



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 25, 2020

Luz G Chan  
Registration Manager  
Drexel Chemical Company  
P.O. Box 13327  
Memphis, TN 38113-0327

Subject: Notification per PRN 98-10 – Added optional referral statement, added optional marketing claims  
Product Name: DREXEL IMITATOR PA PLUS  
EPA Registration Number: 19713-642  
Application Date: February 21, 2019  
Decision Number: 552275

Dear Ms. Chan:

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

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act 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 have any questions, please contact Curtis Hildebrandt at 703-347-8198 or by email at [hildebrandt.curtis@epa.gov](mailto:hildebrandt.curtis@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Emily Schmid".

Emily Schmid, Product Manager 25  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

## NOTIFICATION

19713-642

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

2/25/2020

# Master Label For DREXEL IMITATOR® PA PLUS EPA Reg. No. 19713-642

### The following Brand Names May be Used as Alternate Names:

- Imitator PA Plus Weed & Grass Killer
- Imitator PA Plus RTU
- Imitator RTU Plus Weed and Grass Killer
- Imitator Weed & Grass Killer PA Plus

Editorial Notes: Bracketed text [ ] is for internal use or serves as a placeholder for graphics.

Text in parenthesis ( ) denotes optional wordings.



# ***Imitator<sup>®</sup> PA Plus***

Weed & Grass Killer

**ACTIVE INGREDIENTS:**

Glyphosate in the form of its isopropylamine salt.....	2.0%
Pelargonic acid and related fatty acids.....	2.0%

<b>OTHER INGREDIENTS:</b> .....	<u>96.0%</u>
<b>TOTAL:</b> .....	100.0%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**See First Aid Below**

**(Optional: See Side (Back) Panel for FIRST AID; See Page 2 for FIRST AID)**

EPA Reg. No. 19713-642  
EPA Est. No. 19713-XX-XXX

Net Content: \_\_\_\_\_ fl. oz. (\_\_\_\_ mL)

<b>FIRST AID</b>
<p><b>If In Eyes:</b></p> <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<p>Have the container or label with you when calling a poison control center or doctor, or going for treatment. You may also call CHEMTREC at 800-424-9300 for medical emergency information.</p>

Manufactured By:



IMITATOR and the Drexel logo are registered trademarks of Drexel Chemical Company.

642MSP-0219\*P

## PRECAUTIONARY STATEMENTS

### Hazards to Humans and Domestic Animals

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

## ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface water. Applying this product in calm weather when rain is not predicted for 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage system.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not allow people or pets to enter the treated areas until after the spray has dried.

## PRODUCT INFORMATION

### How It Works:

This product enters the plants through the foliage and moves down to the roots systemically, thereby killing it. Weeds die, roots and all, so they don't grow back. Kills only what you spray. Any product not absorbed by the plant will be rendered inactive after it hits the soil. This product has no soil residual activity. Sprayed weeds (usually turn yellow) wilt (within (3)(6) hours) with complete kill in 1 to 2 weeks.

### Where to Use:

- ✓ Along fences and foundations (Fence lines)
- ✓ Around shrubs and trees
- ✓ Edging (around foundations and retaining walls)
- ✓ Flower beds and Vegetable gardens
- ✓ On patios, walkways and driveways, (gravel or mulch beds)
- ✓ Driveways and patios
- ✓ On wooded or (and) vacant lots
- ✓ Other areas of your yard
- ✓ Other areas where (tough) weeds are invading your yard

### How to Apply:

[Optional text for Pull 'N Spray, Battery Operated Sprayer, and Pump N Go Sprayer (2)(II) Devices]

• Follow illustrations and/or instructions in the How to Assemble and Use section to ready (prime) the sprayer. [Insert instructions / Illustrations from Appendix 3]

[Non-foaming Sprayers like 1 gal]

• Adjust (twist) nozzle (at end of sprayer) to (a) coarse spray.

[Trigger Sprayers only like 24 oz or 30 oz]

• Adjust nozzle to the desired spray setting (FOAM or SPRAY).  
• Spray the weeds or grasses you want to kill until thoroughly wet (or covered with foam).

[All Sprayers]

• When spot treating (weeds) around desirable plants, shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water (or cut off treated area).

[1.25 gal Refill Container only]

• Use this product to refill the empty Imitator PA Plus Weed & Grass Killer (Pump 'N Go (2)(II))

[Insert Brand Name] container by pouring product carefully and directly into the container. DO NOT add water.

[Optional for Refill container]

- Follow illustrations and instructions on the Imitator PA Plus Weed & Grass Killer [Pump 'N Go (2)(II)] container to prime the sprayer.

### **IMPORTANT**

- Do not spray plants or grasses you like - they will die. NOT for spot weed control use in lawns since (this product) (glyphosate) kills lawn grasses.

