



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 20, 2026

Thomas A. Lennan
Senior Regulatory Affairs Specialist
McLaughlin Gormley King Company D/B/A/ MGK
7325 Aspen Lane N.
Minneapolis, MN 55428

Subject: Label Amendment - Registration Review Mitigation for Phenothrin
Product Name: MGK Formula 3169
EPA Registration Number: 1021-2845
Case Number: 482059
Application Date: February 10, 2021

Dear Thomas Lennan:

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 Phenothrin 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 Garland Waleko by phone at 513-569-7983, or via email at waleko.garland@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dana L. Friedman". The signature is written in a cursive style with a large initial "D".

Dana L. Friedman, Chief
Risk Management and Implementation Branch 1
Pesticide Re-Evaluation Division
Office of Pesticide Programs
U.S. Environmental Protection Agency

ENCLOSURE: Stamped label

MGK® 3169

NOTE: Bold, Italicized text is information for the reviewer and is not part of the label. [Bracketed information is optional text.] Text separated by / denotes and/or options.

Not For Use on Humans or Animals.

For Indoor Use in Homes, Apartments and Residences.

Kills: Bed Bugs, Fleas, Brown Dog Ticks, Ants (excluding fire, pharaoh, and harvester ants), Spiders (excluding brown recluse and black widow), Stink Bugs, Boxelder Bugs, Clothes Moths, Dust Mites, Crickets, Earwigs, Millipedes, Moths, Multicolored Asian Lady Beetles, Silverfish.

ACTIVE INGREDIENTS:

Phenothrin, 3-phenoxybenzyl-(1RS, 3RS, 1RS, 3SR)-2, 2-dimethyl-3-(2-methylprop-1-enyl) cyclopropanecarboxylate	0.40%
* N-Octyl bicycloheptene dicarboximide.....	1.00%
Imidacloprid	0.05%

OTHER INGREDIENTS	98.55%
	100.00%

* MGK® 264®, Insecticide Synergist

MGK®, 264® - Registered trademark of McLaughlin Gormley King Company

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none">Call a poison control center or doctor immediately for treatment advice.Have person sip a glass of water if able to swallow.Do not induce vomiting unless told to do so by a poison control center or a doctor.Do not give anything by mouth to an unconscious person.
----------------------	---

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns) you may call 1-888-740-8712.

Manufactured by:



7325 Aspen Lane North
Minneapolis, MN 55428

EPA Reg. No. 1021-2845

EPA Est. No. 1021-MN-2

Net Contents: _____ fl. oz.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Wash hands thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wear long-sleeved shirt and long pants, socks, and shoes.

PHYSICAL OR CHEMICAL HAZARDS

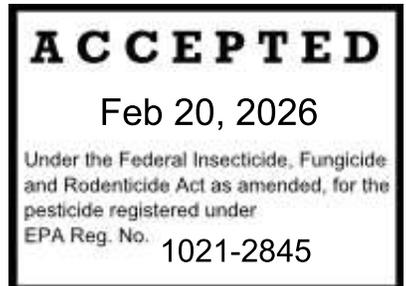
Do not apply this product around electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

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

[STOP; READ ENTIRE LABEL BEFORE USE]

For indoor use only.



USE RESTRICTIONS:

DO NOT USE ON HUMANS OR ANIMALS

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



In the home, all food preparation and eating surfaces and utensils should be covered during treatment, or thoroughly washed before use. Exposed food/ should be covered or removed. Remove pets, birds and cover fish aquariums before spraying.

Do not apply as a broadcast surface spray.
Not intended for commercial applications.

SHAKE WELL BEFORE EACH USE.

APPLICATION: Use only as a spot treatment or crack and crevice application in residences. Spray in an inconspicuous area to test for the unlikely possibility of staining or discoloration. Evaluate test area after drying. Hold with applicator aimed away from you. [Twist nozzle on sprayer tip to adjust spray pattern [to either spray or foam]] Spray [Foam] surfaces from a distance of 8 to 10 inches until slightly damp. Do not allow children or pets to contact treated areas until surfaces are dry. Allow sprayed articles and surfaces to dry thoroughly before using or replacing bedding.

