



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION**

May 22, 2023

Johnny Xu  
Manager  
New Thinking Technology Inc.  
1942 Broadway St., Suite 314C  
Boulder, CO 80302

**Subject:** PRIA Label Amendment – Change of Child-Resistant Package Type and Associated Label Updates; Edits to Storage and Disposal Statements; Updates to Alternate Brand Names.  
Product Name: Fipronil + Methoprene Squeeze-On for Dogs  
EPA Registration Number: 93207-3  
Application Date: September 27, 2022  
Decision Number: 588147

Dear Johnny Xu:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

A term of this amendment for this product packaging:

**The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. You have 18 months from the date of the initial conditional registration, April 6, 2023, to provide these data for this new package material.**

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced

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Decision No. 588147

on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

**Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.**

If you have any questions, please contact Linda Boccuzzo at 202-566-1121 or at [boccuzzo.linda@epa.gov](mailto:boccuzzo.linda@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Walsh", written over a light blue horizontal line.

Michael Walsh  
Product Manager 11  
Invertebrate & Vertebrate Branch 2  
Registration Division  
Office of Pesticide Programs

Attachment

**{Start of front panel}**

**[Jmxu's] Fipronil + Methoprene squeeze on for dogs**

{See ABNs at the end of this label}

{There will be a 1.5 X 1.5cm cat prohibition icon in a box located in the lower right-hand corner of the front panel in yellow with black images}



{The word dog to be a minimum of 75% the height of the largest letter in the primary brand name}

{Large, clear picture of a dog in the weight range for the product as packaged to be placed on the front panel of the label.}

{Alternative pictures at the end of the label.}



Small



Medium



Large



Extra Large

{If one of the following two lines are used, both will be used}

[[Apply to [dogs and] puppies [over] 8 weeks [or older] [old]

[For use ONLY on dogs weighing [5[-] [to] 22 lbs] [23[-] [to] 44 lbs] [45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]]

[[3][6][12][24] Applications]

[[3][6][12][24] Month Supply]

[[One tube] Prevents infestation of listed pests for [4 weeks][1 month]]

[[One tube] Prevents establishment of additional infestation of listed pests]

{The Images below the optional}



[Fleas]



[Ticks]



[Chewing Lice]



[Flea eggs]

**ACCEPTED**

05/22/2023

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 93207-3

**ACTIVE INGREDIENTS:**

Fipronil .....	9.80%
(S)-methoprene .....	8.80%
<b>OTHER INGREDIENTS: .....</b>	<b><u>81.40%</u></b>
TOTAL .....	100.00%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See [Back][or][Side] [or] [Label[s]] [Panel[s]] [Insert] for First Aid and Additional Precautionary Statements

See [inside flap] [or] [insert] and back panel for complete Directions for Use

Net Contents: X fl oz [Y – 0.0xx fl oz (x mL) tubes

{X is the total fl oz of all tubes in the carton, Y is the number of tubes, xx is the fl oz of each tube with x being the corresponding amount in mL}

[0.023 fl oz (0.67 mL) tubes]

[0.045 fl oz (1.34 mL) tubes]

[0.094 fl oz (2.68 mL) tubes]

[0.136 fl oz (4.02 mL) tubes]

{3, 6, 12 or 24 tubes will be packed in a single retail package.}

[3][Three][6][Six][12][Twelve] [24][Twenty-Four] Applications {these are the only options for Y}

**{END - FRONT PANEL}**

**{START BACK /SIDE PANEL}**

{For cartons containing 0.67 mL (0.023 fl oz) tube}

**Only For Dogs Weighing 5 [-] [to] 22 lbs. and over 8 weeks of age. Do not apply to dogs weighing less than 5 lbs.**

Apply one tube (0.67 mL)(0.023 fl oz)

{For cartons containing 1.34 mL (0.045 fl oz) tube}

**Only For Dogs Weighing 23 [-] [to] 44 lbs. and over 8 weeks of age.**

Apply one tube (1.34 mL)(0.045 fl oz).

{For cartons containing 2.68 mL (0.094 fl oz) tube}

**Only For Dogs Weighing 45 [-] [to] 88 lbs. and over 8 weeks of age.**

Apply one tube (1.34 mL)(0.045 fl oz).

{For cartons containing 4.02 mL (0.136 fl oz) tube}

**Only For Dogs Weighing 89 [-] [to] 132 lbs. and over 8 weeks of age.**

Apply one tube (4.02 mL)(0.136 fl oz)

[[Brand Name]][This product] contains Fipronil (9.8%) and Methoprene (8.8%) [insect growth regulator] [IGR] to effectively kill fleas. [The active ingredients in [Brand Name]][This product] features a formula for long lasting control of fleas, and chewing lice for [1 month] [[4][four] weeks] on dogs.]

