

64240-67

3/18/2014

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Combat Insect Control Systems
c/o Ms Georgia Anastasiou
Lewis & Harrison, LLC
122 C Street, Suite 505
Washington, DC 20001

MAR 18 2014

Dear Ms. Anastasiou:

Subject: Application for Pesticide Notification (PRN 98-10)
Replace image on bottom of strip and image depicting removal of adhesive,
Remove "New" from marketing language
COMBAT Flik R
EPA Reg. No. 64240-67
Your submission dated February 4, 2014

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated February 4, 2014 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds 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.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10), or durably marked on the container itself.

If you have any questions regarding this letter, please contact Dana Pilitt, Ph.D. at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)



United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 64240-67	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Combat Flik R	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Combat Insect Control Systems c/o Lewis & Harrison, LLC 122 C Street, Suite 505 Washington, DC 20001 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ NOTIFICATION Product Name _____ MAR 18 2014	

Section - II

- Amendment - Explain below.
- Resubmission in response to Agency letter dated _____
- Notification - Explain below.
- Final printed labels in response to Agency letter dated _____
- "Me Too" Application
- Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification to replace images. Please see cover letter for details.

Notification in Accordance With PR Notice 98-10 This notification is consistent with the provisions of PR Notice 98-10 EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 95-2 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be the subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
*Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)

Name Georgia Anastasiou - Lewis & Harrison, LLC	Title Agent for Combat Insect Control Systems	Telephone No. (Include Area Code) 202-393-2903 ext. 19
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Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Date Application Received
(Stamped)

2. Signature <i>Georgia Anastasiou</i>	3. Title Agent for Combat Insect Control System
4. Typed Name Georgia Anastasiou - Lewis & Harrison, LLC	5. Date February 4, 2014

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LEWIS & HARRISON

Consultants in Government Affairs

122 C Street, N.W., Suite 505
Washington, D.C. 20001

telephone 202.393.3903
fax 202.393.3906

February 4, 2014

HAND-DELIVERED

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**ATTENTION: Richard Gebken
Product Manager, Team 10**

**SUBJECT: Combat Insect Control Systems
Combat® Flik R (EPA Reg. No. 64240-67)
Notification in Accordance with PR Notice 98-10**

Dear Mr. Gebken:

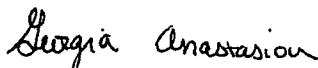
On behalf of Combat Insect Control Systems, I am submitting a notification for the product **Combat® Flik R (EPA Reg. No. 64240-67)**. The purpose of this notification is to replace the image on the bottom of the strip and replace the image depicting the removal of the adhesive on the bottom of the strip (Figure 2). Please note there have been no changes to the language that appears on the bottom of the strip or the directions for use. In addition I removed the use of the word "New" from the marketing language.

In support of this submission enclosed please find the following documents:

- a) Application for Pesticide Notification, which includes a signed statement certifying compliance with PR Notice 98-10;
- b) One (1) copy of the label with changes highlighted; and,
- c) Two (2) copies of the revised label.

If you have any questions, please contact me at 202-393-3903 ext. 19 or by email at georgia@lewisharrison.com.

Sincerely,



Georgia Anastasiou
Agent for,
Combat Insect Control Systems

cc: Arlana Brugato, Combat Insect Control Systems

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

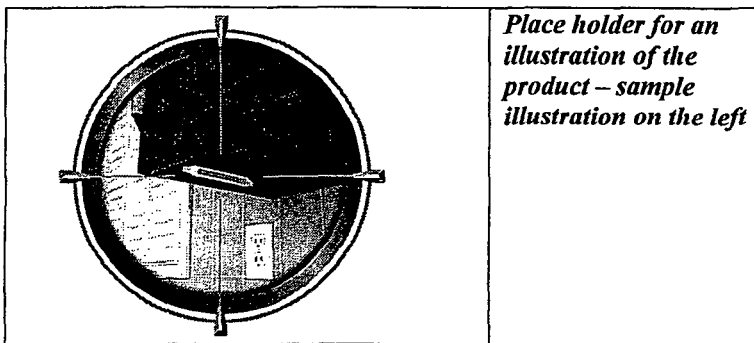
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Combat® Flik R

