

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 29, 2024

Chris Zemanek
Sr. Analyst, Regulatory Affairs
The Scotts Company d/b/a The Ortho Group
P.O. Box 190
Marysville, OH 43040

Subject: Notification per PRN 98-10 – Notification of minor label changes

Product Name: Ortho Home Defense Indoor & Outdoor Insect Killer 3

EPA Registration Number: 239-2717 Application Date: February 6th, 2024

Case Number: 498547

Dear Chris Zemanek:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "NOTIFICATION" and placed in our records.

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 the Federal Insecticide, Fungicide, and Rodenticide Act (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 claims approved through

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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.

If you have any questions, please contact Laura Rademacher at Rademacher.Laura@epa.gov.

Sincerely,

Scott Campbell, Acting Product Manager 03

Invertebrate and Vertebrate Branch I

Registration Division (7505T)

Office of Pesticide Programs

Ortho Home Defense Indoor and Outdoor Insect Killer 3

Alternate Brand Names:

Ortho® Home Defense Max® Insect Killer for Indoor and Perimeter [Ready to Use] 2

Ortho® Home Defense Max® Insect Killer for Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload 2

Ortho® Home Defense Insect Killer for Indoor & Perimeter 1 Ortho® Home Defense Insect Killer for Indoor & Perimeter Refill 1

Ortho® Home Defense® Insect Killer for Indoor and Perimeter 2 Ortho® Home Defense® Insect Killer for Indoor and Perimeter

Ortho® Insect Killer for Indoor & Perimeter [Readyto Use] Ortho® Insect Killer for Indoor & Perimeter [Ready to Use] Refill/Recharge/Renew/Fill-Up/Reload

Ortho® Home Defense Indoor Insect Killer 2

Ortho® Home Defense Indoor Insect Killer Refill 2

Ortho® Indoor Insect Killer

Ortho® Indoor Insect Killer Refill

Ortho® Home Insect Killer 2

Ortho® Home Insect Killer Refill 2

Ortho® Home Invading Insect Killer 2

Ortho® Home Invading Insect Killer Refill 2

Ortho® Home and Perimeter Insect Killer 2

Ortho® Home and Perimeter Insect Killer Refill 2

Ortho® Home Defense Indoor and Perimeter Insect Killer

Ortho® Home Defense Indoor and Perimeter Insect Killer Refill

Ortho® Indoor and Perimeter Insect Killer

Ortho® Indoor and Perimeter Insect Killer Refill

Ortho® Home Defense Perimeter Insect Killer

Ortho® Home Defense Perimeter Insect Killer Refill

Ortho® Perimeter Insect Killer

Ortho® Perimeter Insect Killer Refill

Fundamentals by Ortho Indoor Insect Killer Ready -To -Use₁ Fundamentals by Ortho Insect Killer for Indoor Ready -To -Use₁

NOTIFICATION

239-2717

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/29/2024

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

Active Ingredient:	By Wt.
Bifenthrin ¹	0.0500%
Zeta-Cypermethrin ²	0.0125%
Other Ingredients:	<u>99.9375%</u>
Total	100.0000%

¹ Cis isomers 97% min, trans isomers 3% max

KEEP OUT OF REACH OF CHILDREN CAUTION

See back/panel/booklet for additional precautionary statements

NET CONTENTS: [x fl oz. / gal. (ml / L)]

Note to PM: Label text may also appear all or in part in a foreign language in addition to English.

² Cis/trans ratio: Max. 75% (±) cis and min. 25% (±) trans

[KEEP OUT OF REACH OF CHILDREN]

[REEL OUT OF REPORT OF STREET,		
FIRST AID		
If swallowed	Call poison control center or doctor immediately for treatment advice.	
	Have person sip a glass of water if able to swallow.	
	Do not induce vomiting unless told to do so by the poison control center or doctor.	
	Do not give anything by mouth to an unconscious person.	
If in eyes	Hold eye open and rinse slowly and gently with water for 15-20 minutes.	
	Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.	
	Call a poison control center or doctor for treatment advice.	
HOTLINE NUM	IBER	
	ct container or label with you when calling a poison control center or doctor, or going for may also contact 1-877-465-5161 for Emergency Assistance.	
NOTE TO PHYSICIAN		
Emergency Info	ormation call 1-877-465-5161.	

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear: Long-sleeved shirt and long pants, socks, shoes, and chemical resistant gloves made of: barrier laminate, butyl rubber (> 14 mils), nitrile rubber (> 14 mils), neoprene rubber (> 14 mils), natural rubber, polyethylene, PVC (> 14 mils)or viton (> 14 mils). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS: This pesticide is extremely toxic to fish, aquatic invertebrates, oysters and shrimp. 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 visiting 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.