**READ ENTIRE LABEL BEFORE EACH USE.**  
**USE ONLY ON DOGS AND PUPPIES OVER 8 WEEKS OF AGE**  
**and [5-22][23-44] [45-88] [89-132] lbs.**

#### **PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS. CAUTION.** Harmful if swallowed. Causes 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.

**HAZARDS TO DOMESTIC ANIMALS.** For external use on dogs only. Individual sensitivities, while rare, may occur after using any pesticide product on dogs. Certain medications can interact with pesticides. **Do not** treat your dog with more than one pesticide product at a time. Over dosing your dog can result in serious illness and even death. Consult a veterinarian before using on medicated, debilitated, aged, pregnant or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. If your dog is exhibiting signs of and/or is being treated for skin dermatitis, talk to your veterinarian before applying any topical flea control product.

<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• <b>Do not</b> give anything by mouth to an unconscious person.</li><li>• <b>Do not</b> induce vomiting unless told to by a poison control center or doctor.</li></ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>NOTE TO PHYSICIAN</b> Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-775-9416 for emergency medical treatment information.	

[Distributed by:] [Manufactured for:]  
New Thinking Technology Inc.  
1942 Broadway Street, Suite 314 C  
Boulder CO 80302

EPA Reg. No. 93207-3  
EPA Est. No. XXX-XX-XXX

## 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 ENTIRE LABEL BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY.

### RESTRICTIONS.

**Do not** use on cats, rabbits or animals other than dogs.

**Do not** use on puppies under 8 weeks of age or less than [5][23][45][89] lbs.

Use entire contents of tube on each dog. [**Do not** split one tube between dogs.]

**Do not** use multiple tubes on one dog.

**Do not** apply to dogs weighing less than 5 lbs.

**Do not** apply more than once every 4 weeks.

Weigh your dog to be sure you are applying the right dose formulated for the weight of your dog. **Do not** allow your dog to ingest this product. Separate the treated dog from all other dogs and cats for 24 hours after treatment has been applied to allow the product to dry thoroughly. Dog must be dry at time of application and remain dry for 24 hours after application.

{The following text in a box will be placed in the lower right-hand corner of back panel immediately above the cat warning text box.}

**SIDE EFFECTS:** Monitor your dog after application. [Some dogs may experience temporary startle effects when any product is applied.] Dogs may experience some temporary irritation at the site of product application such as redness, scratching or other signs of discomfort. If signs of sensitivity occur, bathe your dog with a mild soap and rinse with large amounts of water. If these or other side effects occur, consult your veterinarian or call 1-800-775-9416. If your dog has an unusual reaction to the initial application, consult a veterinarian before repeating application. The most common signs of incidental ingestion are excessive salivation and foaming at the mouth. If these symptoms occur, immediately feed your dog and continue to monitor your dog for the next 24 hours.

## [Application Instructions]

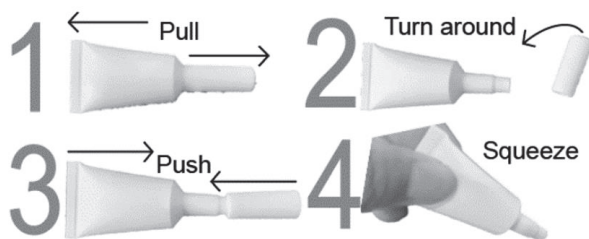
### [How to Apply]

[Open. Part. Squeeze.

Easy-than-ever tube lets you *open* the tube, *part* the fur and *apply* directly to the skin - Putting proven flea and tick protection where it needs to be.]

{The instructions for how to open is optional for back/side panel}

### How to open



### How to apply

1. Invert tube over dog and use open end to part dog's hair.
2. Squeeze tube firmly to apply all of the solution to the dog's skin [as a spot [on] [to] the dog's back between the shoulder blades.] {or} [from the back of the neck to a point midway between the neck and tail.]
3. Allow treated area to dry thoroughly for 24 hours.

{The following 6 step checklist is optional for back/side panel}

[[Look at the Label [Easy] 6 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist]

- [1] Read the label completely and follow directions
- [2] Weigh your dog
- [3] **DO NOT** use dog products on cats
- [4] **DO NOT** treat with more than one pesticide product at a time
- [5] Separate animals after [treatment] [application] to avoid chance of ingestion
- [6] **DO NOT** split tubes between dogs and use the ENTIRE tube contents

### FREQUENCY OF APPLICATION

[Use [Brand Name] [this product] monthly for control of flea and chewing lice infestations.]

