



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, DC 20207

Todd A. Stevenson  
Deputy Secretary and  
Freedom of Information Officer  
Office of the Secretary

1133  
CRA  
Tel: 301-504-0785X1239  
Fax: 301-504-0127  
Email: tstevenson@cpsc.gov

September 16, 1999

Ted Baum, Esq.  
Baum & Baum  
P.O. Box 4543  
Palm Springs, CA 92263-4543

Re: FOIA Request S9090029 and S9090053: Crazy String and Crazy Ribbon Spray String  
Recall / CPSC Corrective Action or Recall File

Dear Mr. Baum:

Thank you for your Freedom of Information Act (FOIA) request seeking information from the Commission. The records from the Commission files responsive to your request have been processed and copies are enclosed. The enclosed records include file information generated by the Commission itself or its contractors for regulatory or enforcement purposes. These records are identified as Laboratory Summaries and sample analyses and other memoranda, correspondence, notes and documents. The Commission has established management systems under which supervisors are responsible for reviewing the work of their employees or contractors. The file information materials are final and have been prepared and accepted by the Commission's staff under such review systems. The Commission believes that it has taken reasonable steps to assure the accuracy of the information. Please note that the Commission's staff, not the Commissioners themselves, made the determination that this product is a banned hazardous substance as defined by the Consumer Product Safety Act.

Processing this request, performing the file searches and preparing the information, cost the Commission \$60.00. In this instance, we have decided to waive all of the charges.

Sincerely,

Todd A. Stevenson

Enclosures



U.S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, DC 20207

1133  
CPA

Todd A. Stevenson  
Deputy Secretary and  
Freedom of Information Officer  
Office of the Secretary

Tel: 301-504-0785X1239  
Fax: 301-504-0127  
Email: tstevenson@cpsc.gov

September 16, 1999

Orlando Balcos  
Strong Government Services, Inc.  
6264 Crooked Creek Road • Suite 15  
Norcross, GA 30092

Re: FOIA Request S9090054: Crazy String and Crazy Ribbon Spray String Recall / CPSC  
Corrective Action or Recall File

Dear Mr. Balcos:

Thank you for your Freedom of Information Act (FOIA) request seeking information from the Commission. The records from the Commission files responsive to your request have been processed and copies are enclosed. The enclosed records include file information generated by the Commission itself or its contractors for regulatory or enforcement purposes. These records are identified as Laboratory Summaries and sample analyses and other memoranda, correspondence, notes and documents. The Commission has established management systems under which supervisors are responsible for reviewing the work of their employees or contractors. The file information materials are final and have been prepared and accepted by the Commission's staff under such review systems. The Commission believes that it has taken reasonable steps to assure the accuracy of the information. Please note that the Commission's staff, not the Commissioners themselves, made the determination that this product is a banned hazardous substance as defined by the Consumer Product Safety Act.

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Sincerely,

Todd A. Stevenson

Enclosures

# NEWS from CPSC

## U.S. Consumer Product Safety Commission

Office of Information and Public Affairs

Washington, DC 20207

FOR IMMEDIATE RELEASE

September 2, 1999

Release # 99-167

CONTACT: Ken Giles

(301) 504-0580 Ext. 1184

### CPSC, Firms Announce Recall of Flammable Spray String

WASHINGTON, D.C. - In cooperation with the U.S. Consumer Product Safety Commission (CPSC), three firms, Stelex Enterprises Inc., of Los Angeles, Calif.; Major Import, of Whittier, Calif.; and LeSa Yang Family Ltd. of Diamond Bar, Calif., are recalling about 912,000 cans of spray string sold under the names "Crazy Ribbon" and "Crazy String." These spray strings' propellant is extremely flammable, creating a serious risk of burn injuries when sprayed near an open flame, such as birthday candles. Flammable products intended for use by children are banned by federal law.

CPSC is aware of at least one report of a burn injury resulting from the use of these spray strings. An 11-year-old boy suffered serious burns during his birthday party that left permanent scars.

Crazy Ribbon sprays strings of various colors, and comes in a round metal spray can about 6.5 inches high. The can is silver with a plastic cap that matches the color of the spray string. Depictions of various colored streamers cover the can. Writing on the can includes "CRAZY RIBBON" in multicolored block letters, "FOR PARTY CELEBRATION AND DECORATION," and "MADE IN TAIWAN."

Crazy String also sprays strings of various colors, and comes in a round metal spray can about 6.5 inches high. The can is silver with a plastic cap that matches the color of the spray string. Depictions of various colored streamers cover the can. Writing on the can includes "CRAZY STRING," "FOR PARTY CELEBRATION AND DECORATION," and "MADE IN TAIWAN."

Party and hobby stores nationwide sold the spray string from October 1996 through July 1999 for between \$2 and \$4.

Consumers should take these spray strings away from children and stop using it immediately. It can be returned to the store where purchased for a refund. For more information, call CPSC's Hotline at (800) 638-2772 anytime.



The U.S. Consumer Product Safety Commission protects the public from unreasonable risk of injury or death from 15,000 types of consumer products under the agency's jurisdiction. To report a dangerous product or a product-related injury and for information on CPSC's fax-on-demand service, call CPSC's hotline at (800) 638-2772 or CPSC's teletypewriter at (800) 638-8270. To order a press release through fax-on-demand, call (301) 504-0051 from the handset of your fax machine and enter the release number. Consumers can obtain this release and recall information or report product hazards to [info@cpsc.gov](mailto:info@cpsc.gov).

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U.S. C

U.S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, DC 20207

Terri Rogers  
Associate Director  
Recalls and Compliance Division  
Office of Compliance

Tel 301-504-0608, Ext. 1363  
Fax: 301-504-0359  
email: trogers@cpsc.gov

AUG 20 1999

Samuel Kim  
Attorney in Fact  
Samuel Kim Customhouse Broker, Inc.  
8939 S. Sepulveda Boulevard  
Suite 506  
Los Angeles, CA 90045

Reference: EX 99-063  
Sample No: 99 860-5682; 'Crazy Ribbon' Party String

*8/10/99*  
**MFR/PRVLBR NOTIFIED**  
 No Comments made  
 Comments attached  
 Excisions/Revisions  
 Firm has not requested further notice  
*Exp. 10/10/99 - J. Torres*  
*10 CFR 111.13*

Dear Mr. Kim:

The Assistant Executive Director for Compliance has received and acted upon your July 26, 1999 notification of intent to export the above referenced product which does not comply with current Commission regulations. Enclosed is a copy of our letter to the government of the country to which the non-complying goods are being shipped. The Commission staff has no objection to the pending export. The staff in our Western Regional Office will advise U.S. Customs of this decision. The U.S. Customs Service may independently assess penalties under their laws relative to these goods. These goods must not be returned to the United States. The introduction of non-complying products can result in injunction, seizure, civil and/or criminal penalty.

