



U.S. ENVIRONMENTAL PROTECTION AGENCY
 Office of Pesticide Programs
 Registration Division (7505P)
 1200 Pennsylvania Ave., N.W.
 Washington, D.C. 20460

EPA Reg. Number:

239-2752

Date of Issuance:

5/13/20

NOTICE OF PESTICIDE:

Registration
 Reregistration
 (under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

A&R 2559

Name and Address of Registrant (include ZIP Code):

Chris Zemanek
 Senior Analyst, Federal Registration
 The Scotts Company d/b/a The Ortho Group
 14111 Scottslawn Road
 Marysville, OH 43041

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.
2. You are required to comply with the data requirements described in the DCI or EDSP Order identified below:

Signature of Approving Official:

Jacquelyn Herrick, Product Manager 3
 Invertebrate-Vertebrate Branch I, Registration Division (7505P)

Date:

5/13/20

EPA Form 8570-6

- a. Pyrethrins GDCI-069001
- b. Akyl Dimethyl benzyl ammonium chloride
GDCI-069105
- c. Cypermethrin EDSP-109702
GDCI-109702
- d. 1-Decanaminium, N, N-Dimethyl-N-octyl-, chloride
GDCI-069165
- e. 1-Octanaminium, N, N-Dimethyl-N-Octyl-Chloride
GDCI-069166
- f. 1-Decanaminium, N-Decyl-N-N-Dimethyl-, Chloride
GDCI-069149

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI or EDSP Order listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:

<http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, “EPA Reg. No. 239-2752.”
4. Submit one copy of the final printed label for the record before you release the product for shipment.

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 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) list 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 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 fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 07/02/2018
- Alternate CSF A dated 05/12/2020
- Alternate CSF B dated 05/12/2020

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EPA Reg. No. 239-2752
Decision No. 544909

If you have any questions, please contact Dr. Helen Hull-Sanders by phone at 703-347-0243, or via email at hull-sanders.helen@epa.gov.

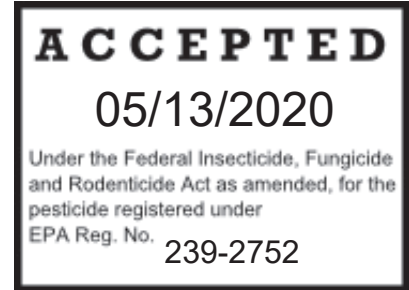
Enclosure

A&R 2559

ACTIVE INGREDIENTS:

Cypermethrin	0.030%
Pyrethrins	0.011%
ETOC (Prallethrin)	0.011%
Alkyl dimethyl benzyl ammonium chloride (C ₁₂₋₁₆)	0.008%
Octyl decyl dimethyl ammonium chloride	0.006%
Dioctyl dimethyl ammonium chloride	0.003%
Didecyl dimethyl ammonium chloride	0.003%

OTHER INGREDIENTS	<u>99.928%</u>
[Total]	100.000%



KEEP OUT OF REACH OF CHILDREN

CAUTION

See side/back panel/booklet for additional Precautionary Statements and First Aid.

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none"> ▪ 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 eyes. ▪ Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. For information regarding medical emergencies or pesticide incidents, call 1-800-225-2883.	

Sold/Distributed/Manufactured for/by:
The Ortho Group
P.O. Box 190
Marysville, OH 43040
EPA Reg. No. 239-NEW
EPA Est. No. XXXXXXXXX

[Superscript is first letter of lot number]

[Marketed Through:]
[Company Name & Address]

Alternate Brand Names:

- Ortho® Home Defense® Ant, Roach, & Spider Killer³
- Ortho® Home Defense® Ant & Roach Killer²
- Ortho® Home Defense® Ant Killer
- Ortho® Home Defense® Roach Killer
- Ortho® Home Defense® Insect Killer
- Ortho® Home Defense® Crawling Insect Killer
- Ortho® Home Defense® Crawling Bug Killer
- Ortho® Home Defense® Bug Killer
- Ortho® Ant, Roach, & Spider Killer³
- Ortho® Ant & Roach Killer²
- Ortho® Ant Killer
- Ortho® Roach Killer
- Ortho® Insect Killer
- Ortho® Crawling Insect Killer
- Ortho® Crawling Bug Killer
- Ortho® Bug Killer
- Ortho® Ant, Roach, & Spider Killer³
- Ortho® Ant & Roach Killer²
- Ortho® Ant Killer
- Ortho® Roach Killer
- Ortho® Insect Killer
- Ortho® Crawling Insect Killer
- Ortho® Crawling Bug Killer

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.

