

#### OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

April 25, 2024

Renee Warner Analyst, Regulatory Affairs The Scotts Company d/b/a The Ortho Group PO Box 190 Marysville, OH 43040

Subject: Label Amendment – Add images, edit applicator instructions, apply ID language

Product Name: Ortho Home Defense Indoor and Outdoor Insect Killer

EPA Registration Number: 239-2699

Application Date: 09/03/2021 Case Number: 473842 & 473582

#### Dear Renee Warner:

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.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Bifenthrin Interim Decision, and has concluded that your submission is acceptable

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.

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 on your product's label, claims made on the website may not substantially differ from those

Page 2 of 2 EPA Reg. No. 239-2699 Case No. 473842

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 Rebecca Lasko at 202-565-2469 or at lasko.rebecca@epa.gov.

Sincerely,

Scott Campbell, Acting Product Manager 03

Invertebrate and Vertebrate Branch I

Registration Division (7505T)

Office of Pesticide Programs

Enclosure

# Ortho Home Defense Indoor and Outdoor Insect Killer<sub>2</sub>

Sublabel A - STANDARD RTU SPRAYER

Sublabel B – BOV PACKAGING

# SUBLABEL A – STANDARD RTU SPRAYER

#### Alternate Brand Names

- Fundamentals by Ortho Indoor Insect Killer Ready-To-Use
- Fundamentals by Ortho Insect Killer for Indoor Ready-To-Use
- Home Defense Max® Perimeter and Indoor Insect Killer
- Ortho® Home and Perimeter Insect Killer
- Ortho® Home and Perimeter Insect Killer Refill
- Ortho® Home Defense® Bug Barrier Insect Killer
- Ortho® Home Defense® Continuous Spray Indoor Insect Killer
- Ortho® Home Defense® Home Insect Killer Ortho® Home Defense® Home Invading Insect Killer
- Ortho® Home Defense® Home Perimeter Insect Killer
- Ortho® Home Defense® Indoor & Perimeter Insect Killer
- Ortho® Home Defense® Indoor & Perimeter Insect Killer with InvisiSHIELD
- Ortho® Home Defense® Indoor & Perimeter Insect Killer with InvisiSHIELD Refill
- Ortho® Home Defense® Indoor & Perimeter Insect Killer with InvisiSHIELD Technology
- Ortho® Home Defense® Indoor & Perimeter Insect Killer with InvisiSHIELD Technology Refill
- Ortho® Home Defense® Indoor Insect Killer
- Ortho® Home Defense® Indoor Insect Killer & Barrier Spray
- Ortho® Home Defense® Indoor Insect Killer Refill
- Ortho® Home Defense® Indoor Insect Killer with Continuous Spray
- Ortho® Home Defense® Indoor Insect Killer with InvisiSHIELD
- Ortho® Home Defense® Indoor Insect Killer with InvisiSHIELD Refill
- Ortho® Home Defense® Indoor Insect Killer with InvisiSHIELD Technology
- Ortho® Home Defense® Indoor Insect Killer with InvisiSHIELD Technology Refill
- Ortho® Home Defense® Insect Killer
- Ortho® Home Defense® Insect Killer for Perimeter and Indoor
- Ortho® Home Defense® Insect Killer Refill
- Ortho® Home Defense® Insect Killer with InvisiSHIELD for Indoor and Perimeter
- Ortho® Home Defense® Insect Killer with InvisiSHIELD for Indoor and Perimeter Refill
- Ortho® Home Defense® Insect Killer with InvisiSHIELD Technology for Indoor and Perimeter

- Ortho® Home Defense® Insect Killer with InvisiSHIELD Technology for Indoor and Perimeter Refill
- Ortho® Home Defense Max® Bug Barrier Insect Killer
- Ortho® Home Defense Max® Home Insect Killer

- Ortho® Home Defense Max® Home Invading Insect Killer Ortho® Home Defense Max® Home Perimeter Insect Killer Ortho® Home Defense Max® Indoor & Perimeter Insect Killer
- Ortho® Home Defense Max® Indoor Insect Killer
- Ortho® Home Defense Max® Insect Killer
- Ortho® Home Defense Max® Insect Killer for Indoor and Perimeter
- Ortho® Home Defense Max® Insect Killer for Indoor and Perimeter Refill
- Ortho® Home Defense Max® Insect Killer for Perimeter and Indoor
- Ortho® Home Defense Max® Outdoor Perimeter Insect Killer
- Ortho® Home Defense Max® Perimeter and Indoor Insect Killer
- Ortho® Home Defense® Outdoor Perimeter Insect Killer
- Ortho® Home Defense® Perimeter and Indoor Insect Killer Ortho® Home Defense® Perimeter Insect Killer<sub>1</sub>
- Ortho® Home Defense® Perimeter Insect Killer Refill<sub>1</sub>
- Ortho® Home Defense® Perimeter Insect Killer with InvisiSHIELD
- Technology
- Ortho® Home Defense® Perimeter Insect Killer with InvisiSHIELD Technology Refill
- Ortho® Home Insect Killer
- Ortho® Home Insect Killer Refill
- Ortho® Home Invading Insect Killer
- Ortho® Home Invading Insect Killer Refill
- Ortho® Indoor & Perimeter Insect Killer<sub>1</sub> Ortho® Indoor & Perimeter Insect Killer Refill<sub>1</sub>
- Ortho® Perimeter and Indoor Insect Killer
- Ortho® Perimeter Insect Killer<sub>1</sub>
- Ortho® Perimeter Insect Killer Refill<sub>1</sub>
- Ortho® Home Defense Max® Ant, Roach & Spider1
- Ortho® Home Defense Max® Indoor Insect Barrier
- Ortho Bug B-Gon Insect Killer for Indoor + Perimeter1

For Indoor Use Only/For Outdoor Use Only/For Both Indoor & Outdoor Use

#### **Active Ingredient**

Bifenthrin\* 0.05% 

\*Cis isomers 97% minimum, trans isomers 3% maximum

## **KEEP OUT OF REACH OF CHILDREN CAUTION**

See back/panel/booklet for additional precautionary statements.

**Net Contents:** 5/X fl. oz. (147.9/X ml) – 5/X gal. (18.9/X L)

# ACCEPTED

04/25/2024

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

239-2699

**Bold, italicized text is information for the reader and is not part of the label.**[Bracketed information is optional text]. Text separated by / denotes and/or options. Highlighted Text is New. Strikethrough Text is deleted

#### PRECAUTIONARY STATEMENTS

**ENVIRONMENTAL HAZARDS:** This pesticide is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. 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 pesticide off the treatment area. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Care should be used when spraying to avoid fish and reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants. Do not apply this product or allow it to drift to blooming plants if bees are foraging in the treatment area.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not apply this product in or on electrical equipment due to the possibility of shock hazard.

**NOTICE:** To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

#### **DIRECTIONS FOR USE**

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

#### **USE RESTRICTIONS**

All outdoor spray applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- 1. Application to pervious surfaces such as soil, lawn, turf, and other vegetation;
- 2. Perimeter band treatments of 7 feet wide or less from the base of a man-made structure to pervious surfaces (e.g., soil, mulch, or lawn);
- 3. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
- 4. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch:
- 5. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level;
- 6. Applications to vertical surfaces directly above pervious surfaces, such as soil, lawn, turf, mulch or other vegetation) only if the pervious surface does not drain into ditches, storm drains, gutters, or surface waters.
- Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft. by 0.5 ft.).
- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
- Treat surfaces to ensure thorough coverage but avoid runoff.
- To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants.
- Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours).
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.
- Do not apply or irrigate to the point of runoff.
- Do not spray the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.
- For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.

NOTE TO PM: For an indoor use only product – all text prior to this note will be omitted from the FPL.

- Do not allow the product to enter any drain during or after application.
- Do not apply to carpets and hard surfaces as a pin stream or coarse spray treatment

Do not allow to enter indoor or outdoor drains. No permita la entrada a desagües internos o externos.

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

NOTE TO PM: For flexible packaging greater than 20 fl. oz. the following will appear on the label –

Once empty, discard the empty pouch immediately into a secure trash receptacle that cannot be accessed by children.

EPA Reg. No. 239-2699

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#### PRODUCT APPLICATION INSTRUCTIONS

NOTE TO PM: For all Options below Graphics illustrating a step or group of steps may appear on final printed label

NOTE TO PM: Spray Pattern Descriptor is any word used to describe the pattern such as flat, fan, coarse, or fine. Note to PM: Quotes around Directions are optional (i.e. "ON", "OFF")

#### Option 1 – Bottle attached trigger sprayer

[Conventional Trigger RTU/Applicator Device/Applicator Name Directions/Instructions]

#### [HOW TO USE:]

#### [Spray]

- 1. Turn sprayer nozzle to desired spray/spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 2. Squeeze trigger repeatedly [to spray.]

#### [Finish]

1. [Turn sprayer nozzle to "OFF"/X.]

#### Option 2- Hose attached trigger sprayer

[Conventional Trigger Large RTU/Quick Connect Trigger Sprayer/Applicator/Applicator Name Directions/Instructions]

#### [HOW TO USE:]

# [Spray][

- [Remove sprayer/Applicator Name from bottle/holster/holder/box/container/package [by sliding/pulling/pushing sprayer up/down/in/out]].
- [Remove cap/seal/cover on pouch/container/bottle spout/knob/fitment]
- 3. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid on [bottle/pouch/container] [cap] [until it clicks].
- 4. [Flip up [color] spout until fully upright / Twist spout / knob to "ON" / Pull spout up / Rotate hose connector [to lock/engage/open/secure].]
- 5. Turn sprayer nozzle to desired spray/spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 6. Squeeze trigger [repeatedly] [to spray.]

#### [Finish]

- 1. [Turn sprayer nozzle to "OFF" / X.]
- [DO NOT DISCONNECT HOSE CONNECTOR [FROM SPOUT/CAP/KNOB/OPENING].]
- 3. [Place sprayer back into holster/holder.]

### Option 3 – Pull 'N Spray

[Pull 'N Spray/Applicator/Applicator Device/Applicator Name Directions/Instructions]

#### [HOW TO USE:]



- 1. [Remove sprayer/Applicator Name from bottle/holster/holder/box/container/package [by sliding/pulling/pushing sprayer up/down/in/out]].
- 2. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid [on] [bottle/pouch/container] cap [until it clicks.]
- 3. [Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up / Rotate hose connector [to lock/engage/open/secure].]
- 4. Turn sprayer nozzle to desired spray/spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.

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6. Press trigger to spray.

#### [Finish]

- 1. [Turn sprayer nozzle to "OFF" / X.]
- 2. [DO NOT DISCONNECT HOSE CONNECTOR [FROM SPOUT/CAP/KNOB/OPENING].]
- 3. [Place sprayer back into holster/holder.]

#### Option 4 - Battery Hose Attached Sprayer

[Battery Powered Wand/Comfort Wand/Comfort Shot Wand/Applicator/Wand/Applicator Name Directions/Instructions]

#### [HOW TO USE:]



- [Remove sprayer/Applicator Name from bottle/holster/holder/box/container/package [by sliding/pulling/pushing sprayer up/down/in/out]].
- 2. [Remove [color] pull strip to activate batteries].
- 3. [Unfold / [Flip] Open/[Rotate] Open [Applicator Name/applicator/wand] until it clicks/locks into position.]
- [Extend wand/applicator/nozzle] [fully].



- 1. [Remove cap/seal/cover on pouch/container/bottle/closure spout/knob/fitment]
- Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid [on] [bottle/pouch/container] [cap] [until it clicks] [until fully seated].
- 3. [Flip up [color] spout until fully upright. / Twist spout/knob to "ON". / Pull spout up / Rotate hose connector [to lock/engage/open/secure].]

# [Spray] [ OR [

- 1. Turn [sprayer] nozzle to desired spray/spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 2. [Slide [color] switch on trigger to "Unlock"].
- 3. Press trigger to spray.



- 1. [Turn [sprayer] nozzle to "OFF"/X].
- [Slide [color] switch on trigger to "Lock"].
- 3. [Fold [Applicator Name/wand/applicator] closed [and place sprayer/wand back in holster/holder].]

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

[**To replace batteries:** See marked diagram inside battery compartment.]

### Option 5 - Pump Container with Applicator

[Pump 'n Go/EZ Sprayer/Applicator/Applicator Device/Applicator Name Directions/Instructions]

### [HOW TO USE:] [HOW TO ASSEMBLE AND USE INSTRUCTIONS][FOR][Pump 'n Go/Applicator Name]



[Carefully cut the [two] [color] zip tie[s] securing hose and pump handle with scissors, using caution not to cut [color] hose.]

#### [CONNECT]

1. [Unwind hose.] [Firmly push the [hose] connector at the end of the hose onto the [color] spout/cap/knob/opening on the pump [, until it locks into place].]

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# [PREP [WAND/SPRAYER]] [Extend Wand][

Lift sprayer [wand] off bottle. Push [color] button while pulling out on the sprayer/wand nozzle tip. Fully extend wand/sprayer until [color] button snaps into SPRAY POSITION. NOTE: [Color] Trigger will not function until wand is fully extended and [color] button is visible in the SPRAY POSITION.





Make sure handle is screwed on tightly [, or the bottle will not pressurize]. Pump container 25-30 times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise/counterclockwise to lock into carrying position.

NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.





Aim wand/sprayer. Spray by pushing down [color] trigger with thumb. Adjust spray pattern by rotating [color] nozzle tip up to one-half rotation.

# [FINISH] [STORE][



[When finished spraying,] push the [color] button and retract/fold the wand/sprayer until the [color] button snaps back into the original storage position. Place wand/sprayer back onto the top of the bottle [in the integrated holster with nozzle tip extended through the eyelet opening].

# [DEPRESSURIZE][ ]



Push pump handle all the way down and turn pump handle and cap counter-clockwise/clockwise to relieve pressure, then retighten to store.

#### Option 6 - Squeeze

[Applicator Name/Applicator Directions/Instructions]

# [HOW TO USE/APPLY] Alternative Text: [HOW TO ASSEMBLE AND USE INSTRUCTIONS]: [Open:]

- 1. [Twist off cap and remove foil liner.]
- 2. [Replace cap.]
- 3. Flip/Twist/Open Cap

## [Spray:]

- 1. To BEGIN spraying, invert the bottle and point/aim/direct [at the insect/or area of application]
- 2. Squeeze the bottle [to initiate the flow of product.]
- 3. Spray only until the surface is wet. / Spray evenly

#### [Finish:]

- 1. [To STOP spraying, release pressure / turn bottle upright]
- 2. [Flip/twist/close the cap [until you hear an audible snap / until secure].]

#### Option 7 - Flairosol

[Applicator Name/Applicator Directions/Instructions]

## [HOW TO USE:]

#### [Prep]

- 1. [Before first use prime the trigger by pumping/squeezing it [several/a few times]]
- 2. [Slide/Press [color] switch/button [on trigger] to "Unlock"].

#### [Spray/Apply]

- 1. Squeeze/pump/pull/press trigger/button to release spray/mist
- 2. Spray [directly] onto/at insects/bugs or onto surfaces

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#### [Finish]

1. [When empty purchase refill bottle & reuse [trigger] sprayer]

#### Option 8 – Integrated Primo Wand

[Battery Powered/Comfort/Ergo [Shot] Wand/Applicator/Applicator Name Directions/Instructions]

#### [HOW TO USE:]



- [Unsnap/Unsecure/Unlock wand/applicator and Extend wand/applicator [upward/fully][until it clicks into place]]
- 2. [Remove [color] pull strip to activate batteries].
- 3. [Slide trigger lock to "Off"]



- [Spray] [
  - Turn [sprayer] nozzle to desired spray/spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
  - [Slide [color] switch on trigger to "Unlock"].
  - 3. Press trigger to spray.



- 1. [Turn [sprayer] nozzle to "OFF"/X].
- [Slide [color] switch on trigger to "Lock"].
- [Fold [Applicator Name/wand/applicator] closed]

Important Use Information: When storing sprayer for long periods, remove batteries.