### **WHEN TO APPLY**

- Apply when weeds are actively growing. (Use anytime weeds (and) (grasses) are actively growing.)
- For best results, apply during warm, sunny weather (above 60 (50)°F) to accelerate systemic movement from foliage to roots. (However, effective results can be obtained when applications are made under cool and cloudy conditions as low as 50°F.)
- Spray when air is calm to prevent drift to desirable plants.
- RAINPROOF (PROTECTION): Rain or watering (10, 30; less than 30 minutes; minutes) after application will NOT wash away effectiveness.  
[Alternate Text] [Insert Brand Name] is Rainproof in (10, 30; less than 30 minutes; minutes)
- All ornamental flowers, trees and shrubs may be planted 1 day after application (or include **When To Replant** section).
- [Optional Text] Apply when weeds are small and before seeds form.
- [Optional Text] Established (perennial) (hard to kill) weeds may require a repeat application.
- [Optional Text] Weeds (usually) yellow and wilt within (2)(II) hours with complete kill in 1 to 2 weeks for annual weeds. Perennial weeds such as poison ivy may take 4 or more weeks for complete kill.

### **WHEN TO REPLANT**

- All ornamental flowers, trees and shrubs may be planted 1 day after application.
- Lawn grasses, herbs, vegetables (all) and fruits may be planted 3 days after application.

### **WHEN TO HARVEST** [Optional Section]

If used to control weeds around fruits or nuts, wait the following number of days before harvesting:

- **1 Day:** Citrus (Citron, Grapefruit, Kumquat, Lemon, Lime, Mandarin, Orange, Pummelo, Tangelo, Tangerine), Guava, Papaya
- **3 Days:** Nuts (Almond, Beechnut, Brazil Nut, Butternut, Cashew, Chestnut, Filbert, Hazelnut, Hickory Nut, Macadamia, Pecan, Pistachio, Walnut)
- **14 Days:** Apple, Avocado, Banana (Plantains), Berries (except Cranberries), Dates, Figs, Grapes, Loquat, Passion Fruit, Pear, Persimmon, Pomegranate & (and) Quince
- **17 Days:** Apricot, Cherries, Nectarine, Olives, Peach, Plum and (&) Prunes

### **(HOW TO) REFILL** [Optional Section]

[Alternate Text Ready To Use Refill For All Sizes]

To refill this empty container, pour product carefully and directly from the Imitator PA Plus Weed & Grass Killer (or insert brand name for 19713-642) container designated as the ready-to-use refill container. DO NOT add water.

[Alternate Text For Refill Container]

Do not reuse or refill this container.

Use this product to refill the empty Imitator PA Plus Weed & Grass Killer (or insert alternate brand name) (Pump N Go (2)(II)) container by pouring product carefully and directly into the container. DO NOT add water.

## **HOW TO CLEAN** [Optional Section - Battery Operated Sprayer ONLY]

- Battery operated sprayer head may be used with other Imitator brand products, it will replace any sprayer fitted with a quick-connect cap
- Before using the [Insert name of sprayer device] sprayer with other Imitator brand products, the sprayer must be thoroughly cleaned (the sprayer must be purged of remaining product).
- Disconnect sprayer unit from the quick-connect cap (Disconnect sprayer unit from the bottle cap)
- Place ONLY the end of the hose (the hose end) into a bucket of water and spray continuously for 30 seconds onto bare soil or gravel.

[Alternate Text] Rinse sprayer and sprayer parts (hose) with water 3 times. 3,pray rinse water on bare soil or gravel. Discard empty sprayer bottle as instructed in the "*Storage and Disposal*" section.

[Alternate Text] Rinse sprayer with water 3 times and then spray (clean) water through sprayer for 30 seconds. All rinse water should be applied to bare soil or gravel.

- Connect sprayer head to any Imitator brand product with a quick-connect cap (adaptor) (any Imitator brand product bottle compatible with the battery sprayer). [Insert brand name of sprayer]
- Failure to properly clean sprayer before using with other Imitator brand products may cause damage to your plants.

## [OPTIONAL SECTIONS]

### **ADDITIONAL TIPS**

#### **To Kill Vines**

- If vines are growing up poles, fences, or tree trunks with mature bark, cut vines to a height of 3 to 4 feet and spray vines thoroughly.
- If vines are climbing shrubs or tree trunks with green bark, cut vines at base and treat as directed for stumps or spray regrowth. If spraying regrowth, shield shrubs and tree trunks from spray drift with a sheet (piece) of cardboard or plastic

#### **For Lawn Replacement**

Use this product [Insert brand name] to kill a (an old) (an unwanted) lawn and (its) weeds before planting a new lawn (OR prior to laying a patio, sidewalk, or driveway).

- Skip one mowing before spraying.
- If soil is dry, water before application and 2 to 3 days after application.
- If green patches remain after 7 days, reapply.
- Wait (at least) 3 days after last application to rake, till or replant with seed or sod.

#### **Kudzu**

For best results, apply in mid to late summer when vines are mature and actively growing.

#### **Wild Blackberry**

Spray anytime plants are actively growing. Dead canes should be cut down and removed. Reapplication is often required to kill deep roots.