Previously Approved Alternate Brand Name:

[Combat Roach Killing Bait Strips]
[Combat Max Roach Killing Bait Strips]

NOTIFICATION
MAR 18 2014



Place holder for an illustration of roaches – may be on front or back or side panels



USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS
KEEP OUT OF REACH OF CHILDREN

CAUTION:

See [side] [and][or] [back] [panel] [of pouch] for additional precautionary statements and directions

ACTIVE INGREDIENT: Fipronil†.....0.01%
 OTHER INGREDIENTS:.....99.99%
 TOTAL.....100.00%
 †CAS No. 120068-37-3

Contains: [6 [to] [-] 24] [10] [Gel] [Bait] [Strips,]
 [Each Containing][:] [0.068 oz. (2.0 g) [to][-] 0.136 oz. (4.0 g)] [0.068 oz. (2.0 g)]
 [TOTAL] NET WT[:] [0.408 oz (12.0 g) [to][-] 3.264 oz (96.0 g)] [0.680 oz. (20 g)]

EPA Reg. No: 64240-67
 EPA Est. No. _____ [85632-KOR-001]

[Manufactured for] [Distributed by] [&] © [201[4][5]]
 Combat Insect Control Systems
 Scottsdale, [AZ] [ARIZONA] 85255
 MADE IN [USA][KOREA]

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]
 [Combat® Information Helpline: 1-800-426-6228]
 [Patent Pending] [Patent Number]

Note: *Bold, italicized text is information for the reader and is not part of the label.*

[Bracketed information is optional text.]

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PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: Keep [gel] bait strips away from foods and food contact surfaces. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

FIRST AID:

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

If in Eyes: Hold eye open, 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.

PHYSICAL OR CHEMICAL HAZARDS: Do not use this product in or on electrical equipment due to the possibility of a shock hazard.

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

STORAGE: Store in a 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 for disposal instructions. [Never place unused product down any indoor or outdoor drain.]

{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code number will appear on each bait strip.}

For front or back or side panel:

[Satisfaction guaranteed] [Guaranteed to work] [or your money back][!]

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

[For information, call the Combat® [Labs] [Information] Helpline at 1-800-426-6228.]

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

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



[GENERAL INFORMATION]

[[This product] **Combat Flik R or alternate brand name** provides fast control of roaches.]

[[This product] **Combat Flik R or alternate brand name** is formulated to effectively control roaches.]

[[That's because] [This product] **Combat Flik R or alternate brand name** [has] [contains] Fipronil, [a [fast-acting] [fast-killing] active ingredient]].] [[Its speed is] [That's] [[still] slow enough for [exposed] [foraging] roaches] [the roaches you see] to return to the nest [where] [so] [that] [[roach] nestmates] [other roaches] [roaches in the nest] are [also] exposed to the insecticide [and] [so] [that] the entire nest is [killed] [destroyed] [through] [by] [the Domino Effect™].]

[[This is] [How] [This Product] **Combat Flik R or alternate brand name** Work[s]:]

[•][1] [Roaches [visit] [find] the [gel] [bait][s] [strips] and [eat] [feed on] the [gel] bait]

[•][1] [This product attracts [foraging] roaches [to the [insecticide] [gel] bait strip][s].] [and] [the] [Roaches] [feed on] [eat] [are exposed to] the [gel] [bait][s] [strips]]

[•][2] [[Exposed] Roaches carry [the] [gel] [bait] [insecticide] back [on and in their bodies] to [the] [nest] [where] [so] [that] [[roach] nestmates] [other roaches] [roaches] [in the nest] are exposed to the insecticide [and] [so] [that] the entire nest is [killed] [destroyed]]

[♦] [Do not interfere with [the] roaches or [the] [product] [gel] [bait][s] [strips] during use]

[♦] [[Replace] [Place more] [gel] [bait][s] [strips] if roaches return]

[♦] [Do not use sprays on or around [the] [product] [gel] [bait][s] [strips] [placements]]

[♦] [Do not use strong cleaners around [the] [product] [gel] [bait][s] [strips] [placements]]

[♦] [Do not use sprays or strong cleaners on or around [the] [product] [gel] [bait][s] [strips] [placements]]

[♦] [Place [the] [product] [gel] [bait][s] [strips] out of reach of children and pets]

Note: *Bold, italicized text is information for the reader and is not part of the label.*

[Bracketed information is optional text.]

