



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OCT 21 2008

Ms. Claudia S Herrington
The Scotts Company LLC
14111 Scottslawn Road
Marysville, OH 43041

Subject: Lawn Crabgrass and Weed Killer
EPA Registration Number 239-2689
Application dated August 1, 2008
CSF Resubmission dated October 9, 2008

Dear Ms. Herrington:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable, provided you make the following changes before you release the product for shipment.

- 1) Remove, modify, or submit efficacy studies to substantiate the following claims, as they are overly broad:
 - a. "Kills more weeds"
 - b. "Complete root [weed] kill"
 - c. "Kills all major [common] broadleaf weeds"
 - d. "Complete kill"
 - e. "100% root kill"
 - f. "Total root kill"
 - g. "Complete weed control for your lawn"
- 2) Remove the claims "New" and "New formula!" as this product is no longer new. The claim new may only be used on labeling of a product of new composition for a period of 6 months following approval of the labeling.
- 3) Remove the claims "Stronger," "Maximum weed control," and "Kills weeds to the MAX" as they imply heightened efficacy and is false and misleading
- 4) Remove the claim "Now"

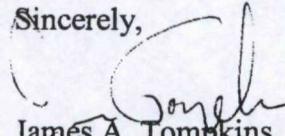
Please note the new alternate brand name "Ortho Weed B Gon Max Plus Crabgrass Killer" is acceptable.

Submit one (1) copy of final printed labeling incorporating the above changes before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

The basic formulation amendment [dated 10/9/2008] and the alternate formulation amendments #1 and #2 [both dated 10/9/2008] of the product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended are acceptable, provided you increase the lower limit of the inert ingredient currently listed as 0.000 to 0.010 in the basic CSF and Alternate #2 CSF. The basic and alternate #1 and #2 CSFs will supercede all previously accepted basic and alternate CSF's and will be added to your file. Submit one copy of each corrected CSF within 30 days from the date of this letter.

If you have any questions, please contact Hope Johnson at 703-305-5410.

Sincerely,



James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

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Lawn Crabgrass and Weed Killer

EPA Reg. No. 239-2689

[**ABN:** Ortho® Weed B Gon® Max™ Plus Crabgrass Control]

[**ABN:** Ortho® Weed B Gon® Max™ Plus Crabgrass Killer]

[Note to PM: See appendix for other optional product claims]

[Kills Crabgrass, Dandelion, Clovers, Plantains, Chickweeds, Oxalis, Spurges, Henbit, English Daisy, Wild Onion And Other Listed Weeds]

For Home Lawns Only

ACTIVE INGREDIENTS:

Quinclorac.....	0.10%
Mecoprop-p, dimethylamine salt.....	0.22%
2,4-D, dimethylamine salt.....	0.12%
Dicamba, dimethylamine salt.....	0.05%
OTHER INGREDIENTS:.....	99.51%
TOTAL	100.00%

ACCEPTED
with COMMENTS
in EPA Letter Dated

OCT 21 2008

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

239-2689

THIS PRODUCT CONTAINS:

- Quinclorac acid 0.1%
- (+)-(R)-2-(2-methyl-4-chlorophenoxy) propionic acid equivalent 0.18%
- 2,4-Dichlorophenoxyacetic acid equivalent 0.10%
- 3,6-dichloro-o-anisic acid equivalent 0.04%

Isomer Specific by AOAC Methods
Contains the single isomer form of Mecoprop-p.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel booklet for additional Precautionary Statements.

- NET CONTENTS: 6 fl. oz. / 177 mL
- NET CONTENTS: 24 fl. oz. (1 pt, 8 fl. oz.) 710 mL
- NET CONTENTS: 64 fl. oz. (½ gallon) 1.89 L
- NET CONTENTS: 1 gallon/3.78 L
- NET CONTENTS: 1.33 gallons/5.03L
- NET CONTENTS: 1.58 gallons/5.98 L
- NET CONTENTS: 1.75 gallons/6.62 L
- NET CONTENTS: 2 gallons/7.56 L

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MANUFACTURED BY:
The ORTHO Group
Post Office Box 190
Marysville, OH 43040
EPA Reg. No. 239-2689
EPA Est. No. 239-IA-3¹, 58996-MO-1^A
Superscript is first letter of lot number
Made in USA

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for spot treatment only.