#### **Poison Ivy and Poison Oak**

Contact with these plants anytime of the year can cause an allergic reaction. Spray anytime plants are actively growing, but at least 4 weeks before the first killing frost in the fall. Reapply, if new growth appears. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.

### For Flowerbed and Garden (Plot) Preparation

Use this product to kill weeds, grasses and brush before planting flowers, fruits, vegetables, trees or shrubs.

- If soil is dry, water before application and 2 to 3 days after application.
- Apply evenly over treatment (plot) area.
- [Optional Text] Wait 4 to 6 days for product to kill plants then cleanup plant refuse and till soil.)
- Wait 1 to 3 days after last application before planting garden (flowers, trees and shrubs). See "When To Replant" section for details.

KILLS ALL TYPES OF WEEDS AND GRASSES [Optional Section]		
Bahiagrass	Evening Primrose	Pennywort
Bentgrass	False Dandelion	Perennial Ryegrass
Bermudagrass	Fennel	Primrose
Bindweed	Fescue	Prostrate Spurge
Black Medic	Fiddleneck	Puncture Vine
Blue Toadflax	Filaree	Quackgrass
Bluegrass	Florida Pusley	Ragweed
Brassbuttons	Garden Spurge	Sandspur
Broadleaf Plantain	Henbit	Shepherdspurse
Bromegrass	Johnsongrass	Smooth Cat's Ear
Bur Clover	Knotweed	Sowthistle
Canada Thistle	Lambsquarters	Spotted Spurge
Chickweed	Little Bitter Cress	St. Augustinegrass
Crabgrass	London Rocket	Tall Fescue
Common Plantain	Maiden Cane	Tansy Ragwort
Common Groundsel	Mallow	Torpedograss
Creeping Bentgrass	Mayweed	White Clover
Creeping Charlie	Mouseear Chickweed	Whitetop
Creeping Beggarweed	Nimblewill	Wild Morning Glory
Curly Dock	Oldenlandia	Wild Barley
Dandelion	Orchardgrass	Yellow Nutgrass
Diffuse Lovegrass	Oxalis	Zoysia
Dog Fennel	Pennsylvania Smartweed	

### STORAGE AND DISPOSAL

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

[All Trigger Sprayers]

**PESTICIDE STORAGE:** Rotate nozzle to closed position. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[Non-Sprayer (refill)]

**PESTICIDE STORAGE:** Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[Quick Connect Sprayer 0.5, 0.75, 1 or 1.1 GAL]

**PESTICIDE STORAGE:** Flip down spout to close. NO NEED TO DISCONNECT TRIGGER SPRAYER. Close nozzle on trigger sprayer. Snap sprayer back in place. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

(continued)

(continuation)

[Pull 'N Spray]

**PESTICIDE STORAGE:**

Completely dispense product in sprayer prior to storage. Rotate sprayer nozzle to the [closed] OFF position. Flip down (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside carrier on bottle with the nozzle facing down. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[Battery Operated (Power Sprayer)]

**PESTICIDE STORAGE:**

Flip down [color of spout] spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and place [sprayer back] in side carrier [clip] [holder]. Store this product in its original container, in a secure area away from sunlight. Protect container from freezing.

[Pump N Go (2)(II) (Pump N Spray (EZ) Sprayer]

**PESTICIDE STORAGE:**

Push the yellow button and retract the wand until the yellow button snaps back into the original storage position. Place wand back onto the top of the bottle in the integrated holster with nozzle tip extended through the eyelet opening. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten to store. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

**PESTICIDE DISPOSAL:** Call your local solid waste agency (or other appropriate toll free number) for disposal instructions. Never place unused product down any indoor or outdoor drain.

**CONTAINER DISPOSAL** [For refillable containers]:

Do not reuse or refill this container unless the directions for use allow a different concentrated or ready-to-use product to be diluted in or poured directly into the container. Reuse or refill this container according to the directions contained in the (see the) (HOW TO) REFILL (instructions) section (for details).

**CONTAINER DISPOSAL** [For non-refillable container]: Non-refillable container. Do not reuse or refill this container. **If Empty:** Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency (or other appropriate toll free number) for disposal instructions. Never place unused product down any indoor or outdoor drain.

## WARRANTY – CONDITIONS OF SALE

OUR DIRECTIONS FOR USE of this product are based upon tests believed reliable. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically directed, and other influencing factors in the use of this product are beyond the control of the Seller. To the extent consistent with applicable law, Buyer assumes all risks of use, storage and handling of this material not in strict accordance with the directions given herewith. To the extent consistent with applicable law, in no case shall the Manufacturer or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product when such use and/or handling is not in strict accordance with the directions given herewith. The foregoing is a condition of sale by the Seller and is accepted as such by the Buyer.

Imitator is a registered trademark of Drexel Chemical Company. All other brand names, product names, or trademarks belong to their respective holders.