If you have any questions please contact Frank Krivda at (301) 504-0608 x1372 or Norvan Allen at 505/260-1707.

Sincerely,

Terri Rogers

cc: [unclear]

1 Incl  
as

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U.S. CONSUMER PRODUCT SAFETY COMMISSION  
WASHINGTON, DC 20207

OFFICE OF COMPLIANCE

RECALLS AND COMPLIANCE DIVISION

TEL: 301-504-0608

FAX: 301-504-0359

DATE: 8/30/99 PAGES TRANSMITTED 1 + cover

TO: SAMUEL KIM

TITLE: \_\_\_\_\_

OFFICE: \_\_\_\_\_

FAX #: \_\_\_\_\_

FROM: FRANK KRINDL

REMARKS: EXPORT NOTIFICATION

- Confirmation copy to follow by U.S. Mail
- Fax Transmission Only

NOTE: If all pages are not received, or if you have problems with this transmittal, please contact the person listed above.

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

2

**Samuel Kim Customhouse Broker, Inc.**

ATTN: Mr. FRANK  
KRIVDA

8939 S. Sepulveda Blvd., Ste. 506  
Los Angeles, CA 90045  
(310) 641-9915 • FAX (310) 641-7268

July 26, 1999

Re: CPSC sample 99-860-5682  
"Crazy Ribbon" Party String

Associate Executive Director for  
Compliance and Enforcement  
U.S. Consumer Product Safety Commission  
4330 East West Highway  
Bethesda, MD 20814

Dear Sir:

The following information is provided to obtain a re-export authorization:

U.S. Exporter: Ameri-China International Inc  
917 S Alameda Street  
Los Angeles CA 90021  
Attn: Austin WU, General Manager  
Tel: 213)683-8898  
Fax: 213)683-8885

Consignee: Taiwan Master Trading Corp.  
3FL, 23 CHANG AN E. RD, SEC. 1  
TAIPEI, TAIWAN, ROC  
TEL: 02)5639885 (9 lines)  
FAX: 886-2-5818810/5317199

220 Ctns of Crazy Ribbon (31,680 Pcs)  
Total value: \$9,952.80


Anticipated date of shipping and port of destination:  
As soon as possible to KEELUNG, TAIWAN, ROC

Testing result by the CPSC: Test Report attached, dated July 23, 1999.

Thank you very much for your prompt assistance in this matter.

Sincerely,

Ameri-China International Inc  
Samuel Kim Customhouse Broker Inc

  
Samuel Kim  
Atty in Fact

1 Incl  
as





**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**

ALASKA  
ARIZONA  
ARKANSAS  
CALIFORNIA  
COLORADO  
HAWAII  
IDAHO  
LOUISIANA  
MONTANA  
NEW MEXICO  
NEVADA  
OKLAHOMA  
OREGON  
TEXAS  
UTAH  
WASHINGTON  
WYOMING  
PACIFIC ISLANDS

JULY 23, 1999

**Ameri-China International, Inc.  
917 Alameda Street  
Los Angeles, California 90021**

**RE: CPSC sample 99-860-5682  
"Crazy Ribbon" Party String**

Gentlemen:

The staff has completed its examination of the sample of "Crazy Ribbon" Party String. The item is a banned hazardous Substance under the Federal Hazardous Substances Act (FHSA) which we administer and distribution in this country is prohibited. The staff requests that you stop the distribution of any current inventory and voluntarily recall to the consumer level any distributed units.

On July 16, 1999 we obtained a sample of "Crazy Ribbon" Party String from a lot of 31,680 units in import status at the Port of Los Angeles/Long Beach, California. The sampled lot was entered under #638-0056499-7, dated 7/9/99 and invoice #A-9038, dated 6/21/99. Your firm is shown as the Importer of Record.

The staff tested the product 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 16 C.F.R. § 2(f)(1)(v) of the Federal Hazardous Substances Act (FHSA), 15 U.S.C. § 1261(f)(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 substance is a prohibited act under Section 4 of the FHSA, 15 U.S.C. § 1263 and could subject your firm to the Penalties outlined in Section 5 of the FHSA, 15 U.S.C. § 1264. As a result, you 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.

M



Ameri-China International, Inc.

Page 2

The Commission staff considers this test failure to be extremely serious and asks that you immediately stop the sale of any current inventory, contact any direct consignees and implement a voluntary consumer level recall. This recall program is to include a recall notification letter to be issued to your direct consignees, point of purchase posters to be placed in each retail store where the product was offered for consumer sale and the issuance of a cooperative press release by the Commission. We also request that you produce a video news release in cooperation with the staff. The staff requests that you carefully review the rest of your product line for other children's products that contain the same chemical composition and therefore may be considered for similar corrective action. We also request that you not begin your voluntary recall until all the recall documents have been reviewed and accepted by the staff.


The staff requested the U.S. Customs Service to seize the sampled lot to assure it will not be distributed. If you disagree with the Commission staff's findings that the product does not comply with the regulations, Chapter 2 of the enclosed Handbook describes the procedures for presenting your views and any supporting evidence to the staff.

If you plan to export the products, you must follow the procedures outlined in Chapter 6 of the Handbook. Failure to do so could subject you to the penalties described in Chapter 1 of the Handbook. The Commission may prevent the export of the products if it determines that their exportation presents an unreasonable risk of injury to U.S. consumers. The sampled lot must be reconditioned, exported or otherwise disposed of within 90 days from the date of this letter unless an extension of time is requested and approved.

Sections 15 and 37 of the CPSA contain requirements for reporting to the Commission information on certain products you manufacture, import or distribute. Chapter 5 of the Handbook describes the reporting requirements applicable to your firm. Chapter 7 of the Handbook contains information about the confidential treatment of information you submit to the Commission.

Please respond by facsimile or by telephone within 24 hours from the date you receive this letter, outlining the specific corrective actions you plan to take to address the hazard associated with this product. Please also supply us with the shipping records covering your importation of other lots of this product; your current inventory amount; and, the name and address of each direct consignee including the date and amount of product per shipment. Please direct your response to:

Norvan Allen, Compliance Officer  
U. S. Consumer Product Safety Commission  
1412 Vassar Drive, S.E.  
Albuquerque, N.M. 87106



EX 99-063

Samuel Kim Customhouse Broker, Inc.

8939 S. Sepulveda Blvd., Ste. 506  
Los Angeles, CA 90045  
(310) 641-9915 • FAX (310) 641-7268

July 26, 1999

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Samuel Kim Customhouse Broker Inc

  
Samuel Kim  
Atty in Fact

1 Incl  
as

6

Ameri-China International, Inc.  
Page

July 23, 1999

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Los Angeles, California 90021

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Ameri-China International, Inc.