[For entire lawn treatment [broadcast applications] use Ortho Weed-B-Gon Weed Killer for Lawns Concentrate or Ortho Weed-B-Gon Crabgrass Killer for Lawns.]

[Note to PM: Optional Table on product facts]

Product Facts

Container treats more than	50 weeds	6 fluid ounce size
Container treats more than	200 weeds	24 fluid ounce size
Container treats more than	500 weeds	Half gallon size
Container treats more than	1000 weeds	Gallon size
Container treats more than	1333 weeds	1.33 gallon size
Container treats more than	1580 weeds	1.58 gallon size
Container treats more than	2000 weeds	2.0 gallon size

KILLS WEEDS

Broadleaf: Dandelion, Clover, Chickweed and many other broadleaf weeds.

Grass Weeds: Crabgrass and other grassy weeds

[Kills Broadleaf weeds such as dandelion, clover, chickweed, plantains, and other broadleaf weeds.]

[Kills crabgrass, and some other grass weeds.]

WHERE TO USE

[Kills the toughest weeds in these lawns:]

[Note to PM: some grass types are optional]

ON LAWNS—[Bahigrass], [bentgrass], bermudagrass, buffalograss, [centipedegrass], fescue, Kentucky bluegrass, perennial ryegrass, [St. Augustinegrass] and zoysiagrass

without harming lawn grasses. (Do not use on 'Floritam' a variety of St Augustinegrass.)

(WHAT TO EXPECT) Weeds begin to wilt and die within 24 hours. Weeds die (optional information) completely within 14 - 28 days after application. Won't harm lawn grasses.

(Re-Entry Icon) Do not allow people or pets to enter the treated area until sprays have dried.



Questions, Comments or Medical Information
Call 1-800-225-2883 www.ortho.com

[Kills weeds in your lawn—won't harm lawn grasses. Lawn Crabgrass and Weed Killer singles out weeds, enters through leaves and moves inside the weed to the roots.]

-OR-

[Lawn Crabgrass and Weed Killer kills weeds in lawns—roots and all. Ready-To-Use. No mixing. No measuring.]

[For weeds OUTSIDE the lawn (on driveways, sidewalks, patios and mulched areas) – use Ortho Season-Long Grass & Weed Killer. It kills & prevents weeds all season long.]

[WEEDS Controlled: *[illustration]*]

[Barnyardgrass, large crabgrass, smooth crabgrass, giant foxtail, green foxtail, yellow foxtail, broadleaf signalgrass, junglerice, *Make 2 sequential applications at 14 to 21 day interval to control kikuyugrass and torpedograss*]

[Bur Clover, Carpetweeds, Chickweeds, Creeping Charlie, Cudweed, Curly Dock, Dandelion, English Daisy, False Dandelion, Field Bindweed, Filaree, Florida Pusley, Heartleaf Drymary, Henbit, Oxalis, Pennywort, Plantains, Purslane, Red Sorrel, Sheep Sorrel, Speedwell, Spurges, Spurweed, Thistles, Toadflax, White Clover, Wild Carrot, Wild Geranium, Wild Onion, and other broadleaf weeds.]

WHEN TO APPLY: *[icon]*

- Spray when [any time] weeds are actively growing.
- For Best Results - Spray when daytime temperatures are above 45°F and below 90°F.
- Rain or watering 1 hour after application will not wash away effectiveness.
- For Best Results – If turf is drought stressed water lawn and spray weeds 3 days later when the weeds are not drought stressed.

Bare spots in lawns can be reseeded 4 weeks after application.

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IMPORTANT: Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not use this product for controlling weeds in vegetable gardens, flower beds or around shrubs or ornamental plants. Do not use on or around fruits, vegetables or flowers. Temporary discoloration may occur on St. Augustine, centipede and bentgrass lawns. Do not use on Floratam, a variety of St. Augustine grass.

