



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

May 14, 2025

Chris Zemanek  
Regulatory Principal, Regulatory Affairs  
The Scotts Miracle-Gro Company  
Marysville, OH 43040

Subject: Label Amendment - Registration Review Mitigation for Bifenthrin  
Product Name: Indoor and Outdoor 2699NS  
EPA Registration Number: 239-2766  
Application Date: February 18, 2021  
Decision Number: 571041  
Case Number: 476307

Dear Chris Zemanek:

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

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 Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must

submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Meaghan Robertson by phone at 202-566-0169, or via email at [robertson.meaghan@epa.gov](mailto:robertson.meaghan@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Cathryn Britton". The signature is fluid and cursive, with the first name "Cathryn" and last name "Britton" clearly distinguishable.

Cathryn Britton  
Chief, Risk Management and Implementation  
Branch V  
Pesticide Re-evaluation Division (7508M)  
Office of Pesticide Programs

ENCLOSURE: Stamped label

# Indoor and Outdoor 2699NS

## Sublabel A – STANDARD RTU SPRAYER

## Sublabel B – BOV PACKAGING

### Alternate Brand Names

- Ortho Bug B Gon Insect Killer For Indoor & Perimeter
- Ortho Bug B Gon Insect Killer For Indoor + Perimeter
- Ortho Bug B Gon Insect Barrier For Indoor & Perimeter
- Ortho Bug B-Gon Insect Killer For Indoor & Perimeter
- Ortho Bug B-Gon Insect Killer For Indoor + Perimeter
- Ortho Bug B-Gon Insect Barrier For Indoor & Perimeter
- Ortho Bug-B-Gon Insect Killer For Indoor & Perimeter
- Ortho Bug-B-Gon Insect Killer For Indoor + Perimeter
- Ortho Bug-B-Gon Insect Barrier For Indoor & Perimeter

## SUBLABEL A – STANDARD RTU SPRAYER

[ICON]For Indoor Use Only/For Outdoor Use Only/For Both Indoor & Outdoor Use

### Active Ingredient

Bifenthrin* .....	0.05%
Other Ingredients.....	99.95%
Total .....	100.00%

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

### KEEP OUT OF REACH OF CHILDREN

### CAUTION

See back/panel/booklet for additional precautionary statements.

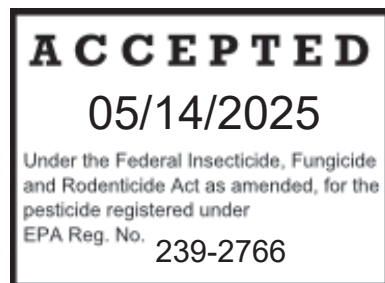
**Net Contents:** 5/X fl. oz. (147.9/X ml) – 5/X gal. (18.9/X L)

### PRECAUTIONARY STATEMENTS

**ENVIRONMENTAL HAZARDS:** This pesticide is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow the pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours, will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Care should be used when spraying to avoid fish and reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants. Do not apply this product or allow it to drift to blooming plants if bees are foraging in the treatment area.

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

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



**NOTE:**

***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.

**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. Application to pervious surfaces such as soil, and other vegetation;
  2. Perimeter band treatments of 7 feet wide or less from the base of a man-made structure to pervious surfaces (e.g., soil, mulch, or lawn);
  3. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
  4. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
  5. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level;
  6. Applications to vertical surfaces directly above pervious surfaces, such as soil, lawn, turf, mulch or other vegetation) only if the pervious surface does not drain into ditches, storm drains, gutters, or surface waters.
- Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft. by 0.5 ft.).
  - Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
  - For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
  - 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.

**PRODUCT APPLICATION INSTRUCTIONS**

***NOTE TO PM: Spray Pattern Descriptor is any word used to describe the pattern such as flat, fan, coarse, or fine.***

***NOTE TO PM: Quotes around Directions are optional (i.e. "ON", "OFF")***

---

**Option 1 – Bottle attached trigger sprayer**

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

**[HOW TO USE:]****[Spray]**

1. Turn sprayer nozzle to desired spray/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 [by sliding/pulling sprayer up].

**NOTE:**

***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.

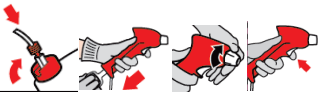
- Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid on [bottle] cap [until it clicks].
- Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up.
- Turn sprayer nozzle to desired spray/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- Squeeze trigger repeatedly [to spray.]

**[Finish]**

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

**Option 3 – Pull ‘N Spray**

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

**[HOW TO USE:]****[Spray]**

- Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].
- Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid on bottle cap [until it clicks.]
- Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up.
- Turn sprayer nozzle to desired spray/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
- Press trigger to spray.

**[Finish]**

- [Turn sprayer nozzle to "OFF" / X.]
- [DO NOT DISCONNECT HOSE CONNECTOR [FROM SPOUT/CAP/KNOB/OPENING].]
- [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:]****[Prep [Wand]]**

- Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].
- [Remove [color] pull strip to activate batteries].
- [Unfold / Flip Open [Applicator Name/applicator/wand] until it clicks/locks into position.]
- [Extend wand/applicator/nozzle] [fully].

**[Connect]**

- Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening on bottle cap [until it clicks.]
- Flip up [color] spout until fully upright. / Twist spout/knob to "ON". / Pull spout up.

**[Spray]**

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

**[Finish]**

- [Turn nozzle to "OFF"/X].
- [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.]

**NOTE:**

***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.

**Option 5 – Pump Container with Applicator**

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

**[HOW TO USE:]****[CONNECT]**

1. Carefully cut the two [color] zip ties securing hose and pump handle with scissors, using caution not to cut [color] hose.
2. Unwind hose and insert hose connector into [color] spout/cap/knob/opening on pump [until it clicks.]

**[PREP [SPRAYER]]**

1. Lift sprayer off bottle.
2. Push [color] button while pulling out on sprayer nozzle tip.
3. Fully extend 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 spray position.
4. Make sure handle is screwed on tightly, then pump container 10-20 [X-X] times to pressurize bottle. NOTE: A full bottle requires fewer pumps than an empty bottle and pumping to higher range will provide longer spray duration.
5. Push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

**[SPRAY]**

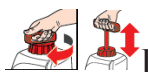
1. Aim sprayer.
2. Spray by pushing down [color] trigger with thumb.
3. Adjust spray pattern by rotating [color] nozzle tip up to one-half rotation.

**[FINISH]**

1. Push [color] button and fold the sprayer until [color] button snaps back into original storage position.
2. Place sprayer back onto bottle with nozzle facing down.
3. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure.
4. Retighten prior to storing.

