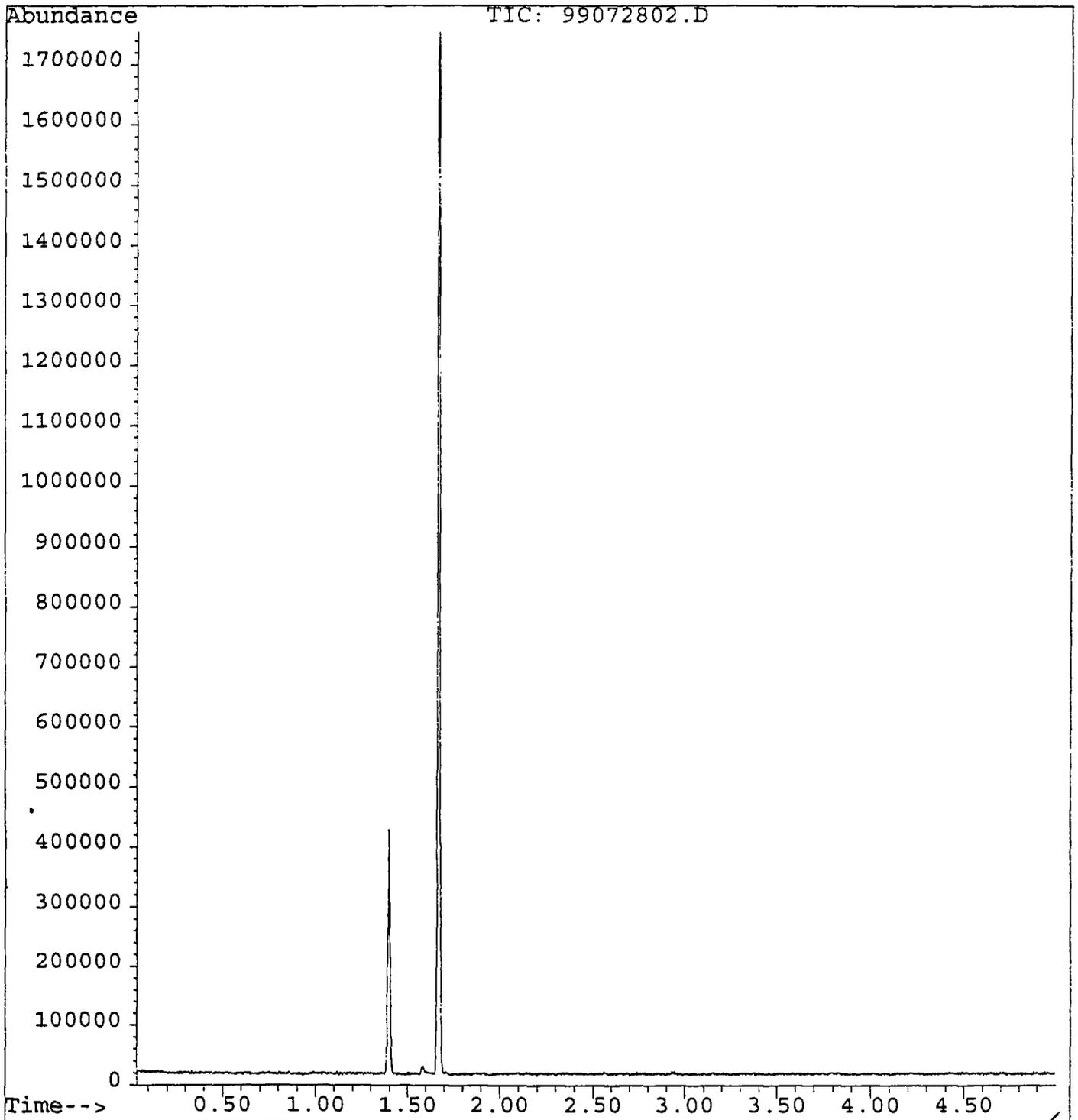
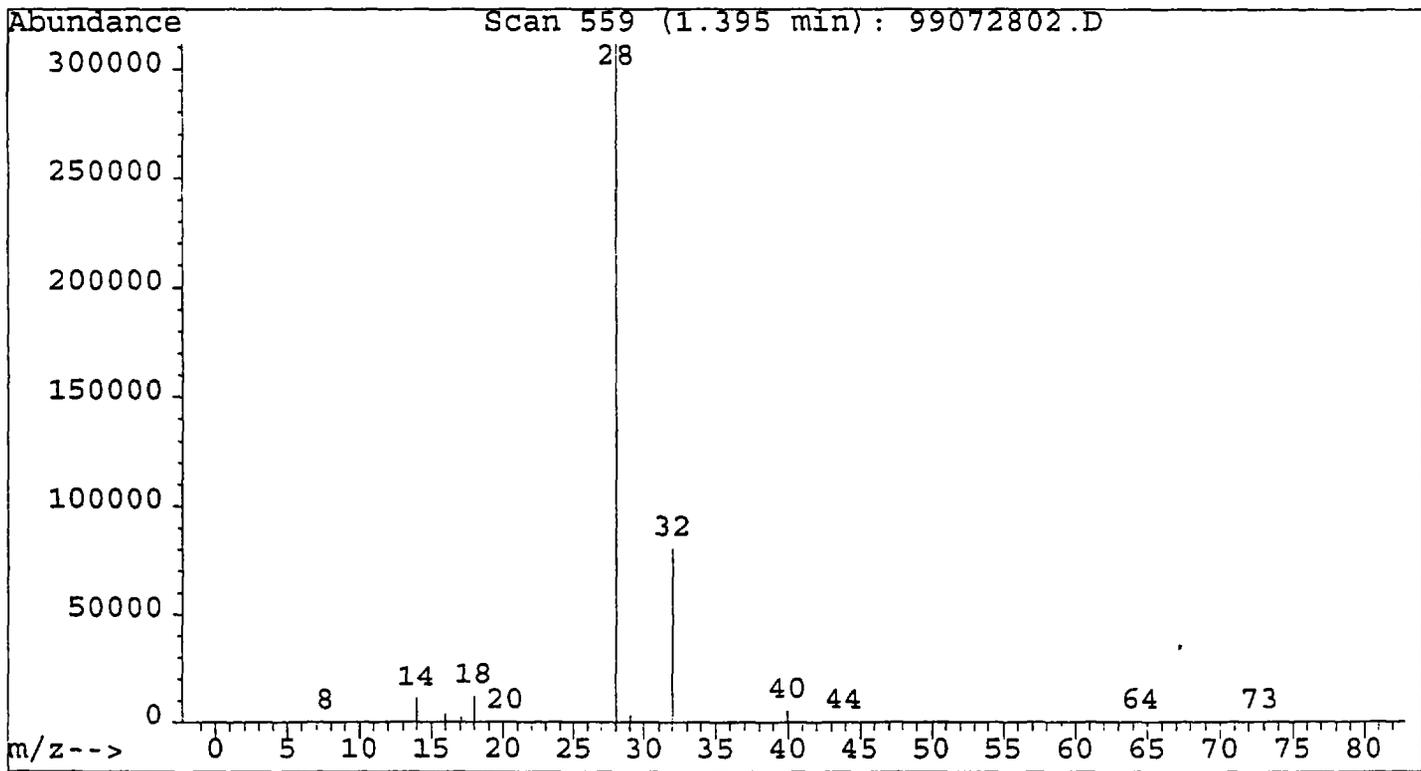
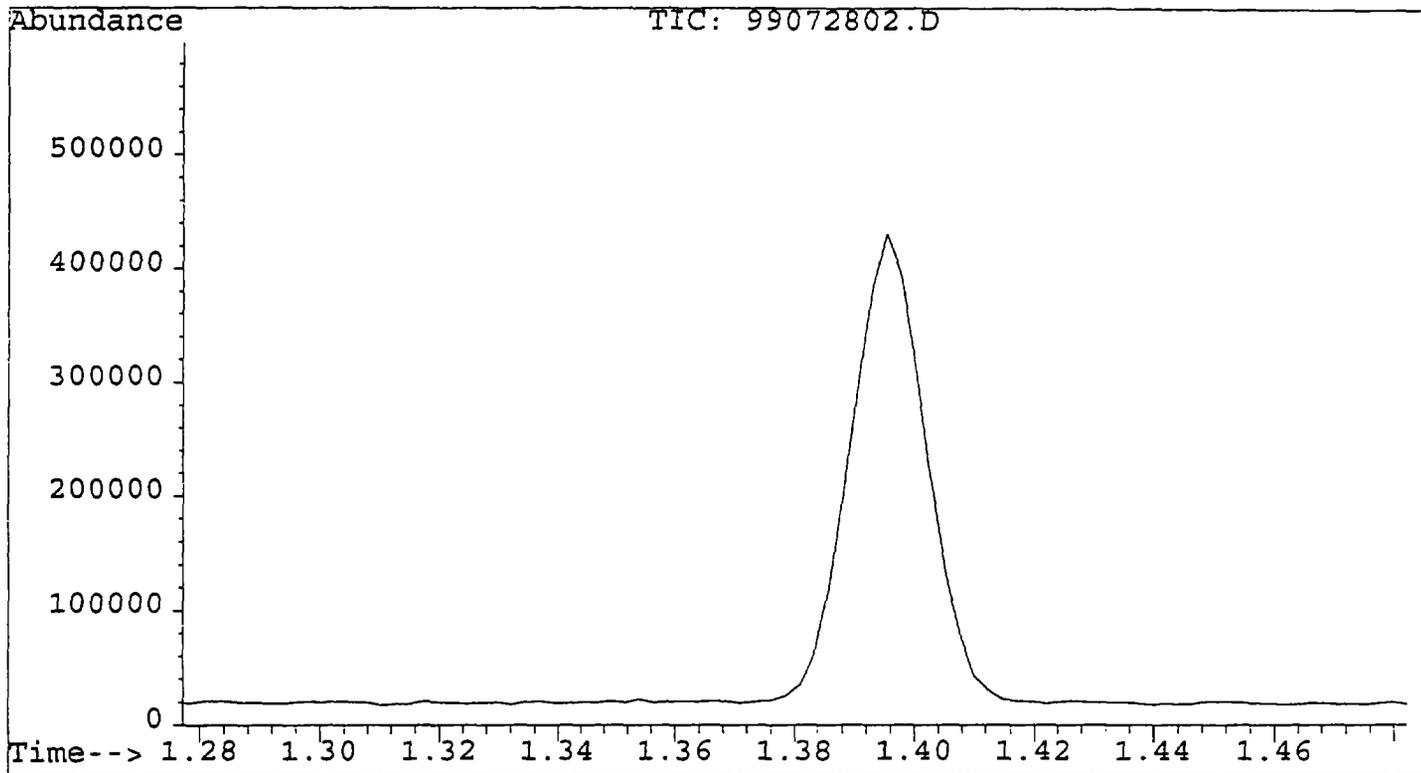


