



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 13, 2022

Mandy K. Styles  
Registration Manager  
Drexel Chemical Company  
P.O. Box 13327  
Memphis, TN 38113-0327

Subject: Notification per PRN 98-10 – Change the Primary Brand Name  
Product Name: Imitator Weed Killer  
EPA Registration Number: 19713-714  
Application Date: November 2, 2021  
Decision Number: 583235

Dear Mandy Styles:

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 primary brand name for this product has been changed from “Drexel MH + AFA RTU” to “**Imitator Weed Killer**” and updated in our records. 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 (FIFRA) 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) lists 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, you may contact Derek Corbin at 202-566-2571 or by email at [Corbin.Derek@epa.gov](mailto:Corbin.Derek@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish".

Mindy Ondish  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

**NOTIFICATION**

19713-714

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:

05/13/2022



# *IMITATOR WEED KILLER*

**ACTIVE INGREDIENTS:**

Ammoniated soap of fatty acids.....	3.68%
Maleic hydrazide .....	0.50%

**OTHER INGREDIENTS:** ..... 95.82%

**TOTAL:**..... 100.00%

This product contains 0.3 pound of Ammoniated soap of fatty acids and 0.04 pound of Maleic hydrazide per gallon.

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

**(See Side Panel for "FIRST AID")**

**(See Back Panel for "FIRST AID")**

**(See Page \_\_\_ for "FIRST AID")**

**(See Attached Booklet (Labeling) for Complete Directions for Use)**

(Please read the) (See) (inner label) (inner peel-back label) (booklet) for (first aid) (precautionary statements) (storage and disposal) (directions for use)

**SHAKE WELL BEFORE USING**

**EPA Reg. No. 19713-714**

**EPA Est. No. 19713-XX-XXX**

**Net Content:** \_\_\_\_\_

### **FIRST AID**

**IF IN EYES:**

- Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also call CHEMTREC at 800-424-9300 for emergency medical treatment information.

Manufactured By:



**Drexel Chemical Company**

P.O. BOX 13327, MEMPHIS, TN 38113-0327

**SINCE 1972**

714SP-1120\*

**PRECAUTIONARY STATEMENTS**  
**Hazards to Humans and Domestic Animals**

**CAUTION:** Causes moderate eye irritation. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**ENVIRONMENTAL HAZARDS**

This product may be hazardous to aquatic invertebrates. 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.

**Surface Water Advisory:** Under some conditions, maleic hydrazide may have a significant potential for runoff into surface water (primarily via dissolution in runoff water) for several days post-application. Conditions favoring runoff include poorly draining soils or wet soils with readily visible slopes, frequently flooded areas, areas where an intense or sustained rainfall is forecast to occur within 48 hours, areas overlying extremely shallow ground water and areas overlying tile drainage systems that flow to surface water.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Keep children and pets out of the treated area until sprays have dried.

**APPLICATION DIRECTIONS**

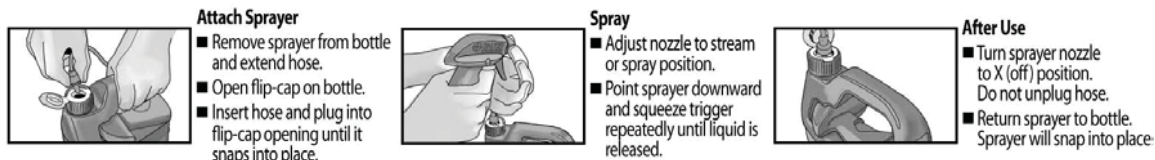
Shake well before using.

Spray weeds until foliage is wet. Thorough coverage is important. For spot treatment of individual weeds, apply the solution to the center of the plant. Apply to newly emerged weeds growing from seed and regrowth from biennial and perennial weeds. Avoid spraying desirable plants. Contents of this container will cover [XXXX\*] square feet.

(Inadvertent overspray of this product does not stain concrete, pavement, stucco or wood.)