EPA File Symbol 239-NEW

Ortho® Bug Killer

Net Weight 2.....32 oz. / 1....2 lb (56.70.....907.20 g)

Contains no CFCs or other
ozone depleting substances



Federal regulations prohibit
CFC propellants in aerosols

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Avoid contact with, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS

Do not apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS

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.

DIRECTIONS FOR USE

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

[STOP!] READ ENTIRE LABEL BEFORE EACH USE

[For] Indoor [Household] Use Only

Do not use as a space spray. Do not apply this product in a way that will contact adults, children or pets, either directly or through drift.

Remove pets, birds, and cover fish aquariums before spraying. Remove and cover exposed food and drinking water before application. Remove dishes and utensils before use. Do not enter treated areas or allow others, including children and pets to enter until sprays have dried.

SHAKE WELL BEFORE USE

Kills: Ants (Fire Ants (including Red Imported Fire Ants, Southern Fire Ants, California Fire Ants, Tropical Fire Ants), Carpenter Ants, Argentine Ants, Pavement Ants, Larger Yellow Ants, Little Black Ants, Cornfield Ants, Odorous House Ants, Crazy Ants, Raspberry Crazy Ants, Ghost Ants, White Footed Ants, Acrobat Ants, Field Ants, Velvety Tree Ants, Pharaoh Ants, Red Harvester Ants, Cockroaches [Roaches] (German Cockroaches), Palmetto Bugs, Spiders (including Black Widow Spiders, Daddy-Long-Legs Spiders, Marbled Cellar Spiders, Giant Wolf Spiders, Burrowing Wolf Spiders, Banded Garden Spiders, Cat-face Spiders, Cupboard Spiders, Cobweb Weaver Spiders, Bud Spiders, European House Spiders, Common House Spiders, Southern House Spiders, Yellow Sac Spiders, Funnel Web Spiders, Grass Spiders, Ground Spiders, Parson Spiders, Bold Jumping Spiders, Woodlouse Spiders), Asian Lady Bird Beetles, Brown Dog Ticks, Carpet Beetles, Crickets, Fleas, Scorpions, Silverfish, Sowbugs (Pillbugs), Stinkbugs, and Waterbugs.

[For best effect/results,] spray directly on insect.

For residual control of German cockroaches spray non-porous surfaces along baseboards, under sinks, refrigerator, stove, dishwasher, or other places where cockroaches may hide.

For Sanitizing: To sanitize pre-cleaned non-porous, non-food surfaces [such as glass, vinyl, glazed stone, glazed ceramic, stainless steel, chrome and other non-porous surfaces], [along baseboards, under sinks, refrigerator, stove, dishwasher, kitchens, bathrooms or other places where listed insects may frequent], hold spray a maximum of 12" from surface being sprayed. Spray surface until thoroughly wet. Let stand for 5 minutes and allow to dry.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by 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! Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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.

MARKETING/ADVERTISING 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: *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*

Fragrance Claims

1. [Fresh] citrus [scent/fragrance]
2. [Clean] citrus [scent/fragrance]
3. Fragrance Free
4. Evergreen Fresh [Fragrance]
5. Fresh Pine [Fragrance]
6. Spring Fresh [Fragrance]
7. No lingering chemical odor