File : C:\HPCHEM\1\DATA\99072802.D
Operator : Bhavi Jain
Acquired : 28 Jul 99 8:52 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5279-02
Misc Info : 35 deg isothermal
Vial Number: 1



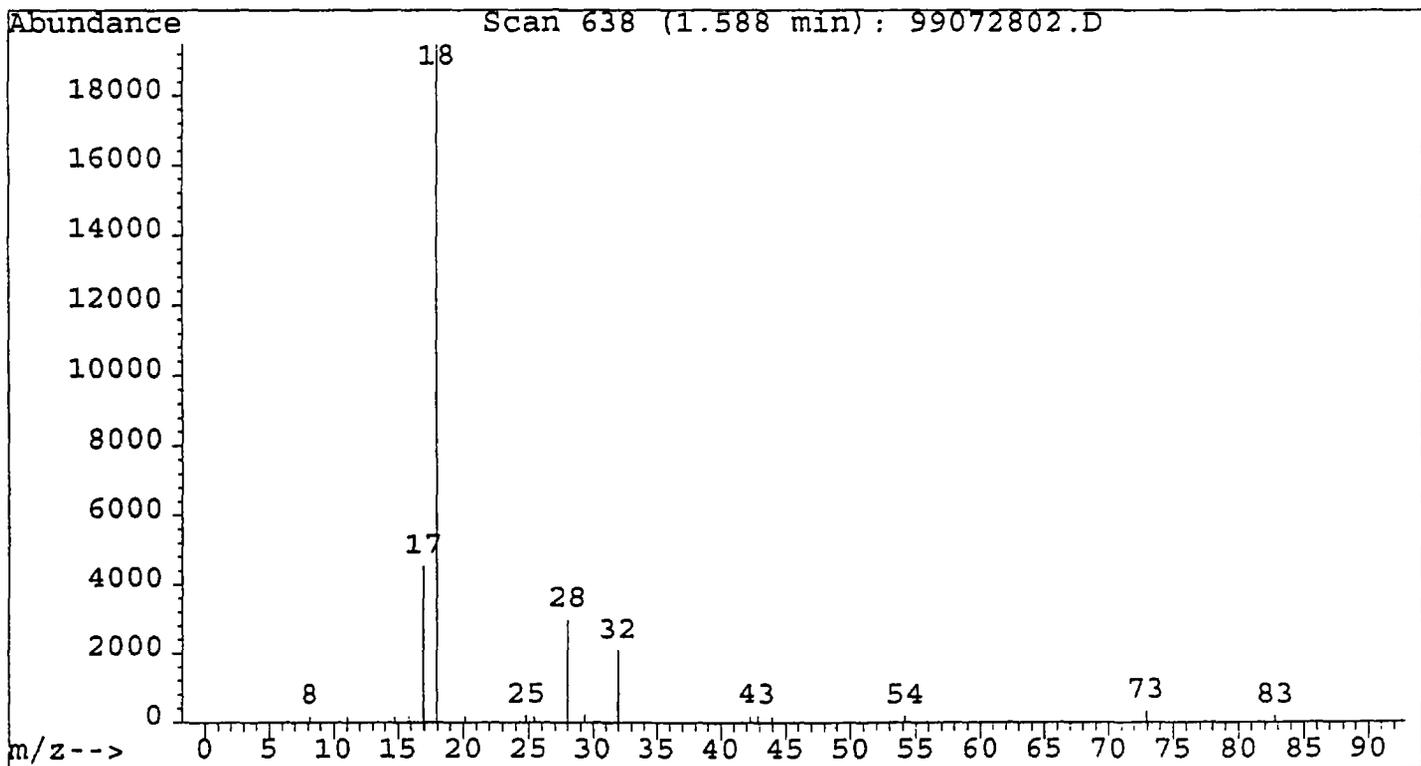
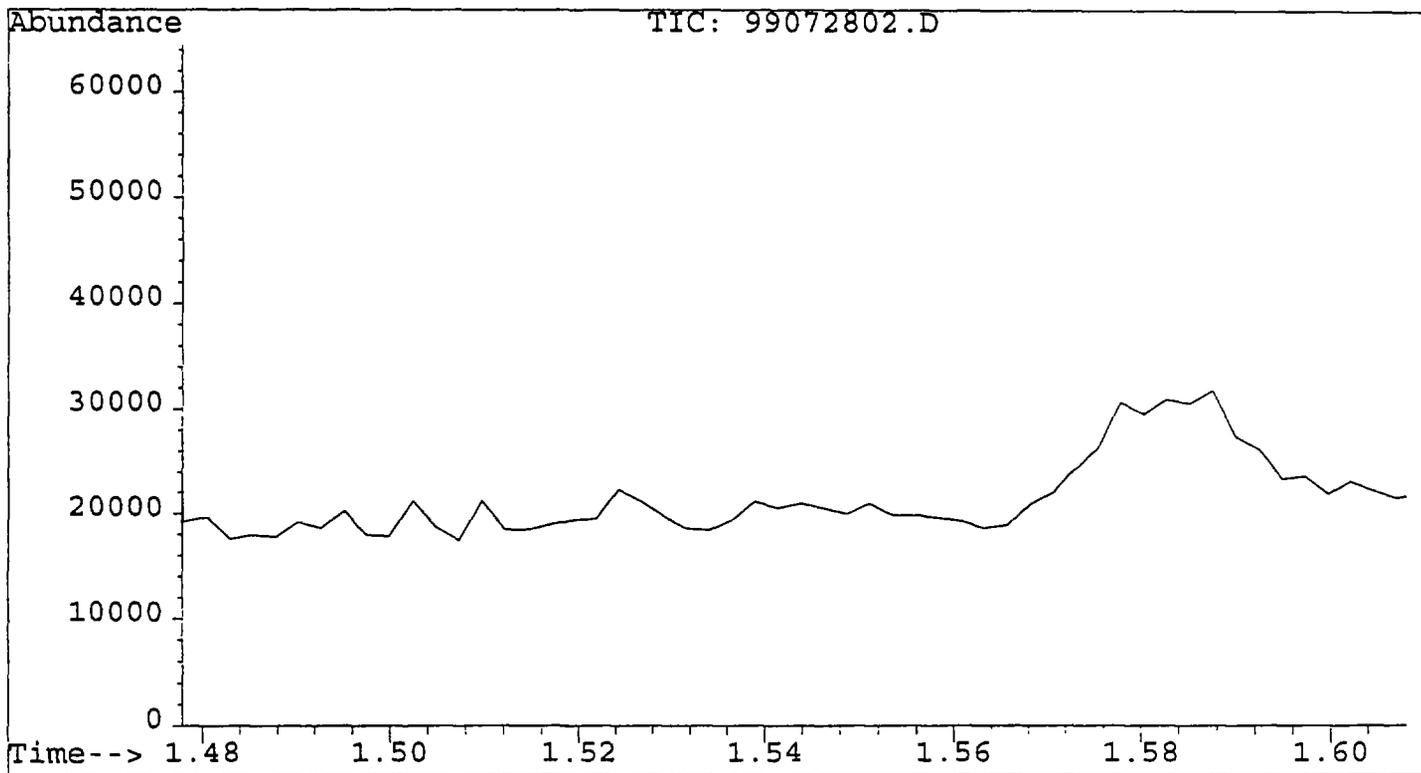
39