[Note to PM: The below text will be added to each "How to Apply/Use" section.]

Do not use this product on or near desirable plants, including within the dripline of roots of desirable trees and shrubs, as injury may result. Do not apply as a fine mist because of potential injury to desirable plants.

-----**OPTION 1 (QCS/Trigger)**-----

(Quick Connect Sprayer Package Design Directions:)

NOW with Quick Connect Sprayer. 1. Pull sprayer from bottle. 2. Pull [color] hose connector and coil from sprayer handle. 3. Insert hose connector into [color] sprout on cap until it clicks into place. 4. Flip up spout. Turn sprayer nozzle to open, and spray.

Quick Connect Sprayer. 1. Remove sprayer. Pull cord ALL THE WAY OUT. 2. Insert red plug into spout (on cap) until it clicks. 3. Flip up spout. Open nozzle at end of sprayer.

HOW TO APPLY/USE: [icon]

Turn sprayer nozzle to open. Adjust spray nozzle [as desired] [to give a coarse spray]. Aim at center of weed and spray to lightly cover. To avoid spray drift, hold spray nozzle 2 feet or less from targeted weed. **Optional Marker language**

Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam. (Both settings provide the same weed control results.) Aim at center of weed and spray to lightly cover. To avoid spray drift, hold spray nozzle 2 feet or less from targeted weed.

(Trigger Sprayer:)

HOW TO APPLY/USE: [icon]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired. [set sprayer to a coarse spray]
- Aim at center of weed and spray to lightly cover. To avoid spray drift, hold spray nozzle 2 feet or less from targeted weed.

[Optional MARKER LANGUAGE]

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Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam. (Both settings provide the same weed control results.)

Aim at center of weed and spray to lightly cover. To avoid spray drift, hold spray nozzle 2 feet or less from targeted weed.

-----End of Option 1-----

-----OPTION 2 (PNS II)-----

(Applicator Device Directions)

(Illustration #1)

- Remove sprayer from side carrier and unwrap hose completely.
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks.
- Flip up spout. Spout must remain up while spraying

(Illustration #2)

- Twist nozzle at end of sprayer to desired spray pattern.

[Optional MARKER LANGUAGE]

- Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam. (Both settings provide the same weed control results.)

(Illustration #3)

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops and hold for two (2) seconds to ready the sprayer.

(Illustration #4)

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

HOW TO APPLY/USE: *[icon]*

Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body and press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying.

[Optional MARKER LANGUAGE]

Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. [Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM

marks treated weeds allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam.] (Both settings provide the same weed control results.) Point sprayer away from body and press sprayer button to begin spraying. Pull ring at sprayer bottom again as needed to continue spraying.

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Aim at center of weed and spray to lightly cover. To avoid spray drift, hold spray nozzle 2 feet or less from targeted weed.

-----End of Option 2-----

Important: Spray only the weed, not the entire lawn. Do not use clippings as mulch or compost.

STORAGE & DISPOSAL

(Following to be used with all Storage Text) Keep from freezing. Keep pesticide in original container. Do not put into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place, preferably in a locked storage area.

STORAGE: *(for PNS [III]/Pull 'N Spray [II])* Completely discharge/dispense product in sprayer prior to storage. Flip down (color of spout) spout on cap. **DO NOT DISCONNECT SPRAYER HOSE FROM CAP.** Place sprayer back inside carrier on bottle with the nozzle facing down.

STORAGE: *(for Quick Connect Sprayer and bottle)* Flip down spout to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer [Turn sprayer nozzle to "OFF" [X]]. Snap sprayer back in place.

STORAGE: *(for conventional trigger sprayers larger than 24 fl. oz.)* Place trigger sprayer under handle on container to keep sprayer above the level of contents.

STORAGE: *(for conventional trigger sprayers)* Rotate nozzle to closed position. **-OR-** Turn sprayer nozzle to "OFF" [X].

CONTAINER DISPOSAL:

If empty: Non-refillable. Do not reuse or refill this container. Place in trash or offer for recycling if available.