**[Base Label]**

[Insert generic logo and brand name in English & Spanish]

(insert applicable instruction along side of base label)

Resealable Label for Directions & Precautions / Etiqueta re-cerrable para instrucciones y avisos de precaucion.

Open Booklet for Assembly and Use Instructions /Abra la etiqueta para las instrucciones para ensamblar y para usar

Guaranteed Satisfaction

CONSUMER GUARANTEE

If for any reason you are not satisfied after using this product, simply send us original proof of purchase and we will replace the product or refund the purchase price.

[Optional Text]

IMITATOR FAMILY OF PRODUCTS

Visit Drexel's website to learn more about the IMITATOR brand family of products for the best solution to your toughest weed problems.

[Insert graphic - IMITATOR product family photo]

Imitator® Lawn & Garden products have the best solutions to your toughest weed problems.

- Imitator Weed & Grass Killer products - kill & prevent (weeds) for up to 4 months
- Imitator RTU - no mixing, no mess
- Imitator 18% Weed & Grass Killer - kills tough, brushy, hard-to-control weeds
- Imitator 25% Concentrate Weed & Grass Killer - kill tough brush & vines (for residential and institutional use in wetland and noncrop areas)
- Imitator Plus Weed & Grass Killer - fast visible results (best Imitator brand concentrate value)  
(COMPLETE BROAD SPECTRUM POSTEMERGENCE HERBICIDE FOR VEGETATION MANAGEMENT, ORNAMENTAL WEED CONTROL, AND NON-PLANTED AREAS AROUND RESIDENTIAL, INDUSTRIAL, INSTITUTIONAL LOCATIONS, AND THEIR IMMEDIATE VICINITIES.) (Controls many Annual and Perennial Grasses and Broadleaf Weeds)

[insert phone & computer icon] Questions, Comments or Information

Preguntas, Comentarios o Informacion?

## APPENDIX 1 - Consolidated List of Label Claims

- [Insert brand name] can be used where weeds and grasses grow on patios, walkways, and driveways; along fences; in landscaping beds; or around flowers, shrubs and trees
- [Insert brand name] kills weeds and grasses in - Patios - Driveways - Sidewalks - Ornamental Gardens and other non-lawn areas
- Made in the USA
- Absorbed into both broadleaf and grassy weeds
- Absorbs on contact, starts working immediately
- Advanced formula
- After [graphic of dead weed]
- All-Season Formula (Delivers 12 hour results all year (even in cool and cloudy weather))
- Also use for large jobs such as lawn renovation and vegetable and flower garden preparation
- Approved for most (many) lawn and garden uses
- Approved for use in vegetable gardens
- Before [graphic of live weed]
- Begins absorbing on contact
- Begins working in hours
- Can reseed or sod lawns 3 days after treatment
- Completely kills even the toughest weeds and grasses.
- Consumer Guarantee: If for any reason you are not satisfied after using this product, simply send us original proof of purchase and we will replace the product or refund the purchase price.
- (Contains) FastAct™ (technology) (with foam)
- (Contains) (Now with) FastAct (II) Technology (Powered by Pelargonic)
- Contains glyphosate
- Contains Pelargonic (acid)
- Controls existing weeds, is not a pre-emergent
- (For weeds that are) Dead in a (less than) (one) day
- Dead Weeds Guaranteed (or Your Money Back)
- Deactivates in soil
- Do NOT add water
- Does not have soil activity
- Easy (-ier.)To Use (convenient, handy, useful, well-situated)
- Easy to store
- Easy-to-use applicator
- Economical
- Effective even in cool and cloudy conditions (as low as 50°F)
- Eliminate weeds - No handling required
- Eliminates pulling (the need to pull) weeds
- Enters the plant within one to two hours, won't wash off
- Even if it rains -won't lose its effectiveness
- Exclusive (Imitator) formula
- Experience the Imitator Advantage (peel back this panel for detail) (see details inside /underneath this booklet) (see details on back panel)
- Fast acting formula
- Fast and complete
- Fast and total
- Fast results
- Fast Uptake
- Fast-acting formula absorbs to root more quickly
- Fastest Imitator (formulation) (weed & grass killer) ever
- For Control of Tough Weeds that won't wash away