Dual Action & Kill + Sanitize Claims

8. [New] Dual Action
9. [New] 2 [jobs] in 1 [Application/Spray]
10. Dual action formula!
11. [GermEnder™] Kills and Sanitizes [in one application/at once/at the same time/in one easy step/in one shot]
12. Reduces/Kills/Sanitizes/Eliminates 99.9% of household germs* that roaches/household insects may leave behind
13. Kills [household] insects** and 99.9% of germs* [they may leave behind]
14. Kills & sanitizes in one treatment
15. Bug** & Germ* killing power in one spray
16. Kills bugs** & [99.9% of] germs* in one step
17. One-Step solution to bugs** and their germs*
18. The quick, easy way to kill bugs** & the germs* they leave behind
19. Kills more than 40 different bugs** & 99.9% of the germs* they may leave behind
20. The one spray solution to bugs** & the germs* they may leave behind
21. More than 40 different bugs** 99.9% of their germs*, up to 10 months of protection against German roaches on non-porous surfaces
22. Kills and sanitizes at the same time
23. [The convenient way to] kill bugs** and germs*
24. Double action killer
25. Kills household pests** and the germs* they spread
26. A powerful one-two combination knocks out pests** and the germs* they spread
27. [Ortho A&R Aerosol/Product Name] [withGermEnder™] kills insects by contact, keeps killing roaches for up to 10 months, and reduces/kills 99.9% of the household germs* that roaches/household insects may leave behind. (No residual sanitizer action. Not for primary use as a sanitizer).

*Staphylococcus aureus (Staph) and Klebsiella pneumoniae on hard, non-porous, non-food contact surfaces [99.9% that household insects may leave behind].

** as listed on label/see label for list of insects

Sanitize only Claims

28. Loaded/Enhanced with GermEnder™
29. GermEnder™ Power
30. Help[s] protect your family from the spread of germs* insects/household insects/roaches may leave behind
31. Kills 99.9% of Household Germs* that [household] insects** may leave behind

*Staphylococcus aureus (Staph) and Klebsiella pneumoniae on hard, non-porous, non-food contact surfaces [99.9% that household insects may leave behind].

** as listed on label/see label for list of insects

Formula Related Claims

- 32. Water based
- 33. Won't stain or discolor

Use Site Claims

- 34. For indoor household use only
- 35. Indoor Use Only

Efficacy Kill Claims

- 36. Kills [listed insects] by contact!
- 37. Kills Ants
- 38. Kills Fire Ants (including Red Imported Fire Ants, Southern Fire Ants, California Fire Ants, Tropical Fire Ants), Carpenter Ants, Argentine Ants, Pavement Ants, Larger Yellow Ants, Little Black Ants, Cornfield Ants, Odorous House Ants, Crazy Ants, Raspberry Crazy Ants, Ghost Ants, White Footed Ants, Acrobat Ants, Field Ants, Velvety Tree Ants, Pharaoh Ants, Red Harvester Ants], Cockroaches [Roaches] (German Cockroaches), Palmetto Bugs, Spiders (including Black Widow Spiders, Daddy-Long-Legs Spiders, Marbled Cellar Spiders, Giant Wolf Spiders, Burrowing Wolf Spiders, Banded Garden Spiders, Cat-face Spiders, Cupboard Spiders, Cobweb Weaver Spiders, Bud Spiders, European House Spiders, Common House Spiders, Southern House Spiders, Yellow Sac Spiders, Funnel Web Spiders, Grass Spiders, Ground Spiders, Parson Spiders, Bold Jumping Spiders, Woodlouse Spiders), Asian Lady Bird Beetles, Brown Dog Ticks, Carpet Beetles, Crickets, Fleas, Scorpions, Silverfish, Sowbugs (Pillbugs), Stinkbugs, and Waterbugs
- 39. Kills 20 Home Invading Ant Species [and] [20 Home Invading Spider Species]
- 40. Kills 20 Home Invading Ant types and Cockroaches
- 41. Kills Ants and Roaches
- 42. Indoor pest protection

Residual Claims

- 43. Keeps killing German roaches [for up to 40 weeks/10 months] on non-porous surfaces
- 44. Guaranteed^{†††} to work or your money back
- 45. Kills German roaches [for 40 weeks/10 Months] on non-porous surfaces
- 46. Long lasting control of German roaches for up to 10 months/40 weeks on non-porous surfaces
- 47. Up to 40 weeks/10 months of continuous killing power against German roaches on non-porous surfaces