Page

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Norvan Allen, Compliance Officer  
U. S. Consumer Product Safety Commission

4

Ameri-China International, Inc.  
Page

1412 Vassar Drive, S.E.  
Albuquerque, N.M. 87106

Mr. Allen may be reached by phone at 505-260-1707 (voice) and 505-260-1710 (fax). His e-mail address is: nallen@cpsc.gov

Thank you for your cooperation in this matter.

Sincerely,

Frank J. Nava  
Director

Enclosure: Regulated Products Handbook  
Test Report  
FHSA and its Regulations

9

Ameri-China International, Inc.  
Page

FOR OFFICIAL USE ONLY

Bcc: Frank Krivda  
Frank Nava  
Larry Cornell  
Keven Barton  
Norvan Allen  
Ted Doi  
Establishment file  
Larry Blend

Bcc footnote: Last of the lab results received by Blend 7/22/99. Customs requested to seize lot or otherwise remain control of the sampled lot via Barton telecon on 7/22/99. Letter of Advice shows CO as Norvan Allen as he will be handling two related imported samples of toys from the same shipment and he has worked with the firm in the past.

10

Approved by [Signature]

LABORATORY/COMPLIANCE SUMMARY

Sample Number:  
99-860-5682

2. Laboratory Summary: Crazy Ribbon Party Streamer (aerosol)

Flammability 16 CFR 1500.45

Flame extension:

All units were tested in the upright, horizontal and inverted positions.

Upright, shaken and unshaken; All units displayed flame extension in excess of 18 inches, streamer can travel at least 6 feet and continues to burn (see enclosed video tape).

Horizontal; Shaken and unshaken; Some units showed flame extension and flash back, others did not.

Inverted; None of the units showed flame extension or flash back.

Composition; The major solvent/propellant was identified as Dimethyl Ether by GC/MS

Original to: FOWR Blend ; Copies to : LSC, CE - Krivda, FOWR(N) Allen

COPY

3. Name and Title

[Signature]

Date:

July 22, 1999

Warren K. Porter, Jr., Dir. LSC

4. Firm Name: Ameri-Chica ; Product: Crazy Ribbon

City, State: Los Angeles, CA ; Model#: 120 g.

5. Compliance Assessment:

Note Video tape sent to L. Blend.

*Violates Recall Consumer Level,*

5. 11(c) Notice: Mfr/Imp.:

Retailer

Other

Original Records to: FOWR-510

; Copies: CHS-Krivda

7. Name and Title:

Tom Allen LO

8. Date:

7-27-99

11

UNITED STATES GOVERNMENT  
MEMORANDUM

CONSUMER PRODUCT  
SAFETY COMMISSION

FOR OFFICIAL USE ONLY

DATE: August 12, 1999

TO: Office of Compliance  
ATTN: Tina Adeyeye

FROM: Lawrence S. Blend, CO  
FOWR/DALLAS TELECOMMUTER

SUBJECT: 99-860-5295: Le Sa Yang Family, Ltd.

This regulatory voluntary recall is now ready for monitoring. The firm started the voluntary recall on 8/10/99. Staff considers the hazard to be very serious. The product is "Crazy Ribbon" party string in 6" aerosol cans.

Attached is a final copy of the firm's available recall documents. We are working on a joint press release. See Mark Ross. Everything else you should need is recorded in the IFIS Recall Data Base under 99-860-5295. When I get a copy of the final, printed point-of-purchase poster I shall send you one.

Also attached is a list of the firm's 15 direct consignees of the product. Please share with Mark Ross.

I would pick 3 consignees at random for REC's by FOWR. However, please do not pick CBB, Los Angeles, California for a REC as we have already inspected this consignee about the matter. There are no REC's for the other regions and MASC to do unless they are involved in the sub-recall. Wholesalers may be done by phone/mail. Retailers should be done on-site. At least one sub-recall check should be done for each REC of a Wholesaler. The REC's should not be done before 9/1/99, but as soon as possible after 9/1/99.

If you need anything else, please call me.

cc: LS Blend  
Mark Ross  
Larry Cornell

12



Norvan Allen  
Establishment file  
Frank Nava  
Frank Krivda

Lawrence S. Blend  
Compliance Officer  
U. S. Consumer Product Safety Commission  
1708 Arvada Drive  
Richardson, Texas 75081-2132  
972-231-5023 (phone)  
972-231-5317 (fax)  
E-mail address: lblend@cpsc.gov

**FOR OFFICIAL USE ONLY**

bcc: Frank Nava  
LS Blend  
Keven Barton  
Frank Krivda  
Establishment file  
LS Blend  
Tina Adeyeye

bcc footnote: This regulatory recall will be transferred to Tina for monitoring when I receive notice the recall has started. A draft press release is being worked on by OIPA.

14

VIA TELEFAX

August 5, 1999

Ms. May Yu, President  
Le Sa Yang Family, Ltd.  
2558 Blaze Trail  
Diamond Bar, California 91765

Dear Ms. Yu:

We are in receipt of your fax of today concerning your voluntary recall of "Crazy Ribbon" party string (our sample 99-860-5295).

We have carefully reviewed your latest revised draft documents and have no comments except for the draft point-of-purchase poster. Our comments are enclosed. Please finalize, print and begin your recall mailings as soon as possible. Please supply me with a printed copy of each recall document and the date your recall mailings begin.

During the recall a random number of your customers will be inspected to make sure the recall is effective by confirming that they received your Notice and are complying with your request. Please keep an accounting of the number of returns received in addition to your current frozen inventory, if any. After January 1, 2000 we shall be back in touch with you to determine if the recall should be closed and to obtain a final accounting concerning the number of units returned and the disposition of returned and frozen inventory. If we encounter any problems in the next few months, we shall let you know immediately.

We trust the above is clear. If you have any questions or wish to discuss the matter further, please do not hesitate to contact us.

Sincerely,

15



**PRODUCT IDENTIFICATION**

TAIWAN\*\*\*". Subs 1-14 pink in color.

**METHOD OF COLLECTION**

carton and sent through the sample custodian to LSC. Sub # 13 & 14 were emptied of their contents. Sub # 13 sent to Frank Krivda, CRC/CHP. Sub # 14 sent to FOWR/CO (L. Blend).

17

VIA TELEFAX

July 28, 1999

Mr. Dan Tan  
Major Import, Inc.  
2835 Pellissier Place  
Whittier, California 90601

Dear Mr. Tan:

We are in receipt of your fax of July 27, 1999 concerning your voluntary recall of "Crazy Ribbon" party string (our samples 99-860-5290/1/2/3/4).

We have carefully reviewed your latest revised draft documents and suggest you use the toll free number on the letter to your direct consignees. Please finalize, print and begin your recall mailings as soon as possible. Please supply me with a printed copy of each recall document and the date your recall mailings begin.