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

- 1. 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);
- 2. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
- 3. 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:
- 4. 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;
- 5. 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.

$Bold, it a licized \ text \ is information for the \ reader \ and \ is \ not \ part of \ the \ label.$

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

- 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.
- Do not allow the product to enter any drain during or after application.

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.

APPLICATOR LANGUAGE SECTION

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]

[If Applicator is not attached:][Remove cap [and seal], then insert applicator/sprayer in/into the bottle. Tighten applicator/sprayer to bottle/container/pouch]

[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][

- 1. Remove sprayer/Applicator Name from bottle/holster/holder/box/container/package [by sliding/pulling/pushing sprayer up/down/in/out].
- 2. [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].

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- 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/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. [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/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 6. Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
- 7. Press trigger 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 4 - Battery Hose Attached Sprayer

[Battery Powered Wand/Comfort Wand/Comfort Shot Wand/Applicator/Wand/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. [Remove [color] pull strip to activate batteries].
- 3. [Unfold / Flip Open [Applicator Name/applicator/wand] until it clicks/locks into position.]
- 4. [Extend wand/applicator/nozzle] [fully].

[Connect][I]OR [I

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

NOTE to PM:

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



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



- 1. [Turn nozzle to "OFF"/X].
- 2. [Slide [color] switch on trigger to "Lock"].
- [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.]



[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].]

[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.



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[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].

IDEPRESSURIZE][Z



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.]
- [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

[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:]

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



1. [Unsnap/Unsecure/Unlock wand/applicator and Extend wand/applicator [upward/fully][until it clicks into place]]

2. [Remove [color] pull strip to activate batteries].



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



- 1. [Turn nozzle to "OFF"/X].
- 2. [Slide [color] switch on trigger to "Lock"].
- 3. [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 bottle by rotating clockwise/counterclockwise to access 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 [insertillustration]

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

[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, carbonzinc 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.

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.

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

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

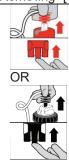
Refill/Applicator Reuse Options

Option 1 - Applicator Reuse

[Applicator Name/Wand] REFILL/REUSE DIRECTIONS

How to attach applicator name/wand to Ortho Home Defense Indoor and Outdoor Insect Killer 3/Product Name/refill/recharge/renew/fill-up/reload/ bottle/container:

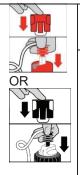
Removing [color] hose/Comfort Wand/Applicator Name from original bottle/container:



Remove the [color] hose connector from the original bottle/container/pouch 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.]

Adding [color] hose/Comfort Wand/Applicator Name to Ortho Home Defense Indoor and Outdoor Insect Killer 3/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:



[Attach the sprayer holster/holder to Ortho Home Defense Indoor and Outdoor Insect Killer3/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].

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 3/Product Name. To refill twist/snap Ortho Home Defense Indoor and Outdoor Insect Killer 3/Product Name into/onto spray/applicator nozzle/top.

OR

[Applicator Name/Flairosol] REFILL/REUSE DIRECTIONS

How to attach Applicator Name/Flairosol to Ortho Home Defense Indoor and Outdoor Insect Killer 3/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

Remove sprayer/applicator/top from the empty container/bottle 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 Primo 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 Killer 3/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

- 1. Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise and remove from empty bottle/container/pouch.
- 2. Remove cap/lid from Ortho Home Defense Indoor and Outdoor Insect Killer 3/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 Killer 3/Product Name/refill/recharge/renew/fill-up/reload/bottle/container/pouch.
- 5. Secure the sprayer head/applicator from botte/container/pouch by rotating clockwise/counterclockwise

Option 2 - Refill by pouring same RTU formula from a refill package

Refill Container

Use this product to refill the empty [insert brand name for Ortho Home Defense Indoor and Outdoor Insect Killer 3] container by pouring product carefully and directly into the container. DO NOT add water.

OR

HOW TO REFILL 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



Option 3 - Refill by pouring same RTU formula from Liquaflex refill 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

Option 4 - 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/HD 2717 Flex/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 HD 2717 Flex/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.

Secure pump handle back on container by twisting it clockwise until tight.

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

PRODUCT FACTS:

[What It Does:] Kills home invading insects: [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles],

[earwigs], [silverfish], [centipedes], [and] [millipedes], (See inside for complete list)[



[Where to Use:] Use with confidence indoors ([kitchens], [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter of foundations, patios and decks], [garages], [doors & windows]) wherever insects are a re-

ecurring problem. |



[When to Use:] Use anytime as a preventative treatment or after you see evidence of insect activity for longlasting control.



