U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460 NOTICE OF PESTICIDE: <u>X</u> Registration Reregistration (under FIFRA, as amended)	EPA Reg. Number: 239-2780 Term of Issuance: Conditional Name of Pesticide Produ C&C 2754	Date of Issuance: 11/18/21
Name and Address of Registrant (include ZIP Code): Chris Zemanek The Scotts Company d/b/a The Ortho Group P.O. Box 190 Marysville, OH 43040		
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.		
<ul> <li>On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.</li> <li>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.</li> <li>This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:</li> <li>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.</li> </ul>		
Signature of Approving Official:	Date:	
Jaquelyn Herrick, Product Manager 03 IVB1, Registration Division (7505P)	11/18/21	

<sup>2.</sup> You are required to comply with the data requirements described in the DCI identified below:

- a. Deltamethrin GDCI-097805-1100
- b. Deltamethrin GDCI-097805-889

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: <u>http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1</u>

- 3. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, "EPA Reg. No. 239-2780."
- 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 10/15/2020
- Alternate CSF A dated 10/15/2020
- Alternate CSF B dated 10/15/2020
- Alternate CSF C dated 10/15/2020
- Alternate CSF D dated 10/15/2020
- Alternate CSF E dated 10/15/2020

If you have any questions, you may contact Hester Dingle at 202-566-2596 or via email at dingle.hester@epa.gov.

Enclosure

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## C&C 2754

#### Alternate Brand Names:

Ortho Home Defense Max Outdoor Insect Killer Ortho Home Defense Max Outdoor Foaming Insect Barrier Ortho Home Defense Max Foaming Insect Killer Ortho Home Defense Max Foaming Outdoor Insect Killer1

For both indoor and outdoor uses./For indoor use only./For outdoor use only

#### ACTIVE INGREDIENT:

Deltamethrin	0.03%
OTHER INGREDIENTS:	99.97%
	100.00%

[0.0003% delta/g]

# KEEP OUT OF REACH OF CHILDREN CAUTION

See back/side [panel/booklet] for additional precautionary statements.

[In case of Medical emergencies or health and safety inquiries or in case of fire, leaking or damaged containers, information may be obtained by calling 1-877-465-5161.]

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

[Superscript is first letter of lot number]

20XX© The Ortho Group. World rights reserved.

[Marketed Through:] [Company Name and Address]

Net Weight X oz / X lbs. ( X g)

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS & DOMESTIC ANIMALS

#### Caution

Contact with product may result in transient tingling and reddening of the skin. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

#### **ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish and aquatic invertebrates. Do not apply directly to water. This product is highly toxic to bees and other pollinating insects exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees or other pollinating insects are foraging in the treatment area.

#### PHYSICAL OR CHEMICAL HAZARDS

**Contents under pressure**. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. Do not apply this product in or on electrical equipment due to the possibility of shock hazard.



Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2020 07202

<sup>eg. NO.</sup> 239-2780

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#### **DIRECTIONS FOR USE**

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

#### [STOP. READ ENTIRE LABLE BEFORE USE.]

**Use Information:** SHAKE WELL BEFORE EACH USE. Hold [aerosol/can] upright **at all times** while spraying. Failure to do so can result in loss of propellant. Do not spray up into air. Apply to surfaces only. [Remove protective cap and] direct spray away from face. Hold can 12-18 inches from surface being sprayed. Press button down and spray as directed. [Spray surface until slightly wet.] [Apply spray stream to outside walls immediately below siding in a continuous band]



Do not allow to enter indoor or outdoor drains Follow proper disposal procedures on this label" No permita la entrada a desagües internos o externos.

Siga las indicaciones del etiquetado para el desecho apropiado del producto.

## Note to PM: Pictogram will be no smaller than 1.5 square centimeters or 0.25 square inch unless this size is greater than 10% of the size of the label

[This product's long-lasting action keeps on killing *Carpenter Ants* for up to 30 days /4 weeks/ 1 month, *American & German Cockroaches and Argentine Ants* for up to 1.5 years /18 months on non-porous surfaces, *Flies* for up to 135 days/4.5 months/ 18 weeks after you spray.] More frequent applications may be necessary on concrete surfaces. Check these areas in 4 weeks and re-treat if insect activity continues. Residual activity kills insects when they return to treated areas.] This formulation is non-staining on surfaces where water alone does not stain. However, when treating delicate fabrics or high value items, first test an inconspicuous area and allow to dry.