[To replace/change batteries: Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise to access battery compartment. See marked diagram inside battery compartment.]

#### OR

[To replace/change batteries: [Push/pull tab/button to] Open battery compartment at bottom of [wand/insert applicator name] [with a small screwdriver] [insert illustration]].

[Remove used batteries and replace with [insert number] new [AA/alkaline] batteries [in correct position as marked inside battery compartment] [or per illustration].] [insert graphics]

[Securely close battery compartment door and [screw closed/close firmly]. Always use a complete set of the same type when replacing batteries. Best performance is achieved with alkaline batteries. Never mix alkaline, carbon-zinc or rechargeable batteries. Dispose of used batteries according to manufacturer's instructions or in household trash.]

#### Optional Troubleshooting Section for Options 4 and 8

**Troubleshooting Tips:** 

Problem: Sprayer does not spray [function]. Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but nothing [no product] comes out].

Possible Cause: Sprayer nozzle is turned off.

Solution: Turn sprayer nozzle to [desired] spray setting [position]. Possible Cause: [Red] [color] hose connector is not flipped up.

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Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks and flip up spout until fully upright.

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about X (10 / 15 / 20 / 30) seconds to prime sprayer.

Problem: Spray pattern is weak [or uneven] [product flow is uneven or dribbles out of nozzle].

Possible Cause: Weak batteries. Solution: Install fresh set of batteries.

Possible Cause: [Red] [color] hose connector is not flipped up.

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks. [Attach coupler to the

cap] and flip up spout until fully upright.

Possible Cause: Sprayer nozzle not fully open.

Solution: Turn sprayer nozzle to [desired] spray setting [position].

#### End of Optional Troubleshooting Section for Options 4 and 8

#### Refill Options

### Option 1 – Applicator Reuse

#### [Applicator Name/Wand] REFILL/REUSE DIRECTIONS

How to attach applicator name/wand to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/ bottle/container:

Removing [color] hose/Comfort Wand/Applicator Name from original bottle/container:



Remove the [color] hose connector from the original bottle/container by pulling the [color] plug from the [color] spout [on cap].

[To remove the side holster/holder from original bottle/container/pouch, pull/lift the bottom tab underneath and slide the holster/holder up.]

OR



Adding [color] hose/Comfort Wand/Applicator Name to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:



[Attach the sprayer holster/holder to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container by sliding the holster/holder down onto the knob.]

[Insert [color] hose connector into [color] spout [on cap] [until it clicks].]

OR



Note to PM: When this is used on a refill container sku, this step will be removed and replaced with the 'Connect' step of Option 4 - Battery Hose Attached Sprayer directions.

#### OR

[Applicator Name/Flairosol] REFILL: This bottle/container may be refilled with Ortho Home Defense Indoor and Outdoor Insect Killer 2/Product Name. To refill twist/snap Ortho Home Defense Indoor and Outdoor Insect Killer 2/Product Name into/onto spray/applicator nozzle/top.

#### **REFILL/REUSE DIRECTIONS**

How to attach Applicator Name/Flairosol to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

Remove sprayer/applicator/top from the empty container by rotating it clockwise/counter clockwise. Place sprayer/applicator/top on the refill container and rotate it clockwise/counter clockwise [until it is secure].

#### OR

Remove sprayer/applicator/top from the empty container by pulling the bottle/container down/out. Place sprayer/applicator/top on the refill container/bottle and push up on the bottle/container [until it is secure].

#### Option 2 – Integrated Wand Applicator Reuse

#### REFILL/REUSE DIRECTIONS / How to Reuse/Refill

How to attach Applicator Name/integrated wand to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

- 1. Remove sprayer head/applicator from bottle/container/pouch by rotating clockwise/counterclockwise and remove from empty bottle/container/pouch.
- 2. Remove cap/lid from Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch.
- 3. [Remove Seal.]
- 4. Insert tube/straw into Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch.
- 5. Secure the sprayer head/applicator from bottle/container/pouch by rotating clockwise/counterclockwise.

#### Option 3 – Refill by pouring in same RTU formula from Bottle

#### [HOW TO REFILL]

#### [Refill Container]

Use this product to refill the empty [insert brand name for Outdoor Insect Killer2/Product Name] container by pouring product carefully and directly into the container. DO NOT add water.

#### OR

#### **HOW TO REFILL/REUSE**

For [Ready-To-Use] Containers with Applicators Intended to be Reused/Refilled: To refill this empty container, pour product carefully and directly from the [insert brand name] container designated as the ready-to-use refill container. DO NOT add water.

Note to PM: illustrations may or may not be included on the market label.



#### Option 4 - Refill by pouring same RTU formula from Liquaflex package

#### [REFILL DIRECTIONS/INSTRUCTIONS]

- 1. Do not reuse or refill this container/pouch. Use this product to refill the empty [Product name] container/bottle/pouch.
- 2. For best pouring experience place bag and refill bottle next to each other at waist height
- 3. Remove cap
- 4. Grasp handle with dominant hand
- 5. Place the other hand on the front side of the bag/pouch/container for stability
- 6. Carefully pour liquid into target container/bottle/pouch
- 7. [Optional illustrations may be used in conjunction with the above steps]

#### Option 5 - Refill by pouring same RTU formula into Pump Container with Applicator

How to refill [Quick Pump/Pump 'N Go/Applicator Name] [using/with] [1.33 Gallon Ready-To-Use Refill/Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container]:

- 1. Remove pump handle on Quick Pump/Pump N Go/Applicator Name by twisting it counterclockwise.
- 2. Remove cap from Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch.
- 3. Pour product carefully and directly into [Quick Pump/Pump 'N Go/Applicator Name] container/bottle. Do Not fill above 2"/3"/4" from top of container/bottle. DO NOT add water.
- 4. Secure pump handle back on container by twisting it clockwise until tight.

## [PRODUCT FACTS]

Kills/Controls (any or all of the following insects)

Adelgids	Eastern Sprucegall		
Ants	Argentine	Pavement	Red/Western Harvester
	Carpenter	Pharaoh/Sugar	
	Foraging Fire Ants	Pyramid	
Aphids	Apple	Greenbug	Rose
	Black Cherry	Pea	Rosy Apple
	Buckhorn	Pecan	Walnut
Bees			
Beetles	Billbugs	Flea	Sap
	Black Turfgrass Ataenius	Japanese (Adults)	Spotted Cucumber / Southern
	Carpet	Lady Beetles (including	Corn Rootworm (Adults)
	Colorado Potato	Asian Lady Beetle Eggs)	Striped Cucumber
	Corn Rootworm (Adults)	Mexican Bean	Weevils (Annual Bluegrass &
	Curculio (Cow Pea ,Plum)	Pine Chafer (grub)	Black Vine)
	Elm Leaf	Pine Shoot	
Borers	American Plum	Peachtree	Squash Vine
	European Corn	Peach Twig	Stalk
	Lesser Peachtree	Southwestern Corn	
Boxelder Bugs			
Bristletails			
Caterpillars	Alfalfa	Cranberry Fruitworm	Navel Orangeworm
	Armyworms (Beet, Fall,	Filbertworm	Painted Lady
	Southern, True, Yellow	Green Cloverworm	Pecan Nut Casebearer
	Striped, Beet Armyworm	Green Fruitworm	Pickleworm
	Eggs)	Hickory Shuckworm	Rindworm
	Bagworms	Hornworms (Tobacco &	Saltmarsh
	Blueberry Spanworm	Tomato)	Sod Webworms
	Budworms	Imported Cabbageworm	Tent
	Corn Earworm	Loopers (Alfalfa, Cabbage,	Velvetbean
	Cutworms	Celery)	
Centipedes			
Chinch Bug	Hairy	Southern	
Cockroaches	American/Palmetto	Asian	German
	Bug/Waterbug	Oriental	
Crickets			
Earwigs			
Firebrats			
Fleas	Cat	Dog	
Flies	Apple Maggot	Cherry Fruit	European Crane (Adult)
	Biting Flies	Cornsilk	House
Fungus Gnats			
Grasshoppers			
Hornets			
Lace Bugs			
Leaffooted	Squash Bug		
Bugs			

Leafhoppers			
Leafminers	Alder	Tentiform	Vegetable
Leafrollers	Oblique Banded	Red-Banded	Variegated
Mealybug	Oblique Barraea	rea Barraca	variogatou
Midges			
Millipedes			
Mites	Broad	Spruce	Two Spotted Spider (Eggs)
	Carmine	Clover	European Red
	Chigger	Two Spotted Spider (Adult)	Pecan Scorch
Mole Crickets	- 55		
Mosquitoes			
Moths	Artichoke Plume	Diamondback	Gypsy
	Codling		
Periodical			
Cicada			
Phylloxera	Pecan Leaf	Pecan Stem	
Pillbugs & Rollie Pollies			
	Tamaiah ad	I D	
Plant Bugs	Tarnished	Lygus Bug	
Psyllids	Pear	D	
Sawflies	European Pine	Redheaded Pine	0.11
Scales	San Jose	Brown Soft	California Red
	Euonymus		
Scorpions			
Silverfish			
Sowbugs	DI LACI		10/ 15
Spiders	Black Widow Brown Recluse	Hobo	Wolf
Spittlebugs	Pecan		
Springtails			
Stink Bugs	Brown Marmorated	Kudzu	
Stored			
Product Pests			
Thrips			
Ticks			
Termites			
Wasps			
Whiteflies			
Yellowjackets			
-	•		

Indoor Surfaces
[illustration]
Note to PM: Below are
representative images that
may or may not be included
on the FPL.



Outdoor Surfaces [illustration]

Note to PM: Below are representative images that may or may not be included on the FPL.



Optional section
In Pantries
[illustration]

Note to PM: Image may or may not be included on the FPL, but would show treatment areas within a representative pantry setting.

When to Apply/Use

Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.

**Bold, italicized text is information for the reader and is not part of the label.**[Bracketed information is optional text]. Text separated by / denotes and/or options. Highlighted Text is New. Strikethrough Text is deleted

Before You	Cover or remove exposed food	Do not allow this product	Cover or remove exposed
Apply/Use	(including pet food)	to contact water supplies.	food (including pet food)
	Cover all food processing	Do not spray into air.	Remove all items from
	surfaces and utensils		pantry and clean pantry
Herry To Apply/Hee	Chalca Mall. Cat agrees a seed	Chalca Wall Cat arms.	thoroughly.
How To Apply/Use	Shake Well. Set spray nozzle	Shake Well. Set spray	Shake Well. Set spray
	to indoor setting [sprayer icon]  [	[sprayer icon] [sprayer icon] [left].  Hold sprayer 12 inches from surfaces being sprayed.  [Apply a 12 inch wide band along the surfaces being treated.] Apply a 12 inch wide band along the exterior perimeter of your home.  Spray until slightly wet without soaking.  [Images of typical indoor application]  [Perimeter Foundations]  [Garages]  [Doors & Windows]  [Patios & Decks]  Note to PM: see above for representative	Isprayer icon] [Spray cracks and crevices along shelves in pantries. Spray until slightly wet without soaking. Replace non-infested items once spray has dried. [image of typical pantry]  Note to PM: see above regarding images.
		images.	
After You Apply/Use	[icon		
Fleas and Ticks (Including ticks that may transmit Lyme Disease)	Do not Spray Animals Pet resting quarters may be trea areas such as pet's resting quart carpet, tile, vinyl & wood) where removed and replaced with clear the source of flea infestation, pet treated with a product registered	ters and localized areas of flot pests may be present. Old be n, fresh bedding after treatme ts inhabiting the treated prem	oors/floor coverings (rugs, edding of pets should be ent of pet area. To control

## Note to reviewer: Below is Storage & Disposal For Non-Refillable containers

#### STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

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Note to reviewer: Below is Storage & Disposal For Refillable Containers

#### STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** [Applicator Name] can be reused with [Product Name refill bottle/container]. Follow instructions in the Reuse Directions when reusing [applicator name]]. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

Manufactured/Sold/Distributed For/By:

The Ortho Group

P.O. Box 190 Marysville, OH 43040

EPA Reg. No. 239-2699

EPA Est. 239-IA-3<sup>1</sup>, 58996-MO-1<sup>A</sup>, 84064-IA-1<sup>P</sup>, 85652-OH-1<sup>W</sup>, 239-MS-1<sup>M</sup>,XXXXX

[Superscript is first letter of lot number]

#### **OPTIONAL MARKETING CLAIMS**

Note to PM: the term cockroach can be interchanged with any and all instances of roaches and vice versa.

Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.

Note to PM: the word "and" can be interchanged with "&" in all instances and vice versa.

Note to PM: Claims containing Now/Improved may appear on any label panel for 6 months following commercial

introduction

The following Product Facts format is optional and the information may appear inside or outside of a box.

#### **PRODUCT FACTS:**

[When to Apply/Use:] [ Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.

	Comfort Wand Applicator	All Other Applicators
[Brand]	Ortho	Ortho
[Product name]	Ortho Home Defense Insect Killer for Indoor & Perimeter2	Ortho Home Defense Insect Killer for Indoor & Perimeter2
	[Product name]	[Product name]
[Marketing Call-out]	Kills Bugs Inside. Keeps Bugs Out.	Kills Bugs Inside. Keeps Bugs Out.
[Claims]		
1.	Reusable Continuous Spray Wand	Long Lasting Bug Barrier
2.	Non-Staining	Non-Staining
3.	Odor Free	Odor Free
4.	Dries Fast/Dries Clear	Dries Fast/Dries Clear

[Product Facts:]	Product Facts: What it Does: Kills home invading insects including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, millipedes. (See inside for complete list)	Product Facts: What it Does: Kills home invading insects including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, millipedes. (See inside for complete list)
	Where to Use: Use with confidence indoors [(kitchens, bathrooms, doors & windows, basements)] and outdoors [(perimeter foundations, garages, doors & windows, patios & decks)] wherever insects are a reoccurring problem.	Where to Use: Use with confidence indoors [(kitchens, bathrooms, doors & windows, basements)] and outdoors [(perimeter foundations, garages, doors & windows, patios & decks)] wherever insects are a re-occurring problem.
	When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.	When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.  People and pets may enter treated areas after
	People and pets may enter treated areas	spray has dried
	after spray has dried	Questions &/or Comments: (phone & computer
	Questions &/or Comments: (phone &	icon) [
	computer icon) [	www.ortho.com
[Ortho Guarantee]	The ORTHO Guarantee: If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.	The ORTHO Guarantee: If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.
[UPC]	UPC Placeholder	UPC Placeholder
[Standard Copy]	© 20xx The ORTHO Group. World rights reserved.	© 20xx The ORTHO Group. World rights reserved.
	Sold by The ORTHO Group	Sold by The ORTHO Group
	PO Box 190, Marysville, OH 43040	PO Box 190, Marysville, OH 43040
[EPA Info]	EPA Reg. No. 239-2699	EPA Reg. No. 239-2699
-	EPA Est. XXX, XXX, XXX, XXX	EPA Est. XXX, XXX, XXX
	Superscript is first letter of lot number.	Superscript is first letter of lot number.
[Component Number]	Component # Placeholder	Component # Placeholder

#### Non-Residual Claims/Kill Claims

- 1. Kills insects\*\* (any or all of the following insects) Ants [(including Western Harvester)], Beetles [(including Asian Lady and Carpet)], German Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Moths, Pantry Pests, Spiders [(including Black Widow, Hobo and Wolf)], and Silverfish.
- 2. [Also] Kills Ticks [(including ticks that may transmit Lyme Disease)].
- 3. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other insects\*\*
- 4. Kills Home invading Insects\*\*
- 5. Kills bugs inside. Keeps bugs out[side] \*\*
- 6. Kills [1...188] Insects\*\*
- 7. Kills [the] bugs you see and [the] [ones] bugs you don't [see] \*\*
- 8. Kills the toughest home invading bugs\*\*

#### NOTE

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- Kills/Controls [both] crawling and flying insects\*\*
- 10. Kills/Controls [all] common household bugs\*\*
- 11. Kills [1...180][plus/+] insects\*\*
- 12. Controls home invading insects\*\*
- 13. Kills ants [and many other insects\*\*!]
- 14. Kills ants, [and] roaches [, and many other insects\*\*!]
- 15. Kills ants, roaches, [and] spiders [, and many other insects\*\*!]
- 16. Kills by contact!