Questions & Comments: [icon phone] [icon computer]—)[

Call 1-800-xxx-xxxx or Visit [our Website at] [www.] ortho.com



PRODUCT FACTS



Adelgids	Eastern Sprucegall		
Ants	Argentine Carpenter	Pavement Pharaoh/Sugar	Red/Western Harvester

	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 /
	Carpet	Lady Beetles (including	Southern Corn Rootworm
	Colorado Potato	Asian Lady Beetle Eggs)	(Adults)
	Corn Rootworm (Adults)	Mexican Bean	Striped Cucumber
	Curculio (Cow Pea ,Plum)	Pine Chafer (grub)	Weevils (Annual Bluegrass
	Elm Leaf	Pine Shoot	& Black Vine)
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)
Fungue Chata	Biting Flies	Cornsilk	House
Fungus Gnats			
Grasshoppers Hornets			
Lace Bugs Leaffooted	Squash Bug		
Bugs	Squasii Bug		
Leafhoppers			
Leafminers	Alder	Tentiform	Vegetable
Leafrollers	Oblique Banded	Red-Banded	Variegated
Mealybug	Conque Danaea	rtea Barraea	vanogatou
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	Diamondback	Gypsy/Spongy

NOTE to PM:

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.

	Codling		
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	Brown Soft	California Red
	Euonymus		
Scorpions			
Silverfish			
Sowbugs			
Spiders	Black Widow	Hobo	Wolf
	Brown Recluse		
Spittlebugs	Pecan		
Springtails			
Stink Bugs	Brown Marmorated	Kudzu	
Stored			
Product Pests			
Thrips			
Ticks			
Termites			
Wasps			
Whiteflies			
Yellowjackets			

For Listed General Insect Control Use

	Indoor Surfaces	Outdoor Surfaces	[In Pantries - Optional Section]
When to Apply	Use anytime as a preventative lasting control.	e treatment or after you see evi	dence of insect activity for long-
Before You Apply	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

- Shake Well
- [Set spray nozzle to indoor

[sprayer icon][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 re-occurring problem)
- Spray until slightly wet without soaking.

Image of typical Indoor Application



- Shake Well
- [Set spray nozzle to outdoor [sprayer



- Hold sprayer 12 inches from surface being sprayed.
- [(Apply a 12-inch wide band along the surfaces being treated) ()][Apply a 12-inch wide band along the exterior of your home in areas where insects are a re-occurring problem-)]
- Spray until slightly wet without soaking.

Image of typical Outdoor Application



- Shake Well
- [Set spray nozzle to indoor [sprayer icon] setting.]
- Spray cracks and crevices along shelves in pantries.
- Spray until slightly wet without soaking.
- Replace non-infested items once spray has dried.]

After You **Apply**

reentry icon] People and Pets may re-enter treated area after spray has dried.

- Thoroughly wash all food processing surfaces and utensils with soap and water before reuse
- Repeat as needed. Re-treatment is recommended at least once per season (3 months) outdoors.
- For long-lasting residual control/action leave spray undisturbed. The product will keep on killing for up to 12 months [*] Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4

Fleas and **Ticks** (Including ticks that may transmit Lvme Disease)

Do not Spray Animals

Pets resting guarters may be treated with this product. How to Apply: Spot treat infested areas such as pets resting quarters and localized areas of floors/floor coverings (rugs, 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: Keep from freezing. To be stored in original container and placed in areas inaccessible to

Note to reviewer: Below is For Non-Refillable containers

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.

Note to reviewer: Below is For Refillable Containers

PESTICIDE DISPOSAL AND CONTAINER HANDLING: [Applicator Name] can be reused/refilled with [Product Name refill bottle/container]. Follow instructions in the Reuse/Refill 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. 239-2717 EPA Est. No. 239-IA-3¹, 58996-MO-1^A, 84064-IA-1^P, 85652-OH-1^W, 239-MS-001^m Superscript is first letter of lot number [Made in USA]

Optional Marketing Claims for Listed General Insect Control Use

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

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

Note to PM: When qualified claims are used on the market label, the qualifying statement will appear in close proximity to the claim when it does not impact any mandatory language.

Note to PM: Any combination of approved claims may be inserted dependent upon sites listed on the market label and product size

[Brand]	Ortho	Ortho
[Product name]	Home Defense Max® Insect Killer for Indoor & Perimeter2	Home Defense Max® 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.	Fast Acting Formula**	Fast Acting Formula*
3.	Non-Staining	Non-Staining
4.	Odor Free	Odor Free
5.	Dries Fast/Dries Clear	Dries Fast/Dries Clear
	** Starts killing in seconds	*Starts killing in seconds and 12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces
[Product Facts:]	What it Does: Kills home invading insects: [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [and] [millipedes]. (See inside for complete	What it Does: Kills home invading insects:[ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [and] [millipedes]. (See inside for complete list)

