

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 29, 2013

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

Subject:

Application for Pesticide Amendment

VetGuard for Dogs EPA Reg. No. 88966-2

Your Submission Dated November 07, 2012

Decision No: 474188

Dear Ms. Tillman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the conditions of registration and label comments below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

Conditions of acceptance

- 1. This registration is now time-limited and expires two years from the date of this letter.
- 2. Please consider limiting the formulations of this product to one basic confidential statement of formula. The Agency may require this in the future and no additional alternate formulations or minor formulation amendments will be approved for this product in the future.
- 3. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product beginning April 1, 2013.

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

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

EPA Registration Number
Product name (brand name)
Lot #
Where purchased: internet, store, veterinarian

Active Ingredient(s)
Weight range for product

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

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

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

Weight: pounds

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

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

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

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

Any known precondition

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

- 4. Along with the enhanced incident reporting, you must submit an analysis of the incidents seen, to include the following details:
 - All incidents should be reported including all minor dermal and ocular irritation reports.
 - Summary table for dogs showing number of incidents of each severity code for each route of exposure. Each incident should only be reported once. If one incident has several routes of exposure, the order should be ocular > oral > dermal. In other words, an incident with both oral and dermal exposure would be reported as oral exposure, and an incident with both ocular and oral exposure would be reported as ocular exposure.
 - A similar summary table for cats (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.

- Summary table for dogs and table for cats showing number of incidents that are believed due to secondary exposure (e.g., multi-pet households).
- A summary table for dogs showing number of incidents for each severity code for these age ranges: <3 months, 3-6 months, 6-9 months, 9-12 months, 1 yr, 2 yr, 3 yr, 4 yr, 5 yr, 6 yr, 7 yr, 8 yr, 9 yr, 10 yr, 11 yr, 12 yr, 13 yr, 14 yr, 15 yr, >15 yr.
- A summary table showing the number of dog incidents for each severity code for each pet weight range on the product label.
- A summary table for dog weight showing number of incidents for each product weight range. This table should show number of incidents in dogs weighing less than that product weight range, number of incidents in dogs in lower half of weight range, number of incidents in dogs in upper half of weight range, and dogs weighing more than the product weight range.
- Table showing number of incidents for each dog breed.
- Table showing number of incidents in dogs for each clinical sign.
- Table showing number of incidents in dogs for each organ system.

Report aggregate incidents, but do not combine moderate and minor incidents.

If EPA determines that future mitigation measures are necessary for all spot-on products, the Agency will inform registrants and if needed, EPA may take regulatory action. If you have any questions contact Driss Benmhend at 703-308-9525 or by e-mail at: Benmhend.driss@epa.gov.

Sincerely,

Richard Gebken

Product Manager 10,

Insecticide Branch

Registration Division (7505P)

Enclosure: Label stamped "Accepted"

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

[Master Label]

1. Carton Label - Front Panel

VETGUARD FOR DOGS

For use ONLY on DOGS & PUPPIES 8 weeks and older

ACTIVE INGREDIENT:

Fipronil: 9.7%
INERT INGREDIENTS: 90.3%
TOTAL: 100.0%

For use ONLY on DOGS 5 to 22 lbs. For use ONLY on DOGS 23 to 44 lbs. For use ONLY on DOGS 45 to 88 lbs. For use ONLY on DOGS 89 to 132 lbs.

[Optional marketing claims]

[3 Doses]

[3 Month Supply]

[3 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]

[Quick-acting]

[Long-lasting]

[Waterproof]

[Does not wash off]

[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 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, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, anaplasmosis]

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

[Eliminates chewing lice infestations]

[Aids in control of sarcoptic mange mite infestations]

[Kills adult mosquitoes]

ACCEPTED with COMMENTS In EPA Letter Dated

JAN 2 9 2013

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

KEEP OUT OF REACH OF CHILDREN CAUTION

See label insert for First Aid and Precautionary Statements.