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests"

## Efficacy/Disease Related Claims

- 17. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
- 18. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
- 19. Kills Fleas that may transmit Mycoplasma to cats
- 20. Kills mosquitoes that may transmit Heartworm\*\*\* [to cats/dogs]
- 21. Kills mosquitoes that may transmit Subcutaneous dirofilariasis [to cats/dogs/people]
- 22. Kills mosquitoes that may transmit West Nile virus
- 23. Kills mosquitoes that may transmit the chikungunya virus
- 24. Kills mosquitoes that may transmit yellow fever
- 25. Kills mosquitoes that may transmit dengue fever
- 26. Kills mosquitoes that may transmit encephalitis
- 27. Kills mosquitoes that may transmit [the] Zika virus
- 28. Kills roaches/cockroaches that may carry disease-causing bacteria
- 29. Kills roaches/cockroaches that may carry Salmonella typhimurium, Entamoeba histolytica, E. coli, Staphylcoccous spp., Pseudomonas aeruginosa, Klebsiella pneumoniae, and the poliomyelitis virus.
- 30. Kills roaches that may produce allergens
- 31. Kills roaches that may carry disease causing bacteria
- 32. Kills roaches that contribute to asthma [in children]
- 33. Kills roaches that may produce asthma-causing allergens [in children]
- 34. Kills roaches that may produce allergens that cause asthma [in children]
- 35. Kills roaches that are a leading contributor/cause of asthma [in/among children]
- 36. Kills Ticks that may transmit [the] Powassan/POW virus
- 37. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
- 38. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia to cats
- 39. Kills Ticks that may transmit Anaplasma, Babesiosis, Ehrlichiosis, Lyme borreliosis, Rocky Mountain spotted fever, Hemoplasmosis, and Mycoplasma [to dogs]
- 40. Kills Ticks that may transmit Lyme Disease
- 41. Kills mosquitoes that may transmit Zika, West Nile, [the] Chikungunya virus, yellow fever, and dengue fever.

#### Formula Based claims



- 42. Water based [formula] [water droplet icon]
- 43. Dries clean/clear
- 44. Dries fast/in minutes [for fast/quick re-entry]
- 45. No oily residue
- 46. No [sticky] mess
- 47. Does not stain [fabrics, floors, wood, surfaces]
- 48. Non-staining
- 49. No stains
- 50. Unscented
- 51. Fragrance-Free
- 52. [Leaves] no odor
- 53. No lingering [chemical] odor
- 54. [Virtually] odor free
- 55. Odorless
- 56. No greasy residue/mess

<sup>\*\*</sup>Refer to booklet/back panel for complete list of insects/bugs/pests

<sup>\*\*\*</sup>Does not substitute for a prescribed heartworm medication

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- 57. No need to wipe up
- 58. Leaves no residue [behind]
- 59. Ready to Use
- 60. No Mixing Necessary
- 61. Increased Spreadability\*
- 62. Dries fast for quick re-entry
- 63. [Improved\*] formula applies evenly and dries quickly
- 64. [Improved\*] formula reaches insects where they hide
- 65. Improved\* formula/formulation/technology
- 66. Patented formula/formulation/technology
- 67. [Improved\*] Patented Quick Dry Formula
- 68. [Improved\*] Quick/Fast Dry Time [for quick re-entry]
- 69. [Improved\*] Dries 30/X % Faster\*
- 70. [Improved\*] Dries up to 30/X % Faster\*
- 71. [Improved\*] No mess/puddling [application]
- 72. Improved coverage\*
- 73. Applies evenly for full coverage
- 74. Dries fast [and clear]so you can get back to enjoying your home
- 75. Spreads easily into cracks, crevices, under appliances, and into hard to reach places [where insects hide].
- 76. Easy Spread formula gets into hard to reach places [where insects hide].
- 77. Patented formula gets into hard to reach places [where insects hide].
- 78. [Improved\*]Far reaching formula [gets into cracks, crevices, under appliances, and other hard to get to places where insects hide].
- 79. [Improved/No mess] formula dries faster\* and goes deeper into cracks and crevices [to reach insects\*\* where they hide]
- 80. [Improved\* Formula] Applies evenly and dries quickly
- 81. [Improved\* Formula] Reaches places where insects hide
- 82. [Improved\*] [Far reaching formula] gets into cracks, crevices, and other hard to reach areas/places [where insects hide]
- 83. [Improved Formula] Dries faster\* [and gets into hard to reach areas/spreads easily into hard to reach areas]
- 84. [Improved formula] dries faster with improved coverage\*
- 85. Patented Formula/Technology
- 86. [Improved\* Formula] Great for use indoors! [No Fumes/Odorless/No Odor] [Dries Clear] [Non-Staining/No Stains] [Fast Drying/Dries Fast] [Year-long\*\* Protection] [With Improved Coverage/Spreading Power/Ability to Spread [In Hard to Reach Places]
- \*vs. Other Ortho Formulas/Product Name from 239-2717
- \*\*Refer to booklet/back panel for complete list of insects/bugs/pests

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests"

### Residual Control claims

- 87. Kills bugs inside. Keeps bugs out. \*\*
- 88. Forms/Creates/Establishes a perimeter treatment
- 89. Forms/Creates/Establishes a [bug\*\*] barrier
- 90. Create[s] a [bug\*\*] border/barrier/perimeter [treatment]
- 91. Create [a] bug\*\* barrier[s]
- 92. Apply [as] a barrier
- 93. Apply [as] a border around your home
- 94. Apply [as] a perimeter/border/residual treatment
- 95. Long lasting\* [bug\*\*] perimeter treatment/barrier/border
- 96. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home. \*\*
- 97. Guards against bugs\*\* so you don't have to
- 98. Guards against the bugs\*\* you can't/don't see
- 99. Kills and prevents insects\*\* [inside your home] [outside your home]
- 100. Provides residual control against listed home invading insects
- 101. Keeps [on] killing with residual action, even after you spray
- 102. Keeps [on] killing with residual action, even after spray has dried
- 103. Keeps [on] killing after spray has dried
- 104. Use in kitchens, garages, basements, and attics to keep/to kill bugs\*\* [from entering your home]
- 105. [Kills two/2 ways]: 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried

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106. [Dual Action]: 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

\*\*\*\* [applies to]12 month contol [for] Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

# Note to PM: 12, 6, 5, 4, and 3 month claims are qualified since the associated insects are specific and not the full insect list.

#### 12-Month Claims

- 107. Up to 12 month control/protection\*\*\*\*
- 108. Kills/Controls/Protects [for] up to 12 months\*\*\*\*
- 109. Kills bugs inside all year\*\*\*\*
- 110. Kills home invading bugs\*\*\*\* all year
- 111. Kills indoor bugs\*\*\*\* all year
- 112. Kills & prevents insects\*\*\*\* for up to 1 year/12 months/52 weeks/365 days
- 113. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months\*\*\*\*.
- 114. Creates a perimeter/border/residual treatment that will kill bugs you have and control new bugs for up to 12 months\*\*\*\*.
- 115. Protects your home in/with just 1 application a year[!]\*\*\*\*
- 116. Year Long Protection/Defense\*\*\*\*
- 117. Season Long [Home] Protection/Defense\*\*\*\*
- 118. One application creates/provides a/an [Continuous] Invisible/Residual bug barrier/shield\*\*\*\*
- 119. [Continuous] Invisible/Residual barrier/shield\*\*\*\*
- 120. Kills insects\*\*\*\* up to 365 days/12 months
- 121. One application kills bugs\*\*\*\* up to 365 days/12 months
- 122. Protect your home from bugs\*\*\*\* with year-long/12 month/365 day control
- 123. Offers long-term insect\*\*\*\* control
- 124. [One Application] kills and protects [all year\*\*\*\*]
- 125. [One Application] kills and protects for [up to] 1 year/12 months/52 weeks/365 days\*\*\*\*
- 126. Formulated to kill/protect [against] insects\*\*\*\* for [up to] 1 year/12 months/52 weeks/365 days

Qualifier Option 1: \*\*\*\* [applies to] [for] Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non porous surfaces

Qualifier Option 2: \*\*\*\* [applies to] [for] American Cockroach / palmetto bug / water bug, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces within minutes of exposure.

Qualifier Option 3: \*\*\*\* [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces after 2 hour continuous exposure.

Qualifier Option 4: \*\*\*\* [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider, centipedes indoors on treated non porous surfaces after 24 hour continuous exposure.

#### 6-Month Claims

- 127. Up to 6 month control/protection outdoors<sup>1</sup>
- 128. Kills/Controls/Protects [for] up to 6 months outdoors<sup>1</sup>
- 129. Kills bugs1 outdoors for 6 months
- 130. Kills bugs<sup>1</sup> [indoors] [and] [outdoors] for 6 months

#### 5-Month Claims

- 131. Keeps bugs away for up to 5 months indoors on insects<sup>†</sup>
- 132. Kills bugs<sup>†</sup> inside, keeps bugs out for up to 5 months
- 133. [One application provides] up to 5 month control indoors of insects<sup>†</sup>
- 134. Provides up to 5 months protection indoors<sup>†</sup>

<sup>&</sup>lt;sup>1</sup> Applies to [for] spiders (excluding black widow, brown recluse, hobo)

EPA Reg. No. 239-2699

#### NOTE:

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- 135. [One application] kills up to 5 months indoors<sup>†</sup>
- 136. [One application] kills insects<sup>†</sup> up to 5 months indoors
- 137. [One application] kills up to 5 months indoors on insects†
- 138. [One application] kills ants, roaches, and spiders for up to 5 months indoors†
- 139. Keeps ants, roaches, and spiders away for up to 5 months indoors†

<sup>†</sup>Up to 5 month control indoors on: Ants (including Western Harvester), Carpet Beetles, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 5 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.

#### 4-Month Claims

- 140. Up to 4 month control/protection outdoors<sup>2</sup>
- 141. Kills/Controls/Protects [for] up to 4 months outdoors<sup>2</sup>
- 142. Kills bugs<sup>2</sup> outdoors for 4 months
- 143. Kills bugs<sup>2</sup> [indoors] [and] [outdoors] for 4 months

#### 3-Month Claims

- 144. Up to 3 month control [protection] outdoors3
- 145. Kills/Controls/Protects [for] up to 3 months outdoors<sup>3</sup>
- 146. Kills bugs<sup>3</sup> outdoors for 3 months
- 147. Kills bugs<sup>3</sup> [indoors] [and] [outdoors] for 3 months
- <sup>3</sup> Applies to [for] spiders (excluding black widow, brown recluse, hobo), harvester ants, / crickets, grasshoppers
- 148. Keeps insects<sup>^</sup> away for up to 3 months indoors
- 149. Keeps away insects<sup>^</sup> for up to 3 months indoors
- 150. [Provides] up to 3 month control of insects<sup>^</sup> indoors
- 151. [Provides] up to 3 month control indoors on insects^
- 152. [Provides] up to 3 months protection indoors^
- 153. [One application] kills ants, roaches, and spiders for up to 3 months indoors^
- 154. [One application] kills insects\(^\) up to 3 months indoors
- 155. [One application] kills up to 3 months indoors [on insects]^
- 156. Keeps ants, roaches, and spiders away/out for up to 3 months indoors^
- 157. Kills bugs inside, keeps bugs out for up to 3 months^

^Up to 3 month control[indoors on: Ants (including Western Harvester), Carpet Beetles, German Cockroaches, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 3 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.

#### Egg Killing Claims

- 158. Kills beet armyworm, two spotted spider mites, Asian Lady Beetles and their eggs
- 159. [Plus] kills insects and their eggs<sup>4</sup>
- 160. Kills insect eggs<sup>4</sup>
- 161. Prevents insect eggs from hatching! 4
- 162. Up to 12 month control\* plus kills insect eggs4

#### Knockdown claims

- 163. Starts killing listed bugs in seconds
- 164. Starts killing listed bugs fast
- 165. Kills by contact [Guaranteed]

### Area-related claims

- 166. Ideal/Great for small/smaller jobs/areas/spaces/rooms
- 167. Ideal/Great for large/larger jobs/areas/spaces/rooms
- 168. Use inside and outside your home!
- 169. Use in kitchens, garages, basements, and attics.

<sup>&</sup>lt;sup>2</sup>Applies to [for] spiders (excluding black widow, brown recluse, hobo)

<sup>&</sup>lt;sup>4</sup>Applies to [for] beet armyworm, two spotted spider mites, Asian Lady Beetles

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- 170. Use in kitchens, garages, basements, and attics to kill insects\*\*.
- 171. Use/Can be used in bathrooms, kitchens, family rooms, pantries, attics, garages, basements, closets, storage areas, and bedrooms
- 172. Use with confidence in bathrooms, kitchens, family rooms, pantry, attics, garages, basements, closets, storage areas, and bedrooms.
- 173. [Illustrations of kitchen, bathroom, home perimeter/foundation, garage, windows and doorways, basement, attic, porches and patios]
- 174. Designed to/for use in kitchens and pantries
- 175. Apply along [and behind] baseboards and foundations.
- 176. Apply along [behind] [and] [between] appliances
- 177. Apply beneath [and behind] sinks
- 178. Apply in other areas where insects\*\* [are often found/appear]
- 179. You're/It's always ready to spray
- 180. Change the way you spray
- 181. [Formulated For] Indoor/Outdoor Use
- 182. Indoor/Outdoor [Formula]

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

#### General Applicator Claims

- 183. No [more] tired hands
- 184. Reduces hand fatigue
- 185. No more squeeze, squeeze, squeeze
- 186. No [constant] pumping
- 187. Quick Pump [applicator/sprayer]
- 188. [Quick and] Easy to Use
- 189. No Leaks or Mess
- 190. Precise control [for maximum accuracy]
- 191. Consistent spray [for maximum accuracy]
- 192. Adjustable sprayer [nozzle][for maximum control]
- 193. [Improved\*] Applicator
- 194. Grab & Go
- 195. Pump [illustration]
- 196. Spray [illustration]
- 197. No [constant] pumping
- 198. No more bending/kneeling
- 199. Just attach hose and spray
- 200. Consistent/even coverage
- 201. You're/It's always ready to spray
- 202. The easy/easier way [to spray/to kill insects\*\*][Home Defense®]
- 203. Change the way you spray
- 204. Easy to spray
- 205. No Aerosols

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

#### **PNS Claims**

- 206. Less/No [more] hand fatigue\* [with PNS II/Pull 'N Spray II/Spray Master™/applicator name]
- 207. Just pull
- 208. One pull equals/= 34/X trigger sprays
- 209. One pull delivers 34/X trigger sprays
- 210. One push of the button = 34/X trigger sprays
- 211. For best results, pull out slowly and hold for 2 seconds
- 212. Up to X minutes/mins. of continuous spray
- 213. Over X minutes/mins of continuous spray
- 214. 1 pull equals X trigger sprays

<sup>\*\*</sup>Refer to booklet/back panel for complete list of insects/bugs/pests

<sup>\*</sup>vs. previous design/Applicator Name

<sup>\*\*</sup>Refer to booklet/back panel for complete list of insects/bugs/pests

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[Bracketed information is optional text]. Text separated by / denotes and/or options. Highlighted Text is New. Strikethrough Text is deleted

Pull n Spray –Less/No hand fatigue\*

\*vs. trigger sprayer

#### Refill Claims

- 216. Refill/Recharge/Fill-Up/Reload/Renew [for] Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name [Illustration]
- 217. Fills Up Quick Pump/Pump 'N Go/Applicator Name [Illustration]
- 218. Fill-Up for Applicator Name/Quick Pump/Pump 'N Go
- 219. Works with Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name [Illustration]
- 220. Just plug [Comfort Wand®/Applicator name] in and it's ready to spray
- 221. [Plug 'N Play] Refill/Recharge/Reload/Renew [For Comfort Wand]
- 222. Refill/Recharge/Fill-Up/Reload/Renew Available
- 223. [Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name] Recharge/Refill/Fill-Up/Reload/Renew [cartridge]