**OR**

[Quick Pump/Applicator/Applicator Name/Applicator Device Directions/Instructions]

**[HOW TO USE:]****[PREP [SPRAYER]]**

1. Remove sprayer from holster and pull hose from storage compartment.
2. Turn pump handle clockwise/counterclockwise to make sure pump is tight [and push pop-up pressure indicator completely down] before pumping.
3. Turn pump handle clockwise/counterclockwise to tighten, then slightly turn handle clockwise/counterclockwise to release handle for pumping.
4. [Pump sprayer] [until pressure indicator pops up about an inch signaling it is ready to spray.] Turn pump handle clockwise/counterclockwise [one-quarter turn] to secure handle for carrying.

**[SPRAY]**

1. Spray by pushing down lever on spray handle.
2. Rotate nozzle tip to adjust spray from stream to gentle mist.
3. For continuous spray, push lever down and slide forward to lock. Pull back to release.

**[FINISH]**

1. Slowly turn pump handle clockwise/counterclockwise to untighten and release pressure [or turn pressure relief valve clockwise until it snaps; once pressure is released, continue to turn until closed.]
2. Then turn back clockwise/counterclockwise to retighten handle.
3. Push hose back into storage compartment and put sprayer back in holster [holder].

**NOTE:**

***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.

**Option 6 - Squeeze**

[Applicator Name/Applicator Directions/Instructions]

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

**[Open:]**

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

**[Spray:]**

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

**[Finish:]**

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

---

**Option 7 – Flairosol**

[Applicator Name/Applicator Directions/Instructions]

**[HOW TO USE:]**

**[Prep]**

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

**[Spray/Apply]**

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

**[Finish]**

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

---

**Option 8 – Integrated Wand**

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

**[HOW TO USE:]**

**[Prep [Wand]]**

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].

**[Spray]**

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

**[Finish]**

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. See marked diagram inside battery compartment.]



**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.

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

Possible Cause: Weak batteries.

Solution: Install fresh set of batteries.

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

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

Possible Cause: Sprayer nozzle not fully open.

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

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

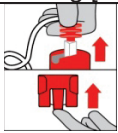
**Refill Options**

**Option 1 – Applicator Reuse**

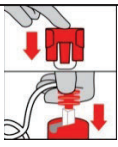
**REFILL/REUSE DIRECTIONS**

How to attach applicator name/wand to Indoor and Outdoor 2699NS/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

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

	<p>Remove the [color] hose connector from the original bottle/container by pulling the [color] plug from the [color] spout on cap.</p> <p>[To remove the side holster/holder from original bottle/container, pull/lift the bottom tab underneath and slide the holster/holder up.]</p>
---	--

Adding [color] hose/Comfort Wand/Applicator Name to Indoor and Outdoor 2699NS /Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

	<p>[Attach the sprayer holster/holder to Indoor and Outdoor 2699NS /Product Name/refill/recharge/renew/fill-up/reload/bottle/container by sliding the holster/holder down onto the knob.]</p> <p>Insert [color] hose connector into [color] spout on cap [until it clicks].</p>
---	---

**OR**

**REFILL:** This container may be refilled with Indoor and Outdoor 2699NS /Product Name. To refill twist/snap Indoor and Outdoor 2699NS /Product Name into spray/applicator nozzle/top.

**REFILL/REUSE DIRECTIONS**

How to attach Applicator Name/Flairosol to Indoor and Outdoor 2699NS /Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

Remove sprayer/applicator/top from the empty container by rotating it clockwise/counter clockwise.

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

**OR**

Remove sprayer/applicator/top from the empty container by pulling the bottle/container down/out.

Place sprayer/applicator/top on the refill container and push up on the bottle [until it is secure].



**NOTE:**

***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.

**Option 2 – Integrated Wand Applicator Reuse****REFILL/REUSE DIRECTIONS / How to Reuse/Refill**

How to attach Applicator Name/integrated wand to Indoor and Outdoor 2699NS /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.
2. Remove cap/lid from Indoor and Outdoor 2699NS /Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
3. [Remove Seal.]
4. Insert tube/straw into Indoor and Outdoor 2699NS /Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
5. Secure the sprayer head/applicator from botte by rotating clockwise/counterclockwise

---

**Option 3 – Refill by pouring in same RTU formula from Bottle****[HOW TO] REFILL**

This container may be refilled with Indoor and Outdoor 2699NS /Product Name.

To refill pour Indoor and Outdoor 2699NS /Product Name into container.

**OR**

To refill this empty container, pour product carefully and directly from the Indoor and Outdoor 2699NS /Product Name container designated as the ready-to-use refill container. DO NOT add water.

---

**Option 4 – Refill by pouring same RTU formula from Liquaflex package****[REFILL DIRECTIONS/INSTRUCTIONS]****Design 1**

1. Do not reuse or refill this pouch. Use this product to refill the empty [Product name] container
2. For best pouring experience place bag and refill bottle next to each other at waist height
3. Remove cap
4. Grasp neck of spout in one hand
5. Place other hand underneath the pouch in the triangular cleft for support, directly opposite of the pour spout
6. Carefully bend spout until it rests on the lip of the target refill bottle
7. Slowly lift the hand supporting the base of the pouch and fill bottle to desired level
8. [Optional illustrations may be used in conjunction with the above steps]

**Design 2**

1. Do not reuse or refill this pouch. Use this product to refill the empty [Product name] container
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 for stability
6. Carefully pour liquid into target container
7. [Optional illustrations may be used in conjunction with the above steps]

---

**Option 5 – Refill by pouring same RTU formula into Pump Container with Applicator**

How to refill [Quick Pump/Pump 'N Go/Applicator Name] [using/with] [1.33 Gallon Ready-To-Use Refill/ Indoor and Outdoor 2699NS /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 Indoor and Outdoor 2699NS /Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
  3. Pour product carefully and directly into [Quick Pump/Pump 'N Go/Applicator Name] container. Do Not fill above 2"/3"/4" from top of container. DO NOT add water.
  4. Secure pump handle back on container by twisting it clockwise until tight.
-

**NOTE:****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.


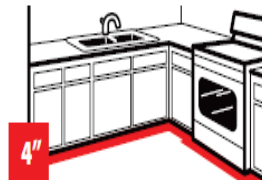



**[PRODUCT FACTS]****Kills/Controls (any or all of the following insects)**

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

**NOTE:****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.


<b>Periodical Cicada</b>	
<b>Phylloxera</b>	Pecan Leaf Pecan Stem
<b>Pillbugs &amp; Rollie Pollies</b>	
<b>Plant Bugs</b>	Tarnished Lygus Bug
<b>Psyllids</b>	Pear
<b>Sawflies</b>	European Pine Redheaded Pine
<b>Scales</b>	San Jose Brown Soft California Red Euonymus
<b>Scorpions</b>	
<b>Silverfish</b>	
<b>Sowbugs</b>	
<b>Spiders</b>	Black Widow Hobo Wolf Brown Recluse
<b>Spittlebugs</b>	Pecan
<b>Springtails</b>	
<b>Stink Bugs</b>	Brown Marmorated Kudzu
<b>Stored Product Pests</b>	
<b>Thrips</b>	
<b>Ticks</b>	
<b>Termites</b>	
<b>Wasps</b>	
<b>Whiteflies</b>	
<b>Yellowjackets</b>	