File : C:\HPCHEM\1\DATA\99072802.D
Operator : Bhavi Jain
Acquired : 28 Jul 99 8:52 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5279-02
Misc Info : 35 deg isothermal
Vial Number: 1



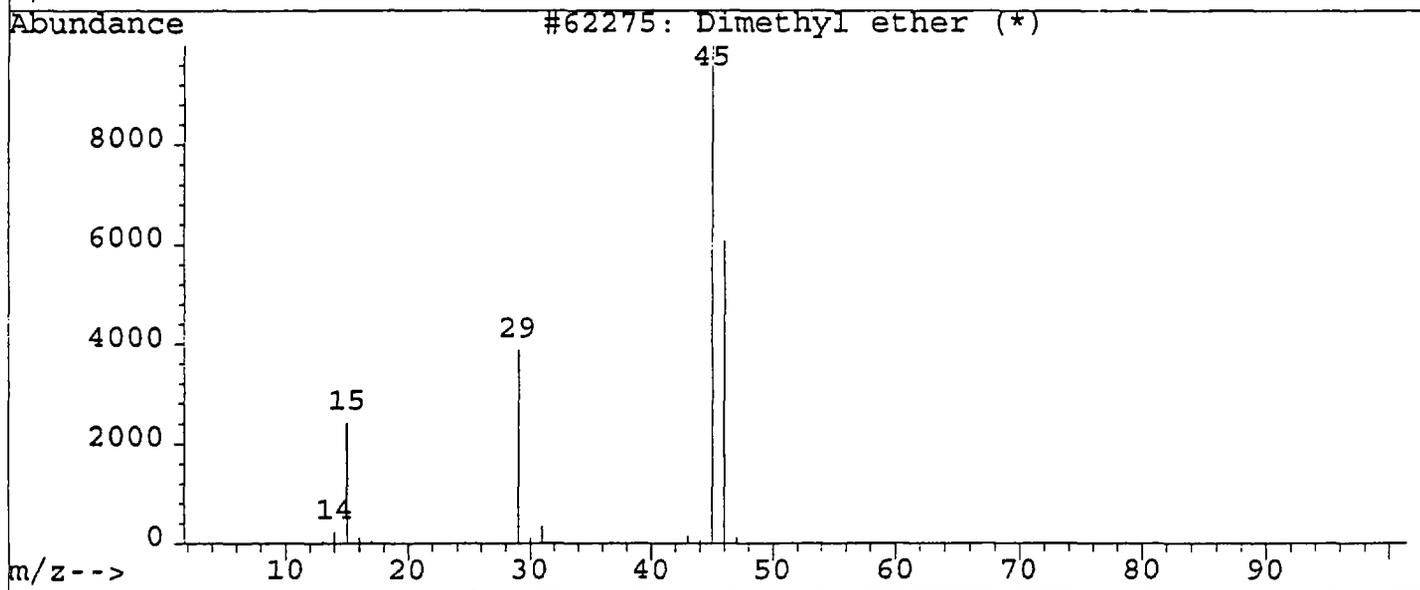
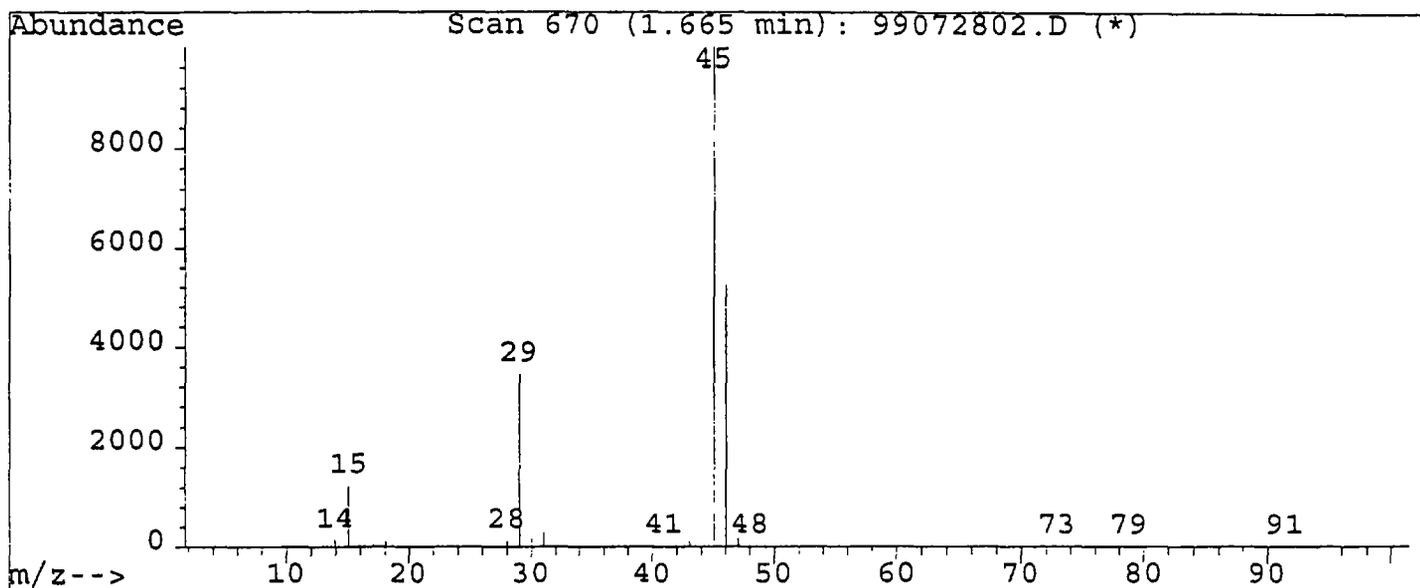
410

File : C:\HPCHEM\1\DATA\99072802.D
Operator : Bhavi Jain
Acquired : 28 Jul 99 8:52 am using AcqMethod GAS
Instrument : 5971 - In
Sample Name: 99-860-5279-02
Misc Info : 35 deg isothermal
Vial Number: 1



41

Library Searched : C:\DATABASE\NBS75K.L
Quality : 72
ID : Dimethyl ether



42

LABORATORY/COMPLIANCE SUMMARY

Sample Number:

99-860-6484

2. Laboratory Summary: Crazy Ribbon, Party Spray

Flammability 16 CFR 1500.14

Samples were tested shaken (2) and unshaken (2) in the upright, sideways, and inverted positions.