During the recall a random number of your customers will be inspected to make sure the recall is effective by confirming that they received your Notice and are complying with your request. Please keep an accounting of the number of returns received in addition to your current frozen inventory of 17,136 units. After January 1, 2000 we shall be back in touch with you to determine if the recall should be closed and to obtain a final accounting concerning the number of units returned and the disposition of returned and frozen inventory. If we encounter any problems in the next few months, we shall let you know immediately.

We trust the above is clear. If you have any questions or wish to discuss the matter further, please do not hesitate to contact us.

Sincerely,

18

Lawrence S. Blend  
Compliance Officer  
U. S. Consumer Product Safety Commission  
1708 Arvada Drive  
Richardson, Texas 75081-2132  
972-231-5023 (phone)  
972-231-5317 (fax)  
E-mail address: lblend@cpsc.gov

**FOR OFFICIAL USE ONLY**

bcc: Frank Nava  
LS Blend  
Keven Barton  
Frank Krivda  
Establishment file  
LS Blend  
Norvan Allen  
Tina Adeyeye

bcc footnote: This regulatory recall will be transferred to Tina for monitoring when I receive notice the recall has started. A draft press release is being worked on by OIPA.

19

UNITED STATES GOVERNMENT  
MEMORANDUM

CONSUMER PRODUCT  
SAFETY COMMISSION

FOR OFFICIAL USE ONLY

DATE: August 10, 1999

TO: Office of Compliance  
ATTN: Tina Adeyeye

FROM: Lawrence S. Blend, CO  
FOWR/DALLAS TELECOMMUTER

SUBJECT: 99-860-5290 et al: Major Import, Inc.

This regulatory voluntary recall is now ready for monitoring. The firm started the voluntary recall on 8/3/99. Staff considers the hazard to be very serious. The product is "Crazy Ribbon" party string in 6" aerosol cans.

Attached is a final copy of the firm's recall documents. We are working on a joint press release. See Jane Francis/Mark Ross. Please note that the firm's toll free number is 800-566-8697. Everything else you should need is recorded in the IFIS Recall Data Base under 99-860-5290.

The firm's direct consignee's are:

Novel-Tees Wholesale & Distribution, 959 East 33<sup>rd</sup>. South, Salt lake City, Utah 84106 (800-637-2799)

Velo Import, Inc., 415 S. Wall St., Los Angeles, Ca. 90013 (213-617-2929)

Fun-Tech Import, Inc., 2550 Corporate Place, Suite 106, Monterey Park, Ca. 91754 (323-269-3286)

Vintage Group, Inc., 601 S. San Pedro St., Los Angeles, Ca. 90014 (213-623-9288)

AB Toys, 1110 Zaragoza St., Laredo, Tx. 78040 (956-726-9937)

Eagle Trading Co., 7430 Harwin Drive, Houston, Tx. 77036 (713-784-8550)

20



Crown Imports, 11311 Harry Hines Blvd., Dallas, Texas 75229 (972-241-0401)

NBC Toys, Inc., 3013 Bandini Blvd., Vernon, Ca. 90023 (213-268-8092)

BB toys, 1119 Hidalgo St., Laredo, Tx. 78040 (956-728-9226)

LS Blend memo dated 8/10/99

Page 2

Ameri-China Intl., Inc., 917 S. Alameda St., Los Angeles, Ca. 90058 (213-683-8898)

T & Y Trading, 5401-5403 NW 163<sup>rd</sup>. St., Miami, Fl. 33014 (305-623-0359)

Pacific Imports, Inc., 3875 Green Ind. Way, Chamblee, Ga. 30341 (770-986-9024)

Stelex Enterprise, Inc., 1282 Factory Place, Los Angeles, Ca. 90013 (213-627-1992)

V F Toys, Inc., 403 S. Wall St., Los Angeles, Ca. 90013 (213-626-5628)

OKK Import, Inc., 7510 Harwin Drive, Houston, Tex 77036 (713-782-4005)

OKK Trading, 4611 S. Alameda St., Los Angeles, Ca. 90058 (213-235-6001)

Hoven, Inc., 6015 Benjamin Rd., #332, Tampa, Fl. 33634 (813-881-0567)

Hebron Import, 4142 W. Lawrence, Chicago, Il. 60630 (773-202-0100)

Myson Corporation, 3911 W. Lawrence Ave., Chicago, Il. 60625 (773-539-2100)

YMC Import & Export Corporation, 1701 E. 7<sup>th</sup>. St., Los Angeles, Ca. 90021 (213-683-8083)

21

Jewel Corner, 821 E. Artesia Blvd., Carson, Ca. 90746 (213-715-3030)

For REC's I would pick 1 consignee each for FOCR and FOER. I would pick 3 at random from the list for FOWR to do. (However, Ameri-China Intl., Inc., and Stelex Enterprises, Inc. should not be picked as we have been in contact with these firms already for this product.) There are no REC's for MASC to do. Wholesalers may be contacted by phone/mail. Retailers should be done on-site. At least one sub-recall check should be done for each REC of a Wholesaler. The REC's should not be done before 9/1/99, but as soon as possible after 9/1/99.

If you need anything else, please call me.

cc: LS Blend; Jane Francis; Mark Ross  
Larry Cornell; Norvan Allen  
Establishment file; Frank Nava; Frank Krivda

22



**PRODUCT IDENTIFICATION**

120G\*\*\*". Contents pink in color.

**METHOD OF COLLECTION**

Krivda) Sub # 14 sent to FOWR/CO (N. Allen)

**REMARKS**

Samples held under lock until officially processed on 7/14/99

24

Author: Ted Doi at cpsc-hq1

Date: 7/20/99 8:30 AM

Normal

CC: Frank J. Krivda at CPSC-HQ2, Ronald G. Yelenik at CPSC-HQ2,  
Keven J. Barton at cpsc-hq1, Frank J. Nava at cpsc-hq1, Larry G. Cornell at cpsc-hq1  
TO: Larry S. Blend at cpsc-hq1  
Subject: Re: Stelex's Silly ribbon

----- Message Contents

Larry B.,

On 6-7-99 I sent Stelex a fax message requesting the importation records, distribution records, and other information on the Crazy String. Stelex had denied having ever imported the Crazy Ribbon and claimed that it had imported only the Crazy String. Then I did not know that Stelex imported the Crazy Ribbon in 1996.

On 7-7-99 when I learned Stelex's importation of the Crazy Ribbon, I sent the firm a fax message requesting the importation records and distribution records on both Crazy Ribbon and Crazy String.