#### **Wand Claims**

#### Note to PM: Numbers in the below claims may change based on changes to the applicator motor or wand length.

- 224. Reusable [Comfort/Continuous][Spray][ Wand]
- 225. Rechargeable
- 226. [Wand/Applicator Name] will last [for] [at least] 20 bottles!
- 227. [Wand/Applicator Name] will last over 25 gallons!
- 228. [Wand/Applicator Name] will last for years\* \*based on X applications per year
- 229. Performs like a tank sprayer with no/without pumping
- 230. Equal performance to a tank sprayer with no/without pumping
- 231. Tank sprayer power with no/without pumping
- 232. Spray [foundations][&/and] [baseboards] without bending!
- 233. [More\*] Precise/Accurate spray
- 234. Continuous Spray [&/and [more/better\*] precision/accuracy]
- 235. Easily get[s] into hard-to-reach areas
- 236. [Precision/Precise/Adjustable] Sprayer
- 237. [Wand/Applicator] [extends up to 2 feet] [to] Reduce[s] [back] bending [and the] [continuous spray wand] helps reduce[s] hand fatigue]
- 238. [Wand/Applicator] [provides] precision control [to maximize every spray/get the most out of every spray]
- 239. Fan Spray [for better coverage/for fast[er\*] application]
- 240. [Now with a] Foaming Spray [for crack[s] and crevice[s]] [application] / [to see where [the product] applied]
- 241. Foaming spray makes it easier to see where [the product is/was][you] applied
- 242. [Foaming spray] disappears/dissolves when dry [to indicate when to re-enter]
- 243. [Foaming spray] dries clear [to indicate when to re-enter]
- 244. [Foaming spray] makes it easy to tell when the area is dry [and people & pets can re-enter]
- 245. Know/See where [product was] applied
- 246. [2x] Faster Application/Coverage\*
- 247. Same coverage in half the/50% less time\*
- 248. Continuous Spray/wand
- 249. Extended Reach
- 250. Continuous [Adjustable] Spray [Wand]
- 251. Longer\* wand
- 252. 50% longer\* reach
- 253. 2x/twice [the] extended reach\*
- 254. Easier [than ever] to spray[the home/foundation/perimeter], [doors], [windows], [and/&] [baseboards]
- 255. Continuous adjustable spray
- 256. [Comfort][Shot] Wand
- 257. Powered by Duracell/Battery Brand
- 258. Save[s] time and energy
- 259. Cut your time spraying in half
- 260. ALWAYS lock after use
- 261. [Applicator Name] Extends 2 feet Continuous Spray
- 262. [Applicator Name] Continuous Spray
- 263. [Battery Image]
- 264. Batteries Included
- 265. [Applicator Name]

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- 266. Now with more power and reliability
- 267. More coverage on a single set of batteries
- 268. Do the job in less time
- 269. [30%/X%] more powerful
- 270. More output = less hand fatigue
- \*vs previous design/Applicator Name

#### Flairosol Claims

- 271. Continuous Spraying
- 272. Fine Mist
- 273. 360° spraying

#### Value

- 274. Great Value
- 275. Value Pack (only when selling Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter Wand/product name/Quick Pump bottle together with Refill)
- 276. Refill/Recharge/Renew/Fill-Up/Reload
- 277. Buy Wand & Refill, Get [X%] Free!
- 278. Same formula, better value! (applies when comparing different product sizes)
- 279. Save [Money] with the Refill!
- 280. Over 10% more than 1.33 gal size
- 281. [Over] X% more than X gal size
- 282. Bonus Size
- 283. Combo [Pack]
- 284. Wow [Pack]
- 285. Exclusive to Club Stores!
- 286. Exclusive Club [Bonus] Size!
- 287. Value/Bonus Size 2-pack!
- 288. Value/Bonus Size 2 gallons!
- 289. Value/Bonus Size 2-pack = 2 gallons!
- 290. Look inside [label] for special offer information!
- 291. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.

## OTHER

- 292. Easy to Use
- 293. [icon] People and pets may re-enter treated areas after spray has dried
- 294. XX% less plastic\*
- 295. [Company] & Your Environment Your yard is a place for family and pets to enjoy. That's why [company] products are designed with care to provide effective solutions to insect problems. Please follow instructions for appropriate usage, storage and disposal.
- 296. Now [with]
- 297. Proven performance
- 298. Read Entire label before use
- 299. Recyclable symbol [illustration/logo according to certifying body]
- 300. Before [illustration of untreated area containing insects]
- 301. After [illustration of treated area containing no insects]
- 302. [For] Indoor & Outdoor Residential use only
- 303. Intended for residential use
- 304. Peel Open for use directions and further information
- 305. OPEN
- 306. Resealable Label for Directions & Precautions
- 307. Peel Open for use directions and further information
- 308. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 309. PEEL HERE
- 310. PULL / PEEL HERE [TO REMOVE TAPE]
- 311. Product of –and/or- Made in U.S.A.
- 312. Assembled in the USA
- 313. ©20XX, licensed by [Company/Brand]. World rights reserved.

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314. QUESTIONS OR COMMENTS - [phone icon]



1-800-225-2883 <u>www.ortho.com</u> [Visit our website]

[computer icon]

- 315. New Look, Same Great Results
- 316. New Look, Better Spreadability<sup>a</sup>
- 317. New Look, Now with InvisiSHIELD
- 318. Patent #: US 8,734,821 & 8,790,673
- 319. Indoor Surfaces
- 320. Outdoor Surfaces
- 321. Indoor and Outdoor Surfaces
- 322. Indoor Use
- 323. Outdoor Use
- 324. Indoor and Outdoor Use

\*vs. previous bottle/container/packaging

avs. Other Ortho Formulas/Product Name from 239-2717

#### Guarantees:

- 325. Guaranteed+++
- 326. [Company/Brand] Guarantee[d] †††
- 327. Guaranteed [results] †††
- 328. Guaranteed Kill [or your money back] †††
- 329. [Company/Brand] Satisfaction guaranteed[†††]
- 330. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]

††† [Company/Brand]Promise: If this [company/brand] product when used for the intended purpose fails to give you complete satisfaction return the item to the [company] store where purchased for free replacement of the same or similar item.

†††The [Company/Brand] Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

†††Consumer Guarantee: If for any reason you are not satisfied after using this product, simply send us original proof of purchase, and we will refund the purchase price.

#### InvisiSHIELD Claims

Note to PM: Claims containing "year-long" will be used only when the insect kill list on the FPL contains one or more of the insects identified in the qualifiers in the section for 12 month claims. Year-long will use the same qualifier options from the 12 month claims section.

- 331. For easy Indoor application, trust the power of Ortho Home Defense [with InvisiSHIELD] [Technology]
- 332. Ortho Home Defense [with InvisiSHIELD Technology], the way to keep bugs away
- 333. With InvisiSHIELD [Technology] [Year-Long\*\*\*\* Bug Control] with no fumes, odors, stains, or [wet] mess.
- 334. InvisiSHIELD helps kill/control the bugs\*\* you have without the stress
- 335. Let [Ortho] Home Defense shield your home from the insects\*\*
- 336. InvisiSHIELD [technology] dries fast, odorless/odor-free, non-staining,12 month\*\*\*\* control/year-long\*\*\*\* protection, with spreading power/ ability to spread / apply more evenly
- 337. With InvisiSHIELD [technology]
- 338. InvisiSHIELD
  - No Fumes
  - Odorless/No Odor
  - Dries Clear
  - Non-Staining/No Stains
  - Fast Drying/Dries Fast
  - Year-long\*\*\*\* Protection
  - With Coverage/Spreading Power/Ability to Spread [In Hard to Reach Places]



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Example of design/icon which will use all or a combination of text listed in claim 331.

\*Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1, 2, 3, or 4

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

# Multiple Insects System Names/Headings:

#### NOTE TO PM: The following items will be used in conjunction with the Multiple Insect System text.

- 1. [3-Step] [location based/use area] System for Home Protection from insects\*\*
- 2. [3-Step] Home/Insect\*\* [location based/use area] Treatment/Control [Plan/Program/System]
- 3. [3-Step] Home/Insect\*\* [location based/use area] Solution System/Set
- 4. [3-Step] Home/Insect\*\* [location based/use area] System [for Protection]
- 5. [3-Step] Home/Insect\*\* [location based/use area] Protection [Plan/Program/System]
- 6. 3-Step Home/Insect\*\* [location based/use area] Control [Program/System]
- 7. Part of the [Ortho Home Defense/Brand name] [3-Step] [location based/use area] System for Home Protection from insects\*\* [in 3 steps]
- 8. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Treatment Plan/Program/System [in 3 steps]
- 9. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Solution System/Set [in 3 steps]
- 10. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] System [for Protection] [in 3 steps]
- 11. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Protection Plan/Program/System [in 3 steps]
- 12. Part of the [Ortho Home Defense/Brand name] 3-Step Home/Insect\*\* [location based/use area] Control [Program/System] [in 3 steps]
- 13. [Ortho Home Defense/Brand name][3-Step] [location based/use area] System for [protection from] Insects\*\* [in 3 steps]
- 14. [Ortho Home Defense/Brand name][3-Step] Home/Insect\*\* [location based/use area] Treatment Plan/Program/System [in 3 steps]
- 15. [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] [Solution] System/Set [in 3 steps]
- 16. [Ortho Home Defense/Brand name][3-Step] Home/Insect\*\* [location based/use area] Protection Plan/Program/System [in 3 steps]
- 17. [Ortho Home Defense/Brand name] 3-Step Home/Insect\*\* [location based/use area] Control [Program/System] [in 3 steps]
- 18. [Location based/use area] Home Insect\*\* Control [system] [in 3 steps]
- 19. Zones of protection from Insects\*\* [in 3 steps]
- 20. Treat these/this area[s]/location[s] [Inside/Indoors],[Perimeter],[and][Outdoors/Outside/Lawn] for [control of/protection from] Insects\*\*
- 21. Location based Insect\*\* treatment/control/protection [program/system/plan] [in 3 steps]
- 22. For best results use a system to treat/control insects\*\*
- 23. For best results to control insects\*\* use the entire/full [treatment/solution/protection] system/plan/program
- 24. For best control of insect\*\* use the entire/full [treatment/solution/protection] system/plan/program
- 25. For best control of insects\*\* use the full [treatment/solution/protection] system/plan/program
- 26. For best results to control insects\*\* use the full [treatment/solution/protection] system/plan/program
- 27. For best results, use the full [treatment/solution/protection] system/plan/program to control insects\*\*
- 28. For best results, more than one product may/might/could be needed for insect/bug control
- 29. [Part of a] Insect\*\* Treatment/Control System/Program/plan [in 3 steps]
- 30. Use as a system for control of Insects\*\*
- 31. Insect\*\* Control in 3 Steps
- 32. Step 1/2/1 & 2
- 33. Ortho Home Defense Home Protection
- 34. Targeted Insect\*\* [location based/use area] Treatment/Control Program/Plan/System [in 3 steps]
- 35. Insect\*\* [location based/use area] Protection Program/Plan/System [in 3 steps]

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

<sup>\*\*</sup>Refer to booklet/back panel for complete list of insects/bugs/pests

EPA Reg. No. 239-2699

#### NOTE:

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#### Additional System Claims

- 1. Part of a system for Home Protection from insects\*\*
- 2. [Part of] [Ortho] [Home Defense] Insect\*\* system for Home Protection
- 3. [Ortho] Home Defense [provides][products for] zones/areas of home protection[:] inside/indoors/in your home/in the home/inside your home/home perimeter/ around the home/around your home, and outdoors/outside/the lawn/your lawn/lawn
- 4. Extend your bug\*\* barrier further with [Ortho] [Home Defense] [treatment/control] system/program/plan for Home Protection
- 5. [Let] [Ortho] Home Defense [system for Home Protection] [guard(s)/protect(s)] your home from insects\*\*
- 6. Part of a home defense system/program/plan from insects\*\*
- 7. [System/Program/Plan for] Insect\*\* Home Protection [in 3 steps]
- 8. [Part of the] [Home Defense/Brand name] Protection Program

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

#### Multiple Bug System Language

Note to PM:

This product may be indicated as steps 1, 2 or 1 & 2

- 1. This product could appear only as Step 1 when packaged with Options 1, 7, and 8 within the "Product Application Instructions section" will emphasize or indicate the product is for "Indoors/Inside" on the FPI
- 2. This product could appear only as Step 2 when packaged with using Options 2, 3, 4, and 5 within the "Product Application Instructions section" will emphasize or indicate the product is for "perimeter" on the FPL.
- 3. This product could appear as Step 1 & 2 regardless of the packaging option used. If the FPL indicates the product as step 1 & 2, the text for those steps may be combined.

Note to PM: System will use a system name from "Multiple Insect System Names/Headings Section". This name will appear in the vicinity of the following text.

[Treat [your home] for many of the most common [crawling] insects\*\* with a system that protects in all areas of your home/space.]

#### OR

[Treat [your home] for many of the most common [crawling] insects\*\* with a system that protects in all areas in and around your home/space.]

#### OR

[Treat [your home] for many of the most common [crawling] insects\*\* with a system that protects in all areas where your family spends time/lives each day.]

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

Note to PM: Below are the system step call outs. On the FPL, the system step will be emphasized if all of the system steps below appear on the label. The FPL could also display just the step(s) applying to the product and the corresponding text.

Note to PM: Representative icons appear at the end of this section.

#### [Step][1-][Kill/Control/Treat:] Indoors/Inside [icon]<sup>a</sup>

[Step][2-][Kill/Control/Treat:] Perimeter [icon] b

[Step][3-][Kill/Control/Treat:] Lawn/Outdoors/Outside [icon] c

<sup>a</sup>[Step 1/Kill/Control/Treat] Indoors/Inside [icon]: See a bug\*\* [inside]? Spray it to kill it. *OR* [Crawling] bug\*\*/bugs\*\* make its/their way in [to your home]? Spray it/them to kill it/them. *OR* See a straggler/lone bug\*\*/bug\*\*/survivor that made its way in/into [your home]? Spray it to kill it.

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>b</sup> [Step 2/Kill/Control/Treat:] Perimeter [icon]: Create a barrier of [bug\*\*] protection [around your home]. *OR* Create a barrier of protection around your home to keep [crawling] bugs\*\* out of [your home / where your family spends time]. *OR* Create a [bug\*\*] barrier of protection around [the perimeter of] your home.

[Use/Look for Ortho [Home Defense] products marked for Perimeter.]

<sup>c</sup> [Step 3/Kill/Control/Treat:] Lawn/Outdoors/Outside [icon]: Extend your protection by killing bugs\*\* in your yard/lawn/grass where your family‡/kids & pets‡/loved ones‡ plays/play/spend time. *OR* Kill the [crawling] bugs\*\* in your yard/lawn [where your children play] before they [even] start a/to journey [into your home]. *OR* Kill and control the [crawling] bugs\*\* in your lawn/yard before they begin their/to journey [in/into your home].

[Use/Look for Ortho [Home Defense] products marked for Lawn/Outdoors/Outside.]