Shaken upright and sideways:

All four subs had flame extension in excess of 18 inches and exhibited flash back to the nozzle.

Shaken inverted:

All four subs extinguished the candle flame.

Unshaken

Upright – Both subs showed flame extension in excess of 18 inches and exhibited flash back to the nozzle.

Sideways, one sub showed flame extension in excess of 18 inches and exhibited flash back to the nozzle. One sub extinguished the candle flame

Inverted, Both subs extinguished the candle flame.

FILE COPY

Original to: FOWR - Allen; **Copies to :** LSC, CE – Krivda, FOWR Blend

3. Name and Title

Date:



August 11, 1999

Warren K. Porter, Jr., Dir. LSC

4. Firm Name: _____; Product: _____

City, State: _____; Model#: _____

5. Compliance Assessment:

5. 11(c) Notice: Mfr/Imp.: _____ Retailer _____ Other _____

Original Records to: _____; Copies: _____

7. Name and Title:

8. Date:

43

LABORATORY REPORT		1. PRODUCT: Crazy Ribbon, Party Spray	2. SAMPLE NUMBERS: 99-860-6484
3. SEALS: Intact		4. DATE REC: 8/10/99	5. LABORATORY: LSC
6. SAMPLE DESCRIPTION: 12 units were received in plastic bags. Sample had the following information: "99-860-6484, Lori S. Person, 8/5/99".			
7. LABELING: N/A		8. CUSTOMS ENTRY NO: N/A	9. LOT/MODEL#:
10. PRODUCT DESCRIPTION: Crazy Ribbon, the product sprays different color strings of materials, and is used at children's birthday parties.			
11. ANALYTICAL RESULTS:			
<p>Flammability 16 CFR 1500.45: When tested upright, all units showed flame extensions greater than 18 inches and flash back to the nozzle. In the inverted position, none of the units tested showed flashback or flame extensions.</p>			
<u>Subunit</u>	<u>Shaken/Unshaken</u>	<u>Orientation</u>	<u>Result</u>
1	S	Upright	Flame extension > 18", flash back to nozzle
		Sideways	Flame extension > 18", flash back to nozzle
		Inverted	Flame extinguished
3	U	Upright	Flame extension > 18", flash back to nozzle
		Sideways	Flame extension > 18", flash back to nozzle
		Inverted	Flame extinguished
7	S	Upright	Flame extension > 18", flash back to nozzle
		Sideways	Initial flame extension > 18", flame extinguished
		Inverted	Flame extinguished
8	U	Upright	Flame extension > 18", flash back to nozzle
		Sideways	Flame extinguished
		Inverted	Flame extinguished
12. RESERVE SAMPLE: Unused sample was sealed in container box and kept in storage room for warehouse pick up			
13a ANALYST SIGNATURE 		13b DATE 8/11/99	
14a CHECK ANALYST SIGNATURE		14b DATE	
15a REPORT CHECKED BY 		15b DATE 8/11/99	

44

99-860-6484
DC
8/11/94

. FEY COMMISSION	
	
SIGNATURE <i>John S. Pearson</i>	SAMPLE NO. 99-860-6484
PRINT NAME & TITLE (CPSC REFERENCE ONLY) John S. Pearson, PST	DATE 8/5/94
SEAL BROKEN BY <i>D</i>	
DATE 8/11/94	

CPSC FORM 164

4

Author: <lblend@cpsc.gov> at INTERNET-MAIL

Date: 7/27/99 2:23 PM

Normal

TO: <nallen@cpsc.gov> at internet-mail

CC: <fkrivda@cpsc.gov> at internet-mail, <ryelenik@cpsc.gov> at internet-mail,
<kbarton@cpsc.gov> at internet-mail, <cosmith@cpsc.gov> at internet-mail,
<lperson@cpsc.gov> at internet-mail, <mross@cpsc.gov> at internet-mail,
<jfrancis@cpsc.gov> at internet-mail, <fnava@cpsc.gov> at internet-mail,
<lcornell@cpsc.gov> at internet-mail, <lpain@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Re: Fw: Documentation for Crazy String.

----- Message Contents

Folks: Maybe this will help clear things up:

It is our understanding that "Crazy String" party string is a brand name that is reportedly used on product imported by Stelex Corporation only. "Crazy Ribbon" party string is used on the product imported by any importer. Stelex has claimed that it only imported "Crazy Ribbon" once in 1996. The unit involved in the incident is a "Crazy Ribbon" product that was PROBABLY distributed by Stelex but actually imported by another firm. Stelex is not yet come forth with records and a decision to recall its imported brand "Crazy String" or the "Crazy Ribbon" lot it imported in 1996. We have no information yet about how many or when it imported "Crazy String".

We obviously believe that both brands are the same item, and a sample of "Crazy String" will go a long way to clear this up. the sample will also give us ammunition to get Stelex to recall and produce records and/or support our need for a subpoena to get the records we need. This is why a sample of "Crazy String" is so important. Norvan is the CO for this firm. Ron Yelenik is our lawyer on the matter from the Legal Division.

*** As you can tell it is important to report the correct brand of party string you sample.***

The Le Sa Yang Family, Ltd has already agreed to a voluntary recall of "Crazy Ribbon" it imported and we sampled under 99-860-5295. Major Import, Inc. has also agreed to a voluntary recall of the "Crazy Ribbon" it imported and we sampled as 99-860-5290/1/2/3/4. (I am the CO for these two firm.) Ameri-China Intl., Inc. has an imported lot of "Crazy Ribbon" under Customs seizure (99-860-5682). It reports no other shipments. Norvan is handling Ameri-China.

We have inspectional assignment 990727WRC1818 issued to Keven to inspect four firms that according to a trade complaint also imported "Crazy Ribbon". The firms are to be inspected by 8/15/99. They are: Royal/Regency Merchandise, Los Angeles; Y.B. Toys, Alhambra; K & F Intl., Inc., Los Angeles; and, Kimsley Trading Co., Inc., Arcadia. We have indicated that Louie Pain will handle any CO work for these firms.

We have draft press releases into OIPA for Major Import and Le Sa Yang Family, Ltd. We do not know whether OIPA will do one press release for all the eventual importers or separate ones for each firm. We are encouraging the firms to develop eventually a Video News Release. Headquarters has indicated that it was ok for all to pool their resources for one tape. A production cost \$10,000 to \$12,000 each. There probably will not be to many takers.

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We are finding that the firms involved with this product may have been both an importer themselves and/or a distributor of lots imported by someone else.

Reply Separator

Subject: Fw: Documentation for Crazy String.
Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL
Date: 7/27/99 9:32 AM

FYI

Larry,

We may need to have one person in FOWR coordinating these party spray actions. This is the first I have heard of Mr. Lu of Le Sa Yang, but we have a file on the firm CBB.

Norvan

-----Original Message-----

From: Cecil O. Smith <cosmith@cpsc.gov>
To: Keven Barton <kbarton@cpsc.gov>
Cc: Norvan Allen <nallen@cpsc.gov>
Date: Tuesday, July 27, 1999 3:21 AM
Subject: Fw: Documentation for Crazy String.

>Keven -----

>
>O.K. Sample 99-860-5279 will ONLY have documentation showing Y2K Novelty
>received the Crazy String from a local firm named CBB, and nothing else. I
>became involved in a very awkward situation yesterday when the importer
>firm's owner, Mr. Lu of Le Sa Yang, suddenly showed up at Y2K Novelty. I
am
>not going to let a firm' employee tell me what records I am entitled to
>request as a Commissioned CPSC employee under CPSC regulations, when I am
>attempting to document an official sample involved in an active compliance
>activity, unless I am told to back-off by my supervisor or compliance
>personnel.

>Cecil.....

>--Original Message-----

>From: Keven J. Barton <kbarton@cpsc.gov>
>To: Cecil O. Smith <cosmith@cpsc.gov>; Lori Person <lperson@cpsc.gov>
>Date: Monday, July 26, 1999 9:26 PM
>Subject: Re: Documentation for Crazy String.

>>Cecil, what you were told was correct. I suggest you back off on Le Sa
>>Yang and let Lori handle any follow up that may be necessary. Call it
>>closed on your end for this firm.