The only records I've been able to receive from Stelex so far are the ones that cover the "only" lot of the Crazy Ribbon imported by the firm in 1996. The invoice issued to Stelex by New International Corp., Taipei, Taiwan, covers 4,560 units of the product. Stelex provided a copy of seven sales receipts covering only 2,160 units.

I insisted Stelex should provide all importation and distribution records on the Crazy String. Mr. Cheng said the firm would provide them but would need more time to search for the records. When I spoke to his attorney Albert Chang by phone about the records, he repeated what Mr. Cheng had told me.

Mr. Cheng does not know if the Crazy Ribbon and the Crazy string use the same chemical formula.

Mr. Cheng insisted that Top Grease Industrial Co., Ltd., the manufacturer of both Crazy Ribbon and Crazy String had shipped mixed lots of both products to Stelex and other US importers. He said that Top Grease had agreed to use the brand name, Crazy String, exclusively for Stelex. He added that Stelex had been gathering information to confirm that Top Grease had been selling the Crazy String to other importers. He said that Stelex would sue Top Grease for a breach of agreement.

Mr. Cheng claimed that Stelex had never sold any Crazy Ribbon to One Stop Party Shop, Fontana, CA, where Sample 99-860-5373 of the Crazy Ribbon was collected on 6-3-99. He insisted that Stelex sold the Crazy String, not the Crazy Ribbon and that the retailer did not purchase the sampled Crazy Ribbon from Stelex.

Mr. Cheng claimed that the LoA on Sample 99-860-5373 did not instruct Stelex to recall the Crazy Ribbon it had imported and distributed. He said that if CPSC requested Stelex to recall the product, Stelex would. (Larry, sorry. I forgot to tell you this during our telephone conversation of this morning. I believe if we "order" him to voluntarily recall the product according to our guidance, he will do so.)



Stelex is represented by Albert J.C. Chang, Law Offices of Albert J.C. Chang, 19138 Walnut Dr., Suite 100, Rowland Heights, CA 91748, Tel: 626-854-2112, Fax: 626-854-2120.

Reply Separator

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Subject: Stelex's Silly ribbon  
Author: Larry S. Blend at cpsc-hq1  
Date: 7/19/1999 9:31 AM

Ted: Did you get the records last week that the firm promised. If not please contact Mr. Cheng and find out why not? Also, the firm to my knowledge has yet to address the issue of recall. Is he? Is he going to recall the 1996 shipment of 150 cases received, too. If not, why not?

Depending on the firm's answers today, I may turn this matter over to Yelenick for legal action consideration.

Thanks Ted. Call me if you have questions.

LABORATORY/COMPLIANCE SUMMARY Sample Number:  
99-860-5277

**2. Laboratory Summary: Crazy String**  
Flammability 16 CFR 1500.45  
Flame extension:  
Four subs were tested, two shaken and two unshaken

**Upright**  
All subs showed flame extension in excess of 18" and Flash back

**Sideways**  
The two unshaken subs showed flame extension in excess of 18" and Flash back  
The two shaken subs showed no flame extension and no flash back

**Inverted**  
Both the shaken and unshaken subs showed no flame extension or flash back.

*solvent/propellant was dimethyl ether*

**FILE COPY**

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

3. Name and Title Date:  
*Warren K. Porter Jr.* *7/29/99*  
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:

*27*

<b>LABORATORY REPORT</b>		<b>1. PRODUCT:</b> Crazy String, Party Spray	<b>2. SAMPLE NUMBERS:</b> 99-860-5277
<b>3. SEALS:</b> Intact	<b>4. DATE REC:</b> 7/27/99		<b>5. LABORATORY:</b> LSC
<b>6. SAMPLE DESCRIPTION:</b> 12 units were received in plastic bags. Sample had the following information: "99-860-5277, Cecil O. Smith, 7/21/99".			
<b>7. LABELING:</b> N/A	<b>8. CUSTOMS ENTRY NO:</b> N/A		<b>9. LOT/MODEL#:</b>
<b>10. PRODUCT DESCRIPTION:</b> Crazy String, the product sprays different color strings of materials, and is used at children's birthday parties.			
<b>11. ANALYTICAL RESULTS:</b>			
<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. In the sideways position, the unshaken units showed flashback and flame extension greater than 18 inches, while the shaken units extinguished the flame. See attached table.</p> <p>GC-MS: The aerosol propellant was analyzed by gas chromatography mass spectrometry (GC-MS). The major component detected in each sample is dimethyl ether. See attached GC-MS chromatographs and data sheets.</p>			
<b>12. RESERVE SAMPLE:</b> Unused sample was sealed in container box and kept in storage room for warehouse pick up			
<b>13a ANALYST SIGNATURE</b> 		<b>13b DATE</b> 7/28/99	
<b>14a CHECK ANALYST SIGNATURE</b>		<b>14b DATE</b>	
<b>15a REPORT CHECKED BY</b>  WKP		<b>15b DATE</b> 7/29/99	