	Where to Use: Use with confidence indoors ([kitchens] [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter of foundations, patios and decks], [garages], [doors & windows],) wherever insects are a re-occurring problem. [IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	Where to Use: Use with confidence indoors ([kitchens] [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter of foundations, patios and decks], [garages], [doors & windows],) wherever insects are a re-eccurring problem. When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting*** control. ***12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces People and pets may enter treated areas after spray has dried Questions & Comments: (phone &
[Ortho Guarantee]	at] [www.]ortho.com The ORTHO Guarantee: [When purchased from an authorized seller,] 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.	computer icon)—[
[UPC]	UPC Placeholder	UPC Placeholder
[Standard Copy]	© 20xx The ORTHO Group. World rights reserved. Sold by The ORTHO Group	© 20xx The ORTHO Group. World rights reserved. Sold by The ORTHO Group
	PO Box 190, Marysville, OH 43040	PO Box 190, Marysville, OH 43040
[EPA Info]	EPA Reg. No. 239-2717 EPA Est. XXX, XXX, XXX, XXX, XXX,	EPA Reg. No. 239-2717 EPA Est. XXX, XXX, XXX, XXX, XXX,
	Superscript is first letter of lot number.	XXX Superscript is first letter of lot number.
[Component	Component # Placeholder	Component # Placeholder

Number1

12-Month Claims



- 1. Up to 12 month control/protection*
- 2. Kills/Controls [for] up to 12 months'
- 3. Kills bugs inside all year*
- 4. Kills home invading bugs all year*
- 5. Kills indoor bugs all year*
- 6. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months*.
- 7. Creates a perimeter/border/residual treatment that will kill bugs you have and control/prevent new bugs for up to 12 months*.
- 8. Protects your home in/with just 1 application a year[!]

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



Qualifier Option 2: * [applies to] [for] American Cockroach/Palmetto Bug/Waterbug, 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/Waterbug, 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/Waterbug, 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

- 1. Up to 6 month control/protection outdoors**
- 2. Kills/Controls/Protects [for] up to 6 months outdoors**
- Kills insects outdoors for 6 months**
- Kills insects [indoors] [and] [outdoors] for 6 months**
- ** Applies to/for: spiders (excluding Black Widow, Brown Recluse, Hobo)

3-Month Claims

- 1. Up to 3 month control [protection] outdoors***
- 2. Kills/Controls/Protects [for] up to 3 months outdoors***
- 3. Kills bugs outdoors for 3 months***
- Kills bugs [indoors] [and] [outdoors] for 3 months***

*** Applies to/for: Ants, Fleas, Cockroaches, Spiders (excluding Black Widow), House Flies, Scorpions, and American Dog Ticks

Egg Killing Claims

- 1. Kills Beet Armyworm, Two Spotted Spider Mites, Asian Lady Beetle and their eggs
- 2. (Plus) kills insects and their eggs****
- 3. Kills insect eggs****
- 4. Prevents insect eggs from hatching!****
- 5. Up to 12 month control* plus kills insect eggs****

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

****Applies to/for: Beet Armyworms, Two Spotted Spider Mites and Asian Lady Beetles

Efficacy Claims

- 1. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
- 2. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
- 3. Kills Fleas that may transmit Mycoplasma to cats
- 4. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
- 5. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia to cats
- 6. Kills Ticks that may transmit Anaplasma/ Babesiosis/ Ehrlichiosis/ Lyme borreliosis/ Rocky Mountain spotted fever/ Hemoplasmosis/ Mycoplasma [to dogs]
- 7. Kills mosquitoes that may transmit Heart worm [to cats/dogs]
- 8. Kills mosquitoes that may transmit Subcutaneous dirofilariasis [to cats/dogs/people]
- 9. Kills cockroaches/roaches that may carry [Salmonella typhimurium], [Entamoeba histolytica], [E. coli], [Staphylcoccous spp.], [Pseudomonas aeruginosa], [Klebsiella pneumoniae], [the poliomyelitis virus].
- 10. Kills ticks that may transmit [the] Powassan [POW] disease/virus.
- 11. Kills mosquitoes that may transmit West Nile virus
- 12. Kills mosquitoes that may transmit the chikungunya virus
- 13. Kills mosquitoes that may transmit yellow fever
- 14. Kills mosquitoes that may transmit dengue fever
- 15. Kills mosquitoes that may transmit encephalitis
- 16. Kills mosquitoes that may transmit [the] Zika virus
- 17. Kills Ticks that may transmit Lyme Disease
- 18. Kills mosquitoes that may transmit [Zika, West Nile and the Chikungunya virus] [yellow fever and dengue fever

Dual Ingredient Claims

- 1. Two active ingredients in one product
- 2. Dual Action
- 3. [Dual Action] Fast Acting plus Long Residual*
- 4. [Fast Acting**], [Long Lasting***] Insect Control