>>Keven.....

>>-----
>>From: Cecil O. Smith <cosmith@cpsc.gov>
>>To: Lori Person <lperson@cpsc.gov>; Keven Barton <kbarton@cpsc.gov>
>>Subject: Documentation for Crazy String.
>>Date: Monday, July 26, 1999 5:02 PM

>>Keven and Lori -----

>>.
>>This afternoon I was at Y2K Novelty in the downtown toy district attempting
>>to get record documentation for the Crazy Ribbon sample I collected late
>>last week (99-860-5279) that was manufactured by Top Grease in Taiwan.
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>>purchased the Crazy String for cash and had no shipping records. A Y2K
>>employee noticed a man outside on the street who had sold the Crazy
String.
>> I, and the store employee, went outside on the street and met with a Mr.
>>Lu. I showed him my credentials and asked if his firm sold the Crazy
>>String that Y2K sold. Mr. Lu did not speak English very well. He said
his
>>firm was Le Sa Yang in Diamond Bar and his firm distributed Crazy String.
>>He said his firm sold Crazy String to CBB (a local firm) who sold it to
>>Y2K. Mr. Lu put me on his cellular telephone to talk with an employee,
>>May, who spoke very good English.
>>
>>May informed me that her firm furnished records to Lori Persons, talked
>>with Larry Blend about recalling the Crazy String, and took the Crazy
>>String back from the customers. I requested shipping records from her
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>>for the Crazy String sample I collected at Y2K. May told me that these
>>records had already been furnished. She told me to get them from Lori or
>>another CPSC employee. I reiterated that I was requesting a meeting at
>>her firm to obtain shipping records. She then repeated the same thing. I
>>told her that I could not deal with her over the telephone. I said I was
>>requesting to meet with her and Mr. Lu at her firm. Another person then
>>translated for me in Chinese as I told Mr. Wu that I was requesting a
>>meeting at this firm to obtain shipping records. I was then told by a
>>translator that someone would call me at my office in the morning about
>>setting up a meeting.
>>
>>Please advise me of any information or things I should do in attempting to
>>document with records the Crazy String sample I collected.
>>
>>Cecil.....
>>
>

46

Author: <lblend@cpsc.gov> at INTERNET-MAIL

Date: 7/27/99 1:23 PM

Normal

TO: <lblend@cpsc.gov> at internet-mail, <fkrivda@cpsc.gov> at internet-mail,
<ryelenik@cpsc.gov> at internet-mail, <nallen@cpsc.gov> at internet-mail

CC: <wporter@cpsc.gov> at internet-mail, <kbarton@cpsc.gov> at internet-mail,
<cosmith@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Re: Crazy String 99-860-5279

----- Message Contents

Once I get the hard copy and records I intend to "Terminate" this sample 99-860-5279 which I understand is Crazy Ribbon-not Crazy String. Le Sa Yang is already preparing to recall its imported "Crazy Ribbon". If the sampled lot was shipped by Le Sa Yang after it got our LOA dated 7/22/99 or the product sampled is Crazy String then we shall look further at it.

Reply Separator

Subject: Crazy String 99-860-5279

Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL

Date: 7/27/99 9:34 AM

It now appears this sample was originally imported by Le Sa Yang, not Stelex, so e should be able to issue the LOA/dun letter to Stelex, once we find out who has he test results for 99-860-5277.

Norvan

49

Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL

Date: 7/27/99 9:34 AM

Normal

TO: "Blend" <lblend@cpsc.gov> at internet-mail,

"Krivda" <fkrivda@cpsc.gov> at internet-mail, <ryelenik@cpsc.gov> at internet-mail

CC: <wporter@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Crazy String 99-860-5279

----- Message Contents

It now appears this sample was originally imported by Le Sa Yang, not Stelex, so we should be able to issue the LoA/dun letter to Stelex, once we find out who has the test results for 99-860-5277.

Norvan

50

Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL

Date: 7/27/99 9:32 AM

Normal

TO: "Blend" <lblend@cpsc.gov> at internet-mail

CC: "Krivda" <fkrivda@cpsc.gov> at internet-mail, <ryelenik@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Fw: Documentation for Crazy String.

----- Message Contents

FYI

Larry,

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Cc: Norvan Allen <nallen@cpsc.gov>

Date: Tuesday, July 27, 1999 3:21 AM

Subject: Fw: Documentation for Crazy String.

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>Subject: Re: Documentation for Crazy String.

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>>
>>-----

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>>To: Lori Person <lperson@cpsc.gov>; Keven Barton <kbarton@cpsc.gov>

>>Subject: Documentation for Crazy String.

>>Date: Monday, July 26, 1999 5:02 PM

>>
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>>document with records the Crazy String sample I collected.
>>
>>Cecil.....
>>
>

52

Author: Norvan K. Allen at CPSC-HQ1

Date: 7/27/99 6:58 AM

Normal

TO: Frank J. Krivda at CPSC-HQ2

Subject: Crazy String Status

----- Message Contents

FYI

Forward Header

Subject: Crazy String Status

Author: Warren K. Porter at CPSC-LSEL

Date: 07/27/1999 8:13 AM

LSC has received the following samples:

Samp #	Status
99-860-5277	Frank Krivda has this one
5279	Not received
5680	At Warehouse - Should be delivered today
5681	At Hdqrts Compliance
5682	Reported out
5290 through 5295	Reported out
5374	Reported out
5375	Reported out

So far all the units tested have flame extensions in excess of 18" and flash back in one or more of the positions and shaken or unshaken modes. All contain Dimethyl ether as the solvent/propellant.

I put a call into the sample custodian to ensure that 99-860-5860 and 5279 asre delivered promptly.

Are I missing any samples in the above list?

Larry,

Have you received the empty cans and 2 video tapes? All the cans are the same, they just have different color tops.

Warren

53

FOR OFFICIAL USE ONLY

99-860-5277

7-30-99

Distr:

Orig: Stelex Enterprise Inc.

Cc: CHP – Frank Krivda

CLD - Ron Yelenik

FOWR-SFO – Estab. file

e-mail

cc: CHP – Frank Krivda

CLD – Ron Yelenik

FOWR-SFO – Larry Cornell

Summary: Frank Nava, Larry Blend, Ted Doi, Keven Barton

Summary: This letter reports the failure of Crazy String to Stelex and repeats CPSC request to recall Crazy Ribbon to the consumer level as well as Crazy String. The sample was collected in domestic status from a retailer who received the product from a distributor, on 4-19-99, who received it from Stelex, on 4-19-99. This sample failed as badly as all other current samples of

54



**U. S. CONSUMER PRODUCT SAFETY COMMISSION
WESTERN REGIONAL OFFICE**

**600 HARRISON STREET, ROOM 245, SAN FRANCISCO, CA 94107-1370
(415) 744-2966 FAX (415) 744-2962 www.cpsc.gov**

July 30, 1999

Albert J.C.Chang, Esq.
19138 Walnut Dr., Suite 100
Rowland Heights, CA 91748

Via facsimile and FED EX

RE: CPSC Sample 99-860-5375
Crazy Ribbon, 120 g
CPSC Sample 99-860-5277
Crazy String, 120 g

Dear Mr. Chang :

On July 9, 1999, I wrote to your client, Stelex Enterprises, Inc., ("Stelex: or "the firm") reporting on the Commission's finding that CPSC sample 99-860-5375 of an aerosol product, Crazy Ribbon, distributed by the firm was a banned hazardous substance as defined under § 2(f)(1)(A)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(1)(A)(v), and, as it is a child's product, it is a banned hazardous substance under § 2(q)(1)(A) of the FHSA, 15 U.S.C. § 1261(q)(1)(A), (see copy attached).

The Commission has now obtained a sample (99-860-5277) of another aerosol product, Crazy String, also distributed by your firm. Grace Qian, owner of 22 Century Toy Co., formerly Toy Palace Trading Co., 204 Boyd St., Los Angeles, CA 90013, signed an affidavit and provided a copy of invoice 103547, dated 4-20-99, issued by Ameri-China International, 917 S. Alameda St., Los Angeles, CA 90021, showing sale of 10 cartons of 12 dozen Crazy String to Toy Palace. The Commission has a copy of Stelex invoice 972535, dated 4-19-99, showing the sale of 10 cartons of Item No. N-SE6002 Crazy String, (five colors), to Ameri-China International.