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DIRECTIONS FOR USE:

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not use for control of insects other than those listed on this label.

[[**Combat Flick R or alternate brand name**] [This product] may be used for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas.]

For indoor and outdoor (adjacent to [the home][homes & structures]) use:

- [1.] Break [bait] strips apart. [See] [Illustration A] [Picture A] [Figure] [1][A]
- [2.] [To] place [a] [gel] bait[s] [strip[s]] [securely] [in a chosen location] indoors or outdoors (adjacent to the home), peel off [protective] [covering][tape][film] [on the bottom of the strip] [marked] ["Remove to Adhere"]. [See] [Illustration B] [Picture B] [Figure] [2][B]
- [3.] [Stick][Adhere] [it] [the exposed side] [the strip] to [a] clean surface. [[The] [D][d]iagram[s] [above] [below] [at right] [at left] show[s] recommended placement locations.]
[See] [Illustration C] [Picture C] [Figure] [3][C] [of] [for] [showing] [gel] [bait] strip before peeling off [covering] [tape] [film].
Discard [the] [covering] [tape] [film] in the trash.
Use all bait strips [at one time].
- [4.] To activate [a] [gel] [bait] strip [already stuck to a clean surface], peel off the [protective] [covering] [tape] [film] [on top of the strip] [marked] ["Peel Here"].
[See] [Illustration C] [Picture C] [Figure] [3][C] [of] [for] [showing] [gel] [bait] strip ready to be activated.]
[See] [Illustration D] [Picture D] [Figure] [4][D] [of] [for] [showing] [shows] [a] strip being activated.]
[Discard [the] [removed] [covering] [tape] [film] in the trash.]

Do not use in beehives.

[TIPS]

[Do not spray insecticide on or around [the] [bait][s] [strip][s], as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness.]

Replace [strips] after 3 months.

[Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash.]

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DIRECTIONS FOR USE (continued):

[Note to reviewer: Label may include alternate usage instructions outlined below instead of those listed above. The only difference is how the adhesive is placed on the strip.]

- [1.] Break [bait] strips apart. [See] [Illustration A] [Picture A] [Figure 1][A]]
- [2.] [To] place [a] [gel] bait[s] [strip[s]] [securely] [in a chosen location] indoors or outdoors (adjacent to the home), remove adhesive tab from pouch and adhere to [bottom of] strip [marked "Place Sticker Here"]. [See] [Illustration] [Picture] [Figure] [2 alt] [B alt]. Reel off [protective] [covering][tape][film] [on the bottom of the strip] [marked] ["Remove to Adhere"]. [See] [Illustration] [Picture] [Figure 2] [B]
- [3.] [Stick][Adhere] [it] [the exposed side] [the strip] to [a] clean surface. [[The] [D][d]iagram[s] [above] [below] [at right] [at left] show[s] recommended placement locations.] [See] [Illustration] [Picture] [Figure] [3] [C] [of] [for] [showing] [gel] [bait] strip before peeling off [covering] [tape] [film].
Discard [the] [covering] [tape] [film] in the trash.
Use all bait strips [at one time].
- [4.] To activate [a] [gel] [bait] strip [already stuck to a clean surface], peel off the [protective] [covering] [tape] [film] [on top of the strip] [marked] ["Peel Here"].
[See] [Illustration] [Picture] [Figure] [3] [C] [of] [for] [showing] [gel] [bait] strip ready to be activated.]
[See] [Illustration] [Picture] [Figure] [4] [D] [of] [for] [showing] [shows] [a] strip being activated.]
[Discard [the] [removed] [covering] [tape] [film] in the trash.]