[HOW TO APPLY/USE]: Hold with applicator aimed away from you. [Twist nozzle on sprayer tip to adjust spray pattern.] Spray surfaces from a distance of 8 to 10 inches until slightly damp.]

TO KILL BED BUGS AND BED BUG EGGS: Apply [spray/foam] as a spot treatment to cracks-and-crevices and/or harborages, where evidence of bed bugs occurs, including bed frames, box springs, inside empty dressers, furniture and clothes closets, carpet edges, high and low wall moldings, behind headboards, pictures, wallpaper edges, and luggage. Spray [Apply to] bed bugs directly when possible. Do not make surface applications to mattresses or bedding. Mattress treatments must be limited to seams, folds, and edges only. Do not treat pillows, bedding, or clothing. Remove linens and wash before reuse. Allow treated mattress to dry thoroughly before remaking bed. Remove all clothes and other articles from dressers or clothes closets before application. [For luggage, be sure to spray/foam seams and pockets.] Allow all treated areas to dry thoroughly before use.

TO KILL LISTED CRAWLING INSECTS AND SPIDERS: Spray as spot or crack and crevice application where insects are harboring, moving, or breeding. Treat feeding or hiding areas such as baseboards, carpet, floor, rugs, under refrigerators, cabinets, sinks, and stoves. Also treat interior entry points such as doors, around windows, and water pipes.

TO KILL BROWN DOG TICKS and FLEAS: Spray around beds, furniture and pet's habitat. Spray pet sleeping quarters, bedding, carpeting, floor and floor covering where pets are kept. Do not apply to your pet. Use only a recommended pet spray on pets.

Directions For Use Options Based On Applicator

Option 1 – for Nonspecific spray container

HOW TO APPLY/USE: [icon]

- Hold with applicator aimed away from you.
- Spray surfaces from a distance of 8 to 10 inches until slightly damp.

STORAGE & DISPOSAL

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

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: Non-refillable 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 disposal instructions.

End of Option 1

Option 2 – for Trigger Sprayer [Trigger Sprayer Applicator Brand Name]

[Applicator Name] [Applicator/Sprayer] Directions

HOW TO APPLY/USE: [icon]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired. [Set sprayer to a coarse spray.]
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.

STORAGE & DISPOSAL

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

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: [Small] [Applicator Name] Rotate nozzle to closed position, -OR- Turn sprayer nozzle to "OFF [X]. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND/CONTAINER HANDLING: Non-refillable 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 disposal instructions. Never place unused product down any indoor or outdoor drain.

PESTICIDE STORAGE: [Large] [Applicator Name] Place trigger sprayer under handle on container to keep sprayer above the level of contents.

Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable 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 disposal instructions.

End of Option 2

Option 3 [Quick Connect Trigger] [Applicator Name]

[Applicator Name] [Applicator/Sprayer] Directions

[Quick Connect Sprayer Type 1] 1. Pull sprayer from bottle. 2. Pull [color] hose connector and coil from sprayer handle. 3. Insert hose connector into [color] spout on cap [until it clicks] into place.] [4.] [Flip up [/Twist/Turn/Pull] spout.] Turn sprayer nozzle to open, and [pull trigger to] spray.

or

[Quick Connect Sprayer Type 2] 1. Remove sprayer. Pull cord ALL THE WAY OUT. 2. Insert [color] plug into spout [on cap] [until it clicks.] [3.] [Flip up [/Twist/Turn/Pull] spout.] Open nozzle at end of sprayer [and pull trigger to spray].

Note to PM: Illustrations may be associated with each step.

HOW TO APPLY/USE: [icon]

- Turn sprayer nozzle to open.
- Adjust sprayer nozzle as desired. [Set sprayer to a coarse spray.]
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.

STORAGE & DISPOSAL

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

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: [Applicator Name] Flip down [/ Turn] spout to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer [Turn sprayer nozzle to "OFF"[X]. Snap sprayer back in place. Protect from freezing. Always store this pesticide product in the original container.

Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable 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 disposal instructions.

End of Option 3

Option 4 – Pull ‘N Spray II

Applicator Name [Applicator/Sprayer] Directions]

[Illustration #1]

- [Remove sprayer from side carrier and unwrap hose completely.]
- [Insert [color of plug] plug at end of hose into [color of spout] spout on cap [until it clicks.]
- [Flip up [/Twist/Turn/Pull] spout]. Spout must remain up while spraying.]]

[Illustration #2]

- Twist nozzle at end of sprayer to desired spray pattern.

[Illustration #3]

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops and hold for two (2) seconds to ready the sprayer.

[Illustration #4]

- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

HOW TO APPLY/USE: [icon]

- Follow illustrations and instructions above.
- Twist nozzle at end of sprayer to desired spray pattern.
- Point sprayer away from body and press sprayer button to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.

Optional Refill [and Reuse] Directions

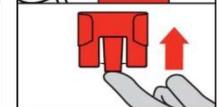
[The Pull 'N Spray II/Applicator Name [applicator/wand] may be reused with the available MGK® 3169/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.] **--OR--**

[REFILL: This container may be refilled with MGK® 3169 / product name. To refill pour MGK® 3169 / product name into container.]

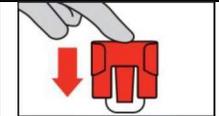
Refill [and Reuse] Directions

How to attach the [Pull 'N Spray II/Applicator Name] [applicator/wand] to MGK® 3169 / product name [refill bottle]:

Removing [Pull 'N Spray II/Applicator Name] [applicator] from original bottle:

	Remove the [applicator name] [applicator] by pulling the [color of plug] [red] plug from the [color of spout] [red] spout on cap. [Illustration]
	[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]

Adding [Pull 'N Spray II/Applicator Name] [applicator] to MGK® 3169 /Product Name:

	[Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container.] [Illustration]
	Insert [color of plug] [red] plug at end of hose into [color of spout] [red] spout on cap [until it clicks]. [Illustration]

STORAGE & DISPOSAL

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

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: [Pull 'N Spray II/Applicator Name] [Applicator]: Completely discharge/dispense product in sprayer prior to storage. Flip down [Turn] [color of spout] spout on cap. DO NOT DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside carrier on bottle with the nozzle facing down. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Refillable container. Refill this container with MGK Formula 3169 only. Do not reuse this container for any other purpose. [Pull 'N Spray II/Applicator Name] can be reused with MGK® 3169/Product Name refill bottle/container. Follow instructions in the Reuse Directions when reusing [applicator name].]

CONTAINER DISPOSAL:

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 disposal instructions.

End of Option 4

Option 5 – Comfort Wand [Applicator Name]

[Applicator Name] [Applicator/Wand] Directions

[1. Remove] Remove [applicator name] Wand from side [holder/clip] [Illustration #1&2]

- [Unwrap hose completely]

3169_1021-2845_0126

- [Remove protective strip from battery compartment to activate batteries]

[2. Connect] Insert [color of plug] plug at end of hose into [color of spout] spout on cap [until it clicks. Flip up [/ Twist/Turn/Pull] spout.] [Spout must remain up while spraying] [Illustration #3]

[3. Extend] Flip open [applicator name] wand until it locks into position [Illustration #4]

[4. Spray] Twist nozzle at end of [applicator name] wand to desired spray pattern. [Ensure trigger lock is disengaged before spraying.] Hold [color of trigger] trigger for continuous spray. [Illustration #5]

HOW TO APPLY/USE: [icon]

- Follow illustrations and instructions above.
- Twist nozzle at end of [applicator name] wand to desired spray pattern.
- Point [applicator name] wand away from body and Hold [color of trigger] trigger for continuous spray.
- Release trigger to stop spray.
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.

[After Use: twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and store on the side [holder/clip].]