[\*1 gallon container will cover 450 square feet]

## METHOD OF APPLICATION [OPTION 1]



## [OPTION 2]

### How To Use Your Sprayer:

#### 1. Remove spray wand from pocket.

- Remove wrap from coiled hose
- Remove protective battery strip from sprayer handle



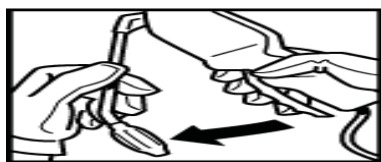
#### 2. Remove Sticker & Cap Cover

Remove sticker and cap cover before inserting hose plug.



#### 3. Connect Hose to Cap

Insert plug at end of coiled hose into hole on Cap and push firmly until secure.



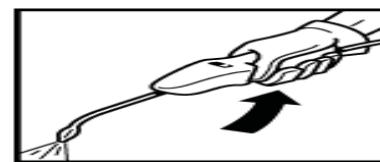
#### 4. Open Spray Wand

- Unfold spray wand until it snaps into place.
- Point spray nozzle away from body.
- Adjust spray nozzle to desired setting.



#### 5. Turn Power On

Slide (OFF-ON) (OFF) (Locked)-(ON) (Locked) switch to ON (Unlocked) position. (Slide the Locked/Unlocked Switch to Unlock position.)



#### 6. Squeeze

- Squeeze trigger to dispense product. Sprayer may require several seconds to prime before product is released.
- Release trigger to stop spraying.

### Storage

- Slide (OFF-ON) (ON) (Locked)-(On) (Unlocked) switch to OFF (Locked) position.
- Do not unplug hose. Leave connected to cap.
- Turn spray nozzle to the off position.
- Fold spray wand against sprayer handle.
- Return spray wand to pocket for storage.

### **To Replace Batteries**

- Open battery compartment [with a small screwdriver].
- Remove used batteries and replace with new batteries in correct position as indicated inside battery compartment.
- Securely close battery compartment door [and screw closed].

### **Proper use of Batteries**

- Never mix old batteries with new.
- Do not mix Alkaline with Standard (carbon zinc) or Rechargeable (nickel cadmium) batteries.
- When storing sprayer for long periods, remove batteries to prevent leakage.
- Dispose of used batteries according to manufacturer's instructions or in household trash.

### **[OPTION 3]**

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)).

### **[OPTION 4]**

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

(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.

## [OPTION 5]

### **BATTERY OPERATED SPRAYER DEVICE**

[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].

### **[OPTION 6] TRIGGER SPRAYER**

Adjust nozzle to the desired spray setting [(foam) (spray) (on)].  
Position sprayer tip to approximately 1 to 2 feet from the weed. Spray weeds (until foliage is wet).

### **USE SITES**

Use on [weeds], [grass], [moss], [algae], [brush], [vines] [and] in areas where tough weeds are invading your yard/property including around and on buildings and other structures, sidewalks, fences, driveways, patios, foundations, gravel, flower gardens, landscaped areas, trees, shrubs, wooded and vacant areas, fields, trails, garden plot preparation and other areas of your yard/property.

### **PESTS**

Controls or suppresses listed weeds, grasses, moss and algae including Annual bluegrass, Barnyardgrass, Black medick, Broadleaf filaree, Broom\*, Burclover, Cat's-ear, Common chickweed, Common groundsel, Common lamb's-quarters, Corn spurry, Creeping buttercup, Curled dock, Dandelion, English daisy, False dandelion, Fiddleneck, Fleabane\*, Foxtail fescue, Geranium species, Horsetail\*, Kudzu\*, Large crabgrass, Lady's-thumb, Locoweed, Low cudweed, Lupine, Mouse-eared chickweed, Mustard species, Oxalis, Plantain species, Poison ivy\*, Poison oak\*, Poison sumac\*, Red clover, Redroot pigweed, Round leaved mallow, Rush, Sheep sorrel, Shepherd's-purse, Spiny annual sowthistle, Stinkweed, Wild blackberry\*, Wild carrot, Wild hyacinth and White clover.



\*Not registered for use in California

**Precautions:** Contact with Poison oak, Poison ivy or Poison sumac anytime of the year can cause an allergic reaction. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.

Use with care as contact of this product with lawn grass can cause injury to the lawn.