[Studies show that] [Brand Name] [this product] kills adult fleas for one month. [Apply monthly to control and chewing lice.] [Allow treated area to dry thoroughly for 24 hours.] **Do not** reapply for [30 days] [4 weeks].

**STORAGE AND DISPOSAL.**

DO NOT contaminate water, food or feed by storage or disposal

**Storage:** Keep this product in its tightly closed original container, when not in use. Store in a cool, dry area that is inaccessible to children and animals.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. If empty: Offer for recycling, if available or place in trash. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**{END BACK/SIDE PANEL}**

**{TUBE LABEL}**

Brand Name

{For cartons containing 0.67 mL (0.023 fl oz) tube}

**Only For Dogs Weighing 5 [-] [to] 22 lbs. and over 8 weeks of age.**

{For cartons containing 1.34 mL (0.045 fl oz) tube}

**Only For Dogs Weighing 23 [-] [to] 44 lbs. and over 8 weeks of age.**

{or the following statements}

{For cartons containing 2.68 mL (0.094 fl oz) tube}

**Only For Dogs Weighing 45 [-] [to] 88 lbs. and over 8 weeks of age.**

{For cartons containing 4.02 mL (0.136 fl oz) tube}

**Only For Dogs Weighing 89 [-] [to] 132 lbs. and over 8 weeks of age.**

Fipronil 9.8%, (S)-methoprene 8.8% [Lot #]

[Graphic icon: **Do not** use on cats]



EPA Reg No, EPA Est No. 93207-3, See package [inserts] for instructions

**CAUTION** Keep out of reach of children

**{Optional Claims on the outer package}**

**[Chewing Lice]**

[Kills chewing lice]

[[A once monthly application required]][Apply monthly to control] [for] chewing lice]



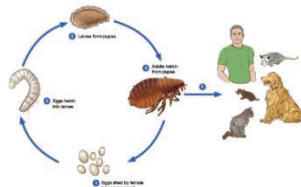
### [Adult Fleas]

[[Kills [adult] Fleas [&][and] [flea eggs] [for [one month] [four weeks] [30 days]]

[Kills Adult Fleas, which may be a source of [flea allergy dermatitis] [, flea bite anemia]]

[Kills Fleas [4 weeks] [1 month] [30 days]!]

[Flea life cycle diagram]



*The product does not kill pupae.*

{The texts below the flea life cycle diagram will appear with the diagram}

### [Flea Eggs]

[Controls flea reinfestation for [4 weeks] [1 month]]

[Prevents flea eggs from developing for [1 month] [4 weeks]]

[[Fipronil (9.8%)] [W][with] [(S)-methoprene (8.8%)] [Insect Growth Regulator] [IGR] [which] [to] [[E][ffectively] Breaks the Flea Life Cycle [!]]

[Kills Flea Eggs for [1 month] [4 weeks]!]

[Prevents Flea Eggs from Developing Into Biting Adults]

[Controls reinfestation of fleas for 1 month]

[Effectively controls all stages of the flea (including [adult fleas] [,flea eggs] [,flea larvae] [and prevents the development of flea pupae]]

### [Ticks]

[Kills Ticks including those that may transmit Lyme disease]

[Kills Ticks for [4 weeks] [1 month] [30 days]!]

[Kills [all stages of] deer ticks [including those that may transmit Lyme disease.] [for [4 weeks] [1 month] [30 days] [per application]]

[Kills Ticks (Including Deer Ticks) for [4 weeks] [1 month] [30 days]]

[Kills [brown dog ticks], [(Rhipicephalus sanguineus)] [American dog ticks,] [and] [lone star ticks][,][and deer ticks] [for [4 weeks] [1 month] [30 days]]

[Kills American Dog Ticks [(Dermacentor variabilis)] for [4 weeks] [1 month] [30 days]!]

### [Multiple Infestations]

[Flea Control for Dogs [&] [and] Puppies 8 weeks old [&] [and] older]

[Kills fleas, flea eggs, ticks [&] [and] chewing lice]

[Kills chewing lice [and controls mites that may cause sarcoptic mange]]

[Breaks the Flea Life Cycle [for [one month][4 weeks][30 days]]

[[Control] [to] kill[s] fleas, chewing lice, [&][and] flea eggs]

[[4 week] [1 month] [30 day] Flea [Application] [Treatment]!]

