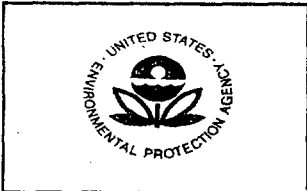
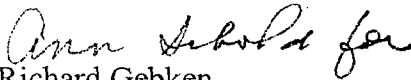


| | | | |
|---|--|---|---|
|  | U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505P) Ariel Rios Building 1200 Pennsylvania Ave., NW Washington, D.C. 20460 | EPA Reg. Number: 64240-60 | Date of Issuance: JAN 16 2009 |
| | | Term of Issuance: unconditional | |
| NOTICE OF PESTICIDE: <input checked="" type="checkbox"/> Registration <input type="checkbox"/> Reregistration (under FIFRA, as amended) | | Name of Pesticide Product: Combat QK Large Roach Bait F34 | |
| Name and Address of Registrant (include ZIP Code): Combat Insect Control Systems c/o Henkel Consumer Goods Inc. Georgia Anastasiou, Lewis and Harrison LLC, Agent 122 C Street, NW Suite 740 Washington, DC 20001 | | | |
| <small>Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.</small> | | | |
| <p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p>This product is unconditionally registered in accordance with FIFRA Sec. 3(c)(5) provided you make the label changes specified below and you comply with the terms of the attached child resistant packaging review and the crp certification dated 12/9/08. Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).</p> <p>Make the following label changes: Change the EPA Reg. No. to 64240-60.</p> <p>On both the outer package and the bait station, revise the statement " Do not allow children or pets to play with the bait stations" to read as follows: Keep out of reach of children and pets.</p> | | | |
| Signature of Approving Official: | | Date: | |
|  Richard Gebken Product Manager 10 Insecticide Branch Registration Division (7505P) | | JAN 16 2009 | |

page 2
EPA Reg. No. 64240-60

This application for registration was submitted as an R300 under PRIA. The number of child resistant bait stations is required to be 8, in accordance with the cited product and its directions for use. 8 is not optional.

Correct the net weights of the stations to match the net weights of the cited product as follows:

0.48 oz –or– 0.8 oz.

On page 2, delete the following implied safety claims:

Quality & Responsibility

Worldwide for more than 130 years, our brands have combined quality with respect for people and the environment. This is what Henkel stands for – today and tomorrow.

Delete the brackets in the Precautionary statements and the Storage and Disposal statements.

On pages 3, move the General Information so that it does not appear to be part of the Directions for Use.

On page 3, it is unclear what the guarantee statements mean, if they are bracketed. Delete the brackets from the guarantee statements or delete all guarantee claims from the label.

On page 4, move the directions on where to place stations to the application instructions.

On page 4, to prevent misuse, revise the statement about placement of bait stations “wherever you see roaches” or “wherever roaches have been found” to read as follows: Place bait stations where roaches are seen in the following areas listed on this label.

On page 4, delete the brackets from 8.

Revise the following statement in accordance with PR Notice 2000-5 to make it clearly mandatory or advisory.

For effective control, bait stations should be placed where roaches can enter your home.

On page 5, revise the directions for use so that they match the cited product as follows: Delete items 1 & 2.

Move item 3 to the end of the second paragraph and delete the brackets.

Remove all brackets from the second and third paragraphs.

Add the following statement to the directions: Do not remove or puncture the label on the bait station.

Add the following: Do not use sprays or foggers around bait stations. They can contaminate bait stations and reduce effectiveness.

page 3
EPA Reg. No. 64240-60

Delete "for best results" and "tip" as these terms make compliance with the directions for use optional.

Revise all marketing claims about 3 month control so that they do not detract from the following efficacy statement:

Replace all baits every 3 months or sooner if roaches return because roaches have probably eaten all of the bait inside.

The cited product provided additional graphics showing how to place place stations and a calendar graphic to remind users when to replace bait stations.

In addition to the comments on marketing claims listed above, also revise the marketing claims as provided in Attachment A.

Submit two copies of the revised final printed label for the record.

Because this product is required to be in child resistant packaging, note that any changes to the packaging and/or number of bait stations marketed must be submitted as an amendment, not a notification.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

The basic confidential statement of formula (CSFs) dated 10/31/08 is acceptable.

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Page 4
EPA Reg. No. 64240-60

Attachment A

Marketing Claims Review

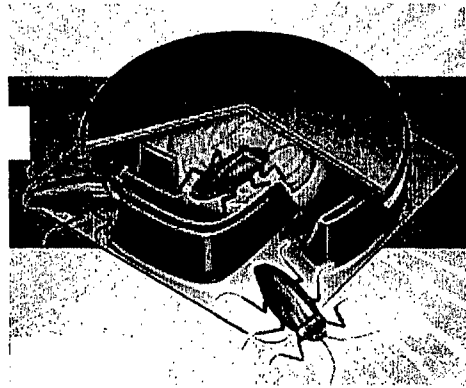
5/23

Note: *Bold, Italicized text is information for the reader and is not part of the label.*
[Bracketed information is optional text.]

