carton (front, back, inside and side panels)
3. [Optional text for front or Optional text for back of cardboard insert if security packaging used]
4. Optional card with tips for use
5. Reminder Stickers
6. Text for back of blister
7. Text for back of pipette (applicator)

Note to reviewer: optional text is placed in brackets

1. Package Insert, Text

VETGUARD FOR CATS

[Alternate brand names: PETLOCK FOR CATS, TRIPLEGUARD FOR CATS]



For use ONLY on CATS & KITTENS over 1.5 lbs. and 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:9.7%

OTHER 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]

[CONTAINS FIPRONIL, SAME ACTIVE INGREDIENT AS FRONTLINE TOP SPOT™]

[Frontline and Frontline Top Spot are registered trademarks of Merial.]

[VetGuard for Cats is not manufactured or distributed by Merial]

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. 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.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call 1-855-844-4375, twenty-four (24) hours per day, seven (7) days per week.

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.

HAZARDS TO DOMESTIC ANIMALS

CAUTION. FOR EXTERNAL USE ON CATS ONLY. Do not use on kittens under 1.5 lbs. or under 8 weeks of age. Individual sensitivities, while rare, may occur after using **ANY** pesticide product. Cats 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. It is advisable to consult a veterinarian before using this product with **ANY** other pesticide product or drug.

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

VetGuard for Cats is for use on cats including breeding, pregnant and lactating queens, and on kittens that weigh over 1.5 lbs and 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 cats including breeding, pregnant and lactating queens, and on kittens weighing over 1.5 lbs. and 8 weeks or older.

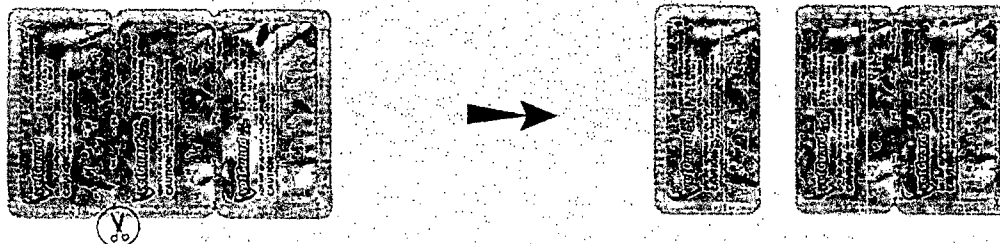
A one-spot application is convenient and easy for effective treatment of fleas, ticks, chewing lice, and mosquitoes. Apply VetGuard for Cats when your cat is dry.

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

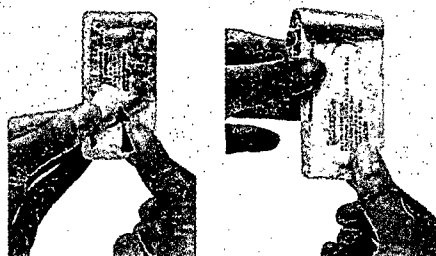
1. Cut along scissor cut line to separate unit



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

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

Keep this product in its tightly closed original container when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to 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.

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 is a registered trade name of Tru Prodigy]

[Optional Bar Code]

[Customer Service: 1-888-314-8588]

2. Carton Text – Front Panel

VETGUARD FOR CATS[Alternate brand names: **PETLOCK FOR CATS, TRIPLEGUARD FOR CATS**]

[Brand name for TripleGuard line of products:

PETBALANCE]For use **ONLY** on **CATS & KITTENS** over 1.5 lbs. and 8 weeks and older**ACTIVE INGREDIENT:**

Fipronil:.....9.7%

OTHER 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 (*including Brown dog ticks, American dog ticks, and deer ticks that may transmit Lyme disease)]

[3 Month Supply]

[3 Applicators]

[3 Doses]

[CONTAINS FIPRONIL, SAME ACTIVE INGREDIENT AS FRONTLINE TOP SPOT™]

[Frontline and Frontline Top Spot are registered trademarks of Merial.]

[VetGuard for Cats is not manufactured or distributed by Merial]



[Photo for Alternate Brand Name is below.]



[Photo for Alternate Brand Name is below.]