[[Four (4) Week] [1 month] [30 day] [Flea, and Chewing Lice Control]

[Use [Brand Name][This product] monthly to break the flea life cycle.]

[Use [Brand Name][This product] monthly to control chewing lice]

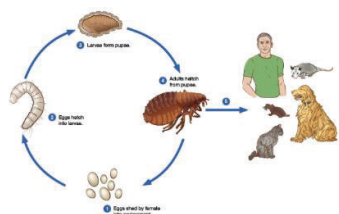
[Monthly protection from fleas, flea eggs, and chewing lice.]  
[Once A Month Flea, [and] [Chewing Lice][Application] [Treatment]]  
[Kills Fleas [and] [&] [Flea Eggs] for [4 Weeks] [1 month] [30 days]]

**[All Others]**

[For Dogs and Puppies 8 weeks of age or older weighing [5[-] [to] 22 lbs] [23[-] [to] 44 lbs]  
[45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]  
[Can be used on puppies 8 weeks of age and older weighing [5[-] [to] 22 lbs] [23[-] [to] 44  
lbs] [45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]  
[Specially formulated for Dogs and Puppies 8 weeks of age or older weighing [5[-] [to] 22 lbs]  
[23[-] [to] 44 lbs] [45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]  
[[For Dogs [5-22 lbs] [23-44 lbs.] [45[-] [to] 88 lbs] [89-132 lbs.] [and] [&] over 8 weeks of  
age]  
[one month][30 days][4 weeks]  
[Convenient spot treatment]  
[Easy to Use [Application]]  
[Best if used year round!]  
[For year-round protection, apply [Brand Name] monthly]  
[(ICON Showing [4 week] [1 month] [30 day] Protection)]



[Apply monthly]  
Breaks the flea life cycle (image)



*The product does not kill pupae*  
{The texts below the flea life cycle diagram will appear with the diagram}

[Prevents reinfestation of listed pests for [4 weeks] [1 month]]  
[Apply once every [4 weeks] [month] [30 days]!]  
[4 Week Dose!] [1 Month Dose!] [30 Day Dose!]  
[Can be used on breeding, pregnant, and lactating [bitches] [female] [dogs]]  
[[Free] Calendar Stickers Inside!]  
[[Free with purchase] [Free inside] Monthly Application Reminder [Magnet][inside]]  
[Fipronil (9.8%) + (S)-methoprene (8.8%)]

[S][Small][4-22 lbs.][M][Medium][23-44 lbs.] [L][Large][45[-] [to] 88 lbs] [XL][Extra Large][89-132 lbs.]

[[3][6][12][24] Applications]

[Stops and prevents infestation of listed pests for [4 weeks][1 month]]

[After the dogs stays dry for 24 hours after application, this product effective after bathing exposing to sunlight]

[Stops existing infestation and prevents establishment of additional infestation of listed pests]

[Direct to skin tube]

[Easy to Use tube]

[No-mess [open] tube]

[Satisfaction Guaranteed - If you are not satisfied, we will make it right with a replacement or refund.]

{Below claims will not distract from the mitigation on the front panel}

[Save Now!] [Buy more and save!]

[Value Size] [Club Size] [Bonus Size]

[Great Value] [Better Value]

[Bonus Pack] [(2) + (1) bonus pack!] [Club Pack]

[Buy 2 Get 1 Free] [Buy 3 get 1 free] [(x)% (More) (Free)!] [33% more free]

[(1) Dose(s) Free!] [(1) Day(s) (Free)!] [(1 Month(s) Free)!] [(3) Day(s) of treatment- Free!]

[(2) Tube(s) Free!] [(3) Application(s) Free!]

{Note to PM – the following claims will not be presented in an overly large font, such that the claims are set in a font type no larger than that of the Signal Word on the label. Furthermore, the claims will not be presented with heavily bolded or highlighted type or use coloring to cause the claim to excessively stand out over the rest of the labeling text. The format of the claims will not be in such a way that is causes greater attention than other required precautionary labeling on the label.}

[Contains the same active ingredients [used in] [as] FRONTLINE® Plus for Dogs.\*]

[Contains the same active ingredients, fipronil (9.8%) and (S)-Methoprene (8.8%), as FRONTLINE® Plus for Dogs.\*]

[[Brand Name] [products] [This product] contain(s) fipronil (9.8%) and (S)-Methoprene (8.8%), the same active ingredients used in FRONTLINE® Plus for Dogs.\*]

[[Brand Name] [products] [This product] contain(s) fipronil (9.8%) and (S)-Methoprene (8.8%) the same active ingredients used in FRONTLINE® Plus for Dogs\*]

{Note to reviewer: Whenever one of the claims above designated with "\*" is used, the claims below will be located on the same panel so they can be read together.}

[\* [Brand Name] [This product] is not manufactured or distributed by [Merial®] [Company name], the makers of [FRONTLINE® Plus for Dogs (or any approved ABN)].]