Master Label, October 31, 2008
EPA Reg. No. 64240-____
Combat QK Large Roach Bait F34
Pg 1 of 11

COMBAT[®] QK Large Roach Bait F34

[Alternate Brand Name(s) to be determined]



For Large Roaches
Waterbugs & Palmetto Bugs

[LARGE ROACH]

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JAN 16 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
64240-60

ACTIVE INGREDIENT: Fipronil†.....0.03%

OTHER INGREDIENTS:99.97%

† CAS No. 120068-37-3

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

CAUTION:

See precautionary statements on back [side] panel.

EPA Reg. No. 64240-____

EPA Est. No. _____

Distributed by & ©2008 {2009} Combat Insect Control Systems

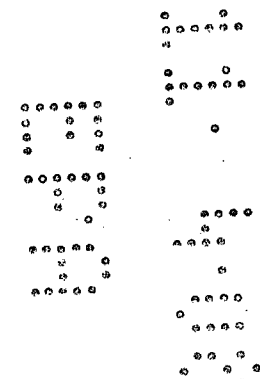
[15101 N. Scottsdale Rd.,] Scottsdale, AZ [ARIZONA] 85254

[Combat GUARANTEED to work [OR YOUR MONEY BACK]]

[CONTAINS] [8] [Child-resistant] Bait Stations
[TOTAL] NET WT. [0.049 oz. (14g)] [0.8 oz. (14g)]

[U.S. Patent Nos. _____ and others pending.]

[♻️] [[The paperboard in this] [C]carton [contains] [is made from] _____% Recycled fiber [minimum
_____ % post consumer content].] [PLEASE RECYCLE EMPTY CARTON]



6/23

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]

aster Label, October 31, 2008
EPA Reg. No. 64240-
Combat QK Large Roach Bait F34
Pg 2 of 11

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

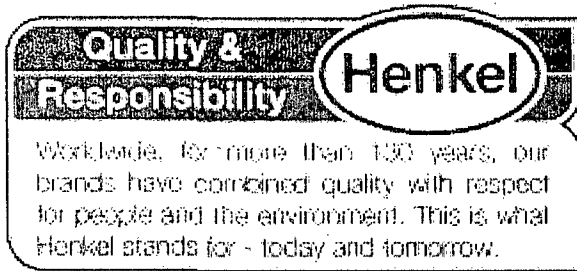
CAUTION: Wash [hands] thoroughly with soap and water after handling bait stations.

STORAGE AND DISPOSAL: [Do not contaminate water, food or feed by storage or disposal.]

STORAGE: Store in cool, dry area out of reach of children.

DISPOSAL: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partly filled:** Call your local solid waste agency or [toll free number] 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

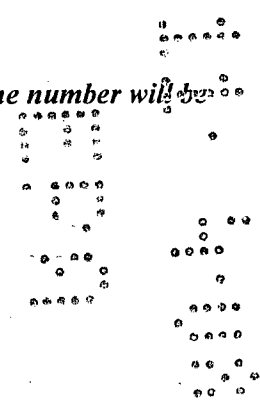
For front or back or side panel:



-or-



{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on each primary package of the product after the container is sealed.}



7/23

DIRECTIONS FOR USE

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

GENERAL INFORMATION

[THIS IS] [HOW] [THIS] [Combat] [QK Large Roach Bait F34]
[*Alternative Brand Name To Be Determined*] [PRODUCT] WORKS:

1. Roaches enter [the] bait station and eat the bait.
2. Roaches return to their nest and die.
3. Other roaches eat them and die, creating a chain reaction.

-or-

1. Roaches enter [the] bait station and eat [feed] on the bait.
2. Roaches take [the] bait back to the nest.
3. Roaches share the bait, killing other roaches and destroying the nest.



For Large Roaches [Waterbugs] [& Palmetto Bugs]

[EFFECTIVENESS GUARANTEED: COMBAT® Insect Control Systems stands behind this insect killing system with a full Satisfaction Guarantee. Should you have any questions regarding COMBAT® baits, please call 1-800-426-6228.]

For information, call the Combat® [Labs] [Information] Helpline at 1-800-426-6228. *-or-* For questions or comments, please call the Combat® Labs [Information] Helpline at 1-800-426-6228 [for information].

8/23

DIRECTIONS FOR USE *continued*

MOST LIKELY PLACES TO FIND ROACHES

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use all [8] bait stations at one time.]

Kitchen:

Under/around sink
Under refrigerator
Under stove

On counters
In cupboards/drawers
Near garbage cans

Near doors
On floor/in corners

Bathroom:

Behind toilet
Under/around sink

Near shower/bathtub
Inside cabinets/drawers

On floor/in corners

-or-

The kitchen, bathroom and points of entry (garage, basement, attic, doors, windows) are the most important locations.

-or-

The kitchen and bathrooms are the most important locations, but use COMBAT® bait stations wherever roaches have been found (laundry room, garage, bedrooms, attic, living room).

FOR LARGE ROACHES, WATERBUGS & PALMETTO BUGS:

This product is specifically designed for large roaches, waterbugs & palmetto bugs.