Formula Based Marketing Claims

- 1. Non-Staining
- 2. No Stains
- 3. Does not Stain [fabrics, floors, wood, surfaces]
- 4. Dries clear
- 5. Virtually Odor Free
- 6. Odorless
- 7. Odor Free
- 8. Graphic to accompany odor-related claims [
- 9. Fragrance-Free
- 10. Unscented
- 11. No lingering [chemical] odor
- 12. Dries fast [
- 13. Water based [formula] [water droplet icor



^{*}Starts killing in seconds and 12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

^{**} Starts killing in seconds

^{***12} month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

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- 14. Dries in minutes [for fast/quick re-entry]! [©]
- 15. Leaves no residue [behind][3]
- 16. No oily residue[]
- 17. No [sticky] mess
- 18. [Leaves] no odor
- 19. No greasy residue [mess] [🔊]
- 20. No need to wipe up
- 21. Ready to Use
- 22. No Mixing Necessary

Location of Use Claims

- 1. Use in garage[s] and/or basement[s] and/or attic[s] to keep listed bugs from coming into [entering] the [your] home.
- 2. Use/Can be used in garage[s] and/or basement[s] and/or attic[s]
- 3. Use with confidence in garage[s] and/or basement[s] and/or attic[s]
- 4. [Formulated] [For] Indoor Use [♣]
- 5. Indoor/Outdoor [Formula] [1]
- 6. [Formulated] [For] Indoor/Outdoor Use [1]
- 7. Apply along [baseboards] [foundations]
- 8. Use with confidence in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms].
- 9. Designed to/for use in kitchens &/and pantries
- 10. Ideal for small/smaller areas/spaces/rooms
- 11. Great for large/larger areas/spaces/rooms
- 12. Ideal/great for large/small jobs/areas/spaces/rooms
- 13. Use inside and outside your home!
- 14. Use in [kitchens], [garages], [basements] [and] [attics].
- 15. Use in [kitchens], [garages], [basements] [and] [attics] to kill listed bugs [listed insects].
- 16. Use [Can be used] in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- 17. Use with confidence in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- 18. [Illustrations of kitchen, bathroom, home perimeter/foundation, garage, windows and doorways, basement, attic, porches and patios]



- 19. Apply along [and behind] baseboards [and][foundations]
- 20. Apply along [behind] [and] [between] appliances
- 21. Apply beneath [and behind] sinks
- 22. Apply in other areas where listed insects [are often found] [often appear]
- 23. [Formulated For] Indoor Use/Outdoor Use
- 24. Indoor/Outdoor [Formula]

Perimeter Treatment Claims

- 1. Apply [as] a barrier
- 2. Apply as a border around your home
- 3. Apply [as] a (perimeter/border/residual treatment)
- 4. Creates a [bug] barrier
- 5. Creates a [bug] border
- 6. Creates a perimeter treatment
- 7. Long lasting*** [bug] perimeter treatment/barrier/border [iii]
- Kills bugs inside. Keeps bugs out.
- 9. Forms/Creates/Establishes a perimeter treatment
- 10. Forms/Creates/Establishes a [bug/insect] barrier

$Bold, it a licized \ text \ is information for the \ reader \ and \ is not \ part of \ the \ label.$

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

- 11. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home
- 12. Guards against bugs so you don't have to
- 13. Guards against the bugs you can't/don't see
- 14. Kills and prevents insects∞ [inside your home] [outside your home]
- 15. Provides residual control against listed home invading insects
- 16. Keeps [on] killing with residual action, even after you spray
- 17. Keeps [on] killing with residual action, even after spray has dried
- 18. Keeps on killing after spray has dried
- 19. Use in [kitchens], [garages], [basements], [attics] to keep/to kill listed bugs [from entering your home]
- 20. [Kills two/2 ways] / [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

***12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests Note to label reviewers: When qualified claims are used, the qualifying statement should appear following the claim when it does not impact any mandatory language.