	<b>Indoor Surfaces</b>	<b>Outdoor Surfaces</b>	<b><u>Optional section</u> In Pantries</b>
<b>When to Apply/Use</b>	Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.		
<b>Before You Apply/Use</b>	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.
<b>How To Apply/Use</b>	<p>Shake Well. Set spray nozzle to indoor setting</p> <p>[sprayer icon [Apply a 4 inch wide band along the surfaces being treated.] Apply a 4 inch wide band along the interior of your home in areas where insects are a recurring problem.] Spray until slightly wet without soaking. [Image of Indoor Application] <b>Example Image</b></p> 	<p>Shake Well. Set spray nozzle to outdoor setting [sprayer icon [Apply a 12 inch wide band along the surfaces being treated.] Apply a 12 inch wide band along the exterior perimeter of your home. Spray until slightly wet without soaking.</p> <p>[Image of typical Outdoor] <b>Example Image</b></p> 	<p>Shake Well. Set spray nozzle to indoor setting [sprayer icon  </p>

**NOTE:**

**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.

<b>After You Apply/Use</b>	<p> 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.</p> <p>Repeat as needed. Re-treatment is recommended at least once per season (3 months) outdoors.</p> <p>For long lasting residual control/action leave spray undisturbed. The product will keep killing for up to 12 months indoors[*].</p> <p><b>*Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2, or 3</b></p>
<b>Fleas and Ticks (Including ticks that may transmit Lyme Disease)</b>	<p><b>Do not Spray Animals</b></p> <p>Pet resting quarters may be treated with this product. How to Apply: Spot treat infested areas such as pet's resting quarters and localized areas of floors/floor coverings (rugs, carpet, tile, vinyl &amp; 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</p>

**STORAGE AND DISPOSAL**

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

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

Manufactured/Sold/Distributed For/By:

The Ortho Group

P.O. Box 190 Marysville, OH 43040

EPA Reg. No. 239-2766

EPA Est. No. XXXXX

[Superscript is first letter of lot number]

**OPTIONAL MARKETING CLAIMS**

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

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

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

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

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

**[What It Does:]** Kills home invading insects [including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, millipedes.] (See inside for complete list)

**[Where to Apply/Use:]** Use with confidence indoors [(kitchens, bathrooms, doors & windows, basements)] and outdoors [(perimeter foundations, garages, doors & windows, & decks)] wherever insects are a re-occurring problem.

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


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

**Questions &/or Comments:** [icon phone] [icon computer 

Call 1-800-225-2883 or Visit [our Website at] [www.]ortho.com

**NOTE:****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.

[Brand]	Ortho
[Product name]	[Product name]
[Marketing Call-out]	Kills Bugs Inside. Keeps Bugs Out.
[Claims]	
1.	Reusable Continuous Spray Wand
2.	Non-Staining
3.	Odor Free
4.	Dries Fast/Dries Clear
	<p>What it Does: Kills home invading insects: ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, millipedes. (See inside for complete list)</p> <p>Where to Use: Use with confidence indoors [(kitchens, bathrooms, doors &amp; windows, basements)] and outdoors [(perimeter foundations, garages, doors &amp; windows, &amp; decks)] wherever insects are a re-occurring problem.</p> <p>When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting* control.</p> <p><b>*12 months [**] **Note to PM: *See 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4</b></p> <p>People and pets may enter treated areas after spray has dried</p> <p>Questions &amp;/or Comments: (phone &amp; computer icon ) Call 1-800-225-2883 or visit [our website at] [www.Ortho.com]</p>
[Ortho Guarantee]	<p>The ORTHO Guarantee:</p> <p>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.</p>
[UPC]	UPC Placeholder
[Standard Copy]	© 20xx The ORTHO Group. World rights reserved.
	Sold by The ORTHO Group
	PO Box 190, Marysville, OH 43040
[EPA Info]	EPA Reg. No. 239-2766
	EPA Est. XXX, XXX, XXX, XXX
	[Superscript is first letter of lot number.]
[Component Number]	Component # Placeholder

**Non-Residual Claims/Kill Claims**

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

**NOTE:**

**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.

12. Kills ants [and many other insects\*\*!]
13. Kills ants, [and] roaches [, and many other insects\*\*!]
14. Kills ants, roaches, [and] spiders [, and many other insects\*\*!]
15. Kills by contact!

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

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

### **Efficacy/Disease Related Claims**

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

\*\*\*Does not substitute for a prescribed heartworm medication

### **Formula Based claims**

36. Water based [formula] [*water droplet icon*]
37. Dries clean/clear
38. Dries fast/in minutes [for fast/quick re-entry]
39. No oily residue
40. No [sticky] mess
41. Does not stain [fabrics, floors, wood, surfaces]
42. Non-staining
43. No stains
44. Unscented
45. Fragrance-Free
46. [Leaves] no odor
47. No lingering [chemical] odor
48. [Virtually] odor free
49. Odorless
50. No greasy residue/mess
51. No need to wipe up
52. Leaves no residue [behind]
53. Ready to Use
54. No Mixing Necessary



### **Residual Control claims**

55. Barrier protection to help keep bugs\*\* out
56. Kills bugs inside. Keeps bugs out.
57. Forms/Creates/Establishes a perimeter treatment
58. Forms/Creates/Establishes a [bug\*\*] barrier



**NOTE:****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.

59. Create[s] a [bug\*\*] border/barrier/perimeter [treatment]
60. Create [a] bug\*\* barrier[s]
61. Apply [as] a barrier
62. Apply [as] a border around your home
63. Apply [as] a perimeter/border/residual treatment
64. Long lasting\*\* [bug] perimeter treatment/barrier/border
65. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home. \*\*
66. Guards against bugs\*\* so you don't have to
67. Guards against the bugs\*\* you can't/don't see
68. Kills and prevents insects\*\* [inside your home] [outside your home]
69. Provides residual control against listed home invading insects
70. Keeps [on] killing with residual action, even after you spray
71. Keeps [on] killing with residual action, even after spray has dried
72. Keeps [on] killing after spray has dried
73. Use in kitchens, garages, basements, and attics to keep/to kill bugs\*\* [from entering your home ]
74. [Kills two/2 ways] : 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried
75. [Dual Action]: 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried

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

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

**12-Month Claims**

76. Up to 12 month control/protection\*\*\*\*
77. Kills/Controls/Protects [for] up to 12 months\*\*\*\*
78. Kills bugs inside all year\*\*\*\*
79. Kills home invading bugs\*\*\*\* all year
80. Kills indoor bugs\*\*\*\* all year
81. Kills & prevents insects\*\*\*\* for up to 1 year/12 months/52 weeks/365 days
82. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months\*\*\*\*.
83. Creates a perimeter/border/residual treatment that will kill bugs you have and control new bugs for up to 12 months\*\*\*\*.
84. Protects your home in/with just 1 application a year[!]\*
85. Year Long Protection/Defense\*\*\*\*
86. Season Long [Home] Protection/Defense\*\*\*\*
87. One application creates/provides a/an [Continuous] Invisible/Residual bug barrier/shield\*\*\*\*
88. [Continuous] Invisible/Residual barrier/shield\*\*\*\*
89. Kills insects\*\*\*\* up to 365 days/12 months
90. One application kills bugs\*\*\*\* up to 365 days/12 months
91. Protect your home from bugs\*\*\*\* with year-long/12 month/365 day control
92. Offers long-term insect\*\*\*\* control
93. [One Application] kills and protects [all year\*\*\*\*]
94. [One Application] kills and protects for [up to] 1 year/12 months/52 weeks/365 days\*\*\*\*
95. Formulated to kill/protect [against] insects\*\*\*\* for [up to] 1 year/12 months/52 weeks/365 days

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

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

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

**Note to PM: When qualified claims are used, the qualifying statement should appear following the claim when it does not impact any mandatory language.**



**NOTE:*****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.

**6-Month Claims**

- 96. Up to 6 month control/protection outdoors<sup>1</sup>
- 97. Up to 6 months protection<sup>1</sup>
- 98. Kills/Controls/Protects [for] up to 6 months outdoors<sup>1</sup>
- 99. Kills bugs<sup>1</sup> outdoors for 6 months
- 100. Kills bugs<sup>1</sup> [indoors] [and] [outdoors] for 6 months

<sup>1</sup> *Applies to [for] spiders (excluding black widow, brown recluse, hobo)***5-Month Claims**

- 101. Keeps bugs away for up to 5 months indoors on insects<sup>†</sup>
- 102. Kills bugs<sup>†</sup> inside, keeps bugs out for up to 5 months
- 103. [One application provides] up to 5 month control indoors of insects<sup>†</sup>
- 104. Provides up to 5 months protection indoors<sup>†</sup>
- 105. [One application] kills up to 5 months indoors<sup>†</sup>
- 106. [One application] kills insects<sup>†</sup> up to 5 months indoors
- 107. [One application] kills up to 5 months indoors on insects<sup>†</sup>
- 108. [One application] kills ants, roaches, and spiders for up to 5 months indoors<sup>†</sup>
- 109. Keeps ants, roaches, and spiders away for up to 5 months indoors<sup>†</sup>

<sup>†</sup> *Up to 5 month control indoors on: Ants (including Western Harvester), Carpet Beetles, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 5 month control indoors on German Cockroaches after 30 minutes continuous exposure to residues.***4-Month Claims**

- 110. Up to 4 month control/protection outdoors<sup>2</sup>
- 111. Kills/Controls/Protects [for] up to 4 months outdoors<sup>2</sup>
- 112. Kills bugs<sup>2</sup> outdoors for 4 months
- 113. Kills bugs<sup>2</sup> [indoors] [and] [outdoors] for 4 months

<sup>2</sup> *Applies to [for] spiders (excluding black widow, brown recluse, hobo)***3-Month Claims**

- 114. Up to 3 month control [protection] outdoors<sup>3</sup>
- 115. Kills/Controls/Protects [for] up to 3 months outdoors<sup>3</sup>
- 116. Kills bugs<sup>3</sup> outdoors for 3 months
- 117. Kills bugs<sup>3</sup> [indoors] [and] [outdoors] for 3 months

<sup>3</sup> *Applies to [for] spiders (excluding black widow, brown recluse, hobo), harvester ants, / crickets, grasshoppers*

- 118. Keeps insects<sup>^</sup> away for up to 3 months indoors
- 119. Keeps away insects<sup>^</sup> for up to 3 months indoors
- 120. [Provides] up to 3 month control of insects<sup>^</sup> indoors
- 121. [Provides] up to 3 month control indoors on insects<sup>^</sup>
- 122. [Provides] up to 3 months protection indoors<sup>^</sup>
- 123. [One application] kills ants, roaches, and spiders for up to 3 months indoors<sup>^</sup>
- 124. [One application] kills insects<sup>^</sup> up to 3 months indoors
- 125. [One application] kills up to 3 months indoors [on insects]<sup>^</sup>
- 126. Keeps ants, roaches, and spiders away/out for up to 3 months indoors<sup>^</sup>
- 127. Kills bugs inside, keeps bugs out for up to 3 months<sup>^</sup>

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

- 128. Kills beet armyworm, two spotted spider mites, Asian Lady Beetles and their eggs
- 129. [Plus] kills insects and their eggs<sup>4</sup>
- 130. Kills insect eggs<sup>4</sup>
- 131. Prevents insect eggs from hatching!<sup>4</sup>
- 132. Up to 12 month control\* plus kills insect eggs<sup>4</sup>

**NOTE:**

***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.

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

**Knockdown claims**

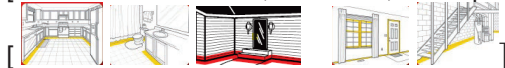
- 133. Starts killing bugs\*\* in seconds
- 134. Starts killing bugs\*\* fast
- 135. Kills by contact [Guaranteed]

\*\*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”**

**Area-related claims**

- 136. Ideal/Great for small/smaller jobs/areas/spaces/rooms
- 137. Ideal/Great for large/larger jobs/areas/spaces/rooms
- 138. Use indoors and outdoors
- 139. Use inside and outside your home!
- 140. Use in kitchens, garages, basements, and attics.
- 141. Use in kitchens, garages, basements, and attics to kill insects\*\*.
- 142. Use/Can be used in bathrooms, kitchens, family rooms, pantries, attics, garages, basements, closets, storage areas, and bedrooms
- 143. Use with confidence in bathrooms, kitchens, family rooms, pantry, attics, garages, basements, closets, storage areas, and bedrooms.
- 144. [Illustrations of kitchen, bathroom, home perimeter/foundation, windows and doorways, basement]



- 145. Designed to/for use in kitchens and pantries
- 146. Apply along [and behind] baseboards and foundations.
- 147. Apply along [behind] [and] [between] appliances
- 148. Apply beneath [and behind] sinks
- 149. Apply in other areas where insects\*\* [are often found/appear]
- 150. You're/It's always ready to spray
- 151. Change the way you spray
- 152. [Formulated For] Indoor/Outdoor Use
- 153. Indoor/Outdoor [Formula]