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

To replace batteries: Open battery compartment at bottom of [applicator name] wand. Remove used batteries and replace with [four new AA] new batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

Optional Refill [and Reuse] Directions

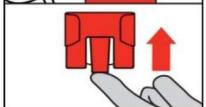
[The Comfort Wand/Applicator Name [applicator/wand] may be reused with MGK® 3169/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.] **--OR--**

[REFILL: This container may be refilled with MGK® 3169 / product name. To refill pour MGK® 3169 / product name into container.]

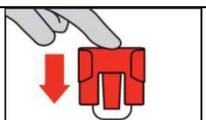
Refill [and Reuse] Directions

How to attach the [Comfort Wand/Applicator Name] [applicator/wand] to MGK® 3169 /Product name [refill bottle]:

Removing [Comfort Wand/Applicator Name] [applicator] from original bottle:

	<p>Remove the [applicator name] [applicator] by pulling the [color of plug] [red] plug from the [color of spout] [red] spout on cap. [Illustration]</p>
	<p>[At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle.] [Illustration]</p>

Adding [Comfort Wand/Applicator Name] [applicator] to MGK® 3169 /Product Name:

	<p>[Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container.] [Illustration]</p>
	<p>Insert [color of plug] [red] plug at end of hose into [color of spout] [red] spout on cap [until it clicks]. [Illustration]</p>

STORAGE & DISPOSAL

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

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: [Applicator Name] [Applicator]: Flip down [/turn] (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.]. Flip the [applicator name] wand closed and place [sprayer] back inside carrier [clip] [holder]. Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Refillable container. Refill this container with MGK Formula 3169 only. Do not reuse this container for any other purpose [Comfort Wand /Applicator Name can be reused with MGK® 3169 /Product Name refill bottle/container. Follow instructions in Reuse Directions when reusing [applicator name].]

CONTAINER DISPOSAL:

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 disposal instruction.

End of Option 5

Option 6 – EZ Sprayer [Pump 'n Go] [Applicator Name]

[Applicator Name] [Applicator] Directions

CUT [Illustration # 1]

1. Carefully cut the two [enter color] [white] zip ties securing the hose and pump handle with scissors. Use caution not to cut the [enter color] [white] hose.

CONNECT [Illustration #2]

2. Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

EXTEND WAND [Illustration #3]

3. Lift sprayer wand off bottle. Push [enter color] [yellow] button while pulling out on the wand nozzle tip. Fully extend wand until [enter color] [yellow] button snaps into SPRAY position. NOTE: [White] [color of] trigger will not function until wand is fully extended and [enter color] yellow button is visible in the spray position.

PUMP [Illustration # 4]

4. [Make sure handle is screwed on TIGHTLY or the bottle will not pressurize.] Pump container 10-20 [X-X] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

SPRAY [Illustration # 5]

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

STORE [Illustration # 6]

6. When finished spraying, push the [enter color] [yellow] button and push the wand until the [enter color] [yellow] button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down.

DEPRESSURIZE [Illustration # 7]

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

STORAGE & DISPOSAL

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

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

CONTAINER HANDLING: Refillable container. Refill this container with MGK Formula 3169 only. Do not reuse this container for any other purpose,

PESTICIDE DISPOSAL AND CONTAINER DISPOSAL:

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 disposal instructions.

End of Option 6.

Option 7 – Other Pump Style [Quick Pump] [Applicator Name]

[Applicator Name] [Applicator] Directions

[1.] TO USE

Remove wand from holster and pull the hose from the storage compartment. Turn the pump handle clockwise to make sure the pump is tight [and push the pop-up pressure indicator completely down] before pumping. [illustration #1]

[2.] TO PUMP

Turn the pump handle clockwise [one-quarter turn] to release the handle. Pump the sprayer [until the pressure indicator pops up about an inch]. [That's your signal you are ready to spray.] Turn the pump handle counterclockwise [one-quarter turn] to secure the handle for carrying. [illustration #2]

[3.] TO SPRAY

Begin spraying by pushing the lever on the spray handle down. Rotate the nozzle at the tip of the wand to adjust spray from a stream to gentle mist. For continuous spraying, push the lever down and slide forward to lock. Pull back to release. Hold 8 to 10 inches from the surface to be sprayed. Spray surface until slightly damp. [illustration #3]

[4.] TO STORE

Slowly turn the pump handle counterclockwise to untighten and release pressure, then turn back clockwise to retighten the handle. Push the hose back into the storage compartment and put the wand back in holster. [illustration #4]

[HOW TO APPLY/USE: [icon]

- Follow illustrations and instructions above.
- Point [applicator name] away from body Release trigger to stop spray.
- Hold 8 to 10 inches from the surface to be sprayed.
- Spray surface until slightly damp.]