Kill Claims

- 1. Kills by contact!
- 2. Kills insects∞, Spiders and Ticks
- 3. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other listed insects
- 4. Kills Home invading Insects∞
- 5. Also Kills Ticks (including Ticks that may transmit Lyme Disease)
- 6. Kills mosquitoes that may transmit West Nile virus
- 7. Kills bugs inside. Keeps bugs out(side) ∞
- 8. Visible activity against bugs within minutes ≈
- 9. Starts killing/acting within minutes≈
- 10. Kills [1...188] Insects∞
- 11. Kills [the] bugs you see and/& [the] [ones] bugs you don't [see] ∞
- 12. Kills the toughest home invading bugs∞
- 13. Kills/Controls [both] crawling and/& flying insects ∞
- 14. Kills/Controls common household bugs∞[7]

≈Applies to/for: Carpenter Ants, Harvester Ants, Oriental and German Cockroaches

∞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")

Applicator Claims

- 1. Comfort wand
- 2. Pull 'n Spray®- No hand fatigue!
- 3. Continuous, Adjustable Spray
- 4. Quick Pump [applicator][sprayer]
- 5. [Quick and] Easy to Use
- 6. No Leaks or Mess
- 7. No Hand Fatigue
- 8. Precise control [for maximum accuracy]
- 9. Consistent spray [for maximum accuracy]
- 10. Ideal/great for large/small jobs/areas/spaces/rooms
- 11. Adjustable sprayer [nozzle] [for maximum control]
- 12. Cut your time spraying in half
- 13. Up to X minutes [mins] of continuous spray

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

- 14. Over X minutes [mins] of continuous spray
- 15. 1 pull equals X trigger sprays
- 16. New [Improved] Applicator
- 17. Grab & Go
- 18. Pump
- 19. Spray
- 20. No [constant] pumping
- 21. [New][Comfort] [Shot][Applicator Name] Wand (New will only to be used for 6 months after product is introduced)
- 22. Saves time and energy
- 23. Continuous Spray
- 24. Extended Reach
- 25. No more bending/kneeling
- 26. Just attach hose and spray
- 27. [Now with a] Longer Wand[!]
- 28. [Now with] 50% longer [reach]
- 29. [Now with] 2x/twice [the] extended reach
- 30. [Now] Easier [than ever] to spray [doors], [windows], [&] [baseboards]
- 31. [Now] Easier [than ever] to spray the home foundation/perimeter
- 32. Spray [foundations] [&/and] [baseboards] without bending[!]
- 33. [More] Precise/Accurate Spray
- 34. Continuous Spray &/AND More/Better Precision/Accuracy
- 35. Easily get[s] into hard-to-reach areas
- 36. [Precision/Precise/Adjustable] Sprayer
- 37. [Wand/Applicator] [extends up to 2 feet] [to] Reduce[s] [back] bending [and the] [continuous spray wand helps reduce[s] hand fatigue]
- 38. [Wand/Applicator] [provides] precision control [to maximize every spray/get the most out of every spray]
- 39. [Now with a] Fan Spray [for better coverage] / [for faster application]
- 40. [Now with a] Foaming Spray [for crack[s] and crevice[s]] [application] / [to see where [the product] applied]
- 41. Foaming spray makes it easier to see where [the product was] applied
- 42. [Foaming spray] disappears/dissolves when dry [to indicate when to re-enter]
- 43. [Foaming spray] dries clear [to indicate when to re-enter]
- 44. [Foaming spray] makes it easy to tell when the area is dry [and people & pets can re-enter]
- 45. Know/See where [product was] applied
- 46. [2x] Faster Application/Coverage
- 47. Performs like a tank sprayer with no/without pumping
- 48. Equal performance to a tank sprayer with no/without pumping
- 49. Tank sprayer power with no/without pumping
- 50. Same coverage in [half the] [50% less] time
- 51. Consistent/even coverage
- 52. You're/It's always ready to spray
- 53. The easy/easier way [to spray][to kill bugs][to kill insects][Home Defense®]
- 54. Change the way you spray
- 55. Easy to spray
- 56. No Aerosols
- 57. Easy to Use

Refill Claims

- Refill/Recharge/Fill-Up/Reload/Renew for [Comfort Wand][Quick Pump][Pump 'N Go][Applicator Name][Product Name]
- Refills/Recharges/Reloads/Renews [Comfort Wand] [Quick Pump] [Pump 'N Go] [Applicator Name] [Product Name]
- 3. Fills Up [Quick Pump] [Pump 'N Go] [Applicator Name] [Product Name]
- 4. Fill-Up for [Applicator Name] [Quick Pump] [Pump 'N Go][Product Name]
- 5. Works with [Comfort Wand] [Quick Pump] [Pump 'N Go] [Applicator Name]
- 6. Just plug [Comfort Wand] [Applicator name] in and it's ready to spray
- 7. [Plug 'N Play] Refill/Recharge/Reload/Renew [For Comfort Wand]

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

- 8. Refill/Recharge/Fill-Up/Reload/Renew Available
- 9. [Comfort Wand] [Quick Pump] [Pump 'N Go][Applicator Name] Recharge/Refill/Fill-Up/Reload/Renew
- 10. [Comfort Wand] [Applicator Name] [Product Name] Refill/Recharge/Reload/Renew Cartridge