Do not use in beehives.

[TIPS]

[Do not spray insecticide on or around [the] [bait][s] [strip][s], as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness.]

Replace [strips] after 3 months.

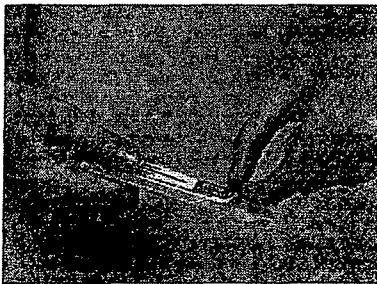
[Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash.]

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

{Note: All photos below are optional. These or similar photos may be added to the directions for use.}



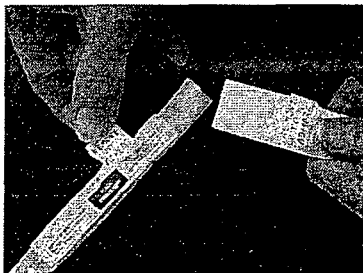
[Illustration] [Picture] [Figure] [1] [A]



[Illustration] [Picture] [Figure] [2] [B]



[Illustration] [Picture] [Figure] [3] [C]



[Illustration] [Picture] [Figure] [2 alt] [B alt]

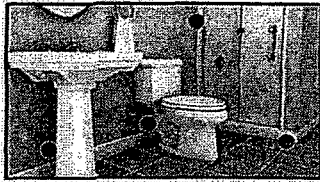
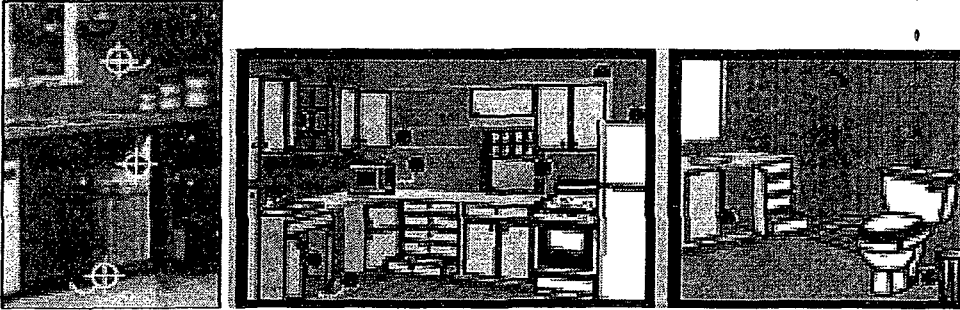
[Faint, illegible text, possibly bleed-through from the reverse side of the page]

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

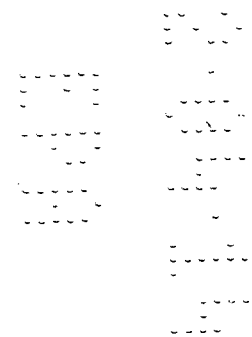
10/
15

[Note to reviewer: Label may include these or similar graphic depictions of recommended placement locations.]

[Recommended [Bait] Strip Placement [Locations]:]



Example illustration of suggested bait strip placement sites.



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Optional claims for front or back or side panel of label

