



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 21, 2013

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

**Subject: Amended Labeling; Proposed Addition of VetIQ™ Logo & Additional Manufacturing Site  
VETGUARD FOR DOGS, EPA Reg. No. 88966-2  
Your Submission Dated July 19, 2013 and E-Mail Resubmissions Dated September 16, 2013,  
November 19, 2013 & November 20, 2013**

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.

Should you wish to add/retain a reference to the company's website, smart phone/tablet app and/or a QR code reader on your product label, please be aware that the website, smart phone/tablet app and/or a QR code reader becomes labeling under FIFRA and is subject to review by the Agency. If the website, smart phone/tablet app, and/or a QR code reader is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website, smart phone/tablet app, and/or a QR code reader is referenced on a product's label, claims made on the website, smart phone/tablet app, and/or a QR code reader may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website, smart phone/tablet app, and/or a QR code reader contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website, smart phone/tablet app, and/or a QR code reader will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

Please note that this letter does not supersede anything contained within the Agency's letter dated September 20, 2012 and the conditions of acceptance detailed in the Agency's letter dated January 29, 2013. A copy of your label stamped "Accepted" is enclosed for your records. If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Carmen Rodia, Jr.", is written over a printed name. To the left of the signature is a small, stylized mark that looks like "fcb".

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

Enclosures: Label stamped "Accepted," dated November 21, 2013  
Child-Resistant Packaging Review, dated November 12, 2013  
Review for Minimum Treatment Weight, dated October 21, 2013  
Product Chemistry Review, dated November 7, 2013

088966-00002 D475057 & D481184

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

[Alternate brand name: PETLOCK FOR DOGS]



For use ONLY on DOGS & PUPPIES 8 weeks and older

**ACTIVE INGREDIENT:**

Fipronil: ..... 9.7%

**OTHER 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]

- [Small Dogs 5-22 lbs.]
- [Medium Dogs 23-44 lbs.]
- [Large Dogs 45-88 lbs.]
- [Extra Large Dogs 89-132 lbs.]
- [3 Doses]
- [3 Month Supply]
- [3 Applicators]
- [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]

**ACCEPTED**  
*November 21, 2013*  
 Under the Federal Insecticide, Fungicide,  
 and Rodenticide Act, as amended, for the  
 pesticide registered under:

EPA. Reg. No: 88966-2

[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 fleas, ticks\*, chewing lice and mosquitoes (\*including Brown dog ticks, American dog ticks, and deer ticks that may transmit Lyme disease)]

[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]

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

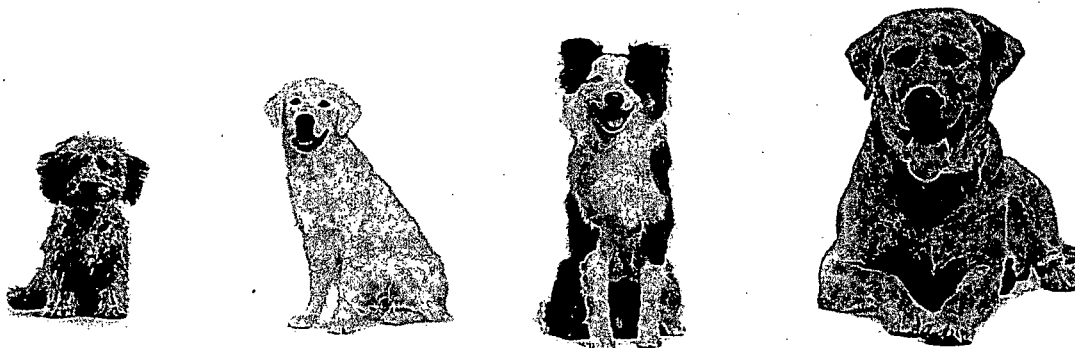
[Frontline and Frontline Top Spot are registered trademarks of Merial.]

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

## KEEP OUT OF REACH OF CHILDREN

## CAUTION

See label insert for First Aid and Precautionary Statements.