*Handwritten mark resembling a stylized '28' or similar signature.*



## Flammability Testing CFR 16 Section 1500.45

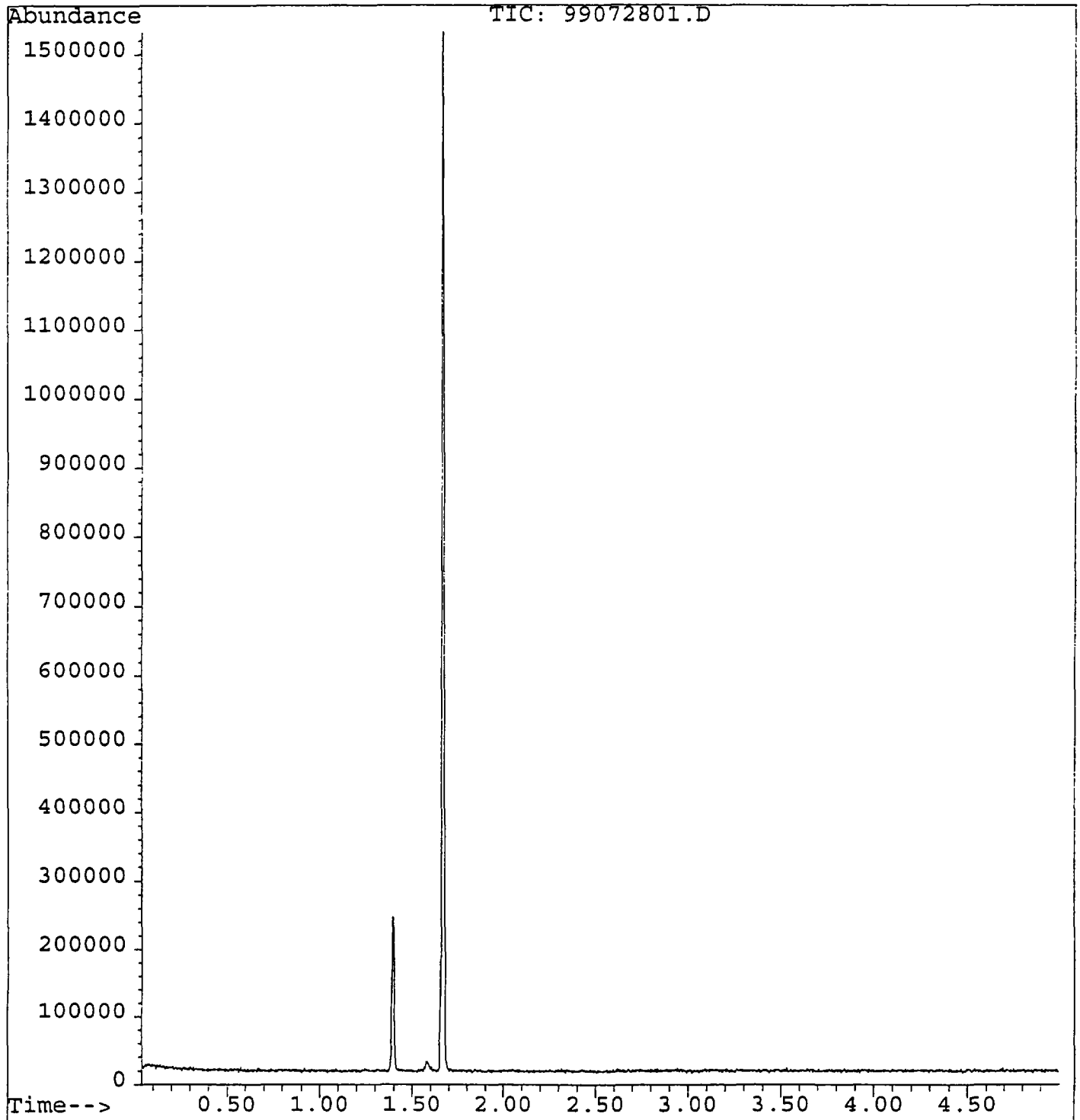
Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5277-02	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5277-03	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5277-05	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5277-06	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5279-01	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5279-03	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5279-04	