Disease Claims

- 48. Kills roaches/cockroaches that may carry [Salmonella typhimurium], [Entamoeba histolytica], [E. coli], [Staphylococcus spp.], [Pseudomonas aeruginosa], [Klebsiella pneumoniae], [the polio virus].
- 49. Kills roaches/cockroaches that may produce asthma-causing allergens [in children]
- 50. Kills roaches/cockroaches that may produce allergens that cause asthma [in children]
- 51. Kills Fleas that may transmit Tapeworms/ Haemobartonellosis [to cats/dogs]
- 52. Kills Fleas that may cause Flea-Bite Anemia/ Flea Allergy Dermatitis (FAD) [to cats/dogs]
- 53. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
- 54. Kills Fleas that may transmit Mycoplasma to cats

Sales Claims


- 55. [____oz.] [Bonus Size] [Value Size]
- 56. X pack
- 57. Bonus Size
- 58. Exclusive to Club Stores!
- 59. Exclusive Club [Bonus] Size!
- 60. [Great] Value
- 61. Value Pack
- 62. Same formula, better value!
- 63. (Over) X% more than X oz size
- 64. Bonus Size
- 65. Combo/Wow Pack
- 66. Value/Bonus Size – X-pack/ X-oz!
- 67. Value/Bonus Size – X-pack = X oz!
- 68. Value Size
- 69. Look inside [label] for special offer information!

70. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.

Private Label

- 71. Satisfaction [Brand/Company Name] Promise Guaranteed
- 72. The [Brand/Company Name] Promise: If this [Brand/Company Name] product, when used for its intended purpose, fails to give you complete satisfaction, return the item to the [Brand/Company Name] store where purchased for free replacement of the same or similar item.
- 73. Quality Since XXXX
- 74. Established/Est. [in] XXXX
- 75. Quality You Deserve
- 76. 100% Guaranteed
- 77. We are so confident you will be delighted with your [Brand/Company Name] purchase that we promise to refund or replace any item you find unsatisfactory. We aim to delight all our members and would love to hear about your discoveries! Call us at: 1-888-301-0332 (toll-free), 8am-5pm CSR Monday-Friday

OTHER

- 78. [icon ] People and pets may re-enter treated areas after spray has dried
- 79. [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.
- 80. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 81. Proven performance
- 82. Read Entire label before use
- 83. [Recyclable symbol]
- 84. [For] Indoor Residential use only
- 85. Intended for residential use
- 86. Peel Open for use directions and further information
- 87. OPEN
- 88. Resealable Label for Directions & Precautions
- 89. Peel Open for use directions and further information
- 90. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 91. PEEL HERE / PRESS TO RESEAL
- 92. PULL / PEEL HERE [TO REMOVE TAPE]
- 93. Product of –and/or- Made in U.S.A.
- 94. Assembled in the USA
- 95. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 96. QUESTIONS OR COMMENTS - [phone icon] 1-800-xxxxxxx www.ortho.com [Visit our website] [computer icon]

Guarantees:

- 97. Guaranteed+++
- 98. [Company/Brand] Guarantee[d] +++
- 99. Guaranteed [results] +++
- 100. Guaranteed Kill [or your money back] +++
- 101. [Company/Brand] Satisfaction guaranteed[+++]
- 102. [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.

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 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. [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/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 Icon Based System

Note to PM: This registration will emphasize or indicate the product is for "The ones you see/See/See & Kill/Kill What You See" on the FPL.

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.

[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 ^a [icon]
[Kill/Control/Treat:] The ones you don't see/ Kill what you don't see/Hiding ^b [icon]
[Kill/Control/Treat:] Create a/an [Ant & Roach/Ant/Roach] barrier/Prevent [bugs/ants] ^c [icon]

^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/Kill What You See.]
[Look for Ortho [Home Defense] products marked See/See & Kill]**

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

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

^c[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].

OR

**[Kill/Control/Treat][Prevent]
[Step][1] - [Kill/Control] Visible [ants/roaches /ants & roaches]** ^a [icon]
[Step] [2] - [Kill/Control] Hidden [ants/roaches /ants & roaches] ^b [icon]
[Step] [3] - [Prevent] [ants/roaches /ants & roaches] ^c [icon]

^a**[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]]**

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

^b[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]]

^c[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].

2-Step Option

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

^b**[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]

^a[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]]

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.

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.