Wand Claims

- 1. Reusable [Comfort] [Continuous Spray][Wand]
- 2. Rechargeable
- 3. [Wand] [Applicator Name] will last [for] [at least] 20 bottles!
- 4. [Wand] [Applicator Name] will last over 25 gallons!
- 5. [Wand] [Applicator Name] will last for years* *based on X applications per year
- 6. Performs like a tank sprayer with no/without pumping
- 7. Equal performance to a tank sprayer with no/without pumping
- 8. Tank sprayer power with no/without pumping
- 9. Spray [foundations][&/and][baseboards]without bending!
- 10. [More*] Precise/Accurate spray
- 11. Continuous Spray &/AND [More/Better*] Precision/Accuracy
- 12. Easily get[s] into hard-to-reach areas
- 13. [Precision/Precise/Adjustable] Sprayer
- 14. [Wand/Applicator] [extends up to 2 feet] [to] Reduce[s] [back] bending [and the] [continuous spray wand helps reduce[s] hand fatigue]
- 15. [Wand/Applicator] [provides] precision control [to maximize every spray/get the most out of every spray]
- 16. Fan Spray [for better coverage] / [for fast[er*] application]
- 17. [Now with a] Foaming Spray [for crack[s] and crevice[s]] [application] / [to see where [the product] applied]
- 18. Foaming spray makes it easier to see where [the product was] applied
- 19. [Foaming spray] disappears/dissolves when dry [to indicate when to re-enter]
- 20. [Foaming spray] dries clear [to indicate when to re-enter]
- 21. [Foaming spray] makes it easy to tell when the area is dry [and people & pets can re-enter]
- 22. Know/See where [product was] applied
- 23. [2x] Faster Application/Coverage*
- 24. Same coverage in [half the] [50/X% less] time*
- 25. Continuous Spray/wand
- 26. Extended Reach
- 27. Continuous [Adjustable] Spray [Wand]
- 28. Longer* wand/50/X% longer* reach
- 29. 2x/twice [the] extended reach*
- 30. Easier [than ever] to spray[the home/foundation/perimeter] [doors], [windows], [&] [baseboards]
- 31. Continuous adjustable spray
- 32. Continuous spray wand
- 33. [Comfort][Shot] Wand
- 34. Powered by Duracell/Battery Brand
- 35. Save[s] time and energy
- 36. Cut your time spraying in half



- 37. ALWAYS lock after use [
- 38. [Applicator Name] Extends 2 feet Continuous Spray
- 39. [Applicator Name] Continuous Spray
- 40. [Battery Image
- 41. Batteries Included
- 42. [Applicator Name]



Flairsol Claims

- 1. Propellant Free
- 2. Continuous Spraying
- 3. Fine Mist
- 4. 360 spraying

Value

- 1. Great Value
- 2. Value Pack (only when selling Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter Wand/product name/Quick Pump bottle together with Refill)
- 3. Refill/Recharge/Renew/Fill-Up/Reload
- 4. Buy Wand & Refill, Get [X%] Free!
- 5. Same formula, better value!
- 6. Save [Money] with the Refill!
- 7. Over 10% more than 1.33 gal size
- 8. [Over] X% more than X gal size
- 9. 10% more bonus size (applies to 1.1 gal size)
- 10. 33% more than 1 gallon size (applies to 1.33 gal size)
- 11. Bonus Size
- 12. Combo Pack
- 13. Wow [Pack]
- 14. Exclusive to Club Stores!
- 15. Exclusive Club [Bonus] Size!
- 16. Value/Bonus Size 2-pack!
- 17. Value/Bonus Size 2 gallons!
- 18. Value/Bonus Size 2-pack = 2 gallons!
- 19. Look inside [label] for special offer information!
- 20. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.
- 21. 2 Bottles [and/&/+ 1 Comfort Wand]



 $Bold, it a licized \ text \ is information for the \ reader \ and \ is \ not \ part of \ the \ label.$

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

OTHER

- 1. [icon People and pets may re-enter treated areas after spray has dried
- 2. XX% more than X gallon size
- 3. XX% less plastic*
- 4. [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.
- 5. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 6. Proven performance
- 7. Read Entire label before use
- 8. Recyclable symbol [4]
- 9. Before / After
- 10. [For] Indoor & Outdoor Residential use only
- 11. Intended for residential use
- 12. Peel Open for use directions and further information
- 13. OPEN
- 14. Resealable Label for Directions & Precautions
- 15. Peel Open for use directions and further information
- 16. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 17. PEEL HERE / PRESS TO RESEAL
- 18. PULL / PEEL HERE [TO REMOVE TAPE]
- 19. Product of -and/or- Made in U.S.A.
- 20. Assembled in the USA
- 21. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 22. QUESTIONS OR COMMENTS [phone icon] 1-800-225-2883 or [Visit] [our website at]