[editor's note: cat icon on right side of front panel]



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))

4/  
28



5/28

**1. Carton Text –Back Panel]**

[3 Doses]

[3 Month Supply]

[3 Applicators]

[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.]

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

[Bar Code]

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

EPA Reg. No. 88966-2

EPA Est. No.

[Made in Germany]

[Batch/Lot No.]

[Bar Code]



EPA Reg. No. 88966-2

EPA Est. No.

6/28

## 1. Carton Label – Back Panel

### 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 AND PACKAGE INSERT BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON DOGS ONLY. DO NOT ALLOW YOUR DOG TO INGEST THIS PRODUCT. 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 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.

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.

[editor's note: Bottom of back panel and right side in a box]

**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.



Keep cats away from treated dogs for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian.

## 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

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.

#### 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]

[3 Doses]

[EPA Reg. No. 88966-2]

[EPA Est. No. ]

[Batch/Lot No.]



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

## VETGUARD FOR DOGS

## VETGUARD FOR DOGS

[Alternate brand name: PETLOCK FOR DOGS]



For use ONLY on DOGS & PUPPIES 8 weeks and older

### ACTIVE INGREDIENT:

Fipronil: ..... 9.7%

OTHER 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]

[Small Dogs 5-22 lbs.]

[Medium Dogs 23-44 lbs.]

[Large Dogs 45-88 lbs.]

[Extra Large Dogs 89-132 lbs.]

[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 fleas, ticks\*, chewing lice and mosquitoes (\*including Brown dog ticks, American dog ticks, and deer ticks that may transmit Lyme disease)]

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

[Eliminates chewing lice infestations]

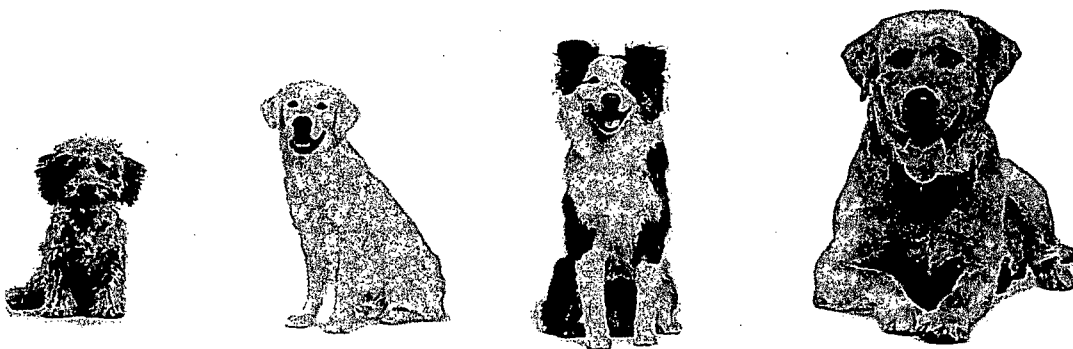
[Aids in control of sarcoptic mange mite infestations]

[Kills adult mosquitoes]

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

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

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



**DO NOT USE  
ON CATS.  
MAY BE FATAL.**



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 fl. 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

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

[Bar code]



12/28

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

## VETGUARD FOR DOGS

## VETGUARD FOR DOGS

[Alternate brand name: PETLOCK FOR DOGS]



For use ONLY on DOGS & PUPPIES 8 weeks and older

### ACTIVE INGREDIENT:

Fipronil.....9.7%

OTHER 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]

[Small Dogs 5-22 lbs.]  
[Medium Dogs 23-44 lbs.]  
[Large Dogs 45-88 lbs.]  
[Extra Large Dogs 89-132 lbs.]  
[3 Doses]  
[3 Month Supply]  
[3 Applicators]  
[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 fleas, ticks\*, chewing lice and mosquitoes (\*including Brown dog ticks, American dog ticks, and deer ticks that may transmit Lyme disease)]

[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]