If partly filled: Call you local solid waste agency for disposal instruction. Never place unused product down any indoor or outdoor drain.

[Re-entry icon] Do not allow people or pets to enter the treated area until sprays have dried.

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. When using this product, wear long-sleeved shirt, long pants, socks, shoes, rubber gloves and protective eyewear.

FIRST AID

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. 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.

Environmental Hazards:

This pesticide is toxic to fish and aquatic invertebrates. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. This product may adversely affect nontarget plants.

To protect the environment, do not apply directly to or allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Do not apply within 25 feet of rivers, fish ponds, lakes, streams, reservoirs, marshes, estuaries, bays, or oceans. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticides off the treatment area. Rinse applicator over lawn or garden area only.

This product has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination. Application around a cistern or well may result in contamination of drinking water or groundwater.

☎ Questions, Comments or Medical Information call 1-800-225-2883 www.ortho.com

NOTICE: Buyer assumes all risks of use, storage or handling of this product not in accordance with label directions.

The ORTHO Guarantee

If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

[Ortho® & Your Environment]

[Your yard is a place for family and pets to enjoy. That's why Ortho® products are designed with care to provide effective solutions to weed problems. For best results, please follow instructions for appropriate usage, storage and disposal.]

[OPEN]

APPENDIX

- 1. Formula Claims:** These claims may be presented on the retail container label or on the labeling accompanying the product.
- ◆ Lawn Crabgrass and Weed Killer [or insert ABN] kills weeds - not lawns.
 - ◆ ORTHO® Lawn Crabgrass and Weed Killer [or insert ABN] for the lawn.
 - ◆ For a beautiful Weed-Free Lawn
 - ◆ Use Lawn Crabgrass and Weed Killer [or insert ABN] to control weeds everywhere in your lawn.
 - ◆ Kills weeds down to the root.
 - ◆ Rainproof [brand] in 1 hour.
 - ◆ Kills broadleaf and grassy weeds in your lawn.
 - ◆ Kills crabgrass and other weeds in your lawn.
 - ◆ Ideal for spot treating individual lawn weeds.
 - ◆ Rain proof in hours.
 - ◆ Kills Dandelion, Clover, Crabgrass [and over 220 other lawn weeds]—Won't Harm Lawns.
 - ◆ Kills Weeds—Not Lawn Grasses
 - ◆ Guaranteed [Results]
 - ◆ Kills weeds the first time, every time, guaranteed.
 - ◆ Guaranteed not to harm one single blade of grass.
 - ◆ Won't harm lawns, guaranteed.
 - ◆ Guaranteed not to harm the lawn.
 - ◆ Guaranteed to kill weeds, not the lawn.
 - ◆ Starts working on contact
 - ◆ Fast results
 - ◆ Fast-acting formula
 - ◆ Weeds begin wilting overnight
 - ◆ Weeds begin to wilt and die overnight
 - ◆ Weed control for any season
 - ◆ Rainproof in 1 hour – so it [the weed killing power] won't wash away.
 - ◆ Rainproof in 1 hour so you won't have to respray.
 - ◆ Kills to the root so weeds don't [won't] ever come [grow] back.
 - ◆ Kills more weeds
 - ◆ Stronger
 - ◆ Complete root [weed] kill
 - ◆ Kills all major [common] broadleaf weeds
 - ◆ Kills the toughest weeds fast
 - ◆ Complete kill
 - ◆ Kills even tough lawn weeds
 - ◆ Kills over 225 weeds [lawn weeds]
 - ◆ Lawn Crabgrass and Weed Killer [or insert ABN] singles out weeds leaves grass alone [unharmed].