Optional Refill [and Reuse] Directions

[This product is also available for sale in a refill bottle/container. Read and follow instructions in the Refill Directions to refill the original container with the Quick Pump/Applicator Name [applicator]. Do not refill this bottle/container with any other product. Wear protective clothing as directed in Precautionary Statements when refilling this bottle/container.] --OR--

[REFILL: This container may be refilled with MGK® 3169 / product name. To refill pour MGK® 3169 / product name into container.]

Refill [and Reuse] Directions

How to refill MGK® 3169 /Product Name with [Quick Pump/Applicator Name] [applicator]:

	Remove the pump handle on the Quick Pump/Applicator Name by twisting it counterclockwise. [Illustration]
	Remove the cap from the MGK® 3169 / Product Name bottle/container. [Illustration]
	Pour the product carefully and directly into the Quick Pump/Applicator Name container. Do Not fill above 2'3"/4" from the top of the container. DO NOT add water. [Illustration]
	Secure the pump handle back on the container by twisting it clockwise until tight. [Illustration]

STORAGE & DISPOSAL

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

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Protect from freezing. Always store this pesticide product in the original container. Store in a cool, dry (preferably locked) place that is inaccessible to children and animals, and in a safe area away from food and pet food.

CONTAINER HANDLING: Refillable container. Refill this container with MGK Formula 3169 only. Do not reuse this container for any other purpose.

PESTICIDE DISPOSAL AND CONTAINER DISPOSAL:

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 disposal instructions.

Optional Trouble Shooting Section for [Battery Powered Wand] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer] [Applicator name]

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: Nozzle is turned Off.

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

Possible Cause: [Red] [color] plug at end of hose is not flipped up.

Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap [until it clicks and flip up spout.]

Possible Cause: Sprayer is not primed.

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

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

Possible Cause: Weak batteries.

Solution: Install a fresh set of batteries.

Possible Cause: [Red] [color of plug] plug at end of hose is not flipped up.

Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap [until it clicks]. [Attach coupler to the cap] and [flip up spout.]

Possible Cause: Nozzle not fully open.

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

End of Optional Trouble Shooting Section

OPTIONAL [REUSE AND] REFILL DIRECTIONS

[REFILL: This container may be refilled with [product name]. To refill pour [product name] into container.

REFILL DIRECTIONS

Removing [Applicator Name] [Comfort Wand] from original bottle:

1. Remove the wand by pulling the red plug from the white spout on cap. [Illustration]
2. At the bottom of the side [clip] [carrier] [holder] press the middle tab up and slide the [clip] [carrier] [holder] upwards to remove it from the bottle. [Illustration]

Adding wand to [MGK® 3169 /Product Name

Refill/Recharge/Renew/Fill-Up/Reload]/ [Refill bottle]:

3. Slide the side [clip] [carrier] [holder] downward on the knob located [at right-hand] [on the] side of the refill container. [Illustration]
4. Insert red plug at end of hose into white spout on cap until it clicks. [Illustration]]

End of OPTIONAL [REUSE AND] REFILL DIRECTIONS

End of Option 7.

OPTIONAL WARRANTY STATEMENTS:

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

[IMPORTANT: Read the entire Directions for Use, Conditions of Sale and Disclaimer of Warranties and Limitations of Liability before using this product.