This product is intended to be used in and around residences and their immediate surroundings: apartments, atriums, attics, automobiles, basements, bathrooms, boats, cabins, campers, carports, cat sleeping quarters, clothes storage, condominiums, decks, dens, driveways, garages, gazebos, homes, kitchens, lanais, living rooms, parlors, patios (spot or crack and crevice treatment only), pet sleeping areas, play rooms, porches, recreational vehicles, rooms, solariums, storage areas, sun rooms, utility rooms and verandahs. Do not use in commercial food/feed handling establishments, restaurants or other places where food/feed is commercially prepared, processed or stored.

#### INDOORS:

Cockroaches [American and German Cockroaches] [Adult and Immature Stages of Both Non-Resistant and Organophosphate and Carbamate Resistant Strains], Ants [Argentine, Carpenter, Fire, Harvester & Pharaoh], Boxelder Bugs, Centipedes, Crickets, Dermestids, Firebrats, Fleas, Palmetto Bugs, Silverfish, Sowbugs, Ticks and Waterbugs: Apply/Spray as a spot and crack & crevice treatment to areas where these pests crawl and hide, especially in hidden areas around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, and bookcases. Cover all food handling surfaces and cover or remove all food and cooking utensils or wash thoroughly after treatment. Cover or remove exposed food. Repeat as necessary but not more than once per week.

[Roaches: Spray in cracks and crevices, around baseboards and hiding places.]

Ants: Spray ant trails and around doors and windows and places where ants enter the house. Repeat as necessary but not more than once per week.

**Carpenter Ants:** Locate and treat nests and surrounding areas. Apply around doors and windows and places where ants enter premises and where they crawl and hide. Spray into infested wood through existing openings.

**Ticks and Fleas** ON SURFACES: Remove pet bedding and destroy or clean thoroughly. Spray pet resting quarters. **Adult Fleas** and **Larvae** contacted by spray will be killed. Put fresh bedding down once spray has dried. **DO NOT SPRAY ANIMALS DIRECTLY**. For best results, treat pets with an appropriate flea and/or tick control product registered for use on pets before allowing them to return to the treated area. Spray rugs and carpets where infestations are bad. Test delicate fabrics for staining in an inconspicuous area prior to use.

**Spiders:** Apply/Spray along and behind baseboards, to window and door frames, corners, pipes, storage localities, attics, crawl spaces and areas over which these pests may crawl.

*Centipedes, Ground Beetles, Pillbugs, Sowbugs, Scorpions and Ticks:* Apply/Spray around doors and windows and places where these pests may enter premises. Treat baseboards, storage areas and other locations where these pests are found.

[Silverfish, Crickets, Spiders: Apply to areas infested by these pests.]

Asian Lady Bird Beetles (Lady bugs): Apply to/Spray areas where bugs crawl or are rest, around doors, windows and areas where insects can enter the home.

**CONTACT SPRAY:** To kill ants (including Argentine, carpenter, fire, harvester & pharaoh ants), bed bugs, centipedes, cockroaches, fleas, spiders (including brown recluse, black widow & hobo spiders), ticks, chiggers, black flies, deer flies, horse flies, gnats, biting midges and wasps: Apply/Spray where insects congregate and individual pests when seen. Apply/Spray 1-2 seconds contacting insects directly. Insects contacted by spray will be killed.

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FLYING INSECTS: *House Flies, Gnats, Mosquitoes and Small Flying Moths:* Apply to/Spray localized resting areas, under eaves, porches, inside surfaces of window and door frames, surfaces around light fixtures and cords, railings and where these insects may rest. Insects coming to rest on treated surfaces will be killed.

[FLYING INSECTS: Apply to/Spray resting areas. Insects coming to rest on treated surfaces will be killed.]

HORSE STABLES: TO KILL **Stable Flies** for up to 18 weeks [4.5 months; 135 days]; TO CONTROL **Horn Flies, House Flies, Face Flies, Horse Flies, Deer Flies, Mosquitoes and Gnats.** Apply thoroughly to surfaces until wet. Insects coming to rest on treated surfaces will be killed or repelled. Repeat treatment as necessary, but not more than once per week. Do not spray animals or humans, or apply to animal feed or watering equipment.

PANTRY PESTS - Grain Beetles (Rusty, Merchant and Sawtoothed), Flour Beetles (Red and Confused), Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths: Treat exposed stages. Remove all food-stuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow to dry prior to replacement of shelf paper, food and utensils. Wash any exposed food handling surfaces and utensils before use.

Carpet Beetles [(Black, Furniture and Varied)]: Spray on and under edges of floor coverings, under rugs and furniture and in closets or localities where these insects are found.

[Webbing] Clothes Moths: Use this product as a crack and crevice treatment in closets and storage areas where these pests are found. This is an adjunct treatment and will not control moth larvae already on clothes. Do not apply to clothing.