1. [Easy to use] [Easy-to-use]
2. Easy to apply [anywhere]
3. [Leaves] no [messy] [residue] [or] [messy clean up]
4. [There's] no [residue] [or] [mess to clean up]
5. Convenient
6. [Mess free] [Mess-free]
7. No mess
8. No [vapors][,] [fumes] [or] [mess]
9. [Kills][Stops] [Eliminates] roaches [without] [messy] [residue] [and] [without insecticide] odors [and] [or] [fumes]
10. Works [without] [messy] [residue] [and] without [insecticide] odors [or fumes]
11. [This] [product is] [gel] [bait] [strip][s] [are] easy to use [and [has] [have] no insecticide odor]
12. No insecticide odor
13. [It's] [the] [clean][,] [easy] way to solve your [roach] problem
14. [Thin][,] [clear][,] adhesive strips
15. [COMBAT®] [***Combat Flik R or alternate brand name***] [killing] [gel] [bait] [strips] for roaches
16. [COMBAT®] [***Combat Flik R or alternate brand name***] [roach killing] [gel] [bait] [strips]
17. [COMBAT®] [***Combat Flik R or alternate brand name***] [roach killing] [gel] [bait][s] [strips] [aren't] [are not] [tape] [or] [glue] [or sticky] [traps] [that] roaches stick to
18. [Inconspicuous] [and] [Discreet] [and easy to apply] [anywhere] [where] [roaches [are] [may be] [a problem] [found]]
19. [Roach] [insecticide] [Gel] [bait] [in] [convenient][,] [easy-to-use] [form] [strip][s]
20. [Roach killing] [gel] [bait] in [convenient][,] [easy-to-use] [form] [strip][s]
21. Goes where bait[s] [stations] [can't] [cannot]
22. COMBAT® [***Combat Flik R or alternate brand name***] [roach killing] [gel] [bait] [strips] go where bait stations can't
23. [The convenient] roach killing [bait] [gel] [form] [strip][s] [that] go[es] where bait stations can't
24. [Large] [and] [+] [Small] [Roach]es]
25. [For [Kills] [both] [Small and Large] Roaches]
26. Gain control of your roach problem
27. Food [&][and][+] water [formulation][formula] attracts roaches to the [insecticide] [gel] [bait] [strips]
28. What roaches are looking for
29. With fipronil
30. COMBAT®'s [potent] [roach killing] [insecticide] [gel] [bait][s] [strip][s] [with Fipronil]
31. Advanced [food] formula* * [versus][vs] the previous COMBAT® bait formula
32. COMBAT® [***Combat Flik R or alternate brand name***] has [a] [specific] [combination or] roach food attractants and a [fast] [fast-killing] [fast-acting] [active ingredient] [insecticide] [to create] [and is] [making it] [a highly effective tool] [in the fight against roaches] [to kill] roaches] [to fight your roach problem]

Optional claims for front or back or side panel of label - continued

33. The [insecticide] [gel] [bait] attracts roaches in search of food and water [to the bait] [to the strip]
34. [COMBAT®] [insecticide] [Bait][s] [gel] [strips] [contain][s] [food and water] [for roaches] [roaches seek] [but] do not spill
35. Fast killing formula
36. Visible results overnight
37. Fast control of [even large] roaches
38. Starts [working] [killing] [roaches] in hours
39. COMBAT® [***Combat Flik R or alternate brand name***] [roach killing] [gel] [bait] [strips] kill[s] roaches fast
40. Kills roaches continuously
41. Kills [roaches] non-stop
42. [Ongoing] [Non-stop] roach control
43. Keeps [killing [roaches]] [working] until [it's] [the bait is] gone
44. Long residual action [for up to 3 months]
45. Keeps [working] [killing roaches] [for] up to 3 months
46. Provides round the clock protection [for up to 3 months]
47. Kill roaches 24/7 [for up to 3 months]
48. Provides 24/7 [roach] protection [for up to 3 months]
49. Kills roaches while you sleep
50. Kills roaches for up to 3 months
51. [The] Domino Effect™
52. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Get][s] [to] [the nest] [,] [the source of [the] [your] [roach] problem]
53. [COMBAT®] [G[g]el] [bait][s] [strips] Kill[s] [roaches] [in hard-to-reach] [and] [inaccessible] [areas] [places]
54. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches where they [hide] [breed] [live] [nest]
55. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you don't see
56. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches [where] you can't see them