[www.]ortho.com [computer icon]

- 23. Indoor Surfaces / Outdoor Surfaces
- 24. Indoor Use / Outdoor Use

*vs. previous bottle/container/packaging

[Use your phone(to) [scan][the][tag][or][this code][to learn][or][to][see/view][more][uses][or][information][the][M]SDS][Videos] [(on)how to use][this product][for] [how to(use)] [tips]

QR code to ortho.com



Note to Reviewer: QR Code image may appear on any panel of the marketplace label

Guarantees:

- 25. Guaranteed[†††]
- 26. [Company/Brand] Guarantee[d] [†††]
- 27. Guaranteed [results] [†††]
- 28. Guaranteed Kill [or your money back] [†††]
- 29. [Company/Brand] Satisfaction guaranteed[†††]

30. [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: [When purchased from an authorized seller,] 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: [When purchased from an authorized seller,] 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.

[*]Our Product/Scotts [Miracle-Gro] [No-Quibble/Consumer] [Money Back] Guarantee® [icon]

If for any reason you, the end-user consumer, are not satisfied with the performance of this/your [Scotts-Miracle-Gro family/Scotts/Ortho] product, simply submit your proof of purchase and we will happily [either] refund the purchase price or provide a replacement product (in our sole discretion). [Visit ortho.com/refunds for more details.]

Sustainable

- 1. [Eco-Friendly] [Sustainable] Refill
- 2. Go Green/Be Sustainable Refill [Reuse]!
- 3. REFILL A more sustainable way to keep bugs out!

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.

- 31. For easy Indoor application, trust the power of Ortho Home Defense [with InvisiSHIELD] [Technology]
- 32. Ortho Home Defense [with InvisiSHIELD Technology], the modern way to keep bugs away
- 33. With InvisiSHIELD [Technology] [Year-Long* Bug Control] with [no fumes], [odors], [stains], or [wet mess].
- 34. InvisiSHIELD helps kill/control the bugs you have without the stress
- 35. Let [Ortho] Home Defense shield your home from the bugs/insects
- 36. InvisiSHIELD [technology] dries fast, odorless/odor-free, non-staining,12 month* control/year-long* protection, with improved spreading power/ ability to spread / apply more evenly
- 37. With InvisiSHIELD [technology]
- 38. InvisiSHIELD
 - 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]

VISI-SHIELD Technology ||

WITH





Example of design/icon which will use all or a combination of text listed in claim 349.

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

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.

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-Step] Home/Insect** [location based/use area] Solution System/Set
- [3-Step] Home/Insect** [location based/use area] System [for Protection]
 [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]
- 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/prevention
- 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. Modern [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 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 FPL.
- 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

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.]

[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"

(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. Icons to be used with this system are at the end of the text.

$[Step][1-][Kill/Control/Treat:] \ \ Indoors/Inside \ \ [icon]^a$

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

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

^a[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 lone bug/bug 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]

^b [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.]

[Use [Product Name from 239-2699 or 239-2717].]

^c [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.] [Use [Product Name(s) from 239-2718 and 239-2726].]

‡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]

NOTE to PM: EPA Reg. No. 239-2717

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 .

22. For best control [of ants/roaches/ants & roaches] use the full [treatment/solution/protection] system/plan/program

- 23. For best results, more than one product may/might/could be needed for ant/roach/ant & roach control/prevention
- 24. [Part of a/an] [Ant/Roach/Ant & Roach] Control System [in 3 steps]
- 25. Use as a system for control of Ants/Roaches/Ants & Roaches
- 26. Ant & Roach Control in 2/3 Steps
- 27. Step 1
- 28. Step 3
- 29. Ortho Home Defense Home Protection
- 30. Targeted [Ant/Roach/Ant & Roach] Treatment/Control Program/Plan/System [in 2/3 steps]
- 31. Modern [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 future [Ants/Roaches/Ants & Roaches]].
- 4. Extend your [bug/insect] 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 [future 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/Heading's Section". This name will appear in the vicinity of the following text.

[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. Icons to be used with this system are at the end of the text.

3-Step Option

[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 [future bugs/ants] [icon]^c

^c[Kill/Control/Treat:] Create a/an [Ant & Roach/Ant/Roach] barrier/Prevent [future 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].

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.

^a[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.]

^b[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.]

[Use [Product name or names from 239-2729 or 239-2730]

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

OR

[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] Future [ants/roaches /ants & roaches] [icon] c

^a [Step] 3 - [Prevent] Future [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]

^b[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]]

^c [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.]

[Use [Product name or names from 239-2729 or 239-2730]

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

2-Step Option

[Kill][Prevent]

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

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

^a[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]

^b[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.]

[Use [Product name or names from 239-2729 or 239-2730]

[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.