[\* [Brand Name] [This product][Frontline®] is a registered trademark of [Merial®] [Company name].]

[ABNs:]

[Jmxu's [Methoprene + Fipronil] Squeeze [-] On for Dogs]

[Advanllent [Methoprene + Fipronil] Squeeze [-] On for Dogs]

[KingMo [Methoprene + Fipronil] Squeeze [-] On for Dogs]

[SOBAKEN [Methoprene + Fipronil] Squeeze [-] On for Dogs]

{Inserts are optional}

**{Start inserts}**

### [Jmxu's] Fipronil + Methoprene squeeze on for dogs



{An optional picture of a dog in the weight range for the product as packaged to be placed on the inserts.}

{Alternative pictures at the end of the lable}



Small



Medium



Large



Extra Large

{If one of the following two lines are used, both will be used}

[[Apply to [dogs and] puppies [over] 8 weeks [or older] [old]

[For use ONLY on dogs weighing [5[-] [to] 22 lbs] [23[-] [to] 44 lbs] [45 [-] [to] 88 lbs] [89[-] [to] 132 lbs]]]

[[3][6][12][24] Applications]

[[3][6][12][24] Month Supply]

[[One tube] Prevents infestation of listed pests for [4 weeks][1 month]]

[[One tube] Prevents establishment of additional infestation of listed pests]

{The Images below the optional}



Fleas



Ticks



Chewing Lice



Flea eggs

**ACTIVE INGREDIENTS:**

Fipronil .....	9.80%
(S)-methoprene .....	8.80%
<b>OTHER INGREDIENTS: .....</b>	<b>81.40%</b>
TOTAL .....	100.00%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See [Back][or][Side] [or] [Label[s]] [Panel[s]] [Insert] for First Aid and Additional Precautionary Statements

See [inside flap] [or] [insert] and back panel for complete Directions for Use

Net Contents: X fl oz [Y – 0.0xx fl oz (x mL) tubes

{X is the total fl oz of all tubes in the carton, Y is the number of tubes, xx is the fl oz of each tube with x being the corresponding amount in mL}

[0.023 fl oz (0.67 mL) tubes]

[0.045 fl oz (1.34 mL) tubes]

[0.094 fl oz (2.68 mL) tubes]

[0.136 fl oz (4.02 mL) tubes]

[3][Three][6][Six][12][Twelve] [24][Twenty-Four] Applications {these are the only options for Y}

{For cartons containing 0.67 mL (0.023 fl oz) tube}

**Only For Dogs Weighing 5 [-] [to] 22 lbs. and over 8 weeks of age. Do not apply to dogs weighing less than 5 lbs.**

Apply one tube (0.67 mL)(0.023 fl oz)

{For cartons containing 1.34 mL (0.045 fl oz) tube}

**Only For Dogs Weighing 23 [-] [to] 44 lbs. and over 8 weeks of age.**

Apply one tube (1.34 mL)(0.045 fl oz).

{For cartons containing 2.68 mL (0.094 fl oz) tube}

**Only For Dogs Weighing 45 [-] [to] 88 lbs. and over 8 weeks of age.**

Apply one tube (1.34 mL)(0.045 fl oz).

{For cartons containing 4.02 mL (0.136 fl oz) tube}

**Only For Dogs Weighing 89 [-] [to] 132 lbs. and over 8 weeks of age.**

Apply one tube (4.02 mL)(0.136 fl oz)

[[Brand Name]][This product] contains Fipronil (9.8%) and Methoprene (8.8%) [insect growth regulator] [IGR] to effectively kill fleas. [The active ingredients in [Brand Name]][This product] features a formula for long lasting control of fleas, and chewing lice for [1 month] [[4][four]

weeks] on dogs.]

**READ ENTIRE LABEL BEFORE EACH USE.**  
**USE ONLY ON DOGS AND PUPPIES OVER 8 WEEKS OF AGE**  
**and [5-22][23-44][45-88][89-132] lbs.**

{Optional precautionary statement for inserts}

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS. CAUTION.** Harmful if swallowed. Causes 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.