\*\*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”**

**General Applicator Claims**

- 154. No [more] tired hands
- 155. Reduces hand fatigue
- 156. No more squeeze, squeeze, squeeze
- 157. No [constant] pumping
- 158. Quick Pump [applicator/sprayer]
- 159. [Quick and] Easy to Use
- 160. No Leaks or Mess
- 161. Precise control [for maximum accuracy]
- 162. Consistent spray [for maximum accuracy]
- 163. Adjustable sprayer [nozzle][for maximum control]
- 164. [Improved\*] Applicator
- 165. Grab & Go
- 166. Pump
- 167. Spray
- 168. No [constant] pumping
- 169. No more bending/kneeling
- 170. Just attach hose and spray
- 171. Consistent/even coverage
- 172. You're/It's always ready to spray
- 173. The easy/easier way [to spray/to kill insects\*\*][Home Defense®]
- 174. Change the way you spray
- 175. Easy to spray
- 176. No Aerosols

**NOTE:**

***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.

\*vs. previous design/Applicator Name

\*\*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"***

**PNS Claims**

- 177. Less/No [more] hand fatigue\* [with PNS II/Pull 'N Spray II/Spray Master™/applicator name]
- 178. Just pull
- 179. One pull equals/= 34/X trigger sprays
- 180. One pull delivers 34/X trigger sprays
- 181. One push of the button = 34/X trigger sprays
- 182. For best results, pull out slowly and hold for 2 seconds
- 183. Up to X minutes/mins. of continuous spray
- 184. Over X minutes/mins of continuous spray
- 185. 1 pull equals X trigger sprays
- 186. Pull n Spray –Less/No hand fatigue\*

\*vs. trigger sprayer

**Refill Claims**

- 187. Refill/Recharge/Fill-Up/Reload/Renew [for] Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name
- 188. Fills Up Quick Pump/Pump 'N Go/Applicator Name
- 189. Fill-Up for Applicator Name/Quick Pump/Pump 'N Go
- 190. Works with Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name
- 191. Just plug [Comfort Wand®/Applicator name] in and it's ready to spray
- 192. [Plug 'N Play] Refill/Recharge/Reload/Renew [For Comfort Wand]
- 193. Refill/Recharge/Fill-Up/Reload/Renew Available
- 194. [Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name] Recharge/Refill/Fill-Up/Reload/Renew [cartridge]

**Wand Claims**


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

- 195. Reusable [Comfort/Continuous][Spray][ Wand]
- 196. Rechargeable
- 197. [Wand/Applicator Name] will last [for] [at least] 20 bottles!
- 198. [Wand/Applicator Name] will last over 25 gallons!
- 199. [Wand/Applicator Name] will last for years\* \*based on X applications per year
- 200. Performs like a tank sprayer with no/without pumping
- 201. Equal performance to a tank sprayer with no/without pumping
- 202. Tank sprayer power with no/without pumping
- 203. Spray foundations and baseboards without bending!
- 204. Spray without bending!
- 205. [More\*] Precise/Accurate spray
- 206. Continuous Spray [and [more/better\*] precision/accuracy]
- 207. Easily get[s] into hard-to-reach areas
- 208. Precision/Precise/Adjustable Sprayer
- 209. [Wand/Applicator] Reduce[s] [back] bending [and [the continuous spray wand] helps reduce[s] hand fatigue]
- 210. [Wand/Applicator] extends up to 2 feet to reduce [back] bending [and [the continuous spray wand] helps reduce[s] hand fatigue]
- 211. [Wand/Applicator] [provides] precision control [to maximize every spray/get the most out of every spray]
- 212. Fan Spray [for better coverage/for fast[er\*] application]
- 213. Foaming Spray for crack[s] and crevice[s] [application]
- 214. Foaming Spray to see where [the product is/was][you] applied
- 215. Foaming spray makes it easier to see where [the product is/was][you] applied
- 216. [Foaming spray] disappears/dissolves when dry [to indicate when to re-enter]
- 217. [Foaming spray] dries clear [to indicate when to re-enter]
- 218. [Foaming spray] makes it easy to tell when the area is dry [and people & pets can re-enter]
- 219. Know/See where [product was] applied
- 220. [2x] Faster Application/Coverage\*
- 221. Same coverage in half the/50% less time\*
- 222. Continuous Spray/wand
- 223. Extended Reach
- 224. Continuous [Adjustable] Spray [Wand]

**NOTE:*****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.

- 225. Longer\* wand
- 226. 50% longer\* reach
- 227. 2x/twice [the] extended reach\*
- 228. Easier [than ever] to spray[the home foundation/perimeter, doors, windows, and baseboards]
- 229. [Comfort][Shot] Wand
- 230. Rechargeable
- 231. Powered by Duracell/Battery Brand
- 232. Save[s] time and energy
- 233. Cut your time spraying in half
- 234. [Applicator Name] Extends 2 feet - Continuous Spray
- 235. [Applicator Name] - Continuous Spray
- 236. [Comfort/Extended] Wand
- 237. Extends 2 feet
- 238. Continuous Spray

239. [Battery Image 

240. ALWAYS lock after use [

\*vs previous design/Applicator Name

**Flairosol Claims**



- 241. Continuous Spraying
- 242. Fine Mist
- 243. 360° spraying

**Value**

- 244. Great Value
- 245. Value Pack (only when selling Ortho® Home Defense Max® Insect Killer For Indoor & Perimeter Wand/product name/Quick Pump bottle together with Refill)
- 246. Refill/Recharge/Renew/Fill-Up/Reload
- 247. Buy Wand & Refill, Get [X%] Free!
- 248. Same formula, better value! (*applies when comparing different product sizes*)
- 249. Save [Money] with the Refill!
- 250. Over 10% more than 1.33 gal size
- 251. [Over] X% more than X gal size
- 252. Bonus Size
- 253. Combo [Pack]
- 254. Wow [Pack]
- 255. Exclusive to Club Stores!
- 256. Exclusive Club [Bonus] Size!
- 257. Value/Bonus Size – 2-pack!
- 258. Value/Bonus Size – 2 gallons!
- 259. Value/Bonus Size – 2-pack = 2 gallons!
- 260. Look inside [label] for special offer information!
- 261. Go to [www.orthohomedefense.com](http://www.orthohomedefense.com) now for a special offer! Offer subject to change or expiration.