Bed Bugs and Lice: Remove linens and wash before reuse. Lightly spray mattresses, especially tufts, folds and edges. Apply to the interior of the frame. Allow to dry before remaking bed.

#### OUTDOORS:

- All outdoor spray applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:
- 1. Application to pervious surfaces such as soil, lawn, turf, and other vegetation;
- 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);
   Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or
- other structure;
- 4. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
- 5. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level;
- 6. Applications to vertical surfaces directly above pervious surfaces, such as soil, lawn, turf, mulch or other vegetation) only if the pervious surface does not drain into ditches, storm drains, gutters, or surface waters.
- Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft. by 0.5 ft.).
- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
- Treat surfaces to ensure thorough coverage but avoid runoff.
- To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants.
- Do not apply when the wind speed is greater than 15 mph.
- 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.
- For soil and 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.
- 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.

Remove all exposed food and cooking utensils. Cover all food handling surfaces or wash thoroughly after treatment and before use. Do not use on edible crops.

For outdoor use only as an aid in controlling listed insects: Point [aerosol] [can] away from face. Hold [aerosol] [can] on a slight downward angle, approximately 18 inches from surface to be sprayed. Spray with wind if breeze is blowing.

**PESTS ON OUTSIDE SURFACES OF BUILDINGS:** For control of building infestation of **Ants, Clover Mites, Crickets and Sowbugs** (**Pillbugs**). Spray foundation of building where insects are active and may find entrance up to a height of 2 feet. Apply to outside surfaces of buildings where insects tend to congregate. Spray screens, window frames, eaves, porches, patios, garages and refuse dumps. Repeat treatment as necessary, but not more than once per week.

## CRAWLING INSECTS: Ants, Cockroaches (Including American, Asian German Cockroaches), Centipedes, Crickets, Mole Crickets, Waterbugs and Silverfish. Spray infested surface of patio or picnic area. Also spray legs of tables and chairs.

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**Ants:** Spray around nests hidden under steps, brickwork, and concrete. Break apart accessible nests and spray freely on and around debris. If nest can be located, spray surface of nest until wet. Repeat as necessary but not more than once per week.

[Ants: Spray ant trails and hills. If nest can be located, spray surface of nest until wet.]

Asian Lady Bird Beetles (Lady bugs): Spray areas where bugs crawl or rest, especially around doors, on and around screens, windows, doorframes and areas where insects can enter the home. Remove screens prior to spraying them, allow to dry and then reinstall them.

Lone Star Ticks, Dog Ticks, Crickets and Fleas: Apply thoroughly to infestation in bushes, grass or weeds.

Wasps, Hornets, Yellowjackets and Bees: Spray nests and surfaces where pests may rest. Aim spray at nest openings. Make applications late in the evening when insects are at rest.

FLYING INSECTS: House Flies, Gnats, Mosquitoes and Small Flying Moths. Spray outside surfaces of window and door frames and areas where these pests may enter the home. Also spray localized resting areas, under eaves, porches, surfaces around light fixtures and cords, railings, and where these insects may rest. Insects coming to rest on treated surfaces will be killed.

**Termites, Carpenter Ants and Carpenter Bees**: (for localized control only.) Apply this product to voids or channels in damaged wood of a structure, or, to cracks, crevices and spaces in and between wooden portions of a structure or between wood and the foundation, in locations vulnerable to attack such as crawl spaces.

For **Termites**, DO NOT use this product as the sole source of control for active, structural infestations by subterranean termites; the purpose of this application is to kill workers or winged reproductive forms of termites which are present at the time of treatment. It is not intended to provide structural pest control. It is not a substitute for mechanical alteration, soil and foundation treatment, but merely a supplement. For active, structural infestations by subterranean termites, this product can only be used to supplement a federally registered conventional product that is registered as a sole source for termite control. This product will not eliminate termite infestations or provide protection against future infestation

**HOUSE PLANTS:** TO CONTROL **Aphids, Japanese Beetles, Lace Bugs, Leafminers, Mealybugs, Mites and Spider Mites** on house plants. Prior to spraying, remove plants from living and eating areas. Do not put in an area likely to come in contact with pets, children or food. Plants can be returned to original location when leaves dry. If plants cannot be moved, cover or remove exposed food and food handling surfaces. Avoid spraying surrounding areas. Apply spray to upper and lower surfaces of foliage. Avoid wetting blossoms if possible. Repeat applications as necessary, but not more than once per week.