- For general weed control - kills weeds and grasses in 2 to 4 weeks - roots and all
- Use along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings, flowerbeds, and buildings, and in brick and gravel walkways.
- (Use) For Landscaping: Use to prepare areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flowerbeds or similar plantings.
- (Use) For Lawn Renovation
- (Use) For Spot Spraying: Use in and around flowerbeds, ornamental, fruit and nut trees, grapevines, shrubs, fences, driveways and walkways
- (Use) For Wildlife Areas: Use to prepare areas for planting wildlife food. Exotic or undesirable plants can be controlled to allow for planting or recovery of native plant species. Spot treatments can be made to selectively remove unwanted plants.
- Gets to the Root in hours
- Got Tough Weeds - Get [Insert brand name]
- Guaranteed (we guarantee it) [qualify guarantee]
- Great quality. Great Price. Guaranteed. Our guarantee is a promise that you'll be fully satisfied with the quality of every (Product Brand Name) product. If for any reason you aren't happy, we'll replace it or return your money – whichever you prefer. All you need to do is return the, empty packaging. It's that simple. Guaranteed. Guaranteed within 1 year of the date of purchase. Questions or comments? Call (Tel. No.)
- Guaranteed effective: Kills over 200 types of weeds and grasses, roots and all, with [Insert brand name] [qualify guarantee]
- Guaranteed results (with one application) [qualify guarantee]
- Guaranteed same effective results even if it rains in (10, 30, 60, 90 minutes; less than an hour, 1 hour, 2 hours) [qualify guarantee]
- Ideal for killing unwanted weeds and grasses throughout your yard. Use along fences; in cracks of walks, drives and patios; and around flower beds, trees and shrubs
- Ideal for spot treatment on driveways, sidewalks, and patios
- Ideal for tough to reach weeds found in flower(beds) and vegetable gardens
- Ideal for vegetable garden weed control
- Keeps driveways, walkways, landscaping beds, and flower gardens weed-free
- Kill Tough Weeds Quickly
- Kills (spray) weeds in flower beds and around fences, trees, shrubs, driveways, walkways and shrubs, in and around fences, patios, paths, sidewalk cracks, walkways.
- Kills (the toughest weeds and grasses) the root so weeds (they) don't come back
- [Insert brand name] Kills the weed you see and the root others leave behind
- Kills (to) the root(s) (Guaranteed) [qualify guarantee]
- Kills all types of tough weeds
- Kills almost all (annual and perennial) weeds, grasses and other unwanted plants
- Kills even tough weeds
- Kills existing weeds only, no residual activity in soil
- Kills Kudzu
- Kills more weeds in more places.
- Kills over 100 weeds
- Kills Poison Ivy
- Kills Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Kills Poison Ivy, Kudzu and Wild Berries
- Kills the root(s) (so weeds don't come back) (so weeds won't grow back) (first time, every time) (guaranteed) [qualify guarantee]
- Kills the toughest weeds (always)
- Kills the weed you see and the root you don't
- Kills to the Root(s) (in hours)
- **Kills the root (Down Arrow)**
- Kills Tough Weeds (& Grasses) (to the Root)

- Kills tough weeds in 1 to 2 weeks
- Kills Ugly, Annoying Weeds (Brush)
- Kills undesirable weeds and grasses
- Kills unwanted weeds (and grasses)
- Kills weeds (and grasses) (clear down to the root) (24 hours) (days) (2-4 weeks) (roots and all)
- Kills weeds (and unwanted grasses) - roots and all
- Kills weeds dead
- Kills weeds clear down to the root, 1st time, every time so weeds don't come back - guaranteed [qualify guarantee]
- Kills weeds in flowerbeds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard
- Kills weeds, roots and all
- Kills wild berries
- Lawns and gardens can be reseeded or planted soon after treatment
- Money back guarantee (See \_\_\_\_ panel for details.)
- Multipurpose grass and broadleaf weed control
- Next day (this weekend) results: Begins killing on contact, visible results in (3)(6) hours
- No Mix, No Mess
- No Mixing (necessary)
- No odor
- No Root, No Weed, No Problem
- No waiting, weeds wilt in hours (minutes)
- Now
- Once it enters the plant, it won't wash off
- One application kills over 200 types of weeds and grasses, roots and all (maximum effectiveness)
- This container treats more than 200 (types of) weeds
- Only Imitator's effectiveness won't be washed away by rain or watering (10, 30, 45, 60, 90 minutes) after treatment
- Ornamental gardens can be reseeded or planted 1 day after treatment
- Our fastest ('quickest) (toughest) (residential) formula (weed & grass killer) ever (yet) (today)
- Outdoor use only [optional graphic]
- Overnight speed
- Pelargonic (acid) makes the difference!
- Perfect for homes, buildings, cabins, campsites, lodges, tent areas, trailers, wooded lots, recreational areas, parks, sports facilities and wildlife areas.
- Pour refill [directly] into Pump 'N Go (2)(II) [Sprayer]
- Provides maximum control: Kills existing weeds to the root so they don't come back
- Pump 'N Go® (2)(II) (Sprayer) (REFILL)
- Quick and easy to use
- Quick kill formula
- Quick uptake, eliminates weather concerns
- Quick visible results
- Quick-action formula lets you see results 50% (2X) faster than other Imitator brand formulas
- Rainfast
- RainFast in minutes - enters the plant on contact
- Rainproof Protection (in 10 minutes) (less than 30,) after application.
- (Rainproof Protection:) Rainproof (in 10 minutes) (less than 30 minutes) (for control that won't wash away)
- Rainproof in 10 Minutes!
- **Rainproof in 10 minutes (Rainproof image)**
- Rapid results
- Ready-To-Use (grass & weed killer) (Tough Weed Killer)
- (Ready-To-Use) Refill