Net Contents: [3-pak] 0.069 fl. oz (2.01 mL) (3 applicators that contain 0.023 fl. oz. (0.67 mL each)) Net Contents: [3-pak] 0.135 fl. oz (4.02 mL) (3 applicators that contain 0.045 fl. oz. (1.34 mL each)) Net Contents: [3-pak] 0.273 fl. oz (8.04 mL) (3 applicators that contain 0.091 fl. oz. (2.68 mL each)) Net Contents: [3-pak] 0.408 fl. oz (12.06 mL) (3 applicators that contain 0.136 fl. oz. (4.02 mL each))

1. Carton Text -Back Panel]

[3 Doses]

[3 Month Supply]

[3 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]

[Quick-acting]

[Long-lasting]

[Waterproof]

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 [Batch/Lot No.]

[Bar Code]

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

EPA Reg. No. 88966-2

EPA Est. No.

[Made in Germany]



EPA Reg. No. 88966-2

EPA Est. No.

1. Carton Label – Back Panel

Side Effects: See package insert for side effects.

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

VetGuard for Dogs acts quickly, lasts up to 30 days and does not wash off treated dogs. VetGuard for Dogs controls fleas, ticks, chewing lice, and mosquitoes, and aids in control of sarcoptic mange mites for use ONLY on puppies 8 weeks or older and small dogs from 5 to 22 lbs., medium dogs weighing 23-44 lbs., large dogs weighing 45-88 lbs., and extra-large dogs weighing 88-132 lbs. VetGuard for Dogs keeps working even after shampooing and rinsing with water. VetGuard for Dogs continues to work if dogs are outdoors and exposed to the sun or rain, or even after swimming.

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

Remove and Open Package

See package insert for opening instructions.

Open Applicator and Apply VetGuard for Dogs

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

Apply VetGuard for Dogs











Find a spot between the dog'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 dog's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.

1. Carton Label - Inside Panel

[3 Month Supply]

READ ENTIRE LABEL AND ENCLOSED DIRECTIONS BEFORE EACH USE.

Use ONLY on DOGS & PUPPIES 8 weeks and older and weighing 5 to 22 lbs./23 to 44 lbs./45 to 88 lbs./89 to 132 lbs

KEEP OUT OF REACH OF CHILDREN

CAUTION

Frequency of Application

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

Adult Fleas: VetGuard for Dogs kills adult fleas for up to three months unless the risk is high for reinfestation of fleas. If your dog becomes reinfested with fleas that cause flea allergy dermatitis, or if your dog is in situations where reinfestation may occur, you may apply VetGuard for Dogs every 30 days.

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

Chewing Lice: VetGuard for Dogs kills chewing lice for at least one month. Apply VetGuard for Dogs every 30 days to aid in the control of chewing lice.

Sarcoptic mange (mites): VetGuard for Dogs aids in the control of sarcoptic mange infestations. Apply VetGuard for Dogs every 30 days until mites are eliminated.

Mosquitoes: Apply VetGuard for Dogs every 30 days to kill adult mosquitoes. Adult mosquitoes are killed within 24 hours for up to 7 days, and within 48 hours for up to 28 days from once-a month applications.

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.

PESTICIDE DISPOSAL

If partly filled, Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain, or on the ground.

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.

1. Carton Text -Side Panel]

[VetGuard for Dogs [3 Month Supply] [EPA Reg. No. 88966-2] [EPA Est. No.] [Lot No.]

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

VETGUARD FOR DOGS

For use ONLY on DOGS & PUPPIES 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:	9.7%
INERT INGREDIENTS:	90.3%
TOTAL:	100.0%

For use ONLY on DOGS 5 to 22 lbs. For use ONLY on DOGS 23 to 44 lbs. For use ONLY on DOGS 45 to 88 lbs. For use ONLY on DOGS 89 to 132 lbs.

KEEP OUT OF REACH OF CHILDREN CAUTION

See label insert for First Aid and Precautionary Statements.