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

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

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

#### 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.

**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

##### HAZARD 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, chewing gum, using tobacco, or using the toilet.

##### HAZARD TO DOMESTIC ANIMALS

**CAUTION.** FOR USE ON DOGS AND PUPPIES ONLY. DO NOT USE ON DOGS OR PUPPIES LESS THAN 5 POUNDS, AND 8 WEEKS OF AGE. **DO NOT ALLOW YOUR DOG TO INGEST THIS PRODUCT.** 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. Dogs 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 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 ALLOW OUR DOG TO INGEST THIS PRODUCT. DO NOT USE ON RABBITS. DO NOT USE ON CATS OR OTHER ANIMALS.**

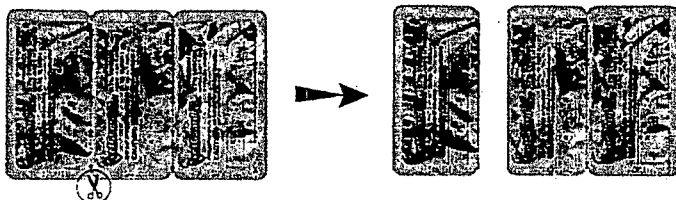
VetGuard for Dogs acts quickly, lasts up to 30 days and does not wash off treated dogs. VetGuard for Dogs controls fleas, ticks, chewing lice, and mosquitoes, and aids in control of sarcoptic mange mites for use **ONLY** on puppies 8 weeks or older and small dogs weighing 5 to 22 lbs., medium dogs weighing 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, ticks, adult 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

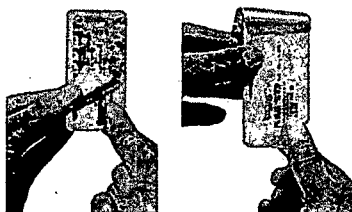
- 1.** Cut along scissor cut line to separate unit



- 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 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.



**DO NOT USE  
ON CATS.  
MAY BE FATAL.**



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.

#### [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.]

#### 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.

##### 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.



## 3. Package Insert, Text

**VETGUARD FOR Dogs****VETGUARD FOR DOGS**

[Alternate brand name: PETLOCK FOR DOGS]



For use ONLY on DOGS &amp; PUPPIES 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]

[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]

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

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

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

**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.

**HOTLINE 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**

**HAZARD 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, chewing gum, using tobacco, or using the toilet.

**HAZARD TO DOMESTIC ANIMALS**

**CAUTION.** FOR USE ON DOGS AND PUPPIES ONLY. DO NOT USE ON DOGS OR PUPPIES LESS THAN 5 POUNDS, AND 8 WEEKS OF AGE. **DO NOT ALLOW YOUR DOG TO INGEST THIS PRODUCT.** 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. Dogs 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 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 ON PACKAGE AND PACKAGE INSERT AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON DOGS ONLY. DO NOT ALLOW YOUR DOG TO INGEST THIS PRODUCT. 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 weighing 5 to 22 lbs., medium dogs weighing 23-44 lbs., large dogs weighing 45-88 lbs., and extra-large dogs weighing 89-132 lbs]. VetGuard for Dogs

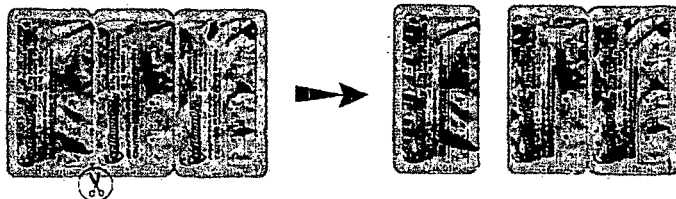
keeps working even after shampooing and rinsing with water. VetGuard for Dogs continues to work if dogs are outdoors and exposed to the sun or rain, or even after swimming.