- Requires no mixing
- Results in (3,4,6,8,10, 12) hours (even when it's cool) (even in the Spring)
- Results that show
- Same day results
- Satisfaction guaranteed or we will gladly refund purchase price
- Satisfaction guaranteed or your money back with proof of purchase
- See results in [insert value between 1 and 24] hours (overnight) (days)
- Speedy results
- Spray today, dead (gone) tomorrow
- Starts to kill [in] the same day (hours) (overnight) (fast)
- Strong enough to kill even the toughest brush
- Suitable for use around flower beds, trees, shrubs, fences, walks and spot treatment in lawns
- Systemic grass and weed killer for spot treatment of undesirable vegetation
- The easy way to kill tough weeds (and brush)
- The fast weed killer (starts working immediately)
- The fastest Imitator brand (Weed & Grass Killer)
- Tough formula (kills to the roots)
- Trusted Results for Guaranteed Satisfaction (Open booklet for details) [qualify guarantee].
- Use around flower beds, trees and shrubs
- Use around fruits and vegetables
- Use as a first step for renovating or replanting your lawn
- Use as a first step for turning brushy fields into grassy areas or parks
- Use for large jobs like garden plot preparation and lawn replacement (renovation)
- Use in and around vegetable gardens
- Use to prepare sites: for large plantings, for planting flowerbeds, fruit trees, ornamentals, vegetables and gardens, and for renovating lawns
- Use to trim and edge landscape areas.
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction.
- (Provides) Visible (see) results in (3)(6) hours
- Visible Results in (3)(6) Hours!
- **Visible results in (3)(6) hours (Clock Image)**
- . WATER BASED [icon]
- Weeds start dying immediately (in hours) (in 1 day) (in less than a day)
- Where it Works
- What to Know
- Will not build up in soil to hurt desirable plants growing nearby
- Won't wash away (off)
- Works first time, every time (guaranteed)
- Works in [insert value between 1 and 24] hours
- Works on [insert weed list]
- Works on contact (so there's no more waiting for weeds to die)
- Works only when absorbed by the foliage of weeds
- Works overnight
- Works to the root(s) in hours

[Promotional options]

- Save up to \$[x] on (your) next purchase
- . [X]% Free (More)
- Great Value
- Bonus Size
- Free weed guide inside
- Free [ ] with this purchase of Imitator RTU (container size)

- FREE REFILL
- FREE SAMPLE
- SAMPLE NOT FOR SALE
- VALUE SIZE
- Pump N Go (2)(II) Refill
- Refill Size
- Can be used to REFILL Pump 'N Go® (2)(II) Sprayer
- FREE (insert brand name) (insert amount) VALUE
- [X]% More Value size

## APPENDIX 2 - Packaging Related Claims

Treats (covers) up to 'X' sq ft (approximate size of 'Y' tennis court)

[X = net contents (fl oz) +128 x 300 sq ft]

[Y = X + 2808]

### Quick-Connect Sprayer (QCS):

- New
- Now
- Quick connect sprayer
- Quick &(and) easy to use
- No leaks or mess
- Easy to store (see back for instructions)

### Foaming Sprayer (Quick-connect or trigger type):

- Foam targets exactly (precisely) what (the weeds) you want to spray (kill)
- Targets exactly (precisely) what (the weeds) you want to spray (kill)
- Accurately targets what (the weeds) you want to spray (kill)
- Accurately targets precisely (exactly) what (the weeds) you want to spray (kill)
- Visible foam shows (targets) (let's you see) exactly (precisely) where (what) (the weeds) you've sprayed
- Visible foam
- Foam
- Foam targets exactly (precisely) what (the weeds) you want to spray (kill)
- Target only what you want to kill
- See (shows) where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied)
- See (shows) exactly (precisely) where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied) (treated)
- See (shows) (marks) area covered (treated) (sprayed).
- (Foam) Marks (shows) treated (sprayed) weeds
- (Foam) Marks (shows) treated (sprayed) weeds for up to 5 minutes
- (Foam) Marks (shows) the weeds you've sprayed (treated)
- (Foam) Marks (shows) the weeds you've sprayed (treated) for up to 5 minutes
- Visible foam marks weeds
- Visible foam marks (shows) weeds you've sprayed (treated)
- Visible foam marks (shows) weeds for up to 5 minutes
- Visible foam marks (shows) weeds you've sprayed (treated) for up to 5 minutes
- Easily (Easy to) see where (the weeds) (what) you've sprayed (treated) (applied)
- Easily (Easy to) see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy (easier) to see where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy (easier) to see exactly (precisely) where (the weeds) (what) you've