‡Always read and follow label directions-

#### NOTE to PM: Below are representative icons arranged Step 1 to 3 from left to right.







#### Ant & Roach System Names/Headings:

#### NOTE TO PM: The following items will be used in conjunction with the Ant & Roach System text.

- 1. [2/3-Step] System for [Protection from] Ants/Roaches/Ants & Roaches
- 2. [2/3-Step] Ant/Roach/Ant & Roach Treatment/Control Plan/Program/System
- 3. [2/3-Step] Ant/Roach/Ant & Roach Solution System/Set
- 4. [2/3-Step] Ant/Roach/Ant & Roach System [for Protection]
- 5. [2/3-Step] Ant/Roach/Ant & Roach Protection Plan/Program/System
- 6. 2/3-Step Ant/Roach/Ant & Roach Control [Program/System]
- 7. Part of the [Ortho Home Defense/Brand name] [2/3-Step] System for [Protection from] Ants/Roaches/Ants & Roaches [in 2/3 steps]
- 8. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Treatment Plan/Program/System [in 2/3 steps]
- 9. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Solution System/Set [in 2/3 steps]
- 10. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach System [for Protection] [in 2/3 steps]
- 11. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Protection Plan/Program/System [in 2/3 steps]
- 12. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Control [Program/System] [in 2/3 steps]
- 13. [Ortho Home Defense/Brand name] [2/3-Step] System for [protection from] Ants/Roaches/Ants & Roaches [in 2/3 steps]
- 14. [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Treatment Plan/Program/System [in 2/3 steps]
- 15. [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach [Solution] System/Set [in 2/3 steps]
- 16. [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Protection Plan/Program/System [in 2/3 steps]
- 17. [Ortho Home Defense/Brand name] 2/3-Step Ant/Roach/Ant & Roach Control [Program/System]
- 18. Home Ant/Roach/Ant & Roach Control [system] [in 2/3 steps]
- 19. Treat [Visible], [Hidden], [Future] Ants/Roaches/Ants for the best control/protection
- 20. For best results use a system to treat/control Ants/Roaches/Ants & Roaches
- 21. For best results for control of ants/roaches/ants & roaches use the full [treatment/solution/protection] system/plan/program [to control ants/roaches/ants & roaches]
- 22. For best results use the full [treatment/solution/protection] system/plan/program to control ants/roaches/ants & roaches
- 23. For best control of ants/roaches/ants & roaches use the full [treatment/solution/protection] system/plan/program
- 24. For best results, more than one product may/might/could be needed for ant/roach/ant & roach control
- 25. [Part of a/an] Ant/Roach/Ant & Roach Control System [in 3 steps]
- 26. Use as a system for control of Ants/Roaches/Ants & Roaches
- 27. Ant & Roach Control in 2/3 Steps
- 28. Step 1/3
- 29. Ortho Home Defense Home Protection

- 30. Targeted Ant/Roach/Ant & Roach Treatment/Control Program/Plan/System [in 2/3 steps]
- 31. Ant/Roach/Ant & Roach Protection Program/Plan/System [in 2/3 steps]

#### **Additional System Claims**

- 1. Part of a system for Home Protection from Ants/Roaches/Ants & Roaches
- 2. [Part of] [Ortho] [Home Defense] Ant/Roach/Ant & Roach system for Home Protection
- 3. [Ortho] Home Defense [provides] modes of treatment for killing the Ants/Roaches/Ants & Roaches/ones you see [, and] the ones/Ants/Roaches/Ants & Roaches you don't[, and prevent [Ants/Roaches/Ants & Roaches]].
- 4. Extend your bug barrier/control further with [Ortho] [Home Defense] [treatment/control] system/program/plan for Home Protection
- 5. [Let] [Ortho] Home Defense [system for Home Protection] [guard(s)/protect(s)] your home from Ants/Roaches/Ants & Roaches
- 6. Part of a home defense system/program/plan from Ants/Roaches/Ants & Roaches
- 7. [System/Program/Plan for] Ant/Roach/Ant & Roach Home Protection [in 2/3 steps]
- 8. [Part of the] [Home Defense/Brand name] Protection Program

#### Ant & Roach System Language

Note to PM: This registration will emphasize or indicate the product is for "Create a barrier/prevent [bugs/ants]" on the FPL.

Note to PM: A different product name will be used for ant & roach system that differs from the multiple insect system focused/branded for Ant & Roach control.

Note to PM: Step 1(See/Visible) and 2 (Don't See/Hidden) may switch orders, but the step description and associated qualifier would remain the same.

Note to PM: System will use a system name from "Ant & Roach System Names/Headings Section". This name will appear in the vicinity of the following text.

Note to PM: Representative icons for this system are located at the end of the section.

[Take back your home with a system that treats [the] ants and roaches [you see,] [their friends,] and those [that are] lying in wait].]

Note to PM: Below are the system step call outs. On the FPL, the system step will be emphasized if all of the system steps below appear on the label. The FPL could also display just the step(s) applying to the product and the corresponding text.

#### 3-Step Option

Note to PM: Sections steps are Kill/Control/Treat.

[Kill/Control/Treat:] The ones you see/See/See & Kill/Kill What You See [icon]a

[Kill/Control/Treat:] The ones you don't see/ Kill what you don't see/Hiding [icon]b

[Kill/Control/Treat:] Create a/an [Ant & Roach/Ant/Roach] barrier/Prevent [bugs/ants] [icon]<sup>c</sup>

<sup>c</sup>[Kill/Control/Treat:] Create a/an [Ant & Roach/Ant/Roach] barrier/Prevent [bugs/ants] [icon]: Treat the perimeter of your home to keep ants/cockroaches/roaches/ants & cockroaches/ants & roaches from setting up shop/entering/coming/invading/coming [back] in/into your home [for up to a year].

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>a</sup>[Kill/Control/Treat:] The ones you see/See/See & Kill/Kill What You See [icon]

If you see [an] ant/ants and/or roach/roaches, kill it/them with a [simple] spray.

[Use/Look for Ortho [Home Defense] Ant & Roach Aerosol [and Ready-To-Use] products.]

[Look for Ortho [Home Defense] products marked Kill the ones you see/See/See & Kill/Kill What You See.]

<sup>b</sup>[Kill/Control/Treat:] The ones you don't see/ Kill what you don't see/Hiding [icon]: Kill the ants and/or roaches you can't see with bait [that's] [specially] designed to be carried back [to the others/ colony].

[Use/Look for Ortho [Home Defense] Ant and/or Roach Bait Stations.]

[Look for Ortho [Home Defense] products marked kill the ones you don't see/Kill what you don't/Hiding.]

OR

Note to PM: The steps in this section are Kill/Control/Treat and Prevent for products with residual claims.

#### [Kill/Control/Treat][Prevent]

[Step][1] - [Kill/Control] Visible [ants/roaches /ants & roaches] [icon] a [Step] [2] - [Kill/Control] Hidden [ants/roaches /ants & roaches] [icon] b

[Step] [3] - [Prevent] [ants/roaches /ants & roaches] [icon] c

<sup>a</sup> [Step] 3 - [Prevent] [ants/roaches /ants & roaches] [icon]: Treat the perimeter of your home to keep ants/roaches/ants & roaches from setting up shop/entering/coming/invading/coming [back] in/into your home [for up to a year].

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>b</sup>[Step][1] - [Kill/Control] Visible [ants/roaches /ants & roaches] [icon]: If you see [an] ant/ants and/or roach/roaches, kill it/them with a [simple] spray.

[Use/Look for Ortho Home Defense Ant & Roach Aerosol [and Ready-To-Use] products.] [Look for Ortho [Home Defense] products marked [Kill/Control] Visible [ants/roaches /ants & roaches]]

<sup>c</sup> [Step] [2] - [Kill/Control] Hidden [ants/roaches /ants & roaches] [icon]: Kill the ants and/or roaches you can't see with bait [that's] [specially] designed to be carried back [to the others/colony].

[Use/Look for Ortho [Home Defense] Ant and/or Roach Bait Stations.]

[Look for Ortho [Home Defense] products marked [Kill/Control] Hidden [ants/roaches /ants & roaches]]

#### 2-Step Option

Note to PM: The steps in this section are Kill and Prevent for products with residual claims [Kill][Prevent]

[Step][1] - Hidden [ants/roaches /ants & roaches] [icon] a

[Step][2] - Visible [ants/roaches /ants & roaches] [icon] b

<sup>a</sup>[Step][2][:] Visible ants/roaches /ants & roaches [icon]: If you see [an] ant/ants and/or roach/roaches, kill it/them with a [simple] spray.

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>b</sup>[Step][1] - Hidden [ants/roaches /ants & roaches] [icon]: Kill the ants and/or roaches you can't see with bait [that's] [specially] designed to be carried back [to the others/colony].

[Use/Look for Ortho Home Defense Ant and/or Roach Bait Stations.]

[Look for Ortho [Home Defense] products marked Hidden [ants/roaches /ants & roaches]]

NOTE to PM: Below are representative icons arranged Step 1 to 3 from left to right. For the 2 step option icons 1 & 3 could both appear or only icon 1.







END OF SUBLABEL A – STANDARD RTU SPRAYER

# **SUB LABEL B - BOV PACKAGING**

For Indoor Use Only/For Outdoor Use Only/ For Both Indoor & Outdoor Use

#### **Active Ingredient**

Bifenthrin*	0.05%
Other Ingredients	<u>99.95</u> %
Total	100.00%

<sup>\*</sup>Cis isomers 97% minimum, trans isomers 3% maximum

# KEEP OUT OF REACH OF CHILDREN

#### **CAUTION**

See back/panel/booklet for additional precautionary statements.

**Net Contents:** 13.35/X fl. oz. (394.8/X ml)

**Net Weight:** 14/X oz. (397/X g)

#### PRECAUTIONARY STATEMENTS

**ENVIRONMENTAL HAZARDS:** This pesticide is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. 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 pesticide off the treatment area. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Care should be used when spraying to avoid fish and reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants. Do not apply this product or allow it to drift to blooming plants if bees are foraging the treatment area.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not apply this product in or on electrical equipment due to the possibility of shock hazard. Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

**NOTICE:** To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

#### **DIRECTIONS FOR USE**

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

#### **USE RESTRICTIONS**

All outdoor spray applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- 1. Application to pervious surfaces such as soil, lawn, turf, and other vegetation;
- 2. Perimeter band treatments of 7 feet wide or less from the base of a man-made structure to pervious surfaces (e.g., soil, mulch, or lawn);
- 3. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
- 4. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
- 5. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level;
- 6. Applications to vertical surfaces directly above pervious surfaces, such as soil, lawn, turf, mulch or other vegetation) only if the pervious surface does not drain into ditches, storm drains, gutters, or surface waters.

- Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft. by 0.5 ft.).
- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
- Treat surfaces to ensure thorough coverage but avoid runoff.
- To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants.
- Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours).
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.
- Do not apply or irrigate to the point of runoff.
- Do not spray the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.
- For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.

### NOTE TO PM: For an indoor use only product – all text prior to this note will be omitted from the FPL.

- Do not allow the product to enter any drain during or after application.
- Do not apply to carpets and hard surfaces as a pin stream or coarse spray treatment

Do not allow to enter indoor or outdoor drains. No permita la entrada a desagües internos o externos.

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

#### [PRODUCT FACTS]

Kills/Controls (any or all of the following insects)

Adelgids	Eastern Sprucegall		
Ants	Argentine	Pavement	Red/Western Harvester
	Carpenter	Pharaoh/Sugar	
	Foraging Fire Ants	Pyramid	
Aphids	Apple	Greenbug	Rose
	Black Cherry	Pea	Rosy Apple
	Buckhorn	Pecan	Walnut
Bees			
Beetles	Billbugs Black Turfgrass Ataenius Carpet	Flea Japanese (Adults) Lady Beetles (including	Sap Spotted Cucumber / Southern Corn Rootworm (Adults)
	Colorado Potato Corn Rootworm (Adults) Curculio (Cow Pea ,Plum) Elm Leaf	Asian Lady Beetle Eggs) Mexican Bean Pine Chafer (grub) Pine Shoot	Striped Cucumber Weevils (Annual Bluegrass & Black Vine)
Borers	American Plum European Corn Lesser Peachtree	Peachtree Peach Twig Southwestern Corn	Squash Vine Stalk
<b>Boxelder Bugs</b>			
Bristletails			
Caterpillars	Alfalfa Armyworms (Beet, Fall, Southern, True, Yellow Striped, Beet Armyworm Eggs) Bagworms Blueberry Spanworm Budworms Corn Earworm Cutworms	Cranberry Fruitworm Filbertworm Green Cloverworm Green Fruitworm Hickory Shuckworm Hornworms (Tobacco & Tomato) Imported Cabbageworm Loopers (Alfalfa, Cabbage, Celery)	Navel Orangeworm Painted Lady Pecan Nut Casebearer Pickleworm Rindworm Saltmarsh Sod Webworms Tent Velvetbean
Centipedes			
Chinch Bug	Hairy	Southern	

Cockroaches	American/Palmetto	Asian	German
GOOM GUOITGO	Bug/Waterbug	Oriental	Coman
Crickets	ag, rratering	<u> </u>	
Earwigs			
Firebrats			
Fleas	Cat	Dog	
Flies	Apple Maggot	Cherry Fruit	European Crane (Adult)
	Biting Flies	Cornsilk	House
Fungus Gnats			
Grasshoppers			
Hornets			
Lace Bugs			
Leaffooted	Squash Bug		
Bugs			
Leafhoppers			
Leafminers	Alder	Tentiform	Vegetable
Leafrollers	Oblique Banded	Red-Banded	Variegated
Mealybug			
Midges			
Millipedes			
Mites	Broad	Spruce	Two Spotted Spider (Eggs)
	Carmine	Clover	European Red
	Chigger	Two Spotted Spider (Adult)	Pecan Scorch
Mole Crickets			
Mosquitoes			
Moths	Artichoke Plume Codling	Diamondback	Gypsy
Periodical Cicada			
Phylloxera	Pecan Leaf	Pecan Stem	
Pillbugs &			
Rollie Pollies			
Plant Bugs	Tarnished	Lygus Bug	
Psyllids	Pear		
Sawflies	European Pine	Redheaded Pine	
Scales	San Jose Euonymus	Brown Soft	California Red
Scorpions			
Silverfish			
Sowbugs			
Spiders	Black Widow Brown Recluse	Hobo	Wolf
Spittlebugs	Pecan		
Springtails	Down M. C. I	IZ	
Stink Bugs	Brown Marmorated	Kudzu	
Stored Product Pests			
Thrips			
Ticks			
Termites			
Wasps			
Whiteflies			
Yellowjackets			
	1		

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	Indoor Surfaces [illustration] Note to PM: Below are representative images that may or may not be included on the FPL.  Kitchens Doors & Windows Bathrooms Basements	Outdoor Surfaces [illustration] Note to PM: Below are representative images that may or may not be included on the FPL.	Optional section In Pantries [illustration] Note to PM: Image may or may not be included on the FPL, but would show treatment areas within a representative pantry setting.
When to Apply/Use	Use anytime as a preventative long-lasting control.	treatment or after you see ev	idence of insect activity for
Before You Apply/Use	Cover or remove exposed food (including pet food) Cover all food processing surfaces and utensils	Do not allow this product to contact water supplies. Do not spray into air.	Cover or remove exposed food (including pet food) Remove all items from pantry and clean pantry thoroughly.
How To Apply/Use	Shake Well. [Gently rotate/turn/revolve top/actuator to desired spray setting.] [Gently rotate/turn/revolve top/actuator to off/non-spraying/closed setting.] Hold sprayer 12 inches from surface being sprayed. [Apply a 4 inch wide band along the surfaces being treated.] Apply a 4 inch wide band along the interior of your home in areas where insects are a recurring problem.] Spray until slightly wet without soaking. [Images of typical indoor application] [Kitchens] [Bathrooms] [Doors & Windows] [Basements]  Note to PM: see above for representative images.	Shake Well. [Gently rotate/turn/revolve top/actuator to desired spray setting.] [Gently rotate/turn/revolve top/actuator to off/non-spraying/closed setting.] Hold sprayer 12 inches from surfaces being sprayed. [Apply a 12 inch wide band along the surfaces being treated.] Apply a 12 inch wide band along the exterior perimeter of your home. Spray until slightly wet without soaking.  [Images of typical indoor application] [Perimeter Foundations] [Garages] [Doors & Windows] [Patios & Decks]  Note to PM: see above for representative images.	Shake Well. [Gently rotate/turn/revolve top/actuator to desired spray setting.] [Gently rotate/turn/revolve top/actuator to off/non-spraying/closed setting.]  Spray cracks and crevices along shelves in pantries. Spray until slightly wet without soaking. Replace non-infested items once spray has dried. [image of typical pantry]  Note to PM: see above regarding images.
After You Apply/Use	[icon	s may re-enter treated area aressing surfaces and utensils vent is recommended at least of laction leave spray undisturbors [*].	with soap and water before  once per season (3 months)  oed. The product will keep

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Fleas and Ticks	Do not Spray Animals
(Including ticks that	Pet resting quarters may be treated with this product. How to Apply: Spot treat infested
may transmit Lyme	areas such as pet's resting quarters and localized areas of floors/floor coverings (rugs,
Disease)	carpet, tile, vinyl & wood) where pests may be present. Old bedding of pets should be
,	removed and replaced with clean, fresh bedding after treatment of pet area. To control the
	source of flea infestation, pets inhabiting the treated premises should themselves be
	treated with a product registered for application to animals

#### STORAGE AND DISPOSAL

**PESTICIDE STORAGE** Store in a cool dry area. Always store pesticides in the original container. Store away from food and pet food.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING** Do Not Puncture or Incinerate! Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Do not dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

#### **OPTIONAL MARKETING CLAIMS**

Note to PM: the term cockroach can be interchanged with any and all instances of roaches and vice versa.

Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.

Note to PM: the word "and" can be interchanged with "&" in all instances and vice versa.

Note to PM: Claims containing Now/Improved may appear on any label panel for 6 months following commercial introduction

# The following Product Facts format is optional and the information may appear inside or outside of a box.

#### PRODUCT FACTS:

[When to Apply/Use:] [ Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.

Questions & Comments: [icon phone] [ ] [icon computer] [ ] Call 1-800-xxx-xxxx or Visit our Website at www.ortho.com

[Brand] [Product name]	Ortho Ortho Home Defense Insect Killer for Indoor & Perimeter2 [Product name]
[Marketing Call-out]	Kills Bugs Inside. Keeps Bugs Out.
[Claims]	
1.	Long Lasting Bug Barrier
2.	Non-Staining
3.	Odor Free
4.	Dries Fast/Dries Clear
[Product Facts:]	Product Facts: What it Does: Kills home invading insects [including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, millipedes]. (See inside for complete list)

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	Where to Use: Use with confidence indoors [(kitchens, bathrooms, doors & windows, basements)] and outdoors [(perimeter foundations, garages, doors & windows, patios & decks)] wherever insects are a re-occurring problem.	
	When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.	
	People and pets may enter treated areas after spray has dried	
	Questions &/or Comments: (phone & computer icon) [	
[Ortho Guarantee]	The ORTHO Guarantee:  If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.	
[UPC]	UPC Placeholder	
[Standard Copy]	© 20xx The ORTHO Group. World rights reserved. Sold by The ORTHO Group PO Box 190, Marysville, OH 43040	
[EPA Info]	EPA Reg. No. 239-2699 EPA Est. XXX, XXX, XXX, XXX, XXX Superscript is first letter of lot number.	
[Component Number]	Component # Placeholder	

#### Non-Residual Claims/Kill Claims

- 1. Kills insects\*\* (any or all of the following insects) Ants [(including Western Harvester)], Beetles [(including Asian Lady and Carpet)], German Cockroaches, Crickets, Earwigs, Firebrats, Fleas, Moths, Pantry Pests, Spiders [(including Black Widow, Hobo and Wolf)], and Silverfish.
- 2. [Also] Kills Ticks [(including ticks that may transmit Lyme Disease)].
- 3. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other insects\*\*
- 4. Kills Home invading Insects\*\*
- 5. Kills bugs inside. Keeps bugs out[side] \*\*
- 6. Kills [1...188] Insects\*\*
- 7. Kills [the] bugs you see and [the] [ones] bugs you don't [see] \*\*
- 8. Kills the toughest home invading bugs\*\*
- 9. Kills/Controls [both] crawling and flying insects\*\*
- 10. Kills/Controls [all] common household bugs\*\*
- 11. Kills [1...180][plus/+] insects\*\*
- 12. Controls home invading insects\*\*
- 13. Kills ants [and many other insects\*\*!]
- 14. Kills ants, [and] roaches [, and many other insects\*\*!]
- 15. Kills ants, roaches, [and] spiders [, and many other insects\*\*!]
- 16. Kills by contact!

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests"

## Efficacy/Disease Related Claims

- 17. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
- 18. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
- 19. Kills Fleas that may transmit Mycoplasma to cats
- 20. Kills mosquitoes that may transmit Heartworm\*\*\* [to cats/dogs]
- 21. Kills mosquitoes that may transmit Subcutaneous dirofilariasis [to cats/dogs/people]
- 22. Kills mosquitoes that may transmit West Nile virus

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- 23. Kills mosquitoes that may transmit the chikungunya virus
  - 24. Kills mosquitoes that may transmit yellow fever
  - 25. Kills mosquitoes that may transmit dengue fever
  - 26. Kills mosquitoes that may transmit encephalitis
  - 27. Kills mosquitoes that may transmit [the] Zika virus
  - 28. Kills roaches/cockroaches that may carry disease-causing bacteria
  - 29. Kills roaches/cockroaches that may carry Salmonella typhimurium, Entamoeba histolytica, E. coli, Staphylcoccous spp., Pseudomonas aeruginosa, Klebsiella pneumoniae, and the poliomyelitis virus.
  - 30. Kills roaches that may produce allergens
  - 31. Kills roaches that may carry disease causing bacteria
  - 32. Kills roaches that contribute to asthma [in children]
  - 33. Kills roaches that may produce asthma-causing allergens [in children]
  - 34. Kills roaches that may produce allergens that cause asthma [in children]
  - 35. Kills roaches that are a leading contributor/cause of asthma [in/among children]
  - 36. Kills Ticks that may transmit [the] Powassan/POW virus
  - 37. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
  - 38. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia to cats
  - 39. Kills Ticks that may transmit Anaplasma, Babesiosis, Ehrlichiosis, Lyme borreliosis, Rocky Mountain spotted fever, Hemoplasmosis, and Mycoplasma [to dogs]
  - 40. Kills Ticks that may transmit Lyme Disease
  - 41. Kills mosquitoes that may transmit Zika, West Nile, [the] Chikungunya virus, yellow fever, and dengue fever.

#### Formula Based claims



- 42. Water based [formula] [water droplet icon
- 43. Dries clean/clear
- 44. Dries fast/in minutes [for fast/quick re-entry]
- 45. No oily residue
- 46. No [sticky] mess
- 47. Does not stain [fabrics, floors, wood, surfaces]
- 48. Non-staining
- 49. No stains
- 50. Unscented
- 51. Fragrance-Free
- 52. [Leaves] no odor
- 53. No lingering [chemical] odor
- 54. [Virtually] odor free
- 55. Odorless
- 56. No greasy residue/mess
- 57. No need to wipe up
- 58. Leaves no residue [behind]
- 59. Ready to Use
- 60. No Mixing Necessary
- 61. Increased Spreadability\*
- 62. Dries fast for quick re-entry
- 63. [Improved\*] formula applies evenly and dries quickly
- 64. [Improved\*] formula reaches insects where they hide
- 65. Improved\* formula/formulation/technology
- 66. Patented formula/formulation/technology
- 67. [Improved\*] Patented Quick Dry Formula
- 68. [Improved\*] Quick/Fast Dry Time [for quick re-entry]
- 69. [Improved\*] Dries 30/X % Faster\*
- 70. [Improved\*] Dries up to 30/X % Faster\*
- 71. [Improved\*] No mess/puddling [application]
- 72. Improved coverage\*
- 73. Applies evenly for full coverage
- 74. Dries fast [and clear]so you can get back to enjoying your home
- 75. Spreads easily into cracks, crevices, under appliances, and into hard to reach places [where insects hide].
- 76. Easy Spread formula gets into hard to reach places [where insects hide].

<sup>\*\*\*</sup>Does not substitute for a prescribed heartworm medication

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- 77. Patented formula gets into hard to reach places [where insects hide].
- 78. [Improved\*]Far reaching formula [gets into cracks, crevices, under appliances, and other hard to get to places where insects hide].
- 79. [Improved/No mess] formula dries faster\* and goes deeper into cracks and crevices [to reach insects\*\* where they hide]
- 80. [Improved\* Formula] Applies evenly and dries quickly
- 81. [Improved\* Formula] Reaches places where insects hide
- 82. [Improved\*] [Far reaching formula] gets into cracks, crevices, and other hard to reach areas/places [where insects hide]
- 83. [Improved Formula] Dries faster\* [and gets into hard to reach areas/spreads easily into hard to reach areas]
- 84. [Improved formula] dries faster with improved coverage\*
- 85. Patented Formula/Technology
- 86. [Improved\* Formula] Great for use indoors! [No Fumes/Odorless/No Odor] [Dries Clear] [Non-Staining/No Stains] [Fast Drying/Dries Fast] [Year-long\*\* Protection] [With Improved Coverage/Spreading Power/Ability to Spread [In Hard to Reach Places]
- \*vs. Other Ortho Formulas/Product Name from 239-2717
- \*\*Refer to booklet/back panel for complete list of insects/bugs/pests

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests"

#### Residual Control claims

- 87. Kills bugs inside. Keeps bugs out. \*\*
- 88. Forms/Creates/Establishes a perimeter treatment
- 89. Forms/Creates/Establishes a [bug\*\*] barrier
- 90. Create[s] a [bug\*\*] border/barrier/perimeter [treatment]
- 91. Create [a] bug\*\* barrier[s]
- 92. Apply [as] a barrier
- 93. Apply [as] a border around your home
- 94. Apply [as] a perimeter/border/residual treatment
- 95. Long lasting\* [bug\*\*]perimeter treatment/barrier/border
- 96. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home. \*\*
- 97. Guards against bugs\*\* so you don't have to
- 98. Guards against the bugs\*\* you can't/don't see
- 99. Kills and prevents insects\*\* [inside your home] [outside your home]
- 100. Provides residual control against listed home invading insects
- 101. Keeps [on] killing with residual action, even after you spray
- 102. Keeps [on] killing with residual action, even after spray has dried
- 103. Keeps [on] killing after spray has dried
- 104. Use in kitchens, garages, basements, and attics to keep/to kill bugs\*\* [from entering your home]
- 105. [Kills two/2 ways]: 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried
- 106. [Dual Action]: 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried

#### NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

\*\*\*\* [applies to] 12 month contol [for] Ants, Roaches / palmetto bug / water bug, & Spiders indoors on nonporous surfaces

Note to PM: 12, 6, 5, 4, and 3 month claims are qualified since the associated insects are specific and not the full insect list.

#### 12-Month Claims

- 107. Up to 12 month control/protection\*\*\*\*
- 108. Kills/Controls/Protects [for] up to 12 months\*\*\*\*
- 109. Kills bugs inside all year\*\*\*\*
- 110. Kills home invading bugs\*\*\*\* all year
- 111. Kills indoor bugs\*\*\*\* all year
- 112. Kills & prevents insects\*\*\*\* for up to 1 year/12 months/52 weeks/365 days
- 113. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months\*\*\*\*.

<sup>\*\*</sup>Refer to booklet/back panel for complete list of insects/bugs/pests

EPA Reg. No. 239-2699

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  - 114. Creates a perimeter/border/residual treatment that will kill bugs you have and control new bugs for up to 12 months\*\*\*\*.
  - 115. Protects your home in/with just 1 application a year[!]\*\*\*\*
  - 116. Year Long Protection/Defense\*\*\*\*
  - 117. Season Long [Home] Protection/Defense\*\*\*\*
  - 118. One application creates/provides a/an [Continuous] Invisible/Residual bug barrier/shield\*\*\*\*
  - 119. [Continuous] Invisible/Residual barrier/shield\*\*\*\*
  - 120. Kills insects\*\*\*\* up to 365 days/12 months
  - 121. One application kills bugs\*\*\*\* up to 365 days/12 months
  - 122. Protect your home from bugs\*\*\*\* with year-long/12 month/365 day control
  - 123. Offers long-term insect\*\*\*\* control
  - 124. [One Application] kills and protects [all year\*\*\*\*]
  - 125. [One Application] kills and protects for [up to] 1 year/12 months/52 weeks/365 days\*\*\*\*
  - 126. Formulated to kill/protect [against] insects\*\*\*\* for [up to] 1 year/12 months/52 weeks/365 days

Qualifier Option 1: \*\*\*\* [applies to] [for] Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non porous surfaces

Qualifier Option 2: \*\*\*\* [applies to] [for] American Cockroach / palmetto bug / water bug, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces within minutes of exposure.

Qualifier Option 3: \*\*\*\* [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces after 2 hour continuous exposure.

Qualifier Option 4: \*\*\*\* [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider, centipedes indoors on treated non porous surfaces after 24 hour continuous exposure.

## 6-Month Claims

- 127. Up to 6 month control/protection outdoors1
- 128. Kills/Controls/Protects [for] up to 6 months outdoors1
- 129. Kills bugs1 outdoors for 6 months
- 130. Kills bugs<sup>1</sup> [indoors] [and] [outdoors] for 6 months

# 5-Month Claims

- 131. Keeps bugs away for up to 5 months indoors on insects<sup>†</sup>
- 132. Kills bugs† inside, keeps bugs out for up to 5 months
- 133. [One application provides] up to 5 month control indoors of insects<sup>†</sup>
- 134. Provides up to 5 months protection indoors†
- 135. [One application] kills up to 5 months indoors†
- 136. [One application] kills insects<sup>†</sup> up to 5 months indoors
- 137. [One application] kills up to 5 months indoors on insects<sup>†</sup>
- 138. [One application] kills ants, roaches, and spiders for up to 5 months indoors†
- 139. Keeps ants, roaches, and spiders away for up to 5 months indoors†

<sup>†</sup>Up to 5 month control indoors on: Ants (including Western Harvester), Carpet Beetles, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 5 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.

## 4-Month Claims

- 140. Up to 4 month control/protection outdoors<sup>2</sup>
- 141. Kills/Controls/Protects [for] up to 4 months outdoors<sup>2</sup>
- 142. Kills bugs<sup>2</sup> outdoors for 4 months
- 143. Kills bugs<sup>2</sup> [indoors] [and] [outdoors] for 4 months

<sup>2</sup>Applies to [for] spiders (excluding black widow, brown recluse, hobo)

## 3-Month Claims

<sup>&</sup>lt;sup>1</sup> Applies to [for] spiders (excluding black widow, brown recluse, hobo)

#### Bold, italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text]. Text separated by / denotes and/or options. Highlighted Text is New. Strikethrough Text is deleted

- 144. Up to 3 month control [protection] outdoors<sup>3</sup>
- 145. Kills/Controls/Protects [for] up to 3 months outdoors<sup>3</sup>
- 146. Kills bugs<sup>3</sup> outdoors for 3 months
- 147. Kills bugs<sup>3</sup> [indoors] [and] [outdoors] for 3 months
- 3 Applies to [for] spiders (excluding black widow, brown recluse, hobo), harvester ants, / crickets, grasshoppers
- 148. Keeps insects<sup>^</sup> away for up to 3 months indoors
- 149. Keeps away insects<sup>^</sup> for up to 3 months indoors
- 150. [Provides] up to 3 month control of insects<sup>^</sup> indoors
- 151. [Provides] up to 3 month control indoors on insects^
- 152. [Provides] up to 3 months protection indoors^
- 153. [One application] kills ants, roaches, and spiders for up to 3 months indoors^
- 154. [One application] kills insects\(^\text{up to 3 months indoors}\)
- 155. [One application] kills up to 3 months indoors [on insects]^
- 156. Keeps ants, roaches, and spiders away/out for up to 3 months indoors^
- 157. Kills bugs inside, keeps bugs out for up to 3 months^

^Up to 3 month control[indoors on: Ants (including Western Harvester), Carpet Beetles, German Cockroaches, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 3 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.