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- ◆ For [use on] lawns
- ◆ How it works – Lawn Crabgrass and Weed Killer's [or insert ABN] exclusive [special] [LawnGuard™] [LawnProtect™] [smart] [proven] formula specifically targets [seeks out] weeds, killing them, while leaving the grass [lawn] unharmed – guaranteed.
- ◆ How it works – Lawn Crabgrass and Weed Killer [or insert ABN] [LawnGuard™] [LawnProtect™] contains [is] a special [unique] [exclusive] blend of proven ingredients that seek out [target] and destroy [kill] weeds, while leaving the [your] grass [lawn] unharmed – guaranteed.
- ◆ How it works – Lawn Crabgrass and Weed Killer [or insert ABN] contains an exclusive [Any-Weed™] [brand name] formula [blend of ingredients] that kills BOTH broadleaf weeds and crabgrass [in one easy step!], without harming your lawn – guaranteed
- ◆ Specially formulated to kill weeds, not the lawn.
- ◆ Targets weeds, leaves grass [the lawn] unharmed.
- ◆ Made [scientifically formulated] [special formula] for use on lawns.
- ◆ Kills weeds, not lawns.
- ◆ Kills Weeds Not Lawns™
- ◆ LawnGuard™ [LawnProtect™]
- ◆ With LawnGuard™[LawnProtect™]
- ◆ Contains LawnGuard™ [LawnProtect™] formula.
- ◆ Contains Ortho's [Lawn Crabgrass and Weed Killer's] [or insert ABN] exclusive [special] [scientific] LawnGuard™ [LawnProtect™] formula.
- ◆ Kills broadleaf and [or] grassy weeds [crabgrass] with one application [product]
- ◆ Exclusive [special] [patented] formula [technology].
- ◆ Exclusive [special] LawnGuard™ [LawnProtect™] formula.
- ◆ Exclusive blend of ingredients
- ◆ The Lawn Crabgrass and Weed Killer [or insert ABN] Advantage™
- ◆ Now with LawnGuard™ [LawnProtect™]
- ◆ With LawnGuard™ [LawnProtect™] Weed Control
- ◆ New Formula!
- ◆ New
- ◆ Now
- ◆ Helps keep lawn[s] healthy and weed-free.
- ◆ Helps keep[s] the lawn look [ing] beautiful.
- ◆ Easy to use
- ◆ Requires no mixing, no measuring and no messy cleanup
- ◆ Great [ideal] for spot treatments
- ◆ Ideal for use in between [as a supplement to] fertilizer applications
- ◆ Ideal for use in between fertilizer applications to spot treat weeds
- ◆ 100% root kill
- ◆ Total root kill
- ◆ Free [Sample]
- ◆ Works in 24 hours
- ◆ Overnight results
- ◆ Kills broadleaf weeds plus crabgrass
- ◆ Kills the toughest crabgrass [grassy weeds] [broadleaf weeds]
- ◆ Kills crabgrass & other grassy weeds

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- ◆ Now kills crabgrass (too!)
- ◆ [See] [Visible] Results in 24 hours
- ◆ Rain-proof in 1 hour
- ◆ Maximum weed control
- ◆ Kills broadleaf [weeds] and grassy weeds [crabgrass] with one spray
- ◆ [One product] kills two types of weeds [broadleaf and crabgrass]
- ◆ Kills weeds to the MAX
- ◆ Kills [even] the toughest [lawn] weeds
- ◆ Ortho's [our] best lawn weed killer [weed killer for lawns]
- ◆ Ortho's [our] fastest lawn weed killer [weed killer for lawns]
- ◆ Ortho's [our] most-effective lawn weed killer [weed killer for lawns]
- ◆ Ortho's [our] most powerful lawn weed killer [weed killer for lawns]
- ◆ Ortho's [our] only complete lawn weeds killer [weed killer for lawns]
- ◆ Kills the root
- ◆ Tough on weeds. Gentle [easy] on lawns.
- ◆ Complete weed control for your lawn
- ◆ Kills all major lawn weeds
- ◆ Just as mean, keeps grass green
- ◆ One [simple] solution
- ◆ All in one [weed killer] [weed control] [formula]
- ◆ Keep your lawn totally weed free
- ◆ Kills more weeds [than ever before]
- ◆ [Exclusive] [patented] Any-Weed™ [brand name] Formula
- ◆ Kills broadleaf and grassy weeds [with one product] [all in one] [in one easy step]
- ◆ One [easy] [simple] solution for dandelions, clover and crabgrass
- ◆ Keeping your lawn weed-free has never been easier
- ◆ Kills Field Bindweed
- ◆ Kills Dandelions, Clover, and Other Broadleaf Weeds! Plus, Kills Crabgrass and Other Grass Weeds!