**OTHER**

262. Easy to Use

- 263. [icon ] People and pets may re-enter treated areas after spray has dried
- 264. XX% less plastic\*
- 265. [Company] & Your Environment – Your home 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.
- 266. Proven performance
- 267. Read Entire label before use
- 268. Recyclable symbol [
- 269. Before
- 270. After

**NOTE:****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.

- 271. [For] Indoor & Outdoor Residential use only
- 272. Intended for residential use
- 273. Peel Open for use directions and further information
- 274. OPEN
- 275. Resealable Label for Directions & Precautions
- 276. Peel Open for use directions and further information
- 277. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 278. PEEL HERE
- 279. PULL / PEEL HERE [TO REMOVE TAPE]
- 280. Product of –and/or- Made in U.S.A.
- 281. Assembled in the USA
- 282. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 283. QUESTIONS OR COMMENTS - [phone icon]  1-800-225-2883 [www.ortho.com](http://www.ortho.com) [Visit our website] [computer icon]  icon]
- 284. Indoor Surfaces
- 285. Outdoor Surfaces
- 286. Indoor and Outdoor Surfaces
- 287. Indoor Use
- 288. Outdoor Use
- 289. Indoor and Outdoor Use

\*vs. previous bottle/container/packaging

**Guarantees:**

- 290. Guaranteed+++
- 291. [Company/Brand] Guarantee[d] +++
- 292. Guaranteed [results] +++
- 293. Guaranteed Kill [or your money back] +++
- 294. [Company/Brand] Satisfaction guaranteed[+++]
- 295. [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.

## ***END OF SUBLABEL A – STANDARD RTU SPRAYER***

**NOTE:**

***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 Reg. No. 239-2766

# **SUB LABEL B - BOV PACKAGING**

[ICON] For Indoor Use Only/For Outdoor Use Only/For Both Indoor & Outdoor Use

**Active Ingredient**

Bifenthrin*	0.05%
Other Ingredients	99.95%
Total	100.00%

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

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

See back/panel/booklet for additional precautionary statements.

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

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

**PRECAUTIONARY STATEMENTS**

**ENVIRONMENTAL HAZARDS:** This pesticide is extremely toxic to fish and aquatic invertebrates. To protect the environment, do not allow the pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours, will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Care should be used when spraying to avoid fish and reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants. Do not apply this product or allow it to drift to blooming plants if bees are foraging the treatment area.

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

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

**DIRECTIONS FOR USE**

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

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

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



**NOTE:*****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.

- 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.
- For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
- 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.

**[PRODUCT FACTS]*****Kills/Controls (any or all of the following insects)***

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



**NOTE:**

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

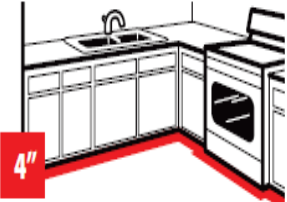


[Bracketed information is optional text]. Text separated by / denotes and/or options.

<b>Flies</b>	Apple Maggot Biting Flies	Cherry Fruit Corn silk	European Crane (Adult) House
<b>Fungus Gnats</b>			
<b>Grasshoppers</b>			
<b>Hornets</b>			
<b>Lace Bugs</b>			
<b>Leaffooted Bugs</b>	Squash Bug		
<b>Leafhoppers</b>			
<b>Leafminers</b>	Alder	Tentiform	Vegetable
<b>Leafrollers</b>	Oblique Banded	Red-Banded	Variegated
<b>Mealybug</b>			
<b>Midges</b>			
<b>Millipedes</b>			
<b>Mites</b>	Broad Carmines Chigger	Spruce Clover Two Spotted Spider (Adult)	Two Spotted Spider (Eggs) European Red Pecan Scorch
<b>Mole Crickets</b>			
<b>Mosquitoes</b>			
<b>Moths</b>	Artichoke Plume Codling	Diamondback	Gypsy
<b>Periodical Cicada</b>			
<b>Phylloxera</b>	Pecan Leaf	Pecan Stem	
<b>Pillbugs &amp; Rollie Pollies</b>			
<b>Plant Bugs</b>	Tarnished	Lygus Bug	
<b>Psyllids</b>	Pear		
<b>Sawflies</b>	European Pine	Redheaded Pine	
<b>Scales</b>	San Jose Euonymus	Brown Soft	California Red
<b>Scorpions</b>			
<b>Silverfish</b>			
<b>Sowbugs</b>			
<b>Spiders</b>	Black Widow Brown Recluse	Hobo	Wolf
<b>Spittlebugs</b>	Pecan		
<b>Springtails</b>			
<b>Stink Bugs</b>	Brown Marmorated	Kudzu	
<b>Stored Product Pests</b>			
<b>Thrips</b>			
<b>Ticks</b>			
<b>Termites</b>			
<b>Wasps</b>			
<b>Whiteflies</b>			
<b>Yellowjackets</b>			

	<b>Indoor Surfaces</b>	<b>Outdoor Surfaces</b>	<b>Optional section In Pantries</b>
<b>When to Apply/Use</b>	Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting* control.		
<b>Before You Apply/Use</b>	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.

**NOTE:****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.

<b>How To Apply/Use</b>	<p>Shake Well. [Gently rotate/turn/revolve top/actuator to desired spray setting.] [Gently rotate/turn/revolve top/actuator to off/non-spraying/closed setting.]</p> <p>Hold sprayer 12 inches from surface being sprayed. [Apply a 4 inch wide band along the surfaces being treated.] Apply a 4 inch wide band along the interior of your home in areas where insects are a recurring problem.] Spray until slightly wet without soaking. <i>[Image of Indoor Application]</i> <b>Example Image</b></p> 	<p>Shake Well. [Gently rotate/turn/revolve top/actuator to desired spray setting.] [Gently rotate/turn/revolve top/actuator to off/non-spraying/closed setting.]</p> <p>Hold sprayer 12 inches from surfaces being sprayed. [Apply a 12 inch wide band along the surfaces being treated.] Apply a 12 inch wide band along the exterior perimeter of your home. Spray until slightly wet without soaking. <i>[Image of typical Outdoor]</i> <b>Example Image</b></p> 	<p>Shake Well. [Gently rotate/turn/revolve top/actuator to desired spray setting.] [Gently rotate/turn/revolve top/actuator to off/non-spraying/closed setting.]</p> <p>Spray cracks and crevices along shelves in pantries. Spray until slightly wet without soaking. Replace non-infested items once spray has dried.</p>
<b>After You Apply/Use</b>	<p> 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 killing for up to 12 months indoors[ *]. <b>*Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2, or 3</b></p>		
<b>Fleas and Ticks (Including ticks that may transmit Lyme Disease)</b>	<p><b>Do not Spray Animals</b> Pet resting quarters may be treated with this product. <b>How to Apply:</b> Spot treat infested areas such as pet's resting quarters and localized areas of floors/floor coverings (rugs, carpet, tile, vinyl &amp; 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</p>		

**STORAGE AND DISPOSAL**

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

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

**NOTE:****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.

**OPTIONAL MARKETING CLAIMS****Note to PM: the term cockroach can be interchanged with any and all instances of roaches and vice versa.****Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.****Note to PM: the word “and” can be interchanged with “&” in all instances and vice versa.****Note to PM: Claims containing Now/Improved may appear on any label panel for 6 months following commercial introduction****The following tables format is optional and the information may appear inside or outside of a box.****[What It Does:]** Kills home invading insects including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, millipedes. (See inside for complete list)**[Where to Apply/Use:]** Use with confidence indoors [(kitchens, bathrooms, doors & windows, basements)] and outdoors [(perimeter foundations, garages, doors & windows, & decks)] wherever insects are a re-occurring problem.**[When to Apply/Use:]** Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting\* control.**\* 12 months [\*] \*Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,or 3****Questions &/or Comments:** [icon phone] [icon computer]  
Call 1-800-225-2883 or Visit [our Website at] [www.]ortho.com