[Habits:] [Primarily live and breed outdoors and enter homes in search of food.] [For effective control, bait stations should be placed where roaches can enter your home.]

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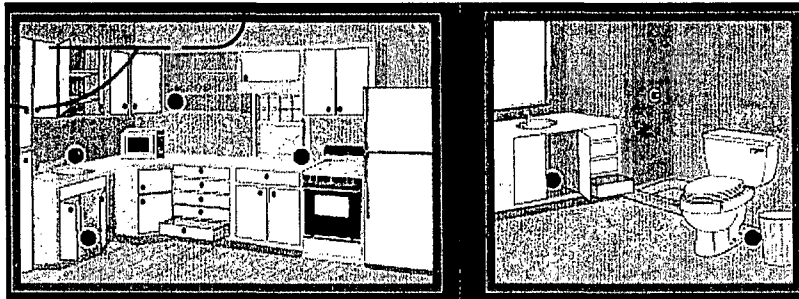
DIRECTIONS FOR USE *continued*

APPLICATION INSTRUCTIONS

1. Use all 8 baits [at one time]. Break baits apart. Do not remove or puncture the labels on bait stations. Place baits wherever you see [have seen] roaches [or signs of roaches].
[TIP:] Place baits about 1 ½ feet away from each other. Place any remaining baits in likely roach hiding places as shown in [the] diagrams [above] [below] [to the right] [to the left].
2. [Baits work best when] Place[ed] [baits] properly so that they are touching walls or corners.
[Do not use sprays or foggers around bait stations] [: they can contaminate bait stations and reduce effectiveness.]
3. Replace all ___ baits every 3 months, or sooner if roaches return [because roaches have probably eaten all of the bait inside.]

[Remove wrapper and separate bait stations from plastic frame. - *or*- Remove wrapper and tear apart along perforation lines.] [Now the baits are ready to use.] [For best results, use all 8 bait stations at one time.] - *or*- [Put out all 8 baits. If you have fewer than 8 places where you have seen roaches, place the extra baits about 1 ½ feet away from the other baits that you have just placed.] [Some of the most likely locations for roaches are shown in the diagram [to the right] [to the left] [above] [below].]

[TIP:] [Roaches find the bait faster when more bait stations [baits] are placed out.] [Use enclosed adhesive squares when placing baits on walls or upside down.] [Use enclosed stickers as needed. It is not necessary to use stickers on all baits.]
[Bait stations work best on horizontal surfaces touching corners and next to walls.] [Use enclosed stickers as needed for vertical surfaces.]



Claims for front or back

- [Fast acting bait that] starts killing roaches on contact and their nests within hours.
- [Fast acting bait that] starts killing roaches and their nests within hours.
- [Fully enclosed bait system] contains Fipronil, one of the fastest and most effective active ingredients available.
- Roaches eat the bait, return to the nest, share the bait [insecticide] with others, and eradicate the nest.

- For roaches 1 inch long or larger[.][more] commonly found in warmer climates and urban areas]. [Winged adults are at least 1 inch long.]

- Kills large roaches, waterbugs and Palmetto bugs
- [24 Hour] [Non-Stop] [Round the Clock] Roach Control
- [24 Hour] [Non-Stop] [Round the Clock] Roach Kill
- Starts killing [roaches] in hours
- Kills roaches [quickly]
- [See] visible results in 2 days
- Quick kill formula
- Kills roaches within 2 days
- Kills roaches where they hide [breed] [live]
- Kills roaches at the source
- Kills roaches continuously for 3 months
- Continuous roach control for 3 months
- Kills non-stop for 3 months
- Long lasting power [control] for 3 months
- Ongoing [roach] control [action]
- Non-stop roach control
- 24 hour roach killing action
- Effectively kills roaches without a trace – no fumes, no mess, no odor
- Ideal for kitchen use
- Easy to use, no clean-up [, no odor]

- Guaranteed to kill roaches for 3 months
- Guaranteed day and night roach control for 3 months
- Guaranteed to rid [protect] your home of roaches for 3 months
- Guaranteed to solve your roach problem for 3 months
- Satisfaction [Quality] Guaranteed
- Kills roaches where you can't see them
- Kills roaches – [so] you don't see [them]
- See dead roaches in [48 hours] [2-3] days
- Powerful results in just [2-3] days
- See [visible] results within [in] 48 hours
- 48 hour kill [action]
- Fast acting [action] formula
- [Delivers] fast killing results

Claims for front or back

- Provides maximum roach control for 3 months
- Starts working within hours and continues working
- Starts working in hours
- Kills roaches fast before they multiply for long-term control
- Continuous action for [a]round the clock protection
- Works continuously, [24 hours a day] [, 7 days a week]
- Works day after day
- Works day and night
- Works [a]round the clock
- Kills in 12 Hours
- Kills in 24 Hours
- Kills in 1 Day
- Kills Overnight
- Preventative maintenance against roaches
- Keeps roaches out of sight