II: WEEDS CONTROLLED [Note to PM: Label may list any or all weeds]

- White heath Aster, Bushy Aster, Heath Aster, Purple Aster, White prairie Aster, Catchweed Bedstraw, Marsh Bedstraw, Northern Bedstraw, Hairy Beggarticks, Creeping Beggarweed, Threeflower Beggarweed, Florida Bellflower, Florida Betony, Field Bindweed, Hairy Bittercress, Whitehead Broom, Burclover, Common Burdock, Great Burdock, Lawn Burweed, Smallflower Buttercup, Hairy Buttercup, Bushy Buttonweed, Virginia Buttonweed, Black Medic, Carolina Geranium, Carpetweed, Wild Carrot, Cat's-ear, Smooth Chaff-flower, Chicory, Common Chickweed, Mouseeared Chickweed, Sticky Chickweed, Chicory, Common Cinquefoil, Oldfield Cinquefoil, Alyce-clover, Crimson Clover, Hop Clover, White Clover, Wandering Cudweed, Purple Cudweed, Narrowleaf Cudweed, Shiny Cudweed, Cupids Shaving Brush, English Daisy, Oxeye Daisy, Common Dandelion, False Dandelion, Catsear Dandelion, Dayflowers, Purple Deadnettle, Dichondra, Dogfennel, Doveweed, Broadleaf Dock, Curly Dock, Dollarweed, Doveweed, Heartleaf Drymary, Eclipta, Facelis, Oakleaf Fleabane, Rough Fleabane, Wild Garlic, Carolina Geranium,

Clammy Ground Cherry, Smooth Ground Cherry, Ground Ivy, Groundsel, Yellow Hawkweed, Healall, Henbit, Sprawling Horseweed, Innocense (blue eyed Mary), Jointvetch, Knawel, Prostrate Knotweed, Tufted Knotweed, Kochia, Lambsquarters, Lespedeza, Field Madder, Alkali Mallow, Venice Mallow, Common Mallow, Little Mallow, Dwarf Mallow, Bristly Mallow, Marcela (yellow joyweed), Marestail, Horseweed, Mat Lippia, Milkweed, Moneywort, Mugwort, Common Mullein, Moth Mullein, Mexican Morningglory, Bigroot Morningglory, Ivyleaf Morningglory, Tall Morningglory, Red Morningglory, Ball Mustard, Black Mustard, Blue Mustard, Indian Mustard, Tumble Mustard, Wild Mustard, Tansy Mustard, White Mustard, Wormseed Mustard, Bitter Nightshade, Eastern Black Nightshade, Silverleaf Nightshade, Cutleaf Nightshade, Hairy Nightshade, Wild Onion, Old World Diamond Flower, Birdseye Pearlwort, Florida Pellatory, Pennywort, Asiatic Pennywort, Peppargrass, Virginia Pepparweed, Prostrate Pigweed, Redroot Pigweed, Smooth Pigweed, Tumble Pigweed, Pineappleweed, Broadleaf Plantain, Buckhorn Plantain, Blackseeded Plantain, Poison Ivy, Poison Oak, Cutleaf Evening Primrose, Showy Evening Primrose, Purple cudweed, Purslane, Brazil Pusley, Largeflower Pusley, Florida Pusley, Giant Ragweed, Common Ragweed, Western Ragweed, Lanceleaf Ragweed, Redweed, Yellow Rocket, Field Sandbur, Longspine Sandbur, Mexican or Texas Sandbur, Southern Sandbur, Sibara, Red Sorrel, Sheep Sorrel, Shepardspurse, Pennsylvania Smartweed, Swamp Smartweed, Ladysthumb Smartweed, Pale Smartweed, Bitter Sneezeweed, Bilobed Speedwell, Common Speedwell, Corn Speedwell, Ivyleav Speedwell, Persian Speedwell, Purslane Speedwell, Slender Speedwell, Snow Speedwell, Thymeleaf Speedwell, Winter Speedwell, Common Spiderwort, Spotted Spurge, Prostrate Spurge, Corn Spurry, Swinecress, Bull Thistle, Canada Thistle, Flodman Thistle, Cotton Thistle, Distaff Thistle, Drummonds Thistle, Elk Thistle, Gray Thistle, Italian Thistle, Leafy Thistle, Meadow Thistle, Milk Thistle, Platte Thistle, Plumeless Thistle, Russian Thistle, Scotch Thistle, Slenderflower Thistle, Tall Thistle, Wavyleaf Thistle, Yellowspine Thistle, Stiff Verbena, Campclipoda Veronica, Common Vetch, Hairy Vetch, Winter Vetch, Wooley Vetch, Violet, Field Violet, Wild Carrot, Wild Lettuce, Woodsorrel, Creeping Woodsorrel, Yellow Woodsorrel, Florida Yellow Woodsorrel, Wooleyleaf Bursage, Common Yarrow, Western Yarrow, Yellow Yarrow