The staff tested the sample of Crazy String by the method described in 16 C.F.R. §1500.45 and determined that the product is flammable as defined under 16 C.F.R. §1500.3(c)(6)(viii) as the flame projection exceeded 18 inches when the valve was opened. Testing also determined that the product exhibited flash back. As a result, the product is a hazardous substance as described under § 2(f)(1)(A)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(1)(A)(v), and, as it is a child's product, it is a banned hazardous substance under § 2(q)(1)(A) of the FHSA, 15 U.S.C. § 1261(q)(1)(A).

The sale, manufacture for sale, offer for sale in commerce, or importation of any banned hazardous product is a prohibited act under Section 4 of the FHSA. 15 U.S.C. § 1263 and could subject your client to the penalties outlined in Section 5 of the FHSA. 15 U.S.C. § 1264. As a result, the firm could be subject to fines of up to \$1.5 million and imprisonment for not more than one year, or both. Please review Chapter 1 of the enclosed Regulated Products Handbook (Handbook) for additional details of these sanctions.

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In addition to the test failure of Crazy Ribbon reported to Stelex in my letter of July 9, 1999, the Commission staff considers the test failure of Crazy String to be extremely serious and asks that the firm immediately stop sale of both Crazy Ribbon and Crazy String and implement a voluntary consumer level recall. This recall program should include a recall notification letter to be issued to Stelex customers who received Crazy Ribbon and/or Crazy String., point of purchase recall posters where the product was offered for consumer sale, posting of the recall on the firm's internet website, if such exists, and the issuance of a press release in conjunction with the Commission. We also request that Stelex produce a video news release in cooperation with the staff.

The staff also requests that Stelex carefully review the rest of its product line for other children's products that contain the same chemical composition and therefore may be considered for similar corrective action.

On or before August 6, 1999, please provide a written plan outlining the specific corrective actions Stelex plans to take to address the hazard associated with these products. Also by that date, provide all requested information and documents regarding Crazy Ribbon and Crazy String, including but not limited to, information and documents requested by Commission investigator Tetsuo Doi. The staff has reason to believe that the information provided by Stelex, to date, regarding distribution in commerce of the products is incomplete. If Stelex fails to comply in a timely manner with these requests, the staff will be forced to pursue compulsory measures, including, but not limited to, seizure of the products and the use of a subpoena to obtain outstanding information and documents. Moreover, the staff will consider the issuance of a unilateral press release in this matter.

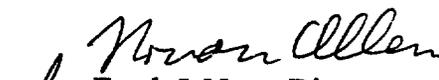
For your information, the staff has inspected the firms identified by Stelex as other importers of Crazy Ribbon, as well as others, and collected samples from several. A number of these firms are currently cooperating with the Commission by instituting voluntary recalls to the consumer level and pledging to issue joint press releases covering Crazy Ribbon or Crazy String imported and distributed by their firms. The staff looks forward to the cooperation of Stelex in this regard.

Please direct your response to:

Norvan Allen, Compliance Officer
U.S. Consumer Product Safety Commission
1412 Vassar Dr. SE
Albuquerque, NM 87106
(505) 260-1707, fax (505) 260-1710, internet nallen@cpsc.gov

Thank you for your cooperation in this matter.

Sincerely,


Frank J. Nava, Director
Western Region

56

Enclosures: Test Report
Regulated Products Handbook
Nava 7-9-1999 Letter

Cc: Ronald G. Yelenik, Esq.
Litigation Division
Office of Compliance

57

July 30, 1999

Albert J.C.Chang, Esq.
19138 Walnut Dr., Suite 100
Rowland Heights, CA 91748

Via facsimile and FED EX

RE: CPSC Sample 99-860-5375
Crazy Ribbon, 120 g
CPSC Sample 99-860-5277
Crazy String, 120 g

Dear Mr. Chang :

On July 9, 1999, I wrote to your client, Stelex Enterprises, Inc., ("Stelex: or "the firm") reporting on the Commission's finding that CPSC sample 99-860-5375 of an aerosol product, Crazy Ribbon, distributed by the firm was a banned hazardous substance as defined under § 2(f)(1)(A)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(1)(A)(v), and, as it is a child's product, it is a banned hazardous substance under § 2(q)(1)(A) of the FHSA, 15 U.S.C. § 1261(q)(1)(A), (see copy attached).

The Commission has now obtained a sample (99-860-5277) of another aerosol product, Crazy String, also distributed by your firm. Grace Qian, owner of 22 Century Toy Co., formerly Toy Palace Trading Co., 204 Boyd St., Los Angeles, CA 90013, signed an affidavit and provided a copy of invoice 103547, dated 4-20-99, issued by Ameri-China International, 917 S. Alameda St., Los Angeles, CA 90021, showing sale of 10 cartons of 12 dozen Crazy String to Toy Palace. The Commission has a copy of Stelex invoice 972535, dated 4-19-99, showing the sale of 10 cartons of Item No. N-SE6002 Crazy String, (five colors), to Ameri-China International.

The staff tested the sample of Crazy String by the method described in 16 C.F.R. §1500.45 and determined that the product is flammable as defined under 16 C.F.R. §1500.3(c)(6)(viii) as the flame projection exceeded 18 inches when the valve was opened. Testing also determined that the product exhibited flash back. As a result, the product is a hazardous substance as described under § 2(f)(1)(A)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(1)(A)(v), and, as it is a child's product, it is a banned hazardous substance under § 2(q)(1)(A) of the FHSA, 15 U.S.C. § 1261(q)(1)(A).

The sale, manufacture for sale, offer for sale in commerce, or importation of any banned hazardous product is a prohibited act under Section 4 of the FHSA. 15 U.S.C. § 1263 and could subject your client to the penalties outlined in Section 5 of the FHSA. 15 U.S.C. § 1264. As a result, the firm could be subject to fines of up to \$1.5 million and imprisonment for not more than

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one year, or both. Please review Chapter 1 of the enclosed Regulated Products Handbook (Handbook) for additional details of these sanctions.

In addition to the test failure of Crazy Ribbon reported to Stelex in my letter of July 9, 1999, the Commission staff considers the test failure of Crazy String to be extremely serious and asks that the firm immediately stop sale of both Crazy Ribbon and Crazy String and implement a voluntary consumer level recall. This recall program should include a recall notification letter to be issued to Stelex customers who received Crazy Ribbon and/or Crazy String., point of purchase recall posters where the product was offered for consumer sale, posting of the recall on the firm's internet website, if such exists, and the issuance of a press release in conjunction with the Commission. We also request that Stelex produce a video news release in cooperation with the staff.

The staff also requests that Stelex carefully review the rest of its product line for other children's products that contain the same chemical composition and therefore may be considered for similar corrective action.

On or before **August 6, 1999**, please provide a written plan outlining the specific corrective actions Stelex plans to take to address the hazard associated with these products. Also by that date, provide all requested information and documents regarding Crazy Ribbon and Crazy String, including but not limited to, information and documents requested by Commission investigator Tetsuo Doi. The staff has reason to believe that the information provided by Stelex, to date, regarding distribution in commerce of the products is incomplete. If Stelex fails to comply in a timely manner with these requests, the staff will be forced to pursue compulsory measures, including, but not limited to, seizure of the products and the use of a subpoena to obtain outstanding information and documents. Moreover, the staff will consider the issuance of a unilateral press release in this matter.

For your information, the staff has inspected the firms identified by Stelex as other importers of Crazy Ribbon, as well as others, and collected samples from several. A number of these firms are currently cooperating with the Commission by instituting voluntary recalls to the consumer level and pledging to issue joint press releases covering Crazy Ribbon or Crazy String imported and distributed by their firms. The staff looks forward to the cooperation of Stelex in this regard.

Please direct your response to:

Norvan Allen, Compliance Officer
U.S. Consumer Product Safety Commission
1412 Vassar Dr. SE
Albuquerque, NM 87106
(505) 260-1707, fax (505) 260-1710, internet nallen@cpsc.gov

Thank you for your cooperation in this matter.