- Kills [roaches] 50% faster*
- Kills [roaches] 60% faster*
- Eliminates [roaches] 50% faster*
- Kills 10x faster*
- Starts killing 10x faster*
- Controls roaches 4x faster*

**vs Combat Source Kill 1 {An alternate brand name for
Combat Roach Killing System, EPA Reg. No. 64240-2}*

- Kills roaches linked to allergy and asthma attacks

Claims for front or back

- Stops [Kills] roaches before they become a problem
- Protects [Defends] your home against roaches
- Patented [action] formula [ingredient]
- Special formula
- Rids your home of roaches
- Gets rid of roaches [in your home]
- Eliminates [Kills] large cockroaches [quickly]
- Destroys [Kills] [roaches] on contact or ingestion
- Kills by contact 24 hours a day, 7 days a week
- Kills by touch
- Destroys roaches just by touching
- The lethal [roach] killer
- Kills [large] roaches
- Virtually eliminates roaches

- Protects for months
- Defends for months
- Long lasting [!]
- Long lasting defense
- Long lasting defense from roaches
- Long lasting roach defense
- Keeps killing for up to 3 months
- Kills non-stop for up to 3 months
- Kills roaches and keeps on killing for up to 3 months
- Provides maximum roach control for up to 3 months
- Works within hours and for up to 3 months
- Starts working [killing] in hours, [doesn't stop] [keeps] working for 3 months
- Laboratory [and home use] tests prove Combat® provides up to 3 months of effective roach control

- Kills roaches quickly
- Kills [roaches] in hours
- Quick kill formula
- Quick killing action
- Quick defense
- Quick defense from roaches
- Instant defense
- Instant defense from roaches
- Kills roaches at the source
- Kills roaches you see and [even] those you don't [see]

Claims for front or back

- Protects your home
- Protection for your home against roaches
- Protect your home against roaches

- Defend your home against roaches
- Defense for your home against roaches
- Defend[s] your home from roaches

- Guaranteed to work or your money back
- Satisfaction Guaranteed
- Quality Guaranteed
-
- Effective [!]
- Effective roach control

- Take control [!]
- Take control of your roach problem
- Stay protected
- Stay protected from roaches
- The hard line on roaches
- Combat – the hard line on roaches
- Take the hard line on roaches
- Take the hard line on roaches with Combat

- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]

- Targeted
- Targeted roach control
- Targets roaches
- Targets roaches where they live
- Targets the nest
- Targets the colony

- Precise [!]
- Precise killing action
- Precise roach killing action
- Precise roach control
- Precision control
- Precision roach control
- Precise roach control targets roaches
- Precise roach control targets roaches where they live

14/
23

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]

Master Label, October 31, 2008
EPA Reg. No. 64240-
Combat QK Large Roach Bait F34
Pg 10 of 11

Claims for front or back

- Advancing pest control
- Advancing roach control
- Advancing roach control with targeted killing action
- Advancing roach control with precise killing action
- Advancing roach control with Combat

- Specially formulated
- Specially formulated for roach control
- Specially formulated for long term control
- Specially formulated for long term roach control

- Professional strength
- Professional performance
- Professional roach control strength
- Professional roach control performance

- Easy to use – Nothing to activate

- No bad odor
- No objectionable odor
- No mess and no bad odor
- No mess and no objectionable odor
- No mess or bad odor
- No mess or objectionable odor
- No vapor, fumes, [mess] or odor

- For best results[,] use Combat [brand] roach baits and gels
- For best results[,] use Combat [brand] roach baits and gels and sprays
- For best roach control[,] use Combat [brand] baits and gels
- For best roach control[,] use Combat [brand] baits and gels and sprays
- For best roach control results[,] use Combat [brand] baits and gels
- For best roach control results[,] use Combat [brand] baits and gels and sprays
- For best results[,] use Combat [brand] products as part of a complete roach control system
- For best results[,] use Combat [brand] products for [your] roach control needs.

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Note: *Bold, Italicized text is information for the reader and is not part of the label.*
[Bracketed information is optional text.]

Master Label, October 31, 2008
EPA Reg. No. 64240-_____
Combat QK Large Roach Bait F34
Pg 11 of 11

UNIT LABEL

COMBAT[®] QK Large Roach Bait F34
[Alternate Brand Name(s) to be determined]

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Fipronil†.....0.03%
OTHER INGREDIENTS:.....99.97%
† CAS No. 120068-37-3

KEEP OUT OF REACH OF CHILDREN AND PETS

CAUTION

DISPOSAL: **If empty:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partially filled:** Call your local solid water agency or [toll free number] **1-800-CLEANUP** for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For questions, comments or information about COMBAT, call toll free 1-800-426-6228.]

[Questions or Comments? Call 1-800-426-6228.]