III: Applicator Claims

- ◆ Now with Quick Connect Sprayer
- ◆ Quick Click Sprayer
- ◆ Quick & Easy to Use
- ◆ No Leaks or Mess
- ◆ EASY-TO-USE [Store]
- ◆ The easy way to spray Weed-B-Gon
- ◆ The easier way to spray
- ◆ No [More] Hand Fatigue
- ◆ Pull 'N Spray® Continuous spray for less hand fatigue
- ◆ No more squeeze, squeeze, squeeze
- ◆ 33% more than 1 gallon size
- ◆ Precise control for maximum accuracy
- ◆ Consistent spray for maximum accuracy
- ◆ No more tired hands

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- ◆ Change the way you spray
- ◆ Ideal for large or small jobs [areas]
- ◆ Great for large or small jobs [areas]
- ◆ Precise control—sprays only what you want
- ◆ Adjustable spray nozzle for maximum control
- ◆ Adjustable spray pattern for maximum control
- ◆ Cut your time spent spraying in half
- ◆ You're always ready to spray
- ◆ It's always ready to spray
- ◆ Targets weeds in tight places
- ◆ Save [s] time and energy
- ◆ One pull [delivers] [=] 34 trigger sprays
- ◆ Improved [Applicator]!/Improved [Application]!
- ◆ Improve Applicator System! [Device!]/Improved Application System! [Device!]
- ◆ Improved [!]
- ◆ No pumping, just pull
- ◆ The easier way to kill weeds
- ◆ the easy way to kill lawn weeds
- ◆ Exclusive [technology]
- ◆ Patented [technology]

IV Marker Claims

- ◆ See [shows] exactly where [the weeds] [what] [how much] you [you've] spray [sprayed] [applied].
- ◆ See [shows] [marks] area covered [treated] [sprayed].
- ◆ Foam [Visible Foam]
- ◆ Marks [shows] treated [sprayed] weeds [for up to 10 minutes]
- ◆ Marks [shows] the weeds you've sprayed
- ◆ Easily [easy to] [makes it easy/easier to] see exactly where [the weeds] [what] you've sprayed [treated] [applied]
- ◆ Treated [sprayed] weeds stay visible [marked] [can easily be seen] for up to 10 minutes.
- ◆ See where [what] you spray technology
- ◆ Marker [foam] [foaming] technology
- ◆ Hit [spray] [target] exactly what you want.
- ◆ Foam marks the spot
- ◆ New!
- ◆ Now!
- ◆ Non-staining
- ◆ Does [will] not stain.
- ◆ Stain-free [formula].
- ◆ Accurate
- ◆ Visible results
- ◆ The accurate way to spray
- ◆ RapidStrike™ [SureStrike™] [MAXStrike™] [brand name] [Foam]
- ◆ Foaming Action
- ◆ Penetrates weeds completely [quickly]

- ◆ Sticks to weeds for tough weed control
- ◆ Covers weeds completely

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