Sincerely,

59

Frank J. Nava, Director
Western Region

Enclosures: Test Report
Regulated Products Handbook
Nava 7-9-1999 Letter

Cc: Ronald G. Yelenik, Esq.
Litigation Division
Office of Compliance

60

FOR OFFICIAL USE ONLY

99-860-5277

7-30-99

Distr:

Orig: Stelex Enterprise Inc.

Cc: CHP – Frank Krivda

CLD - Ron Yelenik

FOWR-SFO – Estab. file

e-mail

cc: CHP – Frank Krivda

CLD – Ron Yelenik

FOWR-SFO – Larry Cornell

Summary: Frank Nava, Larry Blend, Ted Doi, Keven Barton

Summary: This letter reports the failure of Crazy String to Stelex and repeats CPSC request to recall Crazy Ribbon to the consumer level as well as Crazy String. The sample was collected in domestic status from a retailer who received the product from a distributor, on 4-19-99, who received it from Stelex, on 4-19-99. This sample failed as badly as all other current samples of

b1

Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL

Date: 8/5/99 11:20 AM

Normal

TO: <ryelenik@cpsc.gov> at internet-mail, <estone@cpsc.gov> at internet-mail

CC: "Blend" <lblend@cpsc.gov> at internet-mail,

"Cornell" <lcornell@cpsc.gov> at internet-mail,

"Keven" <kbarton@cpsc.gov> at internet-mail,

"Krivda" <fkrivda@cpsc.gov> at internet-mail, "Nava" <fnava@cpsc.gov> at internet-mail,

"Ted" <tdoi@cpsc.gov> at internet-mail, <troger@cpsc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: Stelex Response to 7-30-99 LoA

----- Message Contents

I received a fax response to the LoA sent to Stelex attorney last Friday. The response agrees to everything we asked for. I have fax'd a copy to Ron. I will be working with the attorney on the recall.

The letter states that Stelex will provide all the documents Ted originally requested within two weeks. What Ted received so far includes desk invoices with no names or no addresses. I will be asking for names, addresses and amounts. While the response speaks of both Crazy products, the proposed recall letter only speaks of Crazy STRING, not Crazy RIBBON.

The firm also asked about sharing expenses on the production of a Video News Release.

Norvan

62

Author: Norvan K. Allen at CPSC-HQ1

Date: 8/11/99 9:20 AM

Normal

TO: Mark K. Ross at CPSC-HQ1

CC: Larry S. Blend at CPSC-HQ1, Frank J. Nava at CPSC-HQ1, Larry G. Cornell at CPSC-HQ1,
Keven J. Barton at CPSC-HQ1, Frank J. Krivda at CPSC-HQ2

Subject: Re[3]: status of Crazy Ribbon et. al.

----- Message Contents

Mark,

See my comments below. I believe you already have Larry's

Reply Separator

Subject: Re[2]: status of Crazy Ribbon et. al.

Author: Mark K. Ross at CPSC-HQ1

Date: 08/10/1999 3:01 PM

I think we should do one press release announcing all the companies recalling all the crazy strings and ribbons.

I agree. Will the fact that Stelex will be the only firm recalling Crazy String cause any problems with a single release?

The information sent on the drafts submitted... for Stelex and Major Import, is very limited. It doesn't have number of products from each company, price, contact info, where sold, etc.

The draft press release for Stelex was sent to you so you could begin to work on it and the possible single press release. The basic information is the same for Major, Le Sa Yang Family and Stelex.

Stelex is slowly providing the missing information. I will forward this to you as I receive it. In the interim, your draft single press release will be very useful in dealing with Stelex.

I can't find a draft on the Le Sa Yang Family, Ltd. Can I get this sent again?

Larry's firm

Is it possible to get samples for each company's product and the above information?

All samples have been analysed for the 3 firms above. However, if you are asking about exhibits for Public Affairs activities, You may obtain these from the reserve samples being held by the Sample Custodian, as pointed out to you by Larry.

When will all the companies doing this type of recall be ready to go? Will there be 5 all together?

Again, I am still waiting for the distribution, toll-free number, etc. from Stelex. The firm has advised Ted Doi some of this is ready and they will be sending it to them.

Will they be willing to do a Video News Release?

63

Larry has covered this in his response. Stelex is agreeable both for a VNR and sharing the cost. They have asked about this procedure. I have the material you sent to Larry on this subject.

Mark

Reply Separator

Subject: Re: status

Author: Larry S. Blend at cpsc-hq1

Date: 8/10/99 11:23 AM

Mark: What is the status of my draft press releases on Major Import and Le Sa Yang Family, Ltd.? Are you going to combine them? Major Import began its recall on 8/3/99 and Le Sa Lang Family, Ltd has already called its consignees to stop sale and should issue a recall letter any day now. How about Norvan's draft involving Stelex Enterprises he recently sent you? All involve essentially the same product. There is the possibility that two more importers may be identified but their recalls if any are several weeks away.

Thanks!

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Author: <lblend@cpssc.gov> at INTERNET-MAIL

Date: 8/24/99 7:37 AM

Normal

TO: <mross@cpssc.gov> at internet-mail, <cefieldcoord@cpssc.gov> at internet-mail,
<estone@cpssc.gov> at internet-mail, <fkrivda@cpssc.gov> at internet-mail

CC: <fnava@cpssc.gov> at internet-mail, <lcornell@cpssc.gov> at internet-mail,
<nallen@cpssc.gov> at internet-mail

BCC: Frank J. Krivda at CPSC-HQ2

Subject: spray string matter

----- Message Contents

Below is my report for the two firms I am handling. Norvan Allen will report on Stelex. Each of my two firm was supplied a copy of the draft press release without the names and addresses of any firms shown.

Major Import, Inc.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is willing to contribute \$4,000 to a VNR.

Le SaYang Family, Ltd.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is NOT willing to contribute any amount of money to the VNR.

I await further instructions.

Lawrence S. Blend

65

Author: Norvan K. Allen at CPSC-HQ1

Date: 8/25/99 1:13 PM

Normal

CC: <lblend@cpsc.gov> at INTERNET-MAIL

TO: Mark K. Ross at CPSC-HQ1

CC: Ken P. Giles at CPSC-HQ1, Frank J. Krivda at CPSC-HQ2, Patrick D. Weddle at CPSC-HQ1,
Theresa D. Rogers at CPSC-HQ2, Kathleen P. Begala at CPSC-HQ1

TO: Marc J. Schoem at CPSC-HQ2, David A. Walden at CPSC-LSEL, Jacqueline Elder at cpsc-hq1,
Warren K. Porter at CPSC-LSEL

Subject: Re[3]: spray string matter

----- Message Contents

After viewing the video clip of one test Warren sent us, I can wholeheartedly endorse his comment on the esthetic appeal of the G burn room

Norvan

Reply Separator

Subject: Re[2]: spray string matter

Author: Warren K. Porter at CPSC-LSEL

Date: 08/25/1999 2:25 PM

Mark,

There are a number of samples of the crazy ribbon/string or whatever that were extremely flammable, 99-860- 5290 through 5294 and 99-860-6484. These are in the warehouse.

There are a number of samples that extinguished the flame or showed no flame extension/flashback. Those are 99-XXX-5711, 5734, 5764, 5772. Those too are in the warehouse.

What is your schedule for the VPR and where will it be filmed. We can test them in the laboratory hoods if that is that you want. That is somewhat restrictive. We can also use the burn room in building G or perhaps the burn room in building A. The G burn room is large and would allow for ease in setting up cameras and props (table and BDay cake if so desired. The burn room in A is somewhat more confined but useable. You should bear in mind that the burn room in Building G is REALLY NOT PRETTY. It would require setting up some panels to make it presentable.

I would suggest that the filming people come out for a look at the space available. This should be done with adequate advance time to set up painted panels to accomodate the asthetics of the scene, prior to the actual filming.

If you are considering doing the VNR at EWT, the major flame extension is about 4 to 6 feet and the string continues on to up to 10 feet. The string is still flaming when it hits the wall, floor, etc. Some review of the smoke detectors currently operating in EWT and safety considerations would be necessary prior to filming.