EPA Reg. No. 64240-_____

EPA Est. No. _____

Distributed by & ©2008 [2009] Combat Insect Control Systems
[15101 N. Scottsdale Rd.,] Scottsdale, [AZ] [ARIZONA] 85254

SEE OUTER CARTON [CONTAINER] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

NET WT [0.06 oz (1.75g)] *-or-* [0.1 oz (2.75g)]

Note: Bold, italicized text is information the reader and is not part of the label.
[Bracketed information is optional text]

Master Label, October 31, 2008
EPA Reg. No. 64240-
Combatac Large Roach Bait F34
Pg 8 of 11

Claims for front or back

- ~~[Fast acting bait that] starts killing roaches on contact and their nests within hours.~~
- ~~[Fast acting bait that] starts killing roaches and their nests within hours.~~
- ~~[Fully enclosed bait system] contains Fipronil, one of the fastest and most effective active ingredients available.~~
- ~~Roaches eat the bait, return to the nest, share the bait [insecticide] with others, and eradicate the nest.~~
- For roaches 1 inch long or larger [more] commonly found in warmer climates and urban areas. [Winged adults are at least 1 inch long.]
- Kills large roaches, waterbugs and Palmetto bugs
- [24 Hour] [Non-Stop] [Round the Clock] Roach Control.
- [24 Hour] [Non-Stop] [Round the Clock] Roach Kill.
- Starts killing [roaches] in hours
- Kills roaches [quickly]
- [See] visible results in 2 days
- Quick kill formula
- Kills roaches within 2 days
- Kills roaches where they hide [breed] [live]
- Kills roaches at the source
- Kills roaches continuously for 3 months
- Continuous roach control for 3 months
- Kills non-stop for 3 months
- Long lasting power [control] for 3 months
- Ongoing [roach] control [action]
- Non-stop roach control
- 24 hour roach killing action
- Effectively kills roaches without a trace —no fumes, no mess, no odor.
- Ideal for kitchen use
- Easy to use, no clean-up [no odor]
- Guaranteed to kill roaches for 3 months
- Guaranteed day and night roach control for 3 months
- Guaranteed to rid [protect] your home of roaches for 3 months
- Guaranteed to solve your roach problem for 3 months
- Satisfaction [Quality] Guaranteed
- Kills roaches where you can't see them
- Kills roaches — [so] you don't see [them]
- See dead roaches in [48 hours] [2-3] days
- Powerful results in just [2-3] days
- See [visible] results within [in] 48 hours
- 48 hour kill [action]
- Fast acting [action] formula
- [Delivers] fast killing results

Summary of Comments on Scanned Document

Page: 1

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:15:11 AM



Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:15:20 AM



Author: asibold
Subject: Note
Date: 1/16/2009 10:38:21 AM
Delete claims which are not on cited product label dated 8/2/02, as this is an R300 PRIA action.

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:15:48 AM



Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:19:25 AM



Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:52:14 AM
Delete the following comparative claim:
Ideal

Author: asibold
Subject: Note
Date: 1/16/2009 10:40:31 AM
Delete claims that the product has no fumes, no odor, as roaches and pets can smell or otherwise detect the bait.

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:19:52 AM



Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:41:49 AM
Delete the following claim, as it detracts from the disposal statements:
no clean-up

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:38:31 AM
Delete the following claim as it detracts from the directions for use and precautionary statements:

Comments from page 1 continued on next page

16/23

Note: ***Bold, italicized text is information the reader and is not part of the label.***
[Bracketed information is optional text]

Master Label, October 31, 2008
EPA Reg. No. 64240-
Combat QK Largo Roach Bait F34
Pg 8 of 11

Easy to use,

Claims for front or back

- ~~[Fast acting bait that] starts killing roaches on contact and their nests within hours.~~
- ~~[Fast acting bait that] starts killing roaches and their nests within hours.~~
- ~~[Fully enclosed bait system] contains Fipronil, one of the fastest and most effective active ingredients available.~~
- Roaches eat the bait, return to the nest, share the bait ~~[insecticide]~~ with others, and eradicate the nest.

- For roaches 1 inch long or larger ~~[more] commonly found in warmer climates and urban areas.~~ ~~[Winged adults are at least 1 inch long.]~~

- Kills large roaches, waterbugs and Palmetto bugs
- [24 Hour] ~~[Non-Stop] [Round the Clock] Roach Control~~
- [24 Hour] ~~[Non-Stop] [Round the Clock] Roach Kill~~
- Starts killing [roaches] in hours
- Kills roaches [quickly]
- [See] visible results in 2 days
- Quick kill formula
- Kills roaches within 2 days
- Kills roaches where they hide [breed] [live]
- Kills roaches at the source
- Kills roaches continuously for 3 months
- Continuous roach control for 3 months
- Kills non-stop for 3 months
- Long lasting power [control] for 3 months
- Ongoing [roach] control [action]
- Non-stop roach control
- 24 hour roach killing action
- Effectively kills roaches without a trace ~~—no fumes, no mess, no odor~~
- Ideal for kitchen use
- Easy to use, no clean-up ~~[no odor]~~

- Guaranteed to kill roaches for 3 months
- Guaranteed day and night roach control for 3 months
- Guaranteed to rid [protect] your home of roaches for 3 months
- Guaranteed to solve your roach problem for 3 months
- Satisfaction [Quality] Guaranteed
- Kills roaches where you can't see them
- Kills roaches — [so] you don't see [them]
- See dead roaches in [48 hours] [2-3] days
- Powerful results in just [2-3] days
- See [visible] results within [in] 48 hours
- 48 hour kill [action]
- Fast acting [action] formula
- [Delivers] fast killing results

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Note: Bold, italicized text is information the reader and is not part of the label.
[Bracketed information is optional text.]