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5279-05	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished

Note: All units tested upright had flame extension greater than 18 inches, and flash back to the nozzle.

All units tested upside down extinguished the candle flame.

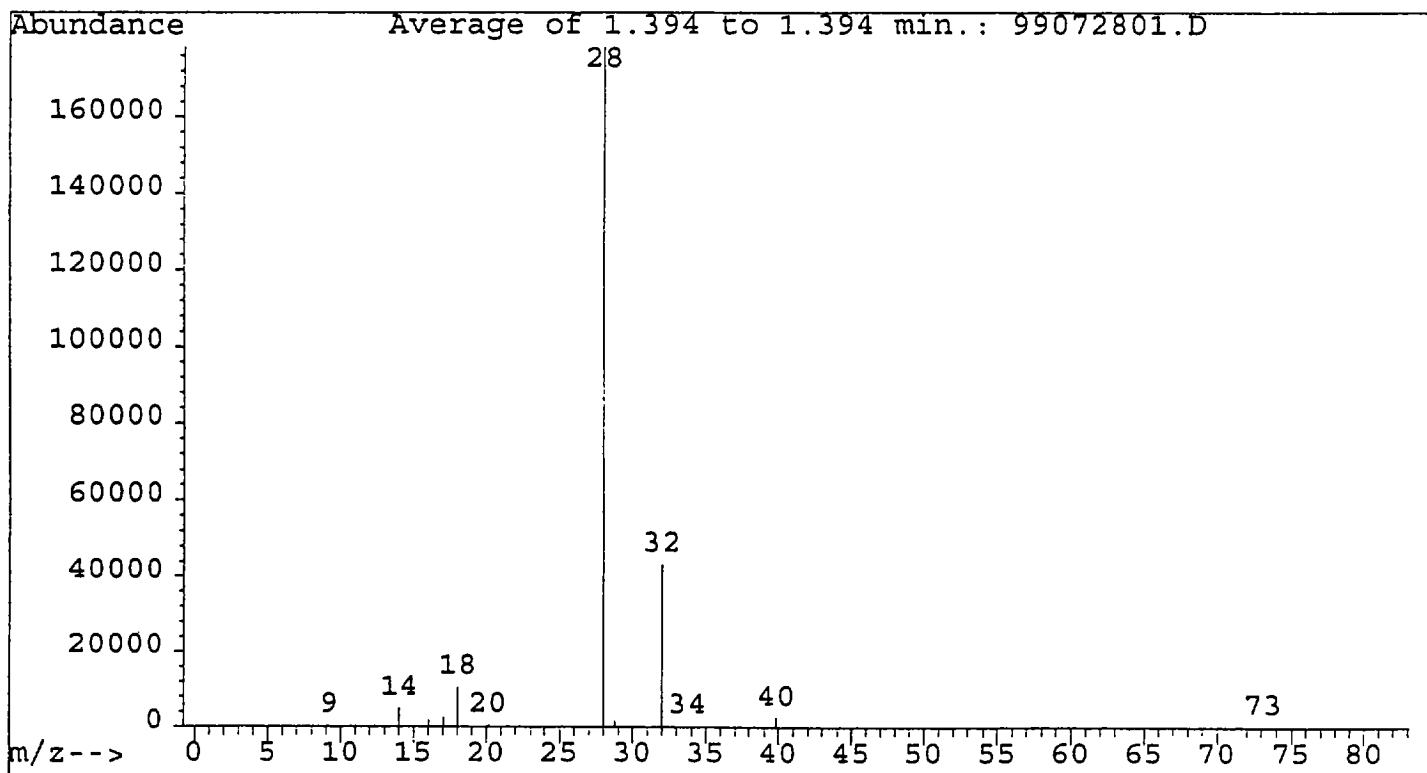
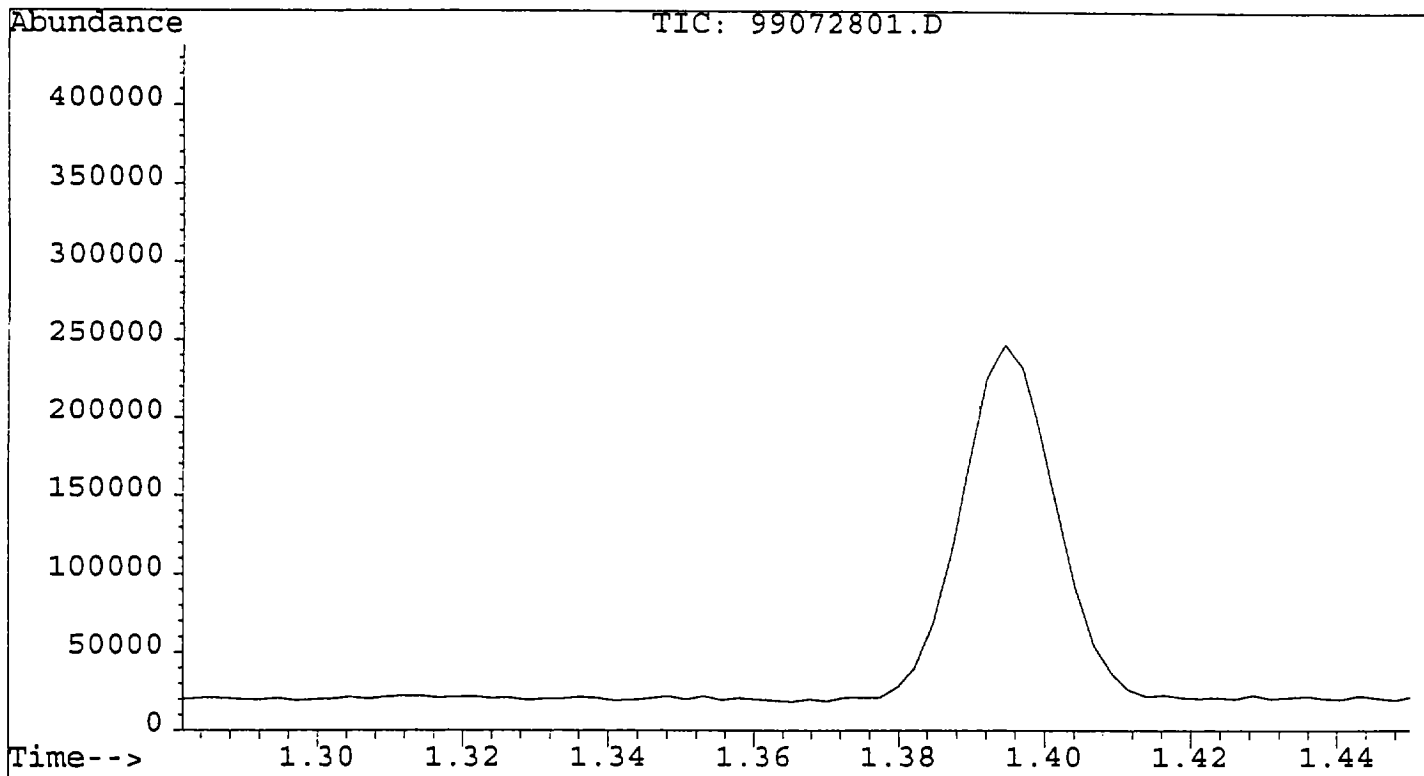
Units tested sideways yielded mixed results. Most shaken units extinguished the candle flame immediately, all unshaken units had flame extensions greater than 18" and flash back for an extended time.