CONDITIONS OF SALE: The directions for use of this product have been determined to be appropriate for the correct use of this product. This product has been tested under different environmental conditions similar to those that are ordinary and customary where the product is to be used. Insufficient control of pests or plant injury may result from the occurrence of extraordinary or unusual conditions, or from failure to follow label directions. In addition, failure to follow label directions may cause injury to animals, man and damage to the environment. Manufacturer and Seller offer, and the buyer accepts and uses, this product subject to the conditions that extraordinary or unusual environmental conditions, or failure to follow label directions are beyond the control of Manufacturer and Seller and are, therefore, the responsibility of the buyer.

LIMITED WARRANTY AND LIMITATION OF DAMAGES

Manufacturer and Seller warrant that this material conforms to the chemical description on the label. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER AND SELLER MAKE NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY, and no agent of Manufacturer or Seller is authorized to do so except in writing with a specific reference to this warranty. Any damages arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values, etc.]

Net Weight XXXX fl. oz.

OPTIONAL MARKETING CLAIMS:

{Note to reviewer: Qualifying statements will appear at the bottom of the label page where they are reference by an indication of a footnote}

[Money-Back Guarantee**

**If you are not satisfied with this product, [We / Company Name] will refund the purchase price within one year after the date of purchase reflected on an original receipt. [Offer limited to 1 refund per household.]

(Exclusive claim for SC Johnson:) [A family company since 1886 [Signature]]

Kill Claims

Kills hard to kill bed bugs*

Kills resistant bed bugs*

Formulated to kill pyrethroid resistant [hard to kill*] bed bugs

Qualifier: *Pyrethroid-Resistant Bed Bugs

Kills bed bugs resistant to pyrethroids.

Kills Dust Mites

Kills Brown Dog Ticks & Fleas

Kills bed bugs where they hide

Kills bed bugs, fleas, dust mites & brown dog ticks

Bed bug killer

Bed bug & flea killer

Flea & Brown Dog Tick Killer

Kills bed bugs

Kills: Bed Bugs, Fleas, Brown Dog Ticks, Ants (excluding fire, pharaoh, and harvester ants), Spiders (excluding brown recluse and black widow), Stink Bugs, Boxelder Bugs, Clothes Moths, Dust Mites, Crickets, Earwigs, Millipedes, Moths, Multicolored Asian Lady Beetles, Silverfish

Also kills Fleas & Dust Mites

Residual Claims

[Kills] [Controls] [Protects] [Lasts] [Works] [Effective] [Guards] [Against] Bed Bugs for [8/12/16 weeks]/[2/3/4/ months] on Ceramic (non-porous) Surfaces.
[Kills] [Controls] [Protects] [Lasts] [Works] [Effective] [Against] Bed bugs for [1/2 Months] [4/6/8 Weeks] on Laminated Wood Surfaces]
[Kills] [Controls] [Protects] [Lasts] [Works][Effective] [Against] Bed Bugs for [2/3 Weeks] [14/21 Days] on Carpeted Surfaces
Keeps killing Bed Bugs for [1/2 Months] [4/6/8 Weeks] on Laminated Wood Surfaces]
Keeps Killing Bed Bugs for [2/3/4 Months] [8/12/16 Weeks] on Ceramic (non-porous) surfaces.
Keeps Killing Bed Bugs for [2/3 Weeks] [14/21 Days] on Carpeted Surfaces.

Kills Fast and Keeps killing Bed Bugs for [1/2 Months] [4/6/8 Weeks] on Laminated Wood Surfaces]
Kills Fast and Keeps Killing Bed Bugs for [2/3/4 Months] [8/12/16 Weeks] on Ceramic (non-porous) surfaces.
Kills Fast and Keeps Killing Bed Bugs for [2/3 Weeks] [14/21 Days] on Carpeted Surfaces.

Kills Bed Bugs for [1/2 Months] [4/6/8 Weeks] on Laminated Wood Surfaces]
Kills Bed Bugs for [2/3/4 Months] [8/12/16 Weeks] on Ceramic (non-porous) surfaces.
Kills Bed Bugs for [2/3 Weeks] [14/21 Days] on Carpeted Surfaces.