**Use Restrictions:**

- Do not make more than 1 application of this product ([Insert Product Name]) per year.
- Do not apply more than 6.1 lbs. a.i. of maleic hydrazide in a year from any source.

**[ALTERNATIVE TEXT]**

<b>Where to Use</b>	Use on (weeds), (grass), (moss), (algae), (brush), (vines) [and] in areas where tough weeds are invading your yard/property including around and on buildings and other structures, around sidewalks, fences, driveways, patios, foundations, gravel, flower gardens, landscaped areas, trees, shrubs, wooded and vacant areas, fields, trails, garden plot preparation, and other areas of your yard/property.
<b>Kills</b>	Controls or suppresses listed weeds, grasses, moss and algae, including Annual bluegrass, Barnyardgrass, Black medick, Broadleaf filaree, Broom*, Burclover, Cat's-ear, Common chickweed, Common groundsel, Common lamb's-quarters, Corn spurry, Creeping buttercup, Curled dock, Dandelion, English daisy, False dandelion, Fiddleneck, Fleabane*, Foxtail, Fescue, Geranium species, Horsetail*, Kudzu*, Large crabgrass, Lady's-thumb, Locoweed, Low cudweed, Lupine, Mouse-eared chickweed, Mustard species, Oxalis, Plantain species, Poison ivy*, Poison oak*, Poison sumac*, Red clover, Redroot pigweed, Round leaved mallow, Rush, Sheep sorrel, Shepherd's-purse, Spiny annual sowthistle, Stinkweed, Wild blackberry*, Wild carrot, Wild hyacinth and White clover.  *Not registered for use in California  Contact with Poison oak, Poison ivy or Poison sumac anytime of the year can cause an allergic reaction. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.
<b>How Much to Use</b>	Spray weeds until foliage is wet. Thorough coverage is important. For spot treatment of individual weeds, apply the solution to the center of the plant.

### **STORAGE AND DISPOSAL**

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material tightly closed in original container only away from open flame. Do not store at temperatures below 39°F.

**PESTICIDE DISPOSAL:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. **If empty**, place in trash or offer for recycling if available. **If partially filled**, call your local solid waste agency 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.

#### **[ALTERNATIVE TEXT**

Buyer assumes all responsibility for safety and use not in accordance with directions.

(Company Name) guarantees this product to the extent of the purchase price, only when used according to directions on the label. Buyer assumes all responsibility for safety and use not in accordance with this label.]

## Optional Marketing Statements:

{Note: Text in ( ) are alternate or optional text that could be used in the statement.

Bracketed text [ ] is for internal use or serves as a placeholder.}

- (Three)(3) hour results
- (Three)(3) hour technology
- (This Product) ([Insert Product Name]) Can be used at any time during the year.
- (This Product) ([Insert Product Name]) Can be used in cultivated areas prior to planting grass, flowers and vegetables.
- (This Product) ([Insert Product Name]) Can be used on listed (weeds), (grasses), (algae), (vines), (brush), or (moss) growing on or around (buildings), (sidewalks), (fences), (trees), (bark mulch), (driveways), (patios) and (gravel).
- (This Product) ([Insert Product Name]) Controls listed (weeds), (grasses), (algae), (vines), (brush), (moss)
- (This Product) ([Insert Product Name]) Controls or suppresses many (weeds), (grasses), (algae), (vines), (brush) and (moss) as listed on the label.
- (This Product) ([Insert Product Name]) is a fast-acting (weed), (grass), (algae), (vines), (brush) and (moss) killer.
- (This Product) ([Insert Product Name]) is a non-selective herbicide that controls many common annual weeds as listed.
- (This Product) ([Insert Product Name]) Suppresses many (weeds), (grasses), (algae), (moss) as listed.
- (This Product) ([Insert Product Name]) Suppresses the growth of many biennial and perennial weeds as listed.
- (This Product) ([Insert Product Name]) Will not stain (concrete), (pavement), (stucco) or (wood) as listed.
- (This Product) ([Insert Product Name]) Does not stain (concrete), (pavement), (stucco) or (wood).
- Acts fast
- Acts quickly
- Acts rapidly
- Ammoniated salts of fatty acids burn down weeds and Maleic hydrazide prevents regrowth - A broad spectrum herbicide for vegetation burndown and re-growth prevention
- Areas can be re-sown five days after treatment.
- Begins to work in hours.
- Best results are obtained with young, actively growing weeds, less than five inches in size.
- Blackberry\*, brush and vine killer
- Brush and vine killer
- Clock image
- Controls (weeds), (grasses), (algae), (vines), (brush) and (moss)
- Controls many weeds and grasses as listed on this label for up to 6 weeks.
- Controls many weeds and grasses as listed on this label.
- Does not (Doesn't) stain (bricks), (concrete) or (asphalt)
- Down arrow image
- Easy to Use!
- Eliminates unwanted vegetation quickly
- Eliminating unsightly brush, vines, brambles, and weeds for your home's landscape has never been easier!
- Fast acting
- Fast-acting (weed), (grass), (algae), (vines), (brush) and (moss) killer.
- Get down to the root
- [Graphic of dead listed weed(s)]
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) fast (and effectively)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) quickly (and effectively)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) rapidly (and effectively)
- Kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss) within (minutes) (hours)