**HAZARDS TO DOMESTIC ANIMALS.** For external use on dogs only. Individual sensitivities, while rare, may occur after using any pesticide product on dogs. Certain medications can interact with pesticides. **Do not** treat your dog with more than one pesticide product at a time. Over dosing your dog can result in serious illness and even death. Consult a veterinarian before using on medicated, debilitated, aged, pregnant or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. If your dog is exhibiting signs of and/or is being treated for skin dermatitis, talk to your veterinarian before applying any topical flea control product.

{Optional first aid statement for inserts}

<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• <b>Do not</b> give anything by mouth to an unconscious person.</li><li>• <b>Do not</b> induce vomiting unless told to by a poison control center or doctor.</li></ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>NOTE TO PHYSICIAN</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-775-9416 for emergency medical treatment information.	

[Distributed by:] [Manufactured for:]  
New Thinking Technology Inc.  
1942 Broadway Street, Suite 314 C  
Boulder CO 80302

EPA Reg. No. 93207-3  
EPA Est. No. XXX-XX-XXX

{Optional directions for use for inserts}

## 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 ENTIRE LABEL BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY.

### RESTRICTIONS.

**Do not** use on cats, rabbits or animals other than dogs.

**Do not** use on puppies under 8 weeks of age or less than [5][23][45][89] lbs.

Use entire contents of tube on each dog. [**Do not** split one tube between dogs.]

**Do not** use multiple tubes on one dog.

**Do not** apply to dogs weighing less than 5 lbs.

**Do not** apply more than once every 4 weeks.

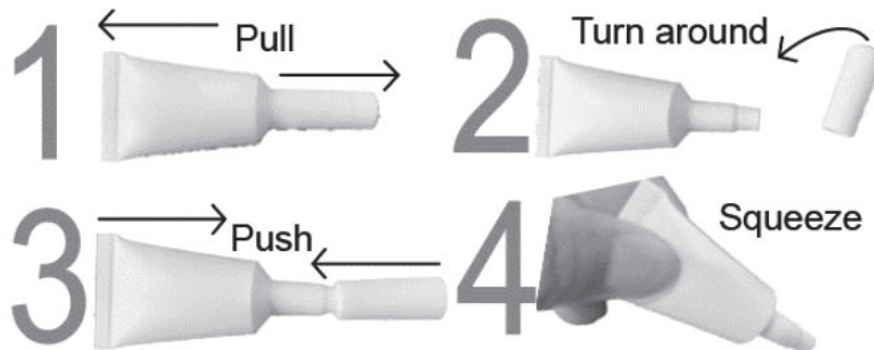
Weigh your dog to be sure you are applying the right dose formulated for the weight of your dog. **Do not** allow your dog to ingest this product. Separate the treated dog from all other dogs and cats for 24 hours after treatment has been applied to allow the product to dry thoroughly. Dog must be dry at time of application and remain dry for 24 hours after application.

{The following text in a box is optional for inserts.}

**SIDE EFFECTS:** Monitor your dog after application. [Some dogs may experience temporary startle effects when any product is applied.] Dogs may experience some temporary irritation at the site of product application such as redness, scratching or other signs of discomfort. If signs of sensitivity occur, bathe your dog with a mild soap and rinse with large amounts of water. If these or other-side effects occur, consult your veterinarian or call 1-800-775-9416. If your dog has an unusual reaction to the initial application, consult a veterinarian before repeating application. The most common signs of incidental ingestion are excessive salivation and foaming at the mouth. If these symptoms occur, immediately feed your dog and continue to monitor your dog for the next 24 hours.

## [Application Instructions]

### How to Open



### How to Apply

[Open. Part. Squeeze.

Easy-than-ever tube lets you *open* the tube, *part* the fur and *apply* directly to the skin - Putting proven flea and tick protection where it needs to be.]

1. Invert tube over dog and use open end to part dog's hair.
2. Squeeze tube firmly to apply all of the solution to the dog's skin [as a spot [on] [to] the dog's back between the shoulder blades.] {or} [from the back of the neck to a point midway between the neck and tail.]
3. Allow treated area to dry thoroughly for 24 hours.