Residual Control for Adult BedBugs
Helps guard/protect against Bed Bug infestations [for [8/12/16 weeks]/[2/3/4/ months]]*
Effective Bed Bug Control**
Qualifier: **Kills Adult Bed Bugs for 16 weeks indoors on Ceramic Tile (non-porous surfaces)

Water-based formula claims

No Stains
Will Not Stain/Non-Staining on [Water-Safe Fabrics and Surfaces]
Water-based/Non-staining Formula
Dries clear

Unscented
No lingering odor
Dries fast
Water based [formula] [water droplet icon]
Non-flammable

Site Use Claims

[Formulated] For use on mattresses, wood furniture & carpet
[Formulated] For use on Mattresses [,Luggage] [,Furniture] [,Headboards] [,Beds] [and] [Carpet]
Luggage Spray
Use with confidence in [bathrooms], [family rooms], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms].

General Claims

Ready to Use
Convenient Ready to Use
Defends your home against Bed Bugs
Unscented
Synergized Formula

Guaranteed*
Guaranteed Kill or your money back†

Qualifier: †THE ORTHO 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.

Ready to Use
No Mixing Necessary
Easy to Use
Kills by contact!
Ortho & Your Environment- Your home and yard are places for family and pets to enjoy. That's why Ortho® products are designed with care to provide effective solutions to insect problems [inside] and [outside] your home.

Dual Ingredient Claims

Dual Modes of Action
Two Modes of Action
Dual Action [Control]
Dual-Action [Fast Acting plus Residual Control]
Contains two different active ingredients
Two active ingredients in one product
[Dual Action] Fast Acting plus Long Residual
Works two ways to kill [pyrethroid resistant] bed bugs
Two active ingredients to kill even pyrethroid resistant bed bugs

Speed of Action Claims

Quick Knockdown of Bed Bugs within 10 minutes.
Kills Bed Bugs Fast within 24 hours
Kills Bed Bugs Quick within 24 hours

Egg Claims

Kills bed bug eggs [before they hatch]
Prevents Bed Bug Eggs from hatching
Kills hiding bed bugs
Kills Bed Bugs where they hide
Kills hard to see Bed Bug Eggs
Kills difficult to find Bed Bug Eggs
Kills Emerging Bed Bug Nymphs

Optional claims for foaming trigger applicator

Spray or Foaming Action
Foaming Action kills bed bugs where they hide
Penetrating Foam Kills Quick
With Penetrating Foam

Optional Claims for odor neutralizer option

[Effectively] Neutralizes/Eliminates [Bed Bug] Odors
With [Contains] [Plus] Odor Neutralizer
Fresh /[Clean] scent
Mountain Fresh Scent

Applicator Claims

Continuous spray wand
Comfort wand
Pull 'n Spray®- No hand fatigue!
Continuous, Adjustable Spray
The easy way to spray
The easier way [to spray], [to kill bugs], [to kill insects]
Quick Pump [applicator] [sprayer]
[Quick and] Easy to Use
No Leaks or Mess
No Hand Fatigue
Precise control [for maximum accuracy]
Consistent spray [for maximum accuracy]
Continuous [Adjustable] Spray [Wand]
Ideal/great for large/small jobs/areas/spaces/rooms
Adjustable sprayer [nozzle] [for maximum control]
Cut your time spraying in half
Up to [X] minutes [mins] of continuous spray {**Note to reviewer Non-FIFRA Claim. X is dependent on volume of product in end use container**}
Over [X] minutes [mins] of continuous spray
1 pull equals [X] trigger sprays
Grab & Go
Pump [illustration]
Spray [illustration]
No [constant] pumping
The easy way [to spray] [to kill bugs]
Saves time and energy
Continuous Spray
Extended Reach
No more bending/kneeling
Just attach hose and spray
Bonus Size
Exclusive to Club Stores!
Exclusive Club [Bonus] Size!

Refill Claims

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

Wand Claims

Reusable [Comfort] [Continuous Spray] [Wand][Powered by Duracell®]
Rechargeable

Value

Great Value
Wand/Quick Pump bottle together with Refill)
Refill/Recharge/Renew/Fill-Up/Reload

END OF OPTIONAL MARKETING CLAIMS