[Brand] [Product name] [Marketing Call-out]	Ortho [Product name] Kills Bugs Inside. Keeps Bugs Out.	
[Claims]		
1.	Long Lasting** Bug Barrier ** [applies to] 12 month control [for] Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces	
2.	Non-Staining	
3.	Odor Free	
4.	Dries Fast/Dries Clear	
	What it Does: Kills home invading insects [including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, millipedes]. (See inside for complete list)	
	Where to Use: Use with confidence indoors [(kitchens, bathrooms, doors & windows, basements)] and outdoors [(perimeter foundations, garages, doors & windows, & decks)] wherever insects are a re-occurring problem.	
	When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting* control.	
	<b>*12 months [*] *Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,or 3</b>	
	People and pets may enter treated areas after spray has dried	
[Ortho Guarantee]	Questions &/or Comments: (phone & computer icon) Call 1-800-225-2883 or visit our website at www.ortho.com	
	The ORTHO Guarantee: If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.	
[UPC]	UPC Placeholder	

**NOTE:****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.

[Standard Copy]	© 20xx The ORTHO Group. World rights reserved.	
	Sold by The ORTHO Group	
	PO Box 190, Marysville, OH 43040	
[EPA Info]	EPA Reg. No. 239-2766	
	EPA Est. No. XXX, XXX, XXX, XXX, XXX, XXX	
	[Superscript is first letter of lot number.]	
[Component Number]	Component # Placeholder	

**Non-Residual Claims/Kill Claims**

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

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

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

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

\*\*\*Does not substitute for a prescribed heartworm medication

**NOTE:****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.

**Formula Based claims**

36. Water based [formula] [water droplet icon]
37. Dries clean/clear
38. Dries fast/in minutes [for fast/quick re-entry]
39. No oily residue
40. No [sticky] mess
41. Does not stain [fabrics, floors, wood, surfaces]
42. Non-staining
43. No stains
44. Unscented
45. Fragrance-Free
46. [Leaves] no odor
47. No lingering [chemical] odor
48. [Virtually] odor free
49. Odorless
50. No greasy residue/mess
51. No need to wipe up
52. Leaves no residue [behind]
53. Ready to Use
54. No Mixing Necessary
55. Increased Spreadability\*
56. Dries fast for quick re-entry

**Residual Control claims**

57. Kills bugs inside. Keeps bugs out.
58. Forms/Creates/Establishes a perimeter treatment
59. Forms/Creates/Establishes a [bug\*\*] barrier
60. Create[s] a [bug\*\*] border/barrier/perimeter [treatment]
61. Create [a] bug\*\* barrier[s]
62. Apply [as] a barrier
63. Apply [as] a border around your home
64. Apply [as] a perimeter/border/residual treatment
65. Long lasting\*\* [bug] perimeter treatment/barrier/border
66. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home. \*\*
67. Guards against bugs\*\* so you don't have to
68. Guards against the bugs\*\* you can't/don't see
69. Kills and prevents insects\*\* [inside your home] [outside your home]
70. Provides residual control against listed home invading insects
71. Keeps [on] killing with residual action, even after you spray
72. Keeps [on] killing with residual action, even after spray has dried
73. Keeps [on] killing after spray has dried
74. Use in kitchens, garages, basements, and attics to keep/to kill bugs\*\* [from entering your home ]
75. [Kills two/2 ways] : 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried
76. [Dual Action]: 1) Kills insects\*\* [by contact] and 2) Keeps killing even after spray has dried

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

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

**12-Month Claims**

77. Up to 12 month control/protection\*\*\*\*
78. Kills/Controls/Protects [for] up to 12 months\*\*\*\*
79. Kills bugs inside all year\*\*\*\*
80. Kills home invading bugs\*\*\*\* all year
81. Kills indoor bugs\*\*\*\* all year
82. Kills & prevents insects\*\*\*\* for up to 1 year/12 months/52 weeks/365 days
83. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months\*\*\*\*.
84. Creates a perimeter/border/residual treatment that will kill bugs you have and control new bugs for up to 12 months\*\*\*\*.

**NOTE:****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.

- 85. Protects your home in/with just 1 application a year[!]<sup>\*\*\*\*</sup>
- 86. Year Long Protection/Defense<sup>\*\*\*\*</sup>
- 87. Season Long [Home] Protection/Defense<sup>\*\*\*\*</sup>
- 88. One application creates/provides a/an [Continuous] Invisible/Residual bug barrier/shield<sup>\*\*\*\*</sup>
- 89. [Continuous] Invisible/Residual barrier/shield<sup>\*\*\*\*</sup>
- 90. Kills insects<sup>\*\*\*\*</sup> up to 365 days/12 months
- 91. One application kills bugs<sup>\*\*\*\*</sup> up to 365 days/12 months
- 92. Protect your home from bugs<sup>\*\*\*\*</sup> with year-long/12 month/365 day control
- 93. Offers long-term insect<sup>\*\*\*\*</sup> control
- 94. [One Application] kills and protects [all year<sup>\*\*\*\*</sup>]
- 95. [One Application] kills and protects for [up to] 1 year/12 months/52 weeks/365 days<sup>\*\*\*\*</sup>
- 96. Formulated to kill/protect [against] insects<sup>\*\*\*\*</sup> for [up to] 1 year/12 months/52 weeks/365 days

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

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

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

**Note to PM:** *When qualified claims are used, the qualifying statement should appear following the claim when it does not impact any mandatory language.*

**6-Month Claims**

- 97. Up to 6 month control/protection outdoors<sup>1</sup>
- 98. Kills/Controls/Protects [for] up to 6 months outdoors<sup>1</sup>
- 99. Kills bugs<sup>1</sup> outdoors for 6 months
- 100. Kills bugs<sup>1</sup> [indoors] [and] [outdoors] for 6 months

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

**5-Month Claims**

- 101. Keeps bugs away for up to 5 months indoors on insects<sup>†</sup>
- 102. Kills bugs<sup>†</sup> inside, keeps bugs out for up to 5 months
- 103. [One application provides] up to 5 month control indoors of insects<sup>†</sup>
- 104. Provides up to 5 months protection indoors<sup>†</sup>
- 105. [One application] kills up to 5 months indoors<sup>†</sup>
- 106. [One application] kills insects<sup>†</sup> up to 5 months indoors
- 107. [One application] kills up to 5 months indoors on insects<sup>†</sup>
- 108. [One application] kills ants, roaches, and spiders for up to 5 months indoors<sup>†</sup>
- 109. Keeps ants, roaches, and spiders away for up to 5 months indoors<sup>†</sup>