[Optional marketing claims]

[3 Doses]

[3 Month Supply]

[6 Month Supply]

[3 Applicators]

[6 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]

[Quick-acting]

[Long-lasting]

[Waterproof]

[Does not wash off]

[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 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, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, anaplasmosis]

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

[Eliminates chewing lice infestations]

[Aids in control of sarcoptic mange mite infestations]

[Kills adult mosquitoes]











Net Contents: (one box) 0.069 fl. oz (2.01 mL) (3 applicators that contain 0.023 fl. oz. (0.67 mL each), 3 doses)

Net Contents: (one box) 0.135 fl. oz (4.02 mL) (3 applicators that contain 0.045 fl. oz. (1.34 mL each), 3 doses)

Net Contents: (one box) 0.273 fl. oz (8.04 mL) (3 applicators that contain 0.091 fl. oz. (2.68 mL each), 3 doses)

Net Contents: (one box) 0.408 fl. oz (12.06 mL) (3 applicators that contain 0.136 fl. oz. (4.02 mL each), 3 doses)

Net Contents: (two boxes) 0.138 fl. oz (4.02 mL) (each box has 3 applicators that contain 0.023 fl. oz. (0.67 mL each), 6 doses)

Net Contents: (two boxes) 0.27. oz (8.04 mL) (each box has 3 applicators that contain 0.045 fl. oz. (1.34 mL each), 6 doses)

Net Contents: (two boxes) 0.546 fl. oz (16.08 mL) (each box has 3 applicators that contain 0.091 fl. oz. (2.68 mL each), 6 doses)

Net Contents: (two boxes) 0.816 fl. oz (24.12 mL) (each box has 3 applicators that contain 0.136 fl. oz. (4.02 mL each), 6 doses)

[VetGuard for Dogs

[EPA Reg. No. 88966-2]

[EPA Est. No.]

Manufactured for:

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



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

VETGUARD FOR DOGS

For use ONLY on DOGS & PUPPIES 8 weeks and older

ACTIVE INGREDIENT:	
Fipronil:	9.7%
INERT INGREDIENTS:	90.3%
TOTAL:	100.0%

For use ONLY on DOGS 5 to 22 lbs. For use ONLY on DOGS 23 to 44 lbs. For use ONLY on DOGS 45 to 88 lbs. For use ONLY on DOGS 89 to 132 lbs.

KEEP OUT OF REACH OF CHILDREN CAUTION

See label insert for First Aid and Precautionary Statements.

[Optional marketing claims]

[3 Doses]

[3 Month Supply]

[3 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]

[Quick-acting]

[Long-lasting]

[Waterproof]

[Does not wash off]

[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]

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[Kills ticks that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, anaplasmosis]

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

[Eliminates chewing lice infestations]

[Aids in control of sarcoptic mange mite infestations]

[Kills adult mosquitoes]

FIRST AID

IF SWALLOWED:

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

• Do not give anything by mouth to an unconscious person.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for 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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week).

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARD TO HUMANS

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

HAZARD TO DOMESTIC ANIMALS

CAUTION. FOR USE ON DOGS AND PUPPIES ONLY. DO NOT USE ON CATS OR OTHER ANIMALS. Keep cats away from treated dogs for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian. 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.

Side Effects: After applying VetGuard for Dogs, check your dog for side-effects such as redness from skin irritation, scratching or other signs of discomfort. In some cases, vomiting or diarrhea have been reported. If you observe these signs or symptoms in your treated dog, 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 DOG, READ THE ENTIRE LABEL AND DIRECTIONS ON PACKAGE INSERT BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON DOGS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON CATS OR OTHER ANIMALS.

VetGuard for Dogs acts quickly, lasts up to 30 days and does not wash off treated dogs. VetGuard for Dogs controls fleas, ticks, chewing lice, and mosquitoes, and aids in control of sarcoptic mange mites for use **ONLY** on puppies 8 weeks or older and small dogs., medium dogs weighing 23-44 lbs., large dogs weighing 45-88 lbs., and extra-large dogs weighing 89-132 lbs. VetGuard for Dogs keeps working even after shampooing and rinsing with water. VetGuard for Dogs continues to work if dogs are outdoors and exposed to the sun or rain, or even after swimming.

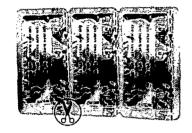
Use VetGuard for Dogs on all dogs and puppies 8 weeks or older (small dogs from 5 to 22 lbs.., medium dogs weighing 23-44 lbs., large dogs weighing 45-88 lbs., extra-large dogs weighing 89-132 lbs.) and on breeding, pregnant and lactating bitches.