Optional claims for front or back or side panel of label - continued

57. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you see and [those] [ones] you don't [see]
58. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the roach] [roaches at the] source
59. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches in the nest
60. [COMBAT®] [G[g]el] [bait][s] [strips] [Kills] [Stop][s] [Eliminate][s] [Destroy][s] the [roach] [entire] [nest]
61. [COMBAT®] [G[g]el] [bait][s] [strips] Lets roaches [Kill] [Stop] [Eliminate] [Destroy] [other] roaches
62. Roaches [take] [share] [it] [COMBAT®] ['s ingredients] [the] [insecticide] [gel] [bait] [back to] [back at] [with] [in] the nest
63. Roaches share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the nest][,] [killing other roaches] [and] [destroying the nest]
64. Roaches share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the nest][,] [killing other roaches] [and] [destroying [the] [local] [your] [roach] population]
65. Roaches eat the [insecticide] [gel] [bait] and die in the nest
66. Roaches are attracted to the [insecticide] [bait] [gel] and take it back to their nest
67. Roaches ingest the [insecticide] [gel] [bait] and return to die in their nest
68. [Fast acting] formula [that] quickly kills roaches [in the nest]
69. Kills quickly and keeps on killing [roaches] [back at the nest]
70. Kills roaches [at their source] [in the nest]
71. As [The] [Domino Effect™] [insecticide] [bait] [gel] spreads through the roach population, [most] roaches are killed
72. This product['s patented action formula] kills roaches
73. This product provides complete roach control
74. Kills roaches while you sleep
75. Kills roaches for 3 months
76. [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] roaches
77. [Kills] [Stops] large roaches outdoors (adjacent to the home) before they come indoors [so that they don't] [and] [invade your home]
78. [Indoor and] Outdoor (adjacent to the home) [roach] control
79. [Ideal for] use with COMBAT® [*another Combat product name*]

Optional claims for front or back or side panel of label - continued

- 80. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® roach bait [station][s] products [for maximum control]
- 81. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® roach gel[s] [products] [in syringe form] [for maximum control]
- 82. [Ideal for] use [in combination] with other COMBAT® roach [bait][s] [products] [for maximum control]
- 83. Kills fast [!]
- 84. Works fast [!]
- 85. Leaves no mess [!]
- 86. Kills the [entire] nest [!]
- 87. Discreet design

Value claims:

Value claims below are only for packs with net contents greater than 6 baits but not to exceed 24:

- Bonus Pack
- Value Pack
- [x][More]^{††} [Free] [Bonus] Baits^{††} [With Purchase]
- [x%] More^{††} [Free] [Bonus] Bait(s)^{††} [With Purchase]
- More Baits – Better Value^{††}
- Value Pack – More Baits^{††}
- Better Value^{††}
- More Baits^{††}

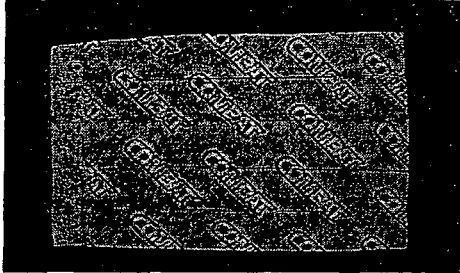
^{††}vs. [standard] [x] [count][ct.][package][pkg.][of this product]

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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.]

Bait Strip Unit Label for Combat® Flik R



TOP VIEW - AS IT APPEARS BEFORE STRIPS ARE BROKEN APART

Text below is what will appear on strip.

Combat brand logo {*as it appears in the photo or similar graphics*}

Peel Here



BOTTOM VIEW - AS IT APPEARS BEFORE adhesive is removed

Text below is what will appear on strip. Batch code will be added to the label or to the bait strip.

KEEP OUT OF REACH OF CHILDREN.

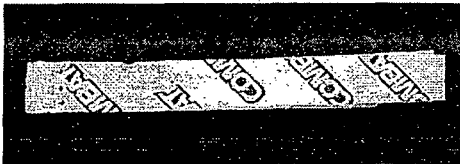
CAUTION: See [Outer Carton] [Pouch] for Complete Directions & Precautions

Remove to Adhere

EPA Reg. No. 64240-67

EPA Est. No. 85632-KOR-001

ACTIVE INGREDIENT: Fipronil 0.01%



TOP VIEW - AS IT APPEARS AFTER PLACEMENT BUT NOT YET ACTIVATED

Combat logo {*as it appears in the photo or similar graphics*}



TOP VIEW - AS IT APPEARS AFTER PLACEMENT AND ACTIVATION