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, ticks, adult 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**

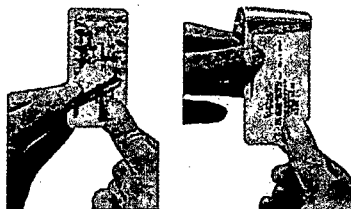
- 1. Cut along scissor cut line to separate unit**



- 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**

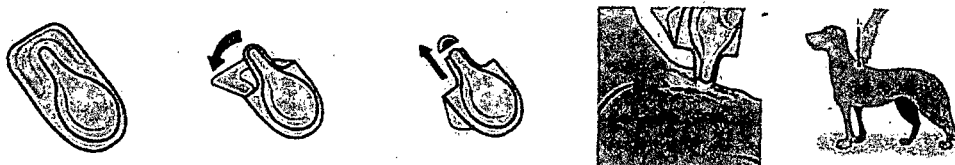


#### **Open Applicator**

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

#### **Apply VetGuard for 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.



#### **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.

##### **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

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

[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 fleas, ticks\*, chewing lice and mosquitoes (\*including Brown dog ticks, American dog ticks, and deer ticks that may transmit Lyme disease)]

[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]



Keep cats away from treated dogs for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian.

##### [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.]



Tru Prodigy

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



[Optional Bar code]

# 6. Text for Back of Blister



ONLY FOR DOGS & PUPPIES  
9.7% FIPRONIL  
XLARGE - 0.136 fl. oz (4.02 mL)  
EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions  
and precautions before using



ONLY FOR DOGS & PUPPIES  
9.7% FIPRONIL  
XLARGE - 0.136 fl. oz (4.02 mL)  
EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions  
and precautions before using



ONLY FOR DOGS & PUPPIES  
9.7% FIPRONIL  
XLARGE - 0.136 fl. oz (4.02 mL)  
EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions  
and precautions before using



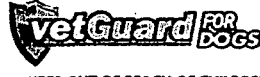
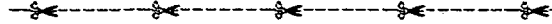




ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 LARGE - 0.091 fl. oz (2.68 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions and precautions before using



ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 LARGE - 0.091 fl. oz (2.68 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

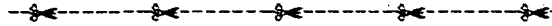
**CAUTION:** see full label for additional instructions and precautions before using



ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 LARGE - 0.091 fl. oz (2.68 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions and precautions before using





ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 MEDIUM - 0.045 fl. oz (1.34 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions and precautions before using



ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 MEDIUM - 0.045 fl. oz (1.34 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions and precautions before using



ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 MEDIUM - 0.045 fl. oz (1.34 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions and precautions before using





ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 SMALL - 0.023 fl. oz (0.67 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

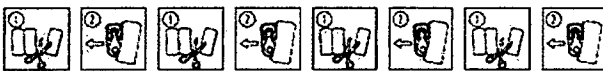
**CAUTION:** see full label for additional instructions  
 and precautions before using



ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 SMALL - 0.023 fl. oz (0.67 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

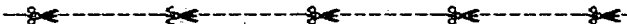
**CAUTION:** see full label for additional instructions  
 and precautions before using



ONLY FOR DOGS & PUPPIES  
**9.7% FIPRONIL**  
 SMALL - 0.023 fl. oz (0.67 mL)  
 EPA Reg. No. 88966-2

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** see full label for additional instructions  
 and precautions before using



7. Text for back of Pipette (applicator)



**ONLY FOR DOGS AND PUPPIES**  
**9.7% FIPRONIL** 0.136 fl. oz (4.02 mL) | EPA Reg. No. 88966-2  
See full label for additional instructions  
and precautions before using  
**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**



**ONLY FOR DOGS AND PUPPIES**  
**9.7% FIPRONIL** 0.091 fl. oz (2.68 mL) | EPA Reg. No. 88966-2  
See full label for additional instructions  
and precautions before using  
**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**



**ONLY FOR DOGS AND PUPPIES**  
**9.7% FIPRONIL** 0.045 fl. oz (1.34 mL) | EPA Reg. No. 88966-2  
See full label for additional instructions  
and precautions before using  
**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**



**ONLY FOR DOGS AND PUPPIES**  
**9.7% FIPRONIL** 0.023 fl. oz (0.67 mL) | EPA Reg. No. 88966-2  
See full label for additional instructions  
and precautions before using  
**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**