Warren

66

Reply Separator

Subject: Re: spray string matter
Author: Marc J. Schoem at CPSC-HQ2
Date: 08/25/1999 12:37 PM

OIPA will pay for the VNR - can you send me the final release that was sent to the firms. Ken Giles is coordinating the VNR. Warren Porter at the Lab may have some additional samples that can be used for the VNR. I've asked Larry Blend and Norvan Allen to see if additional samples can be obtained for use in shooting the video and for publicizing the recall.

Reply Separator

Subject: spray string matter
Author: <lblend@cpsc.gov> at INTERNET-MAIL
Date: 08/24/1999 7:37 AM

Below is my report for the two firms I am handling. Norvan Allen will report on Stelex. Each of my two firm was supplied a copy of the draft press release without the names and addresses of any firms shown.

Major Import, Inc.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is willing to contribute \$4,000 to a VNR.

Le SaYang Family, Ltd.

This firm has no comments on the draft press release. It has no objection to the release of its name and address to the other two firms. It is NOT willing to contribute any amount of money to the VNR.

I await further instructions.

Lawrence S. Blend

Author: Marc J. Schoem at CPSC-HQ2
Date: 8/25/99 3:26 PM
Normal
TO: Warren K. Porter at CPSC-LSEL
CC: Frank J. Krivda, Theresa D. Rogers, Ken P. Giles at CPSC-HQ1
Subject: Re[3]: spray string matter

----- Message Contents

Thanks Warren! I'll defer to OIPA for the filming location. Larry Blend has requested additional samples from his company and they indicated 24 cans are being sent to us.

Reply Separator

Subject: Re[2]: spray string matter
Author: Warren K. Porter at CPSC-LSEL
Date: 08/25/1999 2:25 PM

Mark,

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Reply Separator

Subject: Re: spray string matter
Author: Marc J. Schoem at CPSC-HQ2
Date: 08/25/1999 12:37 PM

66

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Lawrence S. Blend

69

Author: Warren K. Porter at CPSC-LSEL

Date: 8/25/99 2:25 PM

Normal

CC: <lblend@cpsc.gov> at INTERNET-MAIL

TO: Mark K. Ross at CPSC-HQ1

CC: Ken P. Giles at CPSC-HQ1, Norvan K. Allen at CPSC-HQ1, Frank J. Krivda at CPSC-HQ2,
Patrick D. Weddle at CPSC-HQ1, Theresa D. Rogers at CPSC-HQ2,
Kathleen P. Begala at CPSC-HQ1

TO: Marc J. Schoem at CPSC-HQ2, David A. Walden, Jacqueline Elder at cpsc-hq1

Subject: Re[2]: spray string matter

----- Message Contents

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Warren

Reply Separator

Subject: Re: spray string matter

Author: Marc J. Schoem at CPSC-HQ2

Date: 08/25/1999 12:37 PM

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70

Reply Separator

Subject: spray string matter

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Date: 08/24/1999 7:37 AM

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I await further instructions.

Lawrence S. Blend

71

Author: Marc J. Schoem at CPSC-HQ2

Date: 8/25/99 12:37 PM

Normal

Receipt Requested

CC: <lblend@cpsc.gov> at INTERNET-MAIL

TO: Mark K. Ross at CPSC-HQ1

CC: Warren K. Porter at CPSC-LSEL, Ken P. Giles at CPSC-HQ1, Norvan K. Allen at CPSC-HQ1,
Frank J. Krivda, Patrick D. Weddle at CPSC-HQ1, Theresa D. Rogers,
Kathleen P. Begala at CPSC-HQ1

Subject: Re: spray string matter

----- Message Contents

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Reply Separator

Subject: spray string matter

Author: <lblend@cpsc.gov> at INTERNET-MAIL

Date: 08/24/1999 7:37 AM

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I await further instructions.

Lawrence S. Blend

72

Author: "Norvan K. Allen" <nallen@cpsc.gov> at INTERNET-MAIL

Date: 8/24/99 10:21 AM

Normal

TO: <mross@cpsc.gov> at internet-mail,
"CE coordinator" <Cefieldcoord@cpsc.gov> at internet-mail,
"Eric" <estone@cpsc.gov> at internet-mail,
"Krivda" <fkrivda@cpsc.gov> at internet-mail
CC: "Frank Nava" <fnava@cpsc.gov> at internet-mail,
"Blend" <lblend@cpsc.gov> at internet-mail,
"Cornell" <lcornell@cpsc.gov> at internet-mail
BCC: Frank J. Krivda at CPSC-HQ2
Subject: Spray String Matter

----- Message Contents

I received a letter from the firm's attorney stating that Stelex has no objection to releasing their name to the other two firms PROVIDED their names are given to Stelex. I responded with a letter giving Stelex the names of Major Import and LeSa Yang Family.

The attorney also reported the recall letters for both Crazy RIBBON and Crazy ST RING were sent out on August 19th. I had approved both letters. Stelex has not yet sent me their proposed recall posters for approval. I pointed this out in my letter to the attorney.

Stelex has asked what financial arrangement the other two firms have offered, before committing to a Video News Release. In my letter I said one firm agreed to contributing \$ 4,000 while the other had declined to participate. I did not identify the firms.

I included the latest draft press release, without the staff comments or questions, with the letter and requested Stelex comments.

Norvan

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Author: Marc J. Schoem at CPSC-HQ2
Date: 8/25/99 3:37 PM
Normal
TO: Frank J. Krivda, Theresa D. Rogers
Subject: Crazy String Status

----- Message Contents

FYI

Forward Header

Subject: Crazy String Status
Author: Norvan K. Allen at CPSC-HQ1
Date: 08/25/1999 1:21 PM

I just spoke with Albert Chang, attorney for Stelex. He checked with his client on their inventory of the party spray product. Stelex has no inventory of either Crazy Ribbon or Crazy String.

Some customers have already contacted Stelex about returning product, but it is not known when these shipments will be received.

I advised Mr. Chang that the Commission will be funding and producing the VNR. He said his client was agreeable to contributing \$ 4,000 before the CPSC decision was made. I also explained the VNR, as the written press release will be accurate and factual. He and his client will be given a chance to see the VNR before it is released.

Mr. Chang said neither he nor Stelex have any significant comments on the draft press release sent to him. He will respond in writing shortly.

Norvan

74

Author: Murray S. Cohn at CPSC-HQ1

Date: 5/19/99 3:57 PM

TC-47

Normal

TO: Catherine E. Downs at CPSC-HQ2, George W. Rutherford at CPSC-HQ2, Incident Reports

Subject: Internet Form Complaint - Doc # 19950104

----- Message Contents

5/19/99 11:03:02 AM

Name = Ted Baum Esq.

Address = P.O. Box 4543

City = Palm Springs

State = CA

Zip = 92263-4543

ISSUE 34

Email = tedbaum@earthlink.net

Telephone = 760-325-2681

Name of Victim = JAMES ANDREW GARCIA, a minor

Victim's Address = 19390 Rose Lane

Victim's City = Bloomington

Victim's State = CA

Victim's Zip = 92316

MAY 21 1999

Victim's Telephone = 760-325-2681

Incident Description: My clients, JAMES and LISA GARCIA purchased some cans of a

product called CRAZY RIBBON, from ONE STOP PARTY, 16761

Valley Blvd., Unit A, Fontana, CA (Telephone 909-356-5611)

The named manufacturer on the can is TOP GREASE CO. LTD., but

there is no address or contact information. On May 15, 1999,

my clients had a birthday party for their son, JAMES ANDREW

GARCIA, born 5/14/88. After the candles were blown out on

his birthday cake, the children at the party sprayed the

CRAZY RIBBON. It started a fireball, and the child's head

caught on fire. He suffered major burns on his face, ears,

nose, head, and arms. The boy's father, JAMES, also suffered

burning of his facial hair. There were about twenty people

present, with many little children. THIS PRODUCT IS

EXTREMELY DANGEROUS AND NEEDS TO BE PULLED OFF THE MARKET

NOW.

Victim's age at time of incident = 11

Victim's sex = Male

Date of incident = May 15, 1999

Product involved = Can that sprays ribbon

Product brand name/manufacturer = CRAZY RIBBON/ TOP GREASE CO. LTD.

Product involved still available = Yes

Product model and serial number =

Date product purchased = May, 1999

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