[Look at the Label] [Easy] 6 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist]

- [1] Read the label completely and follow directions
- [2] Weigh your dog
- [3] **DO NOT** use dog products on cats
- [4] **DO NOT** treat with more than one pesticide product at a time
- [5] Separate animals after [treatment] [application] to avoid chance of ingestion
- [6] **DO NOT** split tubes between dogs and use the ENTIRE tube contents

### FREQUENCY OF APPLICATION

[Use [Brand Name] [this product] monthly for control of flea and chewing lice infestations.]  
[Studies show that] [Brand Name] [this product] kills adult fleas for one month. Apply monthly to control and chewing lice. [Allow treated area to dry thoroughly for 24 hours.] **Do not** reapply for [30 days] [4 weeks].



{The following storage and disposal are optional for inserts.}

**STORAGE AND DISPOSAL.**

DO NOT contaminate water, food or feed by storage or disposal

**Storage:** Keep this product in its tightly closed original container, when not in use. Store in a cool, dry area that is inaccessible to children and animals.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**Container Handling:** Non-refillable container. Do not reuse or refill this container. If empty: Offer for recycling, if available or place in trash. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**WARRANTY** Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. The directions for use of this product are believed to adequate and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Unintended consequences may result because of unknown factors. All such risks shall be assumed by the user or buyer. New Thinking Technology Inc is committed to providing high quality products. To the extent consistent with applicable law, New Thinking Technology Inc makes no warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. To the extent consistent with applicable law, New Thinking Technology Inc, the manufacturer, or the Seller shall not be liable for indirect, special, incidental or consequential damages. To the extent consistent with applicable law, the exclusive remedy of the user or buyer shall not exceed the purchase price paid.

**{Optional Claims for inserts}**

**[Chewing Lice]**

[Kills chewing lice]

[A once monthly application required][Apply monthly to control] [for] chewing lice]

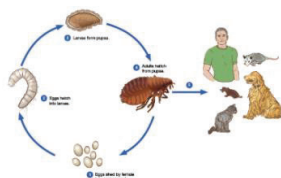
**[Adult Fleas]**

[[Kills [adult] Fleas [&][and] [flea eggs] [for [one month] [four weeks] [30 days]]

[Kills Adult Fleas, which may be a source of [flea allergy dermatitis] [, flea bite anemia]]

[Kills Fleas [4 weeks] [1 month] [30 days]!]

[Flea life cycle diagram]



*The product does not kill pupae.*

{The texts below the flea life cycle diagram will appear with the diagram}

### **[Flea Eggs]**

[Controls flea reinfestation for [4 weeks] [1 month]]

[Prevents flea eggs from developing for [1 month] [4 weeks]]

[[Fipronil (9.8%)] [W][w]ith [(S)-methoprene (8.8%)] [Insect Growth Regulator] [IGR] [which] [to] [[E][e]ffectively Breaks the Flea Life Cycle [!]]

[Kills Flea Eggs for [1 month] [4 weeks]!]

[Prevents Flea Eggs from Developing Into Biting Adults]

[Controls reinfestation of fleas for 1 month]

[Effectively controls all stages of the flea (including [adult fleas] [,flea eggs] [,flea larvae] [and prevents the development of flea pupae])]

### **[Ticks]**

[Kills Ticks including those that may transmit Lyme disease]

[Kills Ticks for [4 weeks] [1 month] [30 days]!]

[Kills [all stages of] deer ticks [including those that may transmit Lyme disease.] [for [4 weeks] [1 month] [30 days] [per application]]

[Kills Ticks (Including Deer Ticks) for [4 weeks] [1 month] [30 days]]

[Kills [brown dog ticks], [(Rhipicephalus sanguineus)] [American dog ticks,] [and] [lone star ticks],[,][and deer ticks] [for [4 weeks] [1 month] [30 days]]

[Kills American Dog Ticks [(Dermacentor variabilis)] for [4 weeks] [1 month] [30 days]!]

### **[Multiple Infestations]**

[Flea Control for Dogs [&] [and] Puppies 8 weeks old [&] [and] older]

[Kills fleas, flea eggs, ticks [&] [and] chewing lice]

[Kills chewing lice [and controls mites that may cause sarcoptic mange]]

[Breaks the Flea Life Cycle [for [one month][4 weeks][30 days]]

[[Control] [to] kill[s] fleas, chewing lice, [&][and] flea eggs]

[[4 week] [1 month] [30 day] Flea [Application] [Treatment]!]

[[Four (4) Week] [1 month] [30 day] [Flea, and Chewing Lice Control]

[Use [Brand Name][This product] monthly to break the flea life cycle.]

[Use [Brand Name][This product] monthly to control chewing lice]

[Monthly protection from fleas, flea eggs, and chewing lice.]