- sprayed (treated) (applied)
- Foam makes it easy (easier) to see where (the weeds) (what) you've sprayed (treated) (applied)
- Foam makes it easy (easier) to see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Treated (sprayed) weeds stay visible (marked) for up to 5 minutes
- Treated (sprayed) weeds can easily be seen for up to 5 minutes
- Choose foam or clear stream (no foam)
- See where you spray technology
- Hit (spray) (target) precisely (exactly) what you want
- Foam marks the spot
- Foaming action
- New!
- Now!
- Accurate
- For Visible Results
- See what you've hit
- The more accurate way to spray
- The accurate way to spray
- Hit what you aim at
- Ideal for use in (flower and vegetable) gardens

#### **Pull 'N Spray:**

- 33% more
- Quick & Easy to Use
- EASY-TO-USE
- The easy way to spray (Insert Brand Name)
- The easier way to spray (Insert Brand Name)
- No (More) Hand Fatigue
- No more squeeze, squeeze, squeeze
- No constant pumping
- No constant trigger squeezing (pulling)
- No more pumping
- No pumping just pull (and spray)
- No pumping. Just Pull N' Spray (brand)
- (33%) More than 1 gallon size
- Precise control for maximum accuracy
- Refillable
- Consistent spray for maximum accuracy
- Continuous, adjustable spray
- Quickly covers large areas
- No more tired (aching) hands
- Fast and easy application (way to spray)
- Easy to use tank sprayer
- Change the way you spray
- Ideal for large or small jobs (areas)
- Great for large or small jobs (areas)
- Precise control - sprays (targets) only what you want
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- The easier way to kill weeds
- Save (Saves) time and energy
- One (1) pull = (equals) (insert #) trigger sprays
- One (1) pull delivers (insert #) trigger sprays

- Give your hands a break
- Continuous spray
- Targeted spray
- Accurate
- Targets weeds
- Convenient

### **Pump 'N Go (2)(II) (EZ) Sprayer**

- Accurate
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- Change the way you spray
- Consistent spray for maximum accuracy
- (Up to 5, 10 minutes of) Continuous spray
- Continuous, adjustable spray
- Convenient (extendable wand)
- Cover more ground faster
- Easy to use tank sprayer
- EASY-TO-USE
- Extendable wand provides greater accuracy without bending over
- Fast and easy application (way to spray)
- Give your hands a break
- Great for large or small jobs (areas)
- Ideal for large or small jobs (areas)
- Improved Applicator (Application) Device!
- Improved Applicator (Application) System!
- Improved Applicator (Application)!
- Improved! For Lasting Spray
- It's always ready to spray
- Long(er) spray time with less pumping
- New and Improved!
- New!
- No (constant) pumping
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No Mix, No Mess
- No more pumping, no more pulling, just spray
- No more squeeze, squeeze, squeeze
- No more tired (aching) hands
- Now!
- Precise control - sprays (targets) only what you want
- Precise control for maximum accuracy
- Pump 'N Go [Sprayer]
- [Insert Device Name] (Provides) Up to [ ] minutes of continuous spray
- Quick & Easy to Use
- Quickly covers large areas
- Refill(able) Container
- Save (Saves) time and energy
- Targeted spray
- Targets weeds
- Targets weeds in tight places
- The easier way to kill weeds
- The easy way to spray



- The fast and easy way to kill weeds
- You're always ready to spray

### **Battery Operated Trigger Sprayer (Power Sprayer):**

- Accurate
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- Batteries included
- Battery Operated
- Change the way you spray
- Consistent spray for maximum accuracy
- Control Wand (with extended reach)
- Control Wand (with continuous spray)
- (New) Continuous spray wand (with extended reach)
- Continuous, adjustable spray
- Convenient
- Easy to use tank sprayer
- Easy reach extendable spray wand
- EASY-TO-USE
- (New) Extended Reach Wand
- Extendable spray wand - less bending
- Extendable (insert device name) spray wand
- Fast and easy application (way to spray)
- Give your hands a break
- Great for large or small jobs (areas)
- Ideal for large or small jobs (areas)
- Improved Applicator (Application) Device!
- Improved Applicator (Application) System!
- Improved Applicator (Application)!
- Improved!
- It's always ready to spray
- New and Improved!
- New!
- New Applicator
- No (constant) pumping
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No more pumping, no more pulling, just spray
- No more squeeze, squeeze, squeeze
- No more tired (aching) hands
- Now!
- Power Sprayer (for large areas)
- Precise control - sprays (targets) only what you want
- Precise control for maximum accuracy
- Quick & Easy to Use
- Quickly covers large areas
- Save (Saves) time and energy
- Targeted spray
- Targets weeds
- Targets weeds in tight places
- The easier way to kill weeds
- The easier way to spray
- The easy way to spray
- The fast (-er) way to spray
- X% more (than 1 gallon)
- You're always ready to spray

## APPENDIX 3 - Packaging Related Instructions

### QUICK CONNECT SPRAYER DEVICE [illustrations]

1. Remove sprayer. Pull cord/tubing ALL THE WAY OUT.
2. Insert (color of plug) plug into spout on cap until it clicks.
3. Flip up spout. (Open) Adjust nozzle (at end of sprayer) to the desired spray setting (foam or spray).