Label, October 31, 2000
EPA Reg. No. 64240-2
Combat OK Large Roach Bait F34
Pg 7 of 11

Claims for front back

- Provides maximum roach control for 3 months
- Starts working within hours and continues working
- Starts working in hours
- Kills roaches fast before they multiply for long-term control
- Continuous action for [a]round the clock protection
- Works continuously, [24 hours a day] [, 7 days a week]
- Works day after day
- Works day and night
- Works [a]round the clock
- Kills in 12 Hours
- Kills in 24 Hours
- Kills in 1 Day
- Kills Overnight
- Preventative maintenance against roaches
- Keeps roaches out of sight

- Kills [roaches] 50% faster*
- Kills [roaches] 60% faster*
- Eliminates [roaches] 50% faster*
- Kills 10x faster*
- Starts killing 10x faster*
- Controls roaches 4x faster*

*vs Combat Source Kill 1 (An alternate brand name for
Combat Roach Killing System, EPA Reg. No. 64240-2)

- Kills roaches linked to allergy and asthma attacks

Page: 2

Author: asibold
Subject: Note
Date: 1/16/2009 10:46:54 AM
Delete comparative claim.

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:46:26 AM
maximum

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:48:25 AM
Kills in 12 Hours
Kills in 24 Hours
Kills in 1 Day
Kills Overnight
These claims are not on label of cited product.

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:49:03 AM
Kills [roaches] 50% faster*
Kills [roaches] 60% faster*
Eliminates [roaches] 50% faster*
Kills 10x faster*
Starts killing 10x faster*
Controls roaches 4x faster*
*vs Combat Source Kill 1 (An alternate brand name for
Combat Roach Killing System, EPA Reg. No. 64240-2)
Kills roaches linked to allergy and asthma attacks

Author: asibold
Subject: Note
Date: 1/16/2009 10:51:34 AM
These claims are not on label of cited product.

18/23

Note: Bold, italicized text is information the reader and is not part of the label.
[Bracketed information is optional text]

Master Label, October 31, 2008
EPA Reg. No. 64240-...
Combat OX Large Roach Dail F34
Pg 8 of 11

Claims for front or back

- Stops [Kills] roaches before they become a problem
- Protects [Defends] your home against roaches
- Patented [action] formula [ingredient]
- Special formula
- Rids your home of roaches
- Gets rid of roaches [in your home]
- Eliminates [Kills] large cockroaches [quickly]
- Destroys [Kills] [roaches] on contact or ingestion
- Kills by contact 24 hours a day, 7 days a week
- Kills by touch
- Destroys roaches just by touching
- The lethal [roach] killer
- Kills [large] roaches
- Virtually eliminates roaches

- ~~Protects for months~~
- ~~Defends for months~~
- ~~Long-lasting [!]~~
- ~~Long-lasting defense~~
- ~~Long-lasting defense from roaches~~
- ~~Long-lasting roach defense~~
- ~~Keeps killing for up to 3 months~~
- ~~Kills non-stop for up to 3 months~~
- ~~Kills roaches and keeps on killing for up to 3 months~~
- ~~Provides maximum roach control for up to 3 months~~
- ~~Works within hours and for up to 3 months~~
- ~~Starts working [killing] in hours, [doesn't stop] [keeps] working for 3 months~~
- ~~Laboratory [and home use] tests prove Combat@ provides up to 3 months of effective roach control~~

- Kills roaches quickly
- ~~Kills [roaches] in hours~~
- Quick kill formula
- Quick-killing action
- Quick defense
- Quick defense from roaches
- Instant defense
- ~~Instant defense from roaches~~
- Kills roaches at the source
- Kills roaches you see and [even] those you don't [see]

Page: 3

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:54:04 AM
Special formula
Delete this comparative claim.

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:57:36 AM
Delete these claims which are not on the label of the cited product.
Protects for months
Defends for months
Long lasting [!]
Long lasting defense
Long lasting defense from roaches
Long lasting roach defense
Keeps killing for up to 3 months
Kills non-stop for up to 3 months
Kills roaches and keeps on killing for up to 3 months
Provides maximum roach control for up to 3 months
Works within hours and for up to 3 months
Starts working [killing] in hours, [doesn't stop] [keeps] working for 3 months
Laboratory [and home use] tests prove Combat@ provides up to 3 months of effective roach control

Author: asibold
Subject: Note
Date: 1/16/2009 10:58:22 AM
Delete this claim which is not on the label of the cited product.

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 10:58:48 AM
Kills [roaches] in hours

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:02:57 AM
Delete these claims which are not on the label of the cited product.
Quick killing action
Quick defense
Quick defense from roaches
Instant defense
Instant defense from roaches

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Note: Bold, italicized text is information the reader and is not part of the label.
[Bracketed information is optional text.]