[Once A Month Flea, [and] [Chewing Lice][Application] [Treatment]]

[Kills Fleas [and] [&] [Flea Eggs] for [4 Weeks] [1 month] [30 days]]

### **[All Others]**

[For Dogs and Puppies 8 weeks of age or older weighing [5[-] [to] 22 lbs] [23[-] [to] 44 lbs] [45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]

[Can be used on puppies 8 weeks of age and older weighing [5[-] [to] 22 lbs] [23[-] [to] 44 lbs] [45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]

[Specially formulated for Dogs and Puppies 8 weeks of age or older weighing [5[-] [to] 22 lbs]

[23[-] [to] 44 lbs] [45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]

[[For Dogs [5-22 lbs] [23-44 lbs.] [45[-] [to] 88 lbs] [89-132 lbs.] [and] [&] over 8 weeks of age]

[one month][30 days][4 weeks]

[Convenient spot treatment]

[Easy to Use [Application]]

[Best if used year round!]

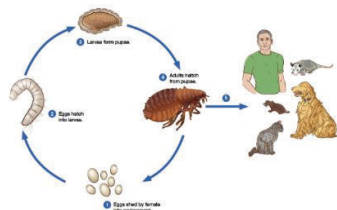
[For year-round protection, apply [Brand Name] monthly]

[(ICON Showing [4 week] [1 month] [30 day] Protection)]



[Apply monthly]

Breaks the flea life cycle (image)



*The product does not kill pupae.*

{The texts below the flea life cycle diagram will appear with the diagram}

[Prevents reinfestation of listed pests for [4 weeks] [1 month]]

[Apply once every [4 weeks] [month] [30 days]!]

[4 Week Dose!] [1 Month Dose!] [30 Day Dose!]

[Can be used on breeding, pregnant, and lactating [bitches] [female] [dogs]]

[[Free] Calendar Stickers Inside!]

[[Free with purchase] [Free inside] Monthly Application Reminder [Magnet][inside]]

[Fipronil (9.8%) + (S)-methoprene (8.8%)]

[S][Small][4-22 lbs.][M][Medium][23-44 lbs.][L][Large][45[-] [to] 88 lbs] [XL][Extra Large][89-132 lbs.]

[[3][6][12][24] Applications]

[Stops and prevents infestation of listed pests for [4 weeks][1 month]]

[After the dog stays dry for 24 hours after application, this product effective after bathing exposing to sunlight]

[Stops existing infestation and prevents establishment of additional infestation of listed pests]

[Direct to skin tube]

[Easy to Use tube]

[No-mess [open] tube]

[Satisfaction Guaranteed - If you are not satisfied, we will make it right with a replacement or refund.]

{Below claims will not distract from the mitigation on the front panel}

[Save Now!] [Buy more and save!]

[Value Size] [Club Size] [Bonus Size]

[Great Value] [Better Value]

[Bonus Pack] [(2) + (1) bonus pack!] [Club Pack]

[Buy 2 Get 1 Free] [Buy 3 get 1 free] [(x)% (More) (Free)!] [33% more free]

[(1) Dose(s) Free!] [(1) Day(s) (Free)!] [(1 Month(s) Free)!] [(3) Day(s) of treatment- Free!]

[(2) Tube(s) Free!] [(3) Application(s) Free!]

[Contains the same active ingredients [used in] [as] FRONTLINE® Plus for Dogs.\*]

[Contains the same active ingredients, fipronil (9.8%) and (S)-Methoprene (8.8%), as FRONTLINE® Plus for Dogs.\*]

[[Brand Name] [products] [This product] contain(s) fipronil (9.8%) and (S)-Methoprene (8.8%), the same active ingredients used in FRONTLINE® Plus for Dogs.\*]

[[Brand Name] [products] [This product] contain(s) fipronil (9.8%) and (S)-Methoprene (8.8%) the same active ingredients used in FRONTLINE® Plus for Dogs\*]

{Note to reviewer: Whenever one of the claims above designated with "\*" is used, the claims below will be located on the same panel so they can be read together.}

[\* [Brand Name] [This product] is not manufactured or distributed by [Merial®] [Company name], the makers of [FRONTLINE® Plus for Dogs (or any approved ABN)].]

[\* [Brand Name] [This product][Frontline®] is a registered trademark of [Merial®] [Company name].]

{Alternative pictures}

{Small Dogs}



Fipronil + Methoprene Squeeze on for Dogs  
Optional text appears in brackets [ ]  
Information for reviewer appears in braces { }

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{Medium Dogs}



{Large Dogs}



{Extra Large Dogs}