### PULL ' N SPRAY DEVICE [illustrations]

[Applicator Device 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 spout.

#### Illustration #2

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

#### Illustration #3

- Adjust nozzle (at the end of sprayer) to the desired spray setting (foam or spray).
- Press and hold (trigger) button on sprayer to begin spraying (and hold down for continuous spray).
- Pull ring at sprayer bottom again as needed to continue spraying.

[Optional Instructions on PNS handle] PULL OUT SLOWLY (AND HOLD FOR (X) SECOND(S)).

### PUMP N' GO (2)(II) (EZ) SPRAYER [illustrations]

FOR PAD PRINTING (SILK SCREEN) TRACKING ONLY- no ppn

(Wand) STORAGE POSITION Push button and pull nozzle end. Extend to spray position. > SPRAY POSITION.

(Handle) (arrow graphic) RELEASE PRESSURE AFTER USE Push handle to cap & turn. RE-TIGHTEN.

#### 1. CUT [Illustration#1]

Carefully cut the two white zip ties securing the hose and pump handle with scissors. Use caution not to cut the white hose.

#### 2. CONNECT [Illustration # 2]

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

#### 3. EXTEND WAND [Illustration #3]

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

#### 4. PUMP [Illustration # 4]

Make sure handle is screwed on tightly or the bottle will not pressurize. Pump container [insert number of pumps to prime 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.

5. SPRAY [Illustration # 5)

Aim wand. Spray by pushing down white trigger with thumb. Adjust spray pattern by rotating white nozzle tip up to one-half rotation. Spray weeds (and grasses) until thoroughly wet

6. STORE [Illustration # 6]

When finished spraying, Push the yellow button and retract the wand until the yellow button snaps back into the original storage position. Place wand back onto the top of the bottle in the integrated holster with nozzle tip extended through the eyelet opening.

7. DEPRESSURIZE [Illustration # 7]

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

**BATTERY OPERATED SPRAYER DEVICE [illustrations]**

[Wand safety sticker & proposed location]

PICTURE HERE

1. Remove

- Open security lock from wand holder by pulling tab from locking knobs
- Remove wand [applicator name] from side (carrier) (holder) (clip).  
[Illustration #1] Unsnap holder Twist left Pull  
Pull connector by slightly twisting from holder and unwrap hose completely.
- Remove protective strip from battery compartment to activate batteries.  
[Illustration #2]

2. Connect

- Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks. Flip up spout. Spout must remain up while spraying.  
[Illustration #3]

3. Extend

- Flip open wand [applicator name] until it clicks and locks into position.  
[Illustration #4]

4. Spray

- Twist nozzle at end of nozzle [applicator name] to desired spray pattern. Ensure trigger lock is disengaged (open) (by sliding the switch back) 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 wand [applicator name] to desired spray pattern. Point [applicator name] nozzle away from body and hold [color of trigger] trigger for continuous spray. Release trigger to stop spray.

After Use: Twist nozzle to OFF position. Completely empty sprayer before storing. Engage trigger lock by sliding the switch forward. Flip the wand to [applicator name] closed and store on the side (holder) (clip) (carrier) with the wand up by slightly twisting back into position.

Push

Twist

Lock

**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 wand (insert device name) with a small screwdriver [illustration].

Remove used batteries and replace with four new AA alkaline batteries in correct position as marked inside battery compartment or per illustration.

Negative

Positive

Securely close battery compartment door and screw closed firmly. Always use a complete set of the same type when replacing batteries. Best performance is achieved with alkaline batteries. Never mix alkaline, carbon-zinc or rechargeable batteries. Dispose of used batteries according to manufacturer's instructions or in household trash.

#### **IMPORTANT SPRAYER INFORMATION [Optional Section for Battery Operated Device Only]**

- Read and follow all directions before use.
- [Insert sprayer brand name] is to be used only (was developed for use) with [Insert brand name of refill pack or bottle] bottles. [Insert sprayer brand name] may not be compatible with other products
- Do not drop or throw sprayer.
- Do not submerge (immerse) sprayer in water. Never place sprayer in dishwasher.
- Do not use soap or other cleaning agents to clean sprayer. If necessary, clean outer sprayer surface only with damp towel.
- Insert batteries in their correct (+/-) position. Remove batteries for winter storage or when storing product for long periods of time.
- Always use a complete set of new alkaline batteries. Never mix alkaline, carbon-zinc, or rechargeable batteries.
- Always follow the manufacturer's recommendations for battery disposal and use.
- Purge [Insert sprayer brand name] of liquid for winter storage or place [Insert sprayer brand name] in a heated storage area for winter storage.

#### **TROUBLESHOOTING SECTION FOR BATTERY-OPERATED SPRAYER [OPTIONAL SECTION]**

Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand]  
Battery Powered Comfort Wand [Applicator Name] Directions]

##### **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: [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 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 alkaline batteries.

Possible Cause: [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].