Master Label, October 31, 2008
EPA Reg. No. 64249
Combat GK Large Roach Bait F34
Pg 9 of 11

Claims for front or back

- ~~Protects your home~~
- Protection for your home against roaches
- Protect your home against roaches
- ~~Defend your home against roaches~~
- ~~Defense for your home against roaches~~
- ~~Defend(s) your home from roaches~~
- Guaranteed to work or your money back
- Satisfaction Guaranteed
- Quality Guaranteed
- ~~Effective (I)~~
- ~~Effective roach control~~
- ~~Take control (I)~~
- ~~Take control of your roach problem~~
- ~~Stay protected~~
- ~~Stay protected from roaches~~
- ~~The hard line on roaches~~
- ~~Combat - the hard line on roaches~~
- ~~Take the hard line on roaches~~
- ~~Take the hard line on roaches with Combat~~
- ~~With [a blend of] [multiple] foods roaches eat~~
- ~~With multiple foods to kill roaches [and the nest]~~
- ~~Targeted~~
- ~~Targeted roach control~~
- ~~Targets roaches~~
- ~~Targets roaches where they live~~
- ~~Targets the nest~~
- ~~Targets the colony~~
- ~~Precise (I)~~
- ~~Precise killing action~~
- ~~Precise roach killing action~~
- ~~Precise roach control~~
- ~~Precision control~~
- ~~Precision roach control~~
- ~~Precise roach control targets roaches~~
- ~~Precise roach control targets roaches where they live~~

Page: 4

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:06:24 AM
Delete the following claim which is not on the label of the cited product:
Protects your home

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:08:24 AM
Delete the following claims which are not on the label of the cited product:
Defend your home against roaches
Defense for your home against roaches
Defend(s) your home from roaches

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:11:59 AM
Delete the following claims which are not on the label of the cited product:
Effective (I)
Effective roach control

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:15:38 AM
Delete the following claims, which are not on the label of the cited product:
Take control (I)
Take control of your roach problem
Stay protected
Stay protected from roaches
The hard line on roaches
Combat - the hard line on roaches
Take the hard line on roaches
Take the hard line on roaches with Combat
With [a blend of] [multiple] foods roaches eat
With multiple foods to kill roaches [and the nest]
Targeted
Targeted roach control
Targets roaches
Targets roaches where they live
Targets the nest
Targets the colony

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:16:30 AM
Delete the following claims which are not on the label of the cited product:
Precise (I)
Precise killing action
Delete the following claims which are not on the label of the cited product:
Precise roach killing action
Precise roach control
Precision control
Precision roach control
Precise roach control targets roaches
Precise roach control targets roaches where they live

Comments from page 4 continued on next page

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Note: **Bold, Italicized text is information the reader and is not part of the label.**
[Bracketed information is optional text.]

Master Label, October 31, 2008
EPA Reg. No. 64249
Combat GK Large Roach Bait F34
Pg 9 of 11

Claims for front or back

- ~~Protects your home.~~
- Protection for your home against roaches
- Protect your home against roaches

- ~~Defend your home against roaches.~~
- ~~Defense for your home against roaches.~~
- ~~Defend [a] your home from roaches.~~

- Guaranteed to work or your money back
- Satisfaction Guaranteed
- Quality Guaranteed
-
- ~~Effective [1].~~
- ~~Effective roach control.~~

- ~~Take control [1].~~
- ~~Take control of your roach problem.~~
- ~~Stay protected.~~
- ~~Stay protected from roaches.~~
- ~~The hard line on roaches.~~
- ~~Combat - the hard line on roaches.~~
- ~~Take the hard line on roaches.~~
- ~~Take the hard line on roaches with Combat.~~

- ~~With [a blend of] [multiple] foods roaches eat.~~
- ~~With multiple foods to kill roaches [and the nest].~~

- ~~Targeted.~~
- ~~Targeted roach control.~~
- ~~Targets roaches.~~
- ~~Targets roaches where they live.~~
- ~~Targets the nest.~~
- ~~Targets the colony.~~

- ~~Precise [1].~~
- ~~Precise killing action.~~
- ~~Precise roach killing action.~~
- ~~Precise roach control.~~
- ~~Precision control.~~
- ~~Precision roach control.~~
- ~~Precise roach control targets roaches.~~
- ~~Precise roach control targets roaches where they live.~~

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Note: Bold, italicized text is information the reader and is not part of the label.
[Bracketed information is optional text.]