- Kills in hours
- Kills nuisance Blackberry plants\*
- Kills Poison ivy\* and Poison oak\* in non-garden areas - around homes, cabins, buildings, fences, and trails
- Kills rapidly
- Kills Roots!
- Kills the toughest (weeds), (grasses) and (brush) including (Poison Ivy\*), (Poison Oak\*), (Broom\*), (Kudzu\*), (Wild Blackberry\*) and other listed plants.
- Kills tough listed (brush)(Blackberry\*)(Poison ivy\*)(Broom\*) and (weeds)- Roots & All
- Kills tough listed weeds – roots and all
- Kills tough listed brushy, hard-to-control weeds
- Kills listed Weeds- Roots & All
- Kills within hours
- Long lasting
- Long term control
- Maleic hydrazide prevents re-growth (from the roots up)!
- Non-selective
- Non-staining (formula)
- Plant damage will be visible from a few hours to 2 days after spraying.
- Prevents plant regrowth
- Prevents plant regrowth for up to 6 weeks.
- Quickly kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss)
- Rainfast in 3 hours
- Rapid action (herbicide)
- Rapidly kills listed (weeds), (grasses), (algae), (vines), (brush) and (moss)
- Ready-to-Use!
- See rapid results
- See results fast
- See results in (three) (3) hours
- See results in hours
- See results quickly
- Significant control visible in 4 (four) hours
- Simple to use!
- Penetrating formula kills even the toughest plants
- Starts to work in hours.
- This convenient ready-to-use formula controls (Poison Ivy\*), (Poison Oak\*), (Blackberries\*), (vines), (brambles), and (Kudzu\*)
- This product kills the tough brushy & vine weeds, roots and all.
- To kill Kudzu\*: For best results, apply in mid to late summer when vines are mature and actively growing.
- To kill vine weeds: If vines are growing up poles, fences or tree trunks with mature bark, cut vines at base and treat as directed. If spraying re-growth, shield shrubs and tree trunks from spray drift with a sheet of cardboard or plastic.
- To kill Wild Blackberry\*: Spray anytime plants are actively growing. Dead canes should be cut down and removed. Re-application is often required to kill deep roots.
- Tough on weeds.
- Use anytime during the year!
- Visible results (with)in (three) (3) hours
- Visible results (with)in 3 hour(s)
- Visible results in 24 hours.
- Watch it work!
- Won't stain (bricks), (concrete) or (asphalt)
- Works fast!
- Works quickly!
- Works rapidly!
- Works systemically, killing weeds to the root
- ([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
- 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 many uses around the lawn and garden
- Before [graphic of live weed]
- Begins absorbing on contact
- Begins working in hours
- Can reseed or sod lawns 3 days after treatment
- 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
- Controls existing weeds, is not a pre-emergent
- Dead weeds in a (less than) (one) day
- Dead Weeds Guaranteed (or Your Money Back)
- Do NOT add water
- Easy-To-Use (convenient, handy, useful)
- 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
- Fast acting formula
- Fast and complete
- Fast and total
- Fast results
- Fast Uptake
- For Control of Tough Listed Weeds. Won't wash away
- For general weed control - kills listed 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, shrubs, fences, driveways and walkways
- Gets to the Root in hours
- Got Tough Weeds - Get [Insert brand name]
- Guaranteed (we guarantee it)
- 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 (more) than 45 weeds and grasses, roots and all, with [Insert brand name] [qualify guarantee]
- Guaranteed results [qualify guarantee]
- Guaranteed same effective results even if it rains in (180 minutes) (3 hours) [qualify guarantee]
- Ideal for killing unwanted weeds and grasses throughout your yard/property.
- 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)
- Keeps driveways, walkways, landscaping beds, and flower gardens weed-free
- Kill Tough Listed Weeds Quickly
- Kills (spray) listed weeds in flower beds and around fences, trees, shrubs, driveways, walkways and shrubs, in and around fences, patios, paths, sidewalk cracks, walkways.
- Kills the root so weeds (they) don't (won't) come back ([zap arrow illustration])
- [Insert brand name] Kills the weed you see and the root others leave behind
- Kills (to) the root(s) (Guaranteed) [qualify guarantee]
- Kills even tough weeds
  - Kills Kudzu
- Kills more listed weeds in more places.
- Kills over 45 listed 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 listed weeds
- 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 listed Weeds (& Grasses) (to the Root)
- Kills tough listed weeds in 1 to 2 weeks
- Kills Ugly, Annoying Listed Weeds (Brush)
- Kills undesirable listed weeds and grasses
- Kills unwanted listed weeds (and grasses)
- Kills listed weeds (and grasses) (clear down to the root) (24 hours) (days) (2-4 weeks) (roots and all)
- Kills listed weeds (and unwanted grasses) - roots and all
- Kills weeds clear down to the roots every time so weeds don't come back - guaranteed [qualify guarantee]
- Kills listed weeds in flowerbeds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard/property
- Kills listed 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) hours
- No Mix, No Mess
- No Mixing (necessary)
- No Root, No Weed, No Problem
- No waiting, weeds wilt in hours
- Now [This claim is valid for 6 months of product launch]
- Once it enters the plant, it won't wash off
- One application kills over 45 listed weeds and grasses, roots and all (maximum effectiveness)
- This container treats more than 45 listed weeds

