APR 1 2 2005

SYNERGY LABS, INC. 3333 S.E. 14TH AVENUE Ft. Lauderdale FL 33318

Subject: Label Revision

Product Name: FIRST DEFENSE PREMISE TREATMENT

EPA Registration No. 68086-4 Application date: January 13, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comment listed below.

o In the UPHOLSTERY section correct the spelling (io) to (to).

o Revise the EPA Registration no. to read "EPA Reg. No. 68086-4".

To expedite handling please, return a copy of the letter with your finished labeling. If you have any questions regarding this letter, please contact Ms. Pat Quarles @ (703) 305-6876.

Sincerely

Richard Gebken Product Manager 10

Insecticide Branch

Registration Divisuion 7505

enclosure

KILLS: FLEAS at "larval stage", COCKROACHES, ANTS, SILVERFISH, & WATERBUGS.

KEEP OUT OF REACH OF CHILDREN CAUTION

See Side/Back panel for Additional Precautionary Statements.

ACTIVE INGREDIENT: Boric Acid . 100.0%

WINTHE WAR IN 3 STEPS!

★ Step #1: Pet Shampoo

★Step #2: Use First Defense Premise Treatment.

★Step #3: Use a Topical Spray.

EPA Reg. No. 68086-U

EPA Est. No. 68086-FL-1

Synergy Labs™

3333 S.E. 14th Avenue Ft. Lauderdale, FL 33318

NET WEIGHT 2 lbs.

NOTICE: Buyer and user assume all risk and liability of use, storage and/or handling of this material not in accordance with the terms of this label.

FIRST DEFENSE PREMISE TREATMENT FOR THE HEALTH, SAFETY AND COMFORT OF YOUR FAMILY & PETS.

DIRECTIONS FOR USE

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

USE RESTRICTIONS:

Children and pets should not be in treatment area until after the application is completed. Do not treat pets with this product. Avoid contamination of feed, food stuffs and ornamental plants.

CARPETS: Clean or vacuum the area before application. Apply to dry surfaces only. Apply directly on carpets where pets

frequently traffic or sleep. Work powder deeply into fibers and mat with a broom or rug rake. Any powder visible after application, must be brushed into carpet fibers or removed. For Larval fleas apply at the rate of 1 pound for every 1,000 sq.ft. of treated area.

PET RESTING & SLEEPING QUARTERS:

FOR LARVAL FLEAS: Remove pet and sprinkle powder over wood flooring around and beneath pet sleeping quarters, Brush and work the powder into cracks and crevices for residual flea larval control. Remove any excess surface powder with a damp sponge or mop, Retreat as needed.

UPHOLSTERY: Remove loose cushions. Apply along creases and into corners and furniture wells. Do not apply product io exposed fabric. Any powder visible after application must be removed.

FOOD and NO-FOOD AREAS: For RESIDENTIAL, COMMERCIAL and INDUSTRIAL SITES; application is limited to CRACK AND CREVICE APPLICATION ONLY.

FIRST AID

Have this product container or label with you when calling a Poison Control Center or doctor or when going for treatment.

IF IN EYES - Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice. Have this product label with you when going for treatment. IF SWALLOWED - Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person. You may also call 1-800-858-7378 for emergency medical treatment advise.

PRECAUTIONARY STATEMENTS

Hazards To Humans and Domestic animals CAUTION: Harmful if swallowed. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Store product in original container away from food and feedstuffs. Keep product in a locked storage area.

DISPOSAL: IF EMPTY; Do not reuse container. Place in trash or offer for recycling. IF PARTLY FILLED, Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down an indoor or outdoor drain. (01-13-05)

In Eth Continents

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Line 20 Total Continents

Line 20 Total

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