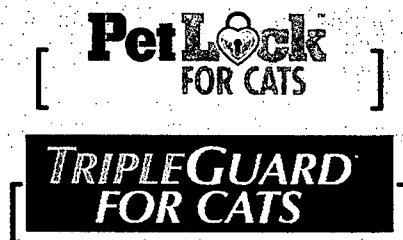


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2. Carton Text – Back Panel

VETGUARD FOR CATS

[Alternate brand names: PETLOCK FOR CATS, TRIPLEGUARD FOR CATS]



[Quick-acting]

[Long-lasting]

[Waterproof]

[3 Month Supply]

[3 Doses]

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

[Customer Service: 1-888-314-8588]

EPA Reg. No. 88966-1

EPA Est. No.

[Made in Germany]

[Batch/Lot No.]

[Bar Code]

[VetGuard is a registered trade name of Tru Prodigy]

VetGuard for Cats can be used on cats including breeding, pregnant and lactating queens, and on kittens that weigh over 1.5 lb. and 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.

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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 ON PACKAGE AND PACKAGE INSERT BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON CATS ONLY. DO NOT USE ON RABBITS OR ON DOGS OR ON OTHER ANIMALS.**

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.

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.

13/23

2. Carton Text - Inside Panel

[3 Month Supply]

[3 Applicators]

READ ENTIRE LABEL AND ENCLOSED DIRECTIONS BEFORE EACH USE.

USE ONLY ON CATS & KITTENS OVER 1.5 LBS. AND 8 WEEKS AND OLDER

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

Keep this product in its tightly closed original container when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to 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.

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2. Carton Text –Side Panel

VetGuard for Cats

[3 Month Supply]

[3 Applicators]

[3 Doses]

[Batch/Lot No.]

[EPA Reg. No. 88966-1]

[EPA Est. No.]

15/23

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

VETGUARD FOR CATS

[Alternate brand names: PETLOCK FOR CATS, TRIPLEGUARD FOR CATS]



PETBALANCE™

[Brand name for TripleGuard line of products:

For use ONLY on CATS & KITTENS over 1.5 lbs. and 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:.....9.7%

OTHER 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 (*including Brown dog ticks, American dog ticks, and deer ticks that may transmit Lyme disease)]

[3 Month Supply]

[3 Applicators]

[CONTAINS FIPRONIL, SAME ACTIVE INGREDIENT AS FRONTLINE TOP SPOT™]

[Frontline and Frontline Top Spot are registered trademarks of Merial.]

[VetGuard for Cats is not manufactured or distributed by Merial]

EPA Reg. No. 88966-1

EPA Est. No.



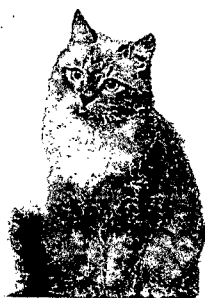
Manufactured for:

Tru Prodigy
500 E. Shore Drive, Suite 130
Eagle, ID 83616
[Customer Service: 1-888-314-8588]

[Bar code]



[Photo for Alternate Brand Name is below.]



[Photo for Alternate Brand Name is below.]

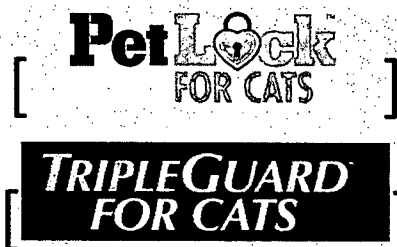


17/23

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

VETGUARD FOR CATS

[Alternate brand names: PETLOCK FOR CATS, TRIPLEGUARD FOR CATS]



For use ONLY on CATS & KITTENS over 1.5 lb. and 8 weeks and older

ACTIVE INGREDIENT:

Fipronil.....9.7%

OTHER 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

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Do not induce vomiting unless told to do so by a poison control center or doctor. Have person sip a glass of water if able to swallow. 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.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), you may call 1-855-844-4375, twenty-four (24) hours per day, seven (7) days per week.

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.

HAZARDS TO DOMESTIC ANIMALS

CAUTION. FOR EXTERNAL USE ON CATS ONLY. Do not use on kittens under 1.5 lbs. and under 8 weeks of age. Individual sensitivities, while rare, may occur after using **ANY** pesticide product. Cats 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. It is advisable to consult a veterinarian before using this product with ANY other pesticide product or drug.

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

VetGuard for Cats is for use on cats including breeding, pregnant and lactating queens, and on kittens that weigh over 1.5 lbs. and 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 cats including breeding, pregnant and lactating queens, and on kittens that weigh over 1.5 lbs. and are 8 weeks or older.