FOR CONTROL OF ORNAMENTAL GARDEN INSECTS: For use on roses, dahlias, asters and other ornamentals to kill Japanese Beetles hit by spray, as well as Whiteflies, Aphids, Armyworms, Lace Bugs, Mealybugs, Exposed Thrips, Pavement Ants, Spiders, Spider and Red Mites, Clover Mites and Leafminers. May be used on plants, as well as a multi-purpose spray in small ornamental gardens and for spot treatments to prevent insects from spreading into large garden areas.

Not for use on plants grown for sale or other commercial use.

May also be used on other plants such as African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, delphiniums, dogwood, English ivy, euonymus, fuchsia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

When spraying plants, do not operate/spray/apply closer than 18 inches. Use sweeping motion. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F.

**DO NOT apply to vegetable plants or other plants used for food.** Spray insects directly whenever possible. Repeat treatment as necessary, but not more than once per week.

#### STORAGE AND DISPOSAL

**<u>STORAGE</u>**: Store in a cool, dry area away from children. Protect from freezing. [Store above 32°F/Do not store below 32°F.] If freezing occurs, allow product to thaw and shake well before using [use]. [Some product separation may occur on freezing which is reversible on shaking]. Freezing does not adversely affect this product/performance.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Do Not Puncture or Incinerate! *If empty*: Place in trash or offer for recycling if available. [This container may be recycled in aerosol recycling centers. At present, there are only a few such centers in the country. Before offering for recycling, empty the can by using the product according to the label.] *If partly filled*: Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

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.
- The term insects can be interchanged with any and all instances of bugs, pests and vice versa.

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- 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.
- Any combination of approved claims may be inserted dependent upon sites listed on the market label and product size

#### Kills Claims

- 1. No Oily [Greasy] Residue Kills Fleas & Ticks
- 2. Kills Wasps, Hornets & Yellowjackets
- 3. Kills Listed Home Invading Pests [including ants, bed bugs, centipedes, cockroaches, fleas and other listed insects]
- 4. Kills Spiders, Centipedes and Scorpions
- 5. Kills Roaches, Ants and Fleas on Contact
- Kills Pantry Pests [Grain Beetles (Rusty, Merchant and Sawtoothed), Flour Beetles (Red and Confused), Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Elmleaf Beetles, Rice Weevils, Lesser Grain Borers, Spider Beetles and Tobacco Moths]
- 7. Kills Plant Pests
- 8. Kills Aphids, Mealybugs, Lace Bugs, Thrips, Leafminers and Mites
- 9. Kills Spider Mites
- 10. Kills Japanese Beetles
- 11. Kills Ticks that may transmit Lyme disease
- 12. Kills Boxelder Bugs, Crickets, Dermestids, Firebrats, Palmetto Bugs, Silverfish, Sowbugs and Waterbugs
- 13. Kills Ground Beetles and Pillbugs
- 14. Kills House Flies, Gnats, Mosquitoes and Small Flying Moths
- 15. Kills Carpet Beetles and Clothes Moths
- 16. Kills Carpenter Ants and Carpenter Bees
- 17. Kills Bed Bugs and Lice
- 18. Kills by Contact
- 19. Kills Fleas
- 20. Kills Asian Lady [bird] Beetles
- 21. Kills Asian Lady bugs by contact
- 22. Kills Termites\*\*, Carpenter Ants & Carpenter Bees

#### \*\*For Localized Control Only

#### **Residual Claims**

- 23. Keeps Killing Carpenter Ants for up to 1 Month/4 Weeks\*
- 24. Keeps Killing Pharaoh Ants, Crazy Ants and Fire Ants for up to 1 Week
- 25. Keeps Killing Flies for up to 5 Months
- 26. Keeps Killing Stable Flies for up to 18 Weeks/4.5 Months/135 Days
- 27. Keeps Killing Lady Beetles for up to 35 Days
- 28. Keeps Killing for up to 18 Months/1.5 Year\*\*\*
- 29. Keeps on Killing German & American Cockroaches and Argentine Ants for up to 18 Months/1.5 years\*
- 30. Protects Against German & American Cockroaches and Argentine Ants for up to 12 Months/1.5 years\*
- 31. Long-Lasting
  - \* On Non-porous Surfaces
  - \*\*\*American and German Cockroaches [and Argentine Ants] on non-porous surfaces]

#### Formula Claims

- Odorless
- 33. Non-Staining
- 34. Does Not Stain Surfaces/Fabrics
- 35. Ready-To-Use
- 36. Easy-To-Use
- 37. Water-Based

#### **Odor Neutralizing Claims:**

Note to Reviewer: Variety of odor neutralizer claims meant to allow multiple marketers to communicate the odor neutralizer in a manner consistent with their brand.