Master Label, October 31, 2009
EPA Reg. No. 44240
Combat OX Large Roach Bait F-34
Pg 10 of 11

Page: 5

Claims for front or back

- Advancing pest control
- Advancing roach control
- Advancing roach control with targeted killing action
- Advancing roach control with precise killing action
- Advancing roach control with Combat

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:21:38 AM

Delete the following claims which are comparative claims and are not on the label of the cited product:

- Advancing pest control
- Advancing roach control
- Advancing roach control with targeted killing action
- Advancing roach control with precise killing action
- Advancing roach control with Combat

- Specially formulated
- Specially formulated for roach control
- Specially formulated for long term control
- Specially formulated for long term roach control

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:23:34 AM

Delete the following claims which are comparative claims and are not on the label of the cited product:

- Specially formulated
- Specially formulated for roach control
- Specially formulated for long term control
- Specially formulated for long term roach control

- Professional strength
- Professional performance
- Professional roach control strength
- Professional roach control performance

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:22:55 AM

Delete the following claims which are enhanced efficacy claims and which are not on the label of the cited product:

- Specially formulated for roach control
- Specially formulated for long term control

- Easy to use - Nothing to activate

- No bad odor
- No objectionable odor
- No mess and no bad odor
- No mess and no objectionable odor
- No mess or bad odor
- No mess or objectionable odor
- No vapor, fumes, [mess] or odor

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:24:22 AM

Delete the following claims which are enhanced efficacy claims and which are not on the label of the cited product:

- Professional strength
- Professional performance
- Professional roach control strength
- Professional roach control performance

- For best results[,] use Combat [brand] roach baits and gels
- For best results[,] use Combat [brand] roach baits and gels and sprays
- For best roach control[,] use Combat [brand] baits and gels
- For best roach control[,] use Combat [brand] baits and gels and sprays
- For best roach control results[,] use Combat [brand] baits and gels
- For best roach control results[,] use Combat [brand] baits and gels and sprays
- For best results[,] use Combat [brand] products as part of a complete roach control system
- For best results[,] use Combat [brand] products for [your] roach control needs

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:50:28 AM

Delete the following claim which detracts from the precautionary statements and directions for use:

- Easy to use - Nothing to activate

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:28:07 AM

Delete the following claims, which are not on the label of the cited product:

- No bad odor
- No objectionable odor

Author: asibold
Subject: Cross-Out
Date: 1/16/2009 11:27:35 AM

or

Author: asibold
Subject: Cross-Out

Comments from page 5 continued on next page

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Note: Bold, Italicized text is information the reader and is not part of the label.
(Bracketed information is optional text)

Master Label, October 31, 2009
EPA Reg. No. 64240-...
Combat DK Large Roach Bait F34
Pg 10 of 11

Date: 1/16/2009 11:29:40 AM

Delete the following claim which is not on the label of the cited product:
and no bad odor

Claims for front or back

- Advancing pest control
- Advancing roach control
- Advancing roach control with targeted killing action
- Advancing roach control with precise killing action
- Advancing roach control with Combat

Author: asibold

Subject: Cross-Out

Date: 1/16/2009 11:30:53 AM

Delete the following claim which is not on the label of the cited product:
and no objectionable odor

- Specially formulated
- Specially formulated for roach control
- Specially formulated for long term control
- Specially formulated for long term roach control

Author: asibold

Subject: Cross-Out

Date: 1/16/2009 11:32:54 AM

Delete the following claim to delete the reference to no bad odor as this claim is not on the label of the cited product:
No mess or bad odor

- Professional strength
- Professional performance
- Professional roach control strength
- Professional roach control performance

Author: asibold

Subject: Cross-Out

Date: 1/16/2009 11:33:32 AM

Delete the following claim to delete the reference to no objectionable odor:
No mess or objectionable odor

- Easy to use - Nothing to activate

Author: asibold

Subject: Cross-Out

Date: 1/16/2009 11:34:48 AM

Delete the references to no vapor, fumes or odor as pets and roaches can smell or detect the bait.
No vapor, fumes, (mess) or odor

- No bad odor
- No objectionable odor
- No mess and no bad odor
- No mess and no objectionable odor
- No mess or bad odor
- No mess or objectionable odor
- No vapor, fumes, (mess) or odor

Author: asibold

Subject: Cross-Out

Date: 1/16/2009 11:35:33 AM

Delete the following claims, which are not on the label of the cited product:

- For best results[,] use Combat [brand] roach baits and gels
- For best results[,] use Combat [brand] roach baits and gels and sprays
- For best roach control[,] use Combat [brand] baits and gels
- For best roach control[,] use Combat [brand] baits and gels and sprays
- For best roach control results[,] use Combat [brand] baits and gels
- For best roach control results[,] use Combat [brand] baits and gels and sprays
- For best results[,] use Combat [brand] products as part of a complete roach control system
- For best results[,] use Combat [brand] products for [your] roach control needs

- For best results[,] use Combat [brand] roach baits and gels
- For best results[,] use Combat [brand] roach baits and gels and sprays
- For best roach control[,] use Combat [brand] baits and gels
- For best roach control[,] use Combat [brand] baits and gels and sprays
- For best roach control results[,] use Combat [brand] baits and gels
- For best roach control results[,] use Combat [brand] baits and gels and sprays
- For best results[,] use Combat [brand] products as part of a complete roach control system
- For best results[,] use Combat [brand] products for [your] roach control needs

Author: asibold

Subject: Cross-Out

Date: 1/16/2009 11:35:01 AM

Delete the following claim as part of a complete roach control

23/23