File : C:\HPCHEM\1\DATA\99072801.D  
Operator : Bhavi Jain  
Acquired : 28 Jul 99 8:36 am using AcqMethod GAS  
Instrument : 5971 - In  
Sample Name: 99-860-5277-01  
Misc Info : 35 deg isothermal  
Vial Number: 1



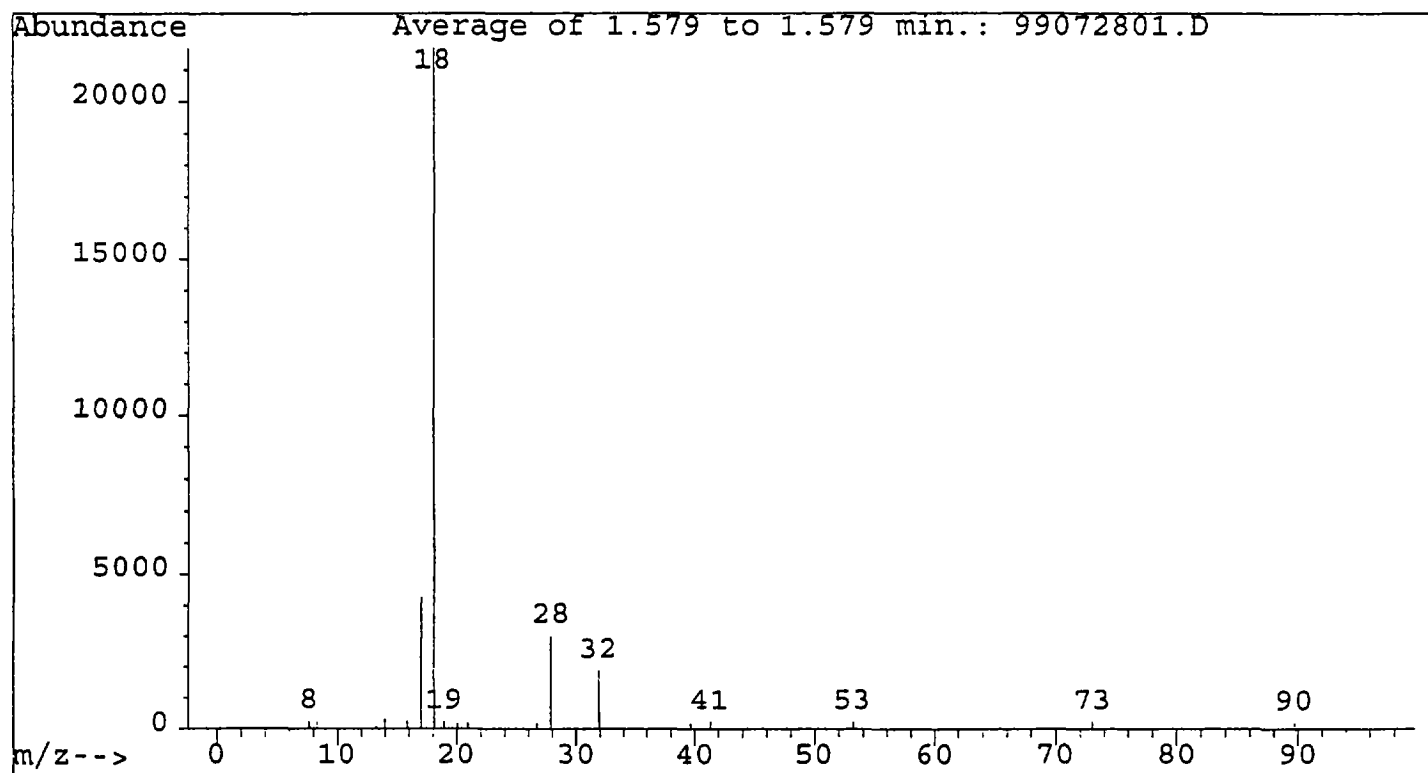
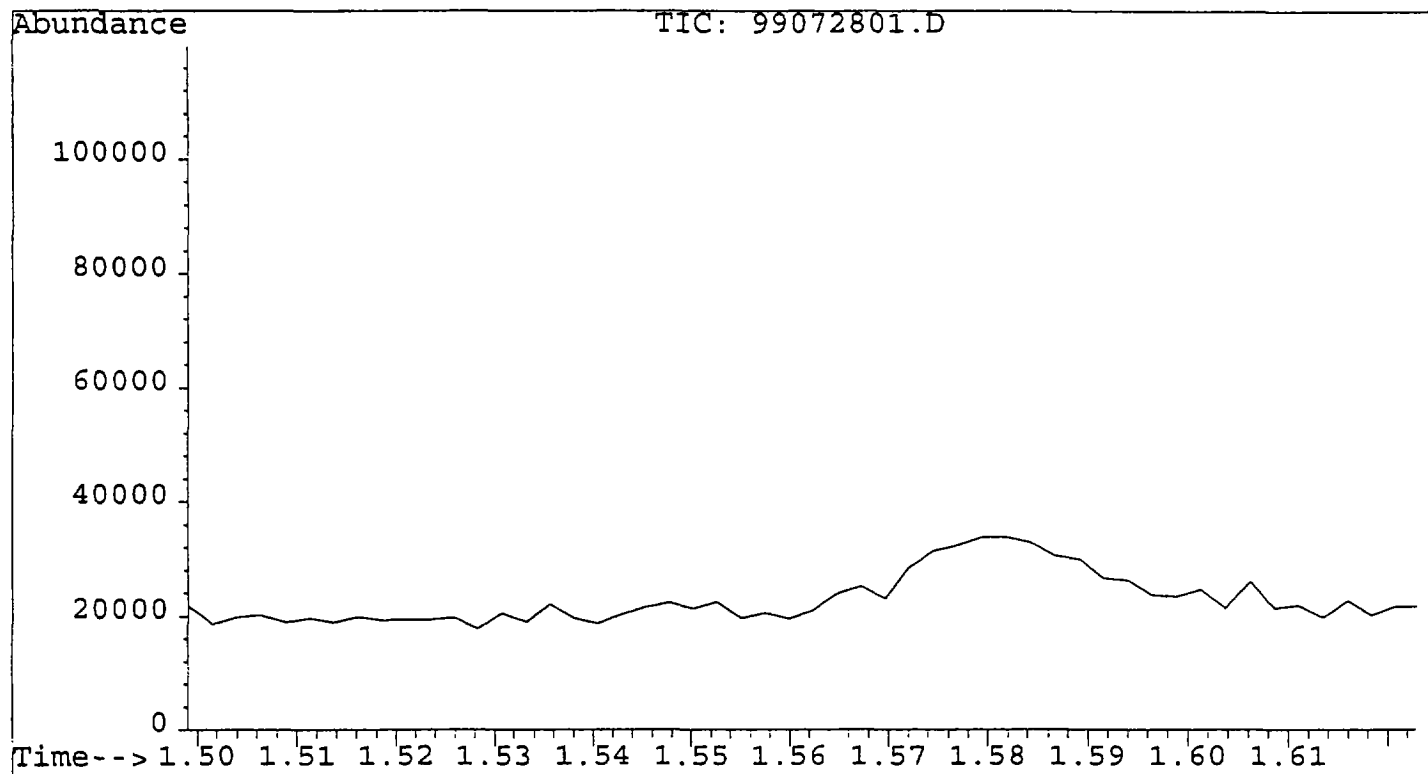
70

File : C:\HPCHEM\1\DATA\99072801.D  
Operator : Bhavi Jain  
Acquired : 28 Jul 99 8:36 am using AcqMethod GAS  
Instrument : 5971 - In  
Sample Name: 99-860-5277-01  
Misc Info : 35 deg isothermal  
Vial Number: 1



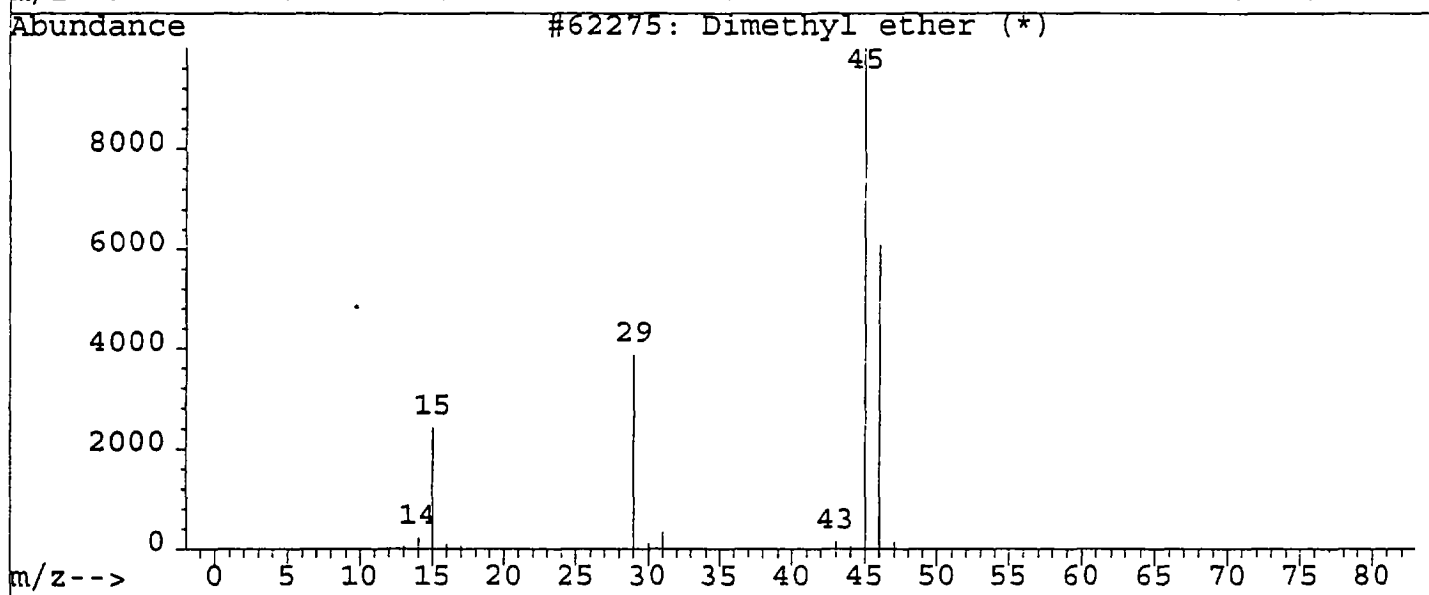