The number of claims in no way is meant to emphasize the odor neutralizing property independently of the insecticidal properties.

- 38. Use only as directed to control listed insects Not intended for use as deodorizer only
- 39. No Lingering Odor(s)
- 40. With /Contains [an] odor neutralizer [eliminator/remover]
- 41. [Leaves a] Clean, Fresh Scent
- 42. [Leaves a] Mountain Fresh Scent
- 43. [Leaves a] Fresh Meadow Scent
- 44. Odor Neutralizing [Eliminating/Removing] Technology /Formula
- 45. Fights listed pests and odors

#### Foaming Claims

- 46. Foam disappears into invisible home barrier
- 47. [Expanding] Foam spreads deep into [hard-to-reach] cracks and(&) crevices

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- 48. [Expanding] Foam spreads deep into [hard-to-reach] places
- 49. Foam expands into where insects live [and eventually dissipates]
- 50. Spray [the foaming aerosol] into hard to reach areas
- 51. Foaming Insect Killer
- 52. Foam protects your home indoor[s] and out
- 53. Foam [expands] and disappears [dissipates] into/leaving an invisible home [home defense [protection]] [protective] barrier
- 54. Foam help[s] track [tracks] where you sprayed/applied
- 55. [Disappearing] Foam Shows where you sprayed/applied
- 56. [Disappearing] foam tracks your treatment progress
- 57. [Disappearing] foam creates protective home barrier
- 58. Flows Like a Liquid, Remains in Place like a Solid, Disappears in less than an hour
- 59. [Precision Delivery –] Foam Tracer Ensures Complete Application Coverage
- 60. Spreads around objects and hard to reach areas [that sprays miss]
- 61. Ready to Use Tracing Foam
- 62. Visible Application Invisible Barrier Guaranteed Results or your money back
- 63. Dries Clear
- 64. Contains/With FoamGuard<sup>™</sup> [action/technology]

#### Spray Claims

- 65. Spray 2 ways! Spot Treatment (with picture of wand out) / Surface Spray (with picture of the wand down)
- 66. Spray[s] [up to] 1....20 feet
- 67. Spray[s] hard-to-reach areas
- 68. Spray[s] windows, doors and/& eves

#### Use Site Claims

- 69. For Use in and Around Horse Stables
- 70. For Use on House Plants
- 71. For Use on Ornamental Plants
- 72. For Indoor and Outdoor Use

#### Sales Claims

- 73. [XX oz.] [Bonus Size] [Value Size]]
- 74. Duo Pack
- 75. XX % [more] [for] free]
- 76. XX pack
- 77. Bonus Size
- 78. Exclusive to Club Stores!
- 79. Exclusive Club [Bonus] Size!
- 80. [Great] Value
- 81. Value Pack
- 82. [Over] X% more than X oz size
- 83. Bonus Size
- 84. Combo/Wow Pack
- 85. Value/Bonus Size X-pack/ X-oz!
- 86. Value/Bonus Size X-pack = X oz!
- 87. Value Size
- 88. Look inside [label] for special offer information!
- 89. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.

#### Private Label

- 90. Satisfaction [Brand/Company Name] Promise Guaranteed
- 91. 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.
- 92. Quality Since XXXX
- 93. Established/Est. [in] XXXX
- 94. Quality You Deserve
- 95. 100% Guaranteed<sup>†</sup>
- 96. [†] 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



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#### <u>OTHER</u>

- 97. [**A**] People and pets may re-enter treated areas after spray has dried
- 98. [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.
  New(New (The following place provide effective solutions or environment of the following provide effective solutions).
- 99. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 100. Proven performance
- 101. Read Entire label before use
- 102. [Recyclable symbol]
- 103. Intended for residential use
- 104. Peel Open for use directions and further information
- 105. OPEN
- 106. Resealable Label for Directions & Precautions
- 107. Peel Open for use directions and further information
- 108. PRESS TO RESEAL
- 109. PEEL HERE / PRESS TO RESEAL
- 110. PULL / PEEL HERE [TO REMOVE TAPE]
- 111. Product of [insert country]
- 112. Assembled in the USA
- 113. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 114. QUESTIONS OR COMMENTS [phone icon ) [call] 1-800-225-2883 [or visit] [our website][at] [www.][ortho.com] [computer or



#### Guarantees:

- 115. Guaranteed+++
- 116. [Company/Brand] Guarantee[d] +++
- 117. Guaranteed [results] +++
- 118. Guaranteed Kill [or your money back] †††
- 119. [Company/Brand] Satisfaction guaranteed[+++]
- 120. [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.

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