- Our fastest ('quickest) (toughest) (residential) formula (weed & grass killer) ever (yet) (today)
- Outdoor use only [optional graphic]
- Overnight speed
- Perfect for homes and yards/property including around and on buildings and other structures, around sidewalks, fences, driveways, patios, foundations, gravel, flower gardens, landscaped areas, trees, shrubs and garden plot preparation.
- 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 uptake, eliminates weather concerns
- Quick visible results
- Rainfast
- RainFast in 180 minutes - enters the plant on contact
- Rainproof in 180 minutes (Rainproof image)
- Rapid results
- Ready-To-Use (grass & weed killer) (Tough Weed Killer)
- (Ready-To-Use) Refill
- Requires no mixing
- Results in (3 to 6) 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 3 to 6 hours
- 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)
- 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 as a first step for renovating or replanting your lawn
- Use for large jobs like garden plot preparation and lawn replacement (renovation)
- 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) hours (Clock image)
- 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 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 (Brand name) (container size)
- FREE REFILL
- FREE SAMPLE
- SAMPLE NOT FOR SALE
- VALUE SIZE
- Pump N Go (2)(ll) Refill
- Refill Size
- Can be used to REFILL Pump 'N Go® (2)(ll) 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 [This claim is valid for 6 months of product launch]
- Now [This claim is valid for 6 months of product launch]
- 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 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! [This claim is valid for 6 months of product launch]
- Now! [This claim is valid for 6 months of product launch]
- 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 Applicator! For Lasting Spray
- It's always ready to spray
- Long(er) spray time with less pumping
- New and Improved! [This claim is valid for 6 months of product launch]
- New! [This claim is valid for 6 months of product launch]
- 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! [This claim is valid for 6 months of product launch]
- 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)!
- It's always ready to spray
- New! [This claim is valid for 6 months of product launch]
- 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! [This claim is valid for 6 months of product launch]
- 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