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

**4-Month Claims**

- 110. Up to 4 month control/protection outdoors<sup>2</sup>
- 111. Kills/Controls/Protects [for] up to 4 months outdoors<sup>2</sup>
- 112. Kills bugs<sup>2</sup> outdoors for 4 months
- 113. Kills bugs<sup>2</sup> [indoors] [and] [outdoors] for 4 months

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



**NOTE:****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.

**3-Month Claims**

- 114. Up to 3 month control [protection] outdoors<sup>3</sup>
- 115. Kills/Controls/Protects [for] up to 3 months outdoors<sup>3</sup>
- 116. Kills bugs<sup>3</sup> outdoors for 3 months
- 117. Kills bugs<sup>3</sup> [indoors] [and] [outdoors] for 3 months

<sup>3</sup> *Applies to [for] spiders (excluding black widow, brown recluse, hobo), harvester ants, / crickets, grasshoppers*

- 118. Keeps insects<sup>^</sup> away for up to 3 months indoors
- 119. Keeps away insects<sup>^</sup> for up to 3 months indoors
- 120. [Provides] up to 3 month control of insects<sup>^</sup> indoors
- 121. [Provides] up to 3 month control indoors on insects<sup>^</sup>
- 122. [Provides] up to 3 months protection indoors<sup>^</sup>
- 123. [One application] kills ants, roaches, and spiders for up to 3 months indoors<sup>^</sup>
- 124. [One application] kills insects<sup>^</sup> up to 3 months indoors
- 125. [One application] kills up to 3 months indoors [on insects]<sup>^</sup>
- 126. Keeps ants, roaches, and spiders away/out for up to 3 months indoors<sup>^</sup>
- 127. Kills bugs inside, keeps bugs out for up to 3 months<sup>^</sup>

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

**Egg Killing Claims**

- 128. Kills beet armyworm, two spotted spider mites, Asian Lady Beetles and their eggs
- 129. [Plus] kills insects and their eggs<sup>4</sup>
- 130. Kills insect eggs<sup>4</sup>
- 131. Prevents insect eggs from hatching! <sup>4</sup>
- 132. Up to 12 month control\* plus kills insect eggs<sup>4</sup>

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

**Knockdown claims**

- 133. Starts killing bugs\*\* in seconds
- 134. Starts killing bugs\*\* fast
- 135. Kills by contact [Guaranteed]

\*\*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"**

**Area-related claims**

- 136. Ideal/Great for small/smaller jobs/areas/spaces/rooms
- 137. Ideal/Great for large/larger jobs/areas/spaces/rooms
- 138. Use inside and outside your home!
- 139. Use in kitchens, garages, basements, and attics.
- 140. Use in kitchens, garages, basements, and attics to kill insects\*\*.
- 141. Use/Can be used in bathrooms, kitchens, family rooms, pantries, attics, garages, basements, closets, storage areas, and bedrooms
- 142. Use with confidence in bathrooms, kitchens, family rooms, pantry, attics, garages, basements, closets, storage areas, and bedrooms.
- 143. [Illustrations of kitchen, bathroom, home perimeter/foundation, windows and doorways, basement]



- 144. Designed to/for use in kitchens and pantries
- 145. Apply along [and behind] baseboards and foundations.
- 146. Apply along [behind] [and] [between] appliances
- 147. Apply beneath [and behind] sinks
- 148. Apply in other areas where insects\*\* [are often found/appear]
- 149. You're/It's always ready to spray
- 150. Change the way you spray
- 151. [Formulated For] Indoor/Outdoor Use



**NOTE:****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.

## 152. Indoor/Outdoor [Formula]

\*\*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"****General Applicator Claims**

- 153. No [more] tired hands
- 154. Reduces hand fatigue
- 155. No Leaks or Mess
- 156. Precise control [for maximum accuracy]
- 157. Consistent spray [for maximum accuracy]
- 158. The easy/easier way [to spray] [to kill bugs]
- 159. Consistent/even coverage
- 160. You're/It's always ready to spray
- 161. The easy/easier way [to spray/to kill bugs/Home Defense®]
- 162. Change the way you spray
- 163. Easy to spray

\*vs. previous design/Applicator Name



**BOV Claims**

- 164. Sprays at any angle
- 165. Spray/s at any angle [to cover hard-to-reach areas]
- 166. Won't lose pressure [as can empties]
- 167. Continuous Spray
- 168. Any-angle spray [helps cover hard-to-reach areas] for complete coverage
- 169. Spray/s at any angle to kill [& prevent] insects where they live/hide

**Value**

- 170. Great Value
- 171. Same formula, better value! (*applies when comparing different product sizes*)
- 172. [Over] X% more than X oz. size
- 173. Bonus Size
- 174. Combo Pack
- 175. Wow (Pack)
- 176. Exclusive to Club Stores!
- 177. Exclusive Club [Bonus] Size!
- 178. Value/Bonus Size – 2-pack!
- 179. Look inside [label] for special offer information!
- 180. Go to [www.orthohomedefense.com](http://www.orthohomedefense.com) now for a special offer! Offer subject to change or expiration.

**OTHER**

- 181. Easy to Use
- 182. [icon]  People and pets may re-enter treated areas after spray has dried
- 183. XX% less plastic\*
- 184. [Company] & Your Environment – Your home 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.
- 185. Proven performance
- 186. Read Entire label before use
- 187. Recyclable symbol [  ]
- 188. Before
- 189. After
- 190. [For] Indoor & Outdoor Residential use only
- 191. Intended for residential use
- 192. Peel Open for use directions and further information
- 193. OPEN
- 194. Resealable Label for Directions & Precautions
- 195. Peel Open for use directions and further information

**NOTE:*****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.

196. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]


197. PEEL HERE

198. PULL / PEEL HERE [TO REMOVE TAPE]

199. Product of –and/or– Made in U.S.A.

200. Assembled in the USA

201. ©20XX, licensed by [Company/Brand]. World rights reserved.

202. QUESTIONS OR COMMENTS - [phone icon]  1-800-225-2883 [www.ortho.com](http://www.ortho.com) [Visit our website] [computer icon]

203. Patent #: US 8,734,821 &amp; 8,790,673

204. Indoor Surfaces

205. Outdoor Surfaces

206. Indoor and Outdoor Surfaces

207. Indoor Use

208. Outdoor Use

209. Indoor and Outdoor Use

\*vs. previous bottle/container/packaging

**Guarantees:**

210. Guaranteed†††

211. [Company/Brand] Guarantee[d] †††

212. Guaranteed [results] †††

213. Guaranteed Kill [or your money back] †††

214. [Company/Brand] Satisfaction guaranteed[†††]

215. [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.

# END OF SUB LABEL B - BOV PACKAGING