## Egg Killing Claims

- 158. Kills beet armyworm, two spotted spider mites, Asian Lady Beetles and their eggs
- 159. [Plus] kills insects and their eggs4
- 160. Kills insect eggs<sup>4</sup>
- 161. Prevents insect eggs from hatching! 4
- 162. Up to 12 month control\* plus kills insect eggs4

## Knockdown claims

- 163. Starts killing listed bugs in seconds
- 164. Starts killing listed bugs fast
- 165. Kills by contact [Guaranteed]

## Area-related claims

- 166. Ideal/Great for small/smaller jobs/areas/spaces/rooms
- 167. Ideal/Great for large/larger jobs/areas/spaces/rooms
- 168. Use inside and outside your home!
- 169. Use in kitchens, garages, basements, and attics.
- 170. Use in kitchens, garages, basements, and attics to kill insects\*\*.
- 171. Use/Can be used in bathrooms, kitchens, family rooms, pantries, attics, garages, basements, closets, storage areas, and bedrooms
- 172. Use with confidence in bathrooms, kitchens, family rooms, pantry, attics, garages, basements, closets, storage areas, and bedrooms.
- 173. [Illustrations of kitchen, bathroom, home perimeter/foundation, garage, windows and doorways, basement, attic, porches and patios]
- 174. Designed to/for use in kitchens and pantries
- 175. Apply along [and behind] baseboards and foundations.
- 176. Apply along [behind] [and] [between] appliances
- 177. Apply beneath [and behind] sinks
- 178. Apply in other areas where insects\*\* [are often found/appear]
- 179. You're/It's always ready to spray
- 180. Change the way you spray
- 181. [Formulated For] Indoor/Outdoor Use
- 182. Indoor/Outdoor [Formula]

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

<sup>&</sup>lt;sup>4</sup>Applies to [for] beet armyworm, two spotted spider mites, Asian Lady Beetles

<sup>\*\*</sup>Refer to booklet/back panel for complete list of insects/bugs/pests

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## **General Applicator Claims**

- 183. No [more] tired hands
- 184. Reduces hand fatigue
- 185. No Leaks or Mess
- 186. Precise control [for maximum accuracy]
- 187. Consistent spray [for maximum accuracy]
- 188. The easy/easier way [to spray] [to kill bugs]
- 189. Consistent/even coverage
- 190. You're/It's always ready to spray
- 191. The easy/easier way [to spray/to kill bugs/Home Defense®]
- 192. Change the way you spray
- 193. Easy to spray

\*vs. previous design/Applicator Name

#### **BOV Claims**

- 194. Sprays at any angle
- 195. Spray/s at any angle [to cover hard-to-reach areas]
- 196. Won't lose pressure [as can empties]
- 197. Continuous Spray
- 198. Any-angle spray [helps cover hard-to-reach areas] for complete coverage
- 199. Spray/s at any angle to kill [& prevent] insects where they live/hide
- 200. Covers XXX sq. ft./linear feet

#### Value

- 201. Great Value
- 202. Same formula, better value! (applies when comparing different product sizes)
- 203. [Over] X% more than X oz. size
- 204. Bonus Size
- 205. Combo Pack
- 206. Wow (Pack)
- 207. Exclusive to Club Stores!
- 208. Exclusive Club [Bonus] Size!
- 209. Value/Bonus Size 2-pack!
- 210. Look inside [label] for special offer information!
- 211. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.

## OTHER

- 212. Easy to Use
- 213. [icon] People and pets may re-enter treated areas after spray has dried
- 214. XX% less plastic\*
- 215. [Company] & Your Environment Your yard is a place for family and pets to enjoy. That's why [company] products are designed with care to provide effective solutions to insect problems. Please follow instructions for appropriate usage, storage and disposal.
- 216. Now [with]
- 217. Proven performance
- 218. Read Entire label before use
- 219. Recyclable symbol [illustration/logo according to certifying body]
- 220. Before [illustration of untreated area containing insects]
- 221. After [illustration of treated area containing no insects]
- 222. [For] Indoor & Outdoor Residential use only
- 223. Intended for residential use
- 224. Peel Open for use directions and further information
- 225. OPEN
- 226. Resealable Label for Directions & Precautions
- 227. Peel Open for use directions and further information
- 228. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 229. PEEL HERE
- 230. PULL / PEEL HERE [TO REMOVE TAPE]

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- Highlighted Text is New. Strikethrough Text is deleted
  - 231. Product of –and/or- Made in U.S.A.
  - 232. Assembled in the USA
  - 233. ©20XX, licensed by [Company/Brand]. World rights reserved.
  - 234. QUESTIONS OR COMMENTS [phone icon] 1-800-225-2883 www.ortho.com [Visit our website]

[computer icon]

- 235. New Look, Same Great Results
- 236. New Look, Better Spreadability
- 237. New Look, Now with InvisiSHIELD
- 238. Patent #: US 8,734,821 & 8,790,673
- 239. Indoor Surfaces
- 240. Outdoor Surfaces
- 241. Indoor and Outdoor Surfaces
- 242. Indoor Use
- 243. Outdoor Use
- 244. Indoor and Outdoor Use

\*vs. previous bottle/container/packaging

## Guarantees:

- 245. Guaranteed†††
- 246. [Company/Brand] Guarantee[d] †††
- 247. Guaranteed [results] †††
- 248. Guaranteed Kill [or your money back] †††
- 249. [Company/Brand] Satisfaction guaranteed[†††]
- 250. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]

††† [Company/Brand]Promise: If this [company/brand] product when used for the intended purpose fails to give you complete satisfaction return the item to the [company] store where purchased for free replacement of the same or similar item.

†††The [Company/Brand] Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

†††Consumer Guarantee: If for any reason you are not satisfied after using this product, simply send us original proof of purchase, and we will refund the purchase price.

# InvisiSHIELD Claims

Note to PM: Claims containing "year-long" will be used only when the insect kill list on the FPL contains one or more of the insects identified in the qualifiers in the section for 12 month claims. Year-long will use the same qualifier options from the 12 month claims section.

- 251. For easy Indoor application, trust the power of Ortho Home Defense [with InvisiSHIELD] [Technology]
- 252. Ortho Home Defense [with InvisiSHIELD Technology], the way to keep bugs away
- 253. With InvisiSHIELD [Technology] [Year-Long\*\*\*\* Bug Control] with no fumes, odors, stains, or [wet]
- 254. InvisiSHIELD helps kill/control the bugs\*\* you have without the stress
- 255. Let [Ortho] Home Defense shield your home from the insects\*\*
- 256. InvisiSHIELD [technology] dries fast, odorless/odor-free, non-staining,12 month\*\*\*\* control/year-long\*\*\*\* protection, with spreading power/ ability to spread / apply more evenly
- 257. With InvisiSHIELD [technology]
- 258. InvisiSHIELD
  - No Fumes
  - Odorless/No Odor
  - **Dries Clear**
  - Non-Staining/No Stains
  - Fast Drying/Dries Fast
  - Year-long\*\*\*\* Protection
  - With Coverage/Spreading Power/Ability to Spread [In Hard to Reach Places]

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Highlighted Text is New. Strikethrough Text is deleted



Example of design/icon which will use all or a combination of text listed in claim 259. \*Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1, 2, 3, or 4

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

# Multiple Insects System Names/Headings:

# NOTE TO PM: The following items will be used in conjunction with the Multiple Insect System text.

- 1. [3-Step] [location based/use area] System for Home Protection from insects\*
- [3-Step] Home/Insect\*\* [location based/use area] Treatment/Control [Plan/Program/System]
   [3-Step] Home/Insect\*\* [location based/use area] Solution System/Set
   [3-Step] Home/Insect\*\* [location based/use area] System [for Protection]

- 5. [3-Step] Home/Insect\*\* [location based/use area] Protection [Plan/Program/System]
- 6. 3-Step Home/Insect\*\* [location based/use area] Control [Program/System]
- 7. Part of the [Ortho Home Defense/Brand name] [3-Step] [location based/use area] System for Home Protection from insects\*\* [in 3 steps]
- 8. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Treatment Plan/Program/System [in 3 steps]
- 9. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Solution System/Set [in 3 steps]
- 10. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] System [for Protection] [in 3 steps]
- 11. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Protection Plan/Program/System [in 3 steps]
- 12. Part of the [Ortho Home Defense/Brand name] 3-Step Home/Insect\*\* [location based/use area] Control [Program/System] [in 3 steps]
- 13. [Ortho Home Defense/Brand name][3-Step] [location based/use area] System for [protection from] Insects\*\* [in 3 stepsl
- 14. [Ortho Home Defense/Brand name][3-Step] Home/Insect\*\* [location based/use area] Treatment Plan/Program/System [in 3 steps]
- 15. [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] [Solution] System/Set [in 3
- 16. [Ortho Home Defense/Brand name][3-Step] Home/Insect\*\* [location based/use area] Protection Plan/Program/System [in 3 steps]
- 17. [Ortho Home Defense/Brand name] 3-Step Home/Insect\*\* [location based/use area] Control [Program/System] [in 3
- 18. [Location based/use area] Home Insect\*\* Control [system] [in 3 steps]
- Zones of protection from Insects\*\* [in 3 steps]
- 20. Treat these/this area[s]/location[s] [Inside/Indoors], [Perimeter], [and] [Outdoors/Outside/Lawn] for [control of/protection from] Insects\*\*
- 21. Location based Insect\*\* treatment/control/protection [program/system/plan] [in 3 steps]
- 22. For best results use a system to treat/control insects\*\*
- 23. For best results to control insects\*\* use the entire/full [treatment/solution/protection] system/plan/program
- 24. For best control of insect\*\* use the entire/full [treatment/solution/protection] system/plan/program
- 25. For best control of insects\*\* use the full [treatment/solution/protection] system/plan/program
- 26. For best results to control insects\*\* use the full [treatment/solution/protection] system/plan/program
- 27. For best results, use the full [treatment/solution/protection] system/plan/program to control insects\*\*
- 28. For best results, more than one product may/might/could be needed for insect/bug control
- 29. [Part of a] Insect\*\* Treatment/Control System/Program/plan [in 3 steps]
- 30. Use as a system for control of Insects\*\*
- 31. Insect\*\* Control in 3 Steps
- 32. Step 1/2/1 & 2
- 33. Ortho Home Defense Home Protection
- 34. Targeted Insect\*\* [location based/use area] Treatment/Control Program/Plan/System [in 3 steps]

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35. Insect\*\* [location based/use area] Protection Program/Plan/System [in 3 steps]

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests (NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

# Additional System Claims

- 1. Part of a system for Home Protection from insects\*\*
- 2. [Part of] [Ortho] [Home Defense] Insect\*\* system for Home Protection
- 3. [Ortho] Home Defense [provides][products for] zones/areas of home protection[:] inside/indoors/in your home/in the home/inside your home/home perimeter/ around the home/around your home, and outdoors/outside/the lawn/your lawn/lawn
- 4. Extend your bug\*\* barrier further with [Ortho] [Home Defense] [treatment/control] system/program/plan for Home Protection
- 5. [Let] [Ortho] Home Defense [system for Home Protection] [guard(s)/protect(s)] your home from insects\*\*
- 6. Part of a home defense system/program/plan from insects\*\*
- 7. [System/Program/Plan for] Insect\*\* Home Protection [in 3 steps]
- 8. [Part of the] [Home Defense/Brand name] Protection Program

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

## Multiple Insects System Names/Headings:

# NOTE TO PM: The following items will be used in conjunction with the Multiple Insect System text.

- 36. [3-Step] [location based/use area] System for Home Protection from insects\*\*
- 37. [3-Step] Home/Insect\*\* [location based/use area] Treatment/Control [Plan/Program/System]
- 38. [3-Step] Home/Insect\*\* [location based/use area] Solution System/Set
- 39. [3-Step] Home/Insect\*\* [location based/use area] System [for Protection]
- 40. [3-Step] Home/Insect\*\* [location based/use area] Protection [Plan/Program/System]
- 41. 3-Step Home/Insect\*\* [location based/use area] Control [Program/System]
- 42. Part of the [Ortho Home Defense/Brand name] [3-Step] [location based/use area] System for Home Protection from insects\*\* [in 3 steps]
- 43. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Treatment Plan/Program/System [in 3 steps]
- 44. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Solution System/Set [in 3 steps]
- 45. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] System [for Protection] [in 3 steps]
- 46. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] Protection Plan/Program/System [in 3 steps]
- 47. Part of the [Ortho Home Defense/Brand name] 3-Step Home/Insect\*\* [location based/use area] Control [Program/System] [in 3 steps]
- 48. [Ortho Home Defense/Brand name][3-Step] [location based/use area] System for [protection from] Insects\*\* [in 3 steps]
- 49. [Ortho Home Defense/Brand name][3-Step] Home/Insect\*\* [location based/use area] Treatment Plan/Program/System [in 3 steps]
- 50. [Ortho Home Defense/Brand name] [3-Step] Home/Insect\*\* [location based/use area] [Solution] System/Set [in 3 steps]
- 51. [Ortho Home Defense/Brand name][3-Step] Home/Insect\*\* [location based/use area] Protection Plan/Program/System [in 3 steps]
- 52. [Ortho Home Defense/Brand name] 3-Step Home/Insect\*\* [location based/use area] Control [Program/System] [in 3 steps]
- 53. [Location based/use area] Home Insect\*\* Control [system] [in 3 steps]
- 54. Zones of protection from Insects\*\* [in 3 steps]
- 55. Treat these/this area[s]/location[s] [Inside/Indoors],[Perimeter],[and][Outdoors/Outside/Lawn] for [control of/protection from] Insects\*\*
- 56. Location based Insect\*\* treatment/control/protection [program/system/plan] [in 3 steps]
- 57. For best results use a system to treat/control insects\*\*
- 58. For best results to control insects\*\* use the entire/full [treatment/solution/protection] system/plan/program
- 59. For best control of insect\*\* use the entire/full [treatment/solution/protection] system/plan/program

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[Bracketed information is optional text]. Text separated by / denotes and/or options.

Highlighted Text is New. Strikethrough Text is deleted

- 60. For best control of insects\*\* use the full [treatment/solution/protection] system/plan/program
- 61. For best results to control insects\*\* use the full [treatment/solution/protection] system/plan/program
- 62. For best results, use the full [treatment/solution/protection] system/plan/program to control insects\*\*
- 63. For best results, more than one product may/might/could be needed for insect/bug control
- 64. [Part of a] Insect\*\* Treatment/Control System/Program/plan [in 3 steps]
- 65. Use as a system for control of Insects\*\*
- 66. Insect\*\* Control in 3 Steps
- 67. Step 1/2/1 & 2
- 68. Ortho Home Defense Home Protection
- 69. Targeted Insect\*\* [location based/use area] Treatment/Control Program/Plan/System [in 3 steps]
- 70. Insect\*\* [location based/use area] Protection Program/Plan/System [in 3 steps]

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

## Additional System Claims

- 9. Part of a system for Home Protection from insects\*\*
- 10. [Part of] [Ortho] [Home Defense] Insect\*\* system for Home Protection
- 11. [Ortho] Home Defense [provides][products for] zones/areas of home protection[:] inside/indoors/in your home/in the home/inside your home/home perimeter/ around the home/around your home, and outdoors/outside/the lawn/your lawn/lawn
- 12. Extend your bug\*\* barrier further with [Ortho] [Home Defense] [treatment/control] system/program/plan for Home Protection
- 13. [Let] [Ortho] Home Defense [system for Home Protection] [guard(s)/protect(s)] your home from insects\*\*
- 14. Part of a home defense system/program/plan from insects\*\*
- 15. [System/Program/Plan for] Insect\*\* Home Protection [in 3 steps]
- 16. [Part of the] [Home Defense/Brand name] Protection Program

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

## Multiple Bug System Language

Note to PM:

This product may be indicated as steps 1, 2 or 1 & 2

- 4. This product could appear only as Step 1 when packaged with Options 1, 7, and 8 within the "Product Application Instructions section" will emphasize or indicate the product is for "Indoors/Inside" on the FPL.
- 5. This product could appear only as Step 2 when packaged with using Options 2, 3, 4, and 5 within the "Product Application Instructions section" will emphasize or indicate the product is for "perimeter" on the EPI
- 6. This product could appear as Step 1 & 2 regardless of the packaging option used. If the FPL indicates the product as step 1 & 2, the text for those steps may be combined.

Note to PM: System will use a system name from "Multiple Insect System Names/Headings Section". This name will appear in the vicinity of the following text.

[Treat [your home] for many of the most common [crawling] insects\*\* with a system that protects in all areas of your home/space.]

## OR

[Treat [your home] for many of the most common [crawling] insects\*\* with a system that protects in all areas in and around your home/space.]

#### OR

[Treat [your home] for many of the most common [crawling] insects\*\* with a system that protects in all areas where your family spends time/lives each day.]

\*\*Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

**Bold, italicized text is information for the reader and is not part of the label.**[Bracketed information is optional text]. Text separated by / denotes and/or options. Highlighted Text is New. Strikethrough Text is deleted

Note to PM: Below are the system step call outs. On the FPL, the system step will be emphasized if all of the system steps below appear on the label. The FPL could also display just the step(s) applying to the product and the corresponding text.

Note to PM: Representative icons appear at the end of this section.

# [Step][1-][Kill/Control/Treat:] Indoors/Inside [icon]<sup>a</sup>

[Step][2-][Kill/Control/Treat:] Perimeter [icon] b

[Step][3-][Kill/Control/Treat:] Lawn/Outdoors/Outside [icon] c

<sup>a</sup>[Step 1/Kill/Control/Treat] Indoors/Inside [icon]: See a bug\*\* [inside]? Spray it to kill it. *OR* [Crawling] bug\*\*/bugs\*\* make its/their way in [to your home]? Spray it/them to kill it/them. *OR* See a straggler/lone bug\*\*/bug\*\*/survivor that made its way in/into [your home]? Spray it to kill it.

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>b</sup> [Step 2/Kill/Control/Treat:] Perimeter [icon]: Create a barrier of [bug\*\*] protection [around your home]. *OR* Create a barrier of protection around your home to keep [crawling] bugs\*\* out of [your home / where your family spends time]. *OR* Create a [bug\*\*] barrier of protection around [the perimeter of] your home.

[Use/Look for Ortho [Home Defense] products marked for Perimeter.]

<sup>c</sup> [Step 3/Kill/Control/Treat:] Lawn/Outdoors/Outside [icon]: Extend your protection by killing bugs\*\* in your yard/lawn/grass where your family<sup>‡</sup>/kids & pets<sup>‡</sup>/loved ones<sup>‡</sup> plays/play/spend time. *OR* Kill the [crawling] bugs\*\* in your yard/lawn [where your children play] before they [even] start a/to journey [into your home]. *OR* Kill and control the [crawling] bugs\*\* in your lawn/yard before they begin their/to journey [in/into your home].

[Use/Look for Ortho [Home Defense] products marked for Lawn/Outdoors/Outside.]

# NOTE to PM: Below are representative icons arranged Step 1 to 3 from left to right.







## Ant & Roach System Names/Headings:

NOTE TO PM: The following items will be used in conjunction with the Ant & Roach System text.

- 32. [2/3-Step] System for [Protection from] Ants/Roaches/Ants & Roaches
- 33. [2/3-Step] Ant/Roach/Ant & Roach Treatment/Control Plan/Program/System
- 34. [2/3-Step] Ant/Roach/Ant & Roach Solution System/Set
- 35. [2/3-Step] Ant/Roach/Ant & Roach System [for Protection]
- 36. [2/3-Step] Ant/Roach/Ant & Roach Protection Plan/Program/System
- 37. 2/3-Step Ant/Roach/Ant & Roach Control [Program/System]
- 38. Part of the [Ortho Home Defense/Brand name] [2/3-Step] System for [Protection from] Ants/Roaches/Ants & Roaches [in 2/3 steps]
- 39. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Treatment Plan/Program/System [in 2/3 steps]
- 40. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Solution System/Set [in 2/3 steps]
- 41. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach System [for Protection] [in 2/3 steps]
- 42. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Protection Plan/Program/System [in 2/3 steps]
- 43. Part of the [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Control [Program/System] [in 2/3 steps]
- 44. [Ortho Home Defense/Brand name] [2/3-Step] System for [protection from] Ants/Roaches/Ants & Roaches [in 2/3 steps]
- 45. [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Treatment Plan/Program/System [in 2/3 steps]
- 46. [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach [Solution] System/Set [in 2/3 steps]
- 47. [Ortho Home Defense/Brand name] [2/3-Step] Ant/Roach/Ant & Roach Protection Plan/Program/System [in 2/3 steps]

<sup>‡</sup>Always read and follow label directions:

EPA Reg. No. 239-2699

#### NOTE:

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Highlighted Text is New. Strikethrough Text is deleted

- 48. [Ortho Home Defense/Brand name] 2/3-Step Ant/Roach/Ant & Roach Control [Program/System]
- 49. Home Ant/Roach/Ant & Roach Control [system] [in 2/3 steps]
- 50. Treat [Visible],[Hidden],[Future] Ants/Roaches/Ants for the best control/protection
- 51. For best results use a system to treat/control Ants/Roaches/Ants & Roaches
- 52. For best results for control of ants/roaches/ants & roaches use the full [treatment/solution/protection] system/plan/program [to control ants/roaches/ants & roaches]
- 53. For best results use the full [treatment/solution/protection] system/plan/program to control ants/roaches/ants & roaches
- 54. For best control of ants/roaches/ants & roaches use the full [treatment/solution/protection] system/plan/program
- 55. For best results, more than one product may/might/could be needed for ant/roach/ant & roach control
- 56. [Part of a/an] Ant/Roach/Ant & Roach Control System [in 3 steps]
- 57. Use as a system for control of Ants/Roaches/Ants & Roaches
- 58. Ant & Roach Control in 2/3 Steps
- 59. Step 1/3
- 60. Ortho Home Defense Home Protection
- 61. Targeted Ant/Roach/Ant & Roach Treatment/Control Program/Plan/System [in 2/3 steps]
- 62. Ant/Roach/Ant & Roach Protection Program/Plan/System [in 2/3 steps]

## Additional System Claims

- 9. Part of a system for Home Protection from Ants/Roaches/Ants & Roaches
- 10. [Part of] [Ortho] [Home Defense] Ant/Roach/Ant & Roach system for Home Protection
- 11. [Ortho] Home Defense [provides] modes of treatment for killing the Ants/Roaches/Ants & Roaches/ones you see [, and] the ones/Ants/Roaches/Ants & Roaches you don't[, and prevent [Ants/Roaches/Ants & Roaches]].
- 12. Extend your bug barrier/control further with [Ortho] [Home Defense] [treatment/control] system/program/plan for Home Protection
- 13. [Let] [Ortho] Home Defense [system for Home Protection] [guard(s)/protect(s)] your home from Ants/Roaches/Ants & Roaches
- 14. Part of a home defense system/program/plan from Ants/Roaches/Ants & Roaches
- 15. [System/Program/Plan for] Ant/Roach/Ant & Roach Home Protection [in 2/3 steps]
- 16. [Part of the] [Home Defense/Brand name] Protection Program

## Ant & Roach System Language

Note to PM: This registration will emphasize or indicate the product is for "Create a barrier/prevent [bugs/ants]" on the FPL.

Note to PM: A different product name will be used for ant & roach system that differs from the multiple insect system focused/branded for Ant & Roach control.

Note to PM: Step 1(See/Visible) and 2 (Don't See/Hidden) may switch orders, but the step description and associated qualifier would remain the same.

Note to PM: System will use a system name from "Ant & Roach System Names/Headings Section". This name will appear in the vicinity of the following text.

Note to PM: Representative icons for this system are located at the end of the section.

[Take back your home with a system that treats [the] ants and roaches [you see,] [their friends,] and those [that are] lying in wait].]

Note to PM: Below are the system step call outs. On the FPL, the system step will be emphasized if all of the system steps below appear on the label. The FPL could also display just the step(s) applying to the product and the corresponding text.

## 3-Step Option

Note to PM: Sections steps are Kill/Control/Treat.

[Kill/Control/Treat:] The ones you see/See/See & Kill/Kill What You See [icon]<sup>a</sup>

[Kill/Control/Treat:] The ones you don't see/ Kill what you don't see/Hiding [icon]<sup>b</sup>

[Kill/Control/Treat:] Create a/an [Ant & Roach/Ant/Roach] barrier/Prevent [bugs/ants] [icon]<sup>c</sup>

<sup>c</sup>[Kill/Control/Treat:] Create a/an [Ant & Roach/Ant/Roach] barrier/Prevent [bugs/ants] [icon]: Treat the perimeter of your home to keep ants/cockroaches/roaches/ants & cockroaches/ants & roaches from setting up shop/entering/coming/invading/coming [back] in/into your home [for up to a year].

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[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>a</sup>[Kill/Control/Treat:] The ones you see/See/See & Kill/Kill What You See [icon]

If you see [an] ant/ants and/or roach/roaches, kill it/them with a [simple] spray.

[Use/Look for Ortho [Home Defense] Ant & Roach Aerosol [and Ready-To-Use] products.]

[Look for Ortho [Home Defense] products marked Kill the ones you see/See/See & Kill/Kill What You See.]

<sup>b</sup>[Kill/Control/Treat:] The ones you don't see/ Kill what you don't see/Hiding [icon]: Kill the ants and/or roaches you can't see with bait [that's] [specially] designed to be carried back [to the others/ colony].

[Use/Look for Ortho [Home Defense] Ant and/or Roach Bait Stations.]

[Look for Ortho [Home Defense] products marked kill the ones you don't see/Kill what you don't/Hiding.]

## OR

Note to PM: The steps in this section are Kill/Control/Treat and Prevent for products with residual claims.

## [Kill/Control/Treat][Prevent]

[Step][1] - [Kill/Control] Visible [ants/roaches /ants & roaches] [icon] a

[Step] [2] - [Kill/Control] Hidden [ants/roaches /ants & roaches] [icon] b

[Step] [3] - [Prevent] [ants/roaches /ants & roaches] [icon] c

<sup>a</sup> [Step] 3 - [Prevent] [ants/roaches /ants & roaches] [icon]: Treat the perimeter of your home to keep ants/roaches/ants & roaches from setting up shop/entering/coming/invading/coming [back] in/into your home [for up to a year].

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>b</sup>[Step][1] - [Kill/Control] Visible [ants/roaches /ants & roaches] [icon]: If you see [an] ant/ants and/or roach/roaches, kill it/them with a [simple] spray.

[Use/Look for Ortho Home Defense Ant & Roach Aerosol [and Ready-To-Use] products.]

[Look for Ortho [Home Defense] products marked [Kill/Control] Visible [ants/roaches /ants & roaches]]

<sup>c</sup> [Step] [2] - [Kill/Control] Hidden [ants/roaches /ants & roaches] [icon]: Kill the ants and/or roaches you can't see with bait [that's] [specially] designed to be carried back [to the others/colony].

[Use/Look for Ortho [Home Defense] Ant and/or Roach Bait Stations.]

[Look for Ortho [Home Defense] products marked [Kill/Control] Hidden [ants/roaches /ants & roaches]]

## 2-Step Option

Note to PM: The steps in this section are Kill and Prevent for products with residual claims [Kill][Prevent]

[Step][1] - Hidden [ants/roaches /ants & roaches] [icon] a

[Step][2] - Visible [ants/roaches /ants & roaches] [icon] b

<sup>a</sup>[Step][2][:] Visible ants/roaches /ants & roaches [icon]: If you see [an] ant/ants and/or roach/roaches, kill it/them with a [simple] spray.

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

<sup>b</sup>[Step][1] - Hidden [ants/roaches /ants & roaches] [icon]: Kill the ants and/or roaches you can't see with bait [that's] [specially] designed to be carried back [to the others/colony].

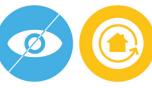
[Use/Look for Ortho Home Defense Ant and/or Roach Bait Stations.]

[Look for Ortho [Home Defense] products marked Hidden [ants/roaches /ants & roaches]]

NOTE to PM: Below are representative icons arranged Step 1 to 3 from left to right. For the 2 step option icons 1 & 3 could both appear or only icon 1.

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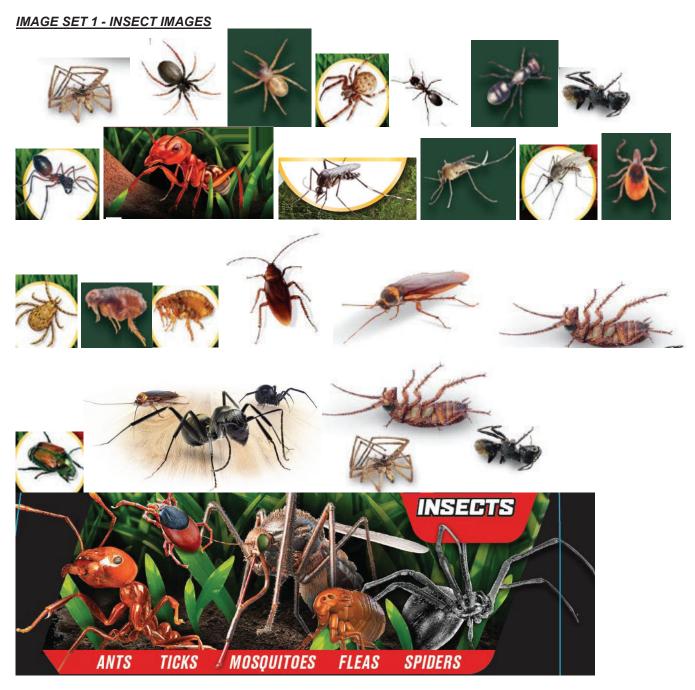




# **END OF SUB LABEL B - BOV PACKAGING**

# **IMAGE INDEX**

NOTE TO PM: Image Set descriptions indicate claim types that images may be used in relation with beyond those indicated elsewhere in the label.



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# IMAGE SET 2 - WHERE TO USE OR USE SITE CLAIMS OR TEXT

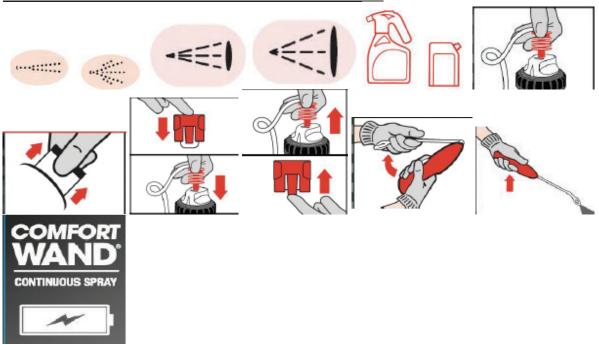


# IMAGE SET 2 - FOR USE WITH KILL/CONTROL/WHAT IT DOES TEXT & CLAIMS



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# **IMAGE SET 3 – FOR USE WITH APPLICATOR CLAIMS & TEXT**



# **IMAGE SET 4 – FOR USE WITH FORMULA TEXT & CLAIMS**













# IMAGE SET 5 - FOR USE WITH USE SITE TEXT & CLAIMS











# IMAGE SET 6 - FOR USE WITH WHEN TO USE TEXT & CLAIMS



# IMAGE SET 7 - FOR USE WITH TIME/SPEED/RESIDUAL TEXT & CLAIMS















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# <u>IMAGE SET 8 – FOR USE WITH REENTRY TEXT & CLAIMS</u>



# IMAGE 9 - FOR USE WITH WEBSITES/INTERNET TEXT & CLAIMS



# **IMAGE 10 - FOR USE WITH PHONE NUMBERS or TEXT WITH PHONE NUMBERS**



# <u>IMAGE SET 11 – FOR USE WITH SUB-BRAND PRODUCTS</u>