A one-spot application is convenient and easy for effective treatment of adult fleas, ticks, chewing lice, and adult mosquitoes. VetGuard for Dogs aids in control of sarcoptic mange mites. Apply VetGuard for Dogs when your dog is dry. VetGuard for Dogs is applied at a single point on the surface of the skin

between the dog's shoulders and rapidly covers the entire dog by localizing on the surface of the skin and in the sebaceous glands. Soon after coming into contact with a treated dog, adult fleas, ticksadult, mosquitoes, and chewing lice are rapidly killed. To kill adult fleas, ticks, chewing lice and adult mosquitoes apply VetGuard for Dogs as follows:

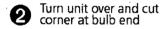
Remove and Open Package

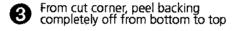
Cut along scissor cut line to separate unit





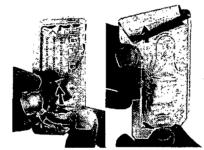


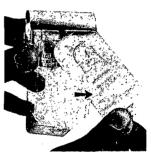












Open Applicator

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

Apply VetGuard for Dogs

Find a spot between the dog'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 dog's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.











Frequency of



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

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.

PESTICIDE DISPOSAL

If partly filled, Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain, or on the ground.

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.

VETGUARD FOR Dogs

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ACTIVE INGREDIENT:	
Fipronil:	9.7%
•	90.3%
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

[Optional marketing claims]

[FREE APP AT www.VETGUARDPLUS.com]

[Quick-acting]

[Long-lasting]

[Waterproof]

[Does not wash off]

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[Eliminates chewing lice infestations]

[Aids in control of sarcoptic mange mite infestations]

[Kills adult mosquitoes]

FIRST AID

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- Call a poison control center or doctor immediately for treatment advice.
- · Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES:

- · Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- · Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
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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.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week).

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DIRECTIONS FOR USE

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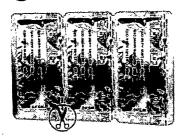
VetGuard for Dogs acts quickly, lasts up to 30 days and does not wash off treated dogs. VetGuard for Dogs controls fleas, ticks, chewing lice, and mosquitoes, and aids in control of sarcoptic mange mites for use **ONLY** on puppies 8 weeks or older and small dogs., medium dogs weighing 23-44 lbs., large dogs weighing 45-88 lbs., and extra-large dogs weighing 89-132 lbs. VetGuard for Dogs keeps working even after shampooing and rinsing with water. VetGuard for Dogs continues to work if dogs are outdoors and exposed to the sun or rain, or even after swimming.

Use VetGuard for Dogs on all dogs and puppies 8 weeks or older (small dogs from 5 to 22 lbs.., medium dogs weighing 23-44 lbs., large dogs weighing 45-88 lbs., extra-large dogs weighing 89-132 lbs.) and on breeding, pregnant and lactating bitches.

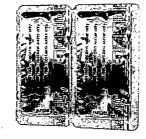
A one-spot application is convenient and easy for effective treatment of adult fleas, ticks, chewing lice, and adult mosquitoes. VetGuard for Dogs aids in control of sarcoptic mange mites. Apply VetGuard for Dogs when your dog is dry. VetGuard for Dogs is applied at a single point on the surface of the skin between the dog's shoulders and rapidly covers the entire dog by localizing on the surface of the skin and in the sebaceous glands. Soon after coming into contact with a treated dog, adult fleas, ticksadult, mosquitoes, and chewing lice are rapidly killed. To kill adult fleas, ticks, chewing lice and adult mosquitoes apply VetGuard for Dogs as follows:

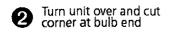
Remove and Open Package

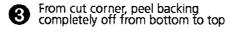
Cut along scissor cut line to separate unit

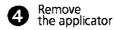




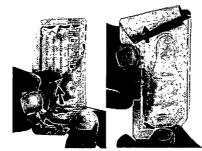


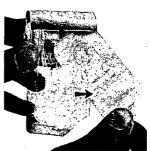












Open Applicator

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

Apply VetGuard for Dogs

Find a spot between the dog'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 dog's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.