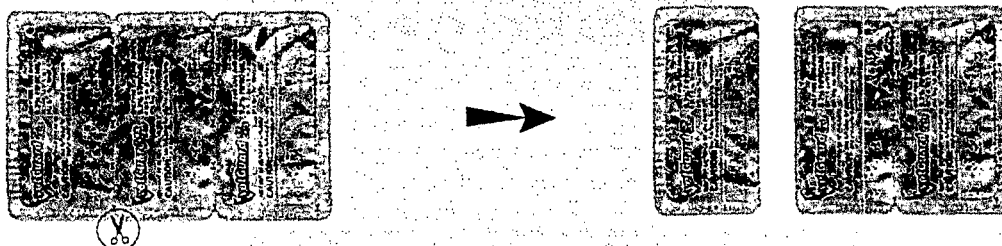
A one-spot application is convenient and easy for effective treatment of fleas, ticks, chewing lice, and mosquitoes. Apply VetGuard for Cats when your cat is dry.

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.

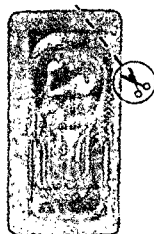
Soon after coming into contact with a treated cat, fleas, ticks, mosquitoes, and chewing lice are killed. To kill fleas, ticks, chewing lice and mosquitoes apply VetGuard for Cats as follows:

REMOVE AND OPEN PACKAGE

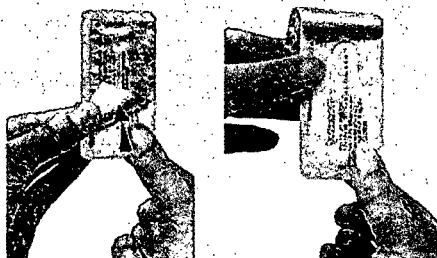
1. Cut along scissor cut line to separate unit



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.

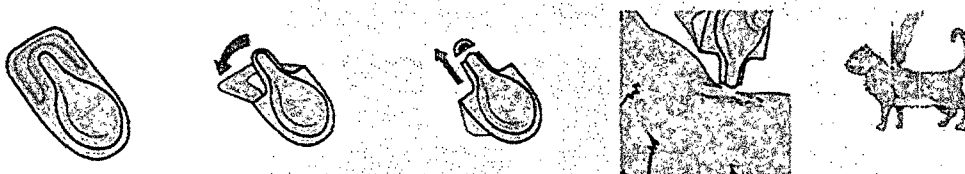
APPLY VETGUARD FOR CATS

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

Keep this product in its tightly closed original container when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to 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.

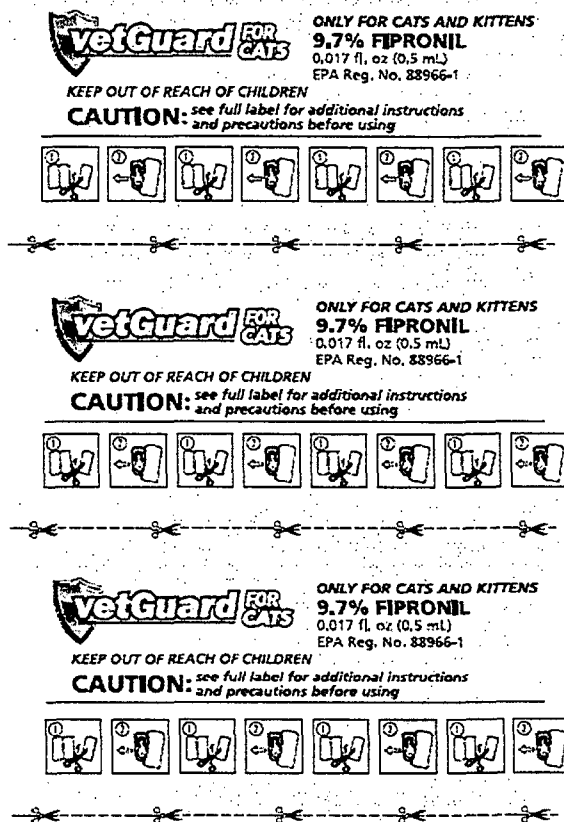
The first time you treat your cat, peel off the sticker and place on your calendar that day. To remind you when the next application is due, place the other two stickers on your calendar 1 and 2 months after the first application.

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



[Optional Bar code]

6. Pictogram of Back of Blister With Opening Instructions



7. Text for back of pipette (applicator)