Frequency of

Application

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

Adult Fleas: VetGuard for Dogs kills adult fleas for up to three months unless the risk is high for reinfestation of fleas. If your dog becomes reinfested with fleas that cause flea allergy dermatitis, or if your dog is in situations where reinfestation may occur, you may apply VetGuard for Dogs every 30 days.

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

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

Sarcoptic mange mites: VetGuard for Dogs aids in the control of sarcoptic mange mite infestations. Apply VetGuard for Dogs every 30 days until mites are eliminated.

Adult Mosquitoes: Apply VetGuard for Dogs 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 from once-a month applications.

How Supplied

VetGuard for Dogs is available in several convenient sizes for use ONLY on puppies 8 weeks or older and small dogs from 5 to 22 lbs. (0.023 fl. oz./0.67 mL), medium dogs 23-44 lbs. (0.045 fl. oz./1.34 mL), large dogs 45-88 lbs. (0.091 fl. oz./2.68 mL), and extra-large dogs 89-132 lbs. (0.136 fl. oz./4.02 mL).

VetGuard for Dogs can be used on small, medium, large, and extra-large dogs even if breeding, pregnant and lactating, and on puppies that are older than 8 weeks.

VetGuard for Dogs keeps working even after shampooing and rinsing with water. VetGuard for Dogs continues to work if dogs are outdoors and exposed to the sun or rain, or even after swimming.



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

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.

PESTICIDE DISPOSAL

If partly filled, Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain, or on the ground.

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.: 88966-2

[EPA Est. No.:]

Manufactured for:

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

[Made in Germany]
[VetGuard for Dogs is a registered trade name of Tru Prodigy]

[Optional Bar Code]

4. Optional Card with Tips for Use]

[Optional marketing claims]

[Long-lasting]

[Does not wash off]

[For monthly control of adult fleas, ticks, chewing lice, adult 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 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, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, anaplasmosis]

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

[Eliminates chewing lice infestations]

[Aids in control of sarcoptic mange mite infestations]

[Kills adult mosquitoes]



[VetGuard for Dogs

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

[Some Tips and Other Information for Using VetGuard for Dogs.]

[Follow the label instructions for how to apply and be sure that VetGuard for Dogs 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 Dogs when your dog is dry. Make sure you apply all of the dose that is in the applicator.]

[Fleas have many life stages and serious infestations can take up to 3 applications every 30 days for complete 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 Dogs!]

Use these stickers to remind you when to apply and re-purchase VetGuard for Dogs.

The first time you treat your dog, 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 please call 1-888-314-8588.] [For more information, visit www.xxxxx.com]

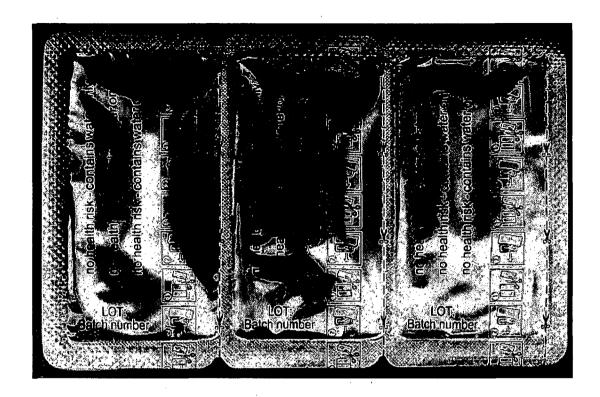
Tru Prodigy

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



[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 Dogs & Puppies 5 to 22 lbs.

Only for Dogs & Puppies 23 to 44 lbs.

Only for Dogs & Puppies 45 to 88 lbs.

Only for Dogs & Puppies 89 to 132 lbs.

VetGuard for Dogs

EPA Reg. No. 88966-2

Lot/Batch No.

0.023 fl. oz. (0.67 mL)

0.045 fl. oz. (1.34 mL)

0.091 fl. oz. (2.68 mL)

0.136 fl. oz. (4.02 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 Dogs & Puppies 5 to 22 lbs.

Only for Dogs & Puppies 23 to 44 lbs.

Only for Dogs & Puppies 45 to 88 lbs.

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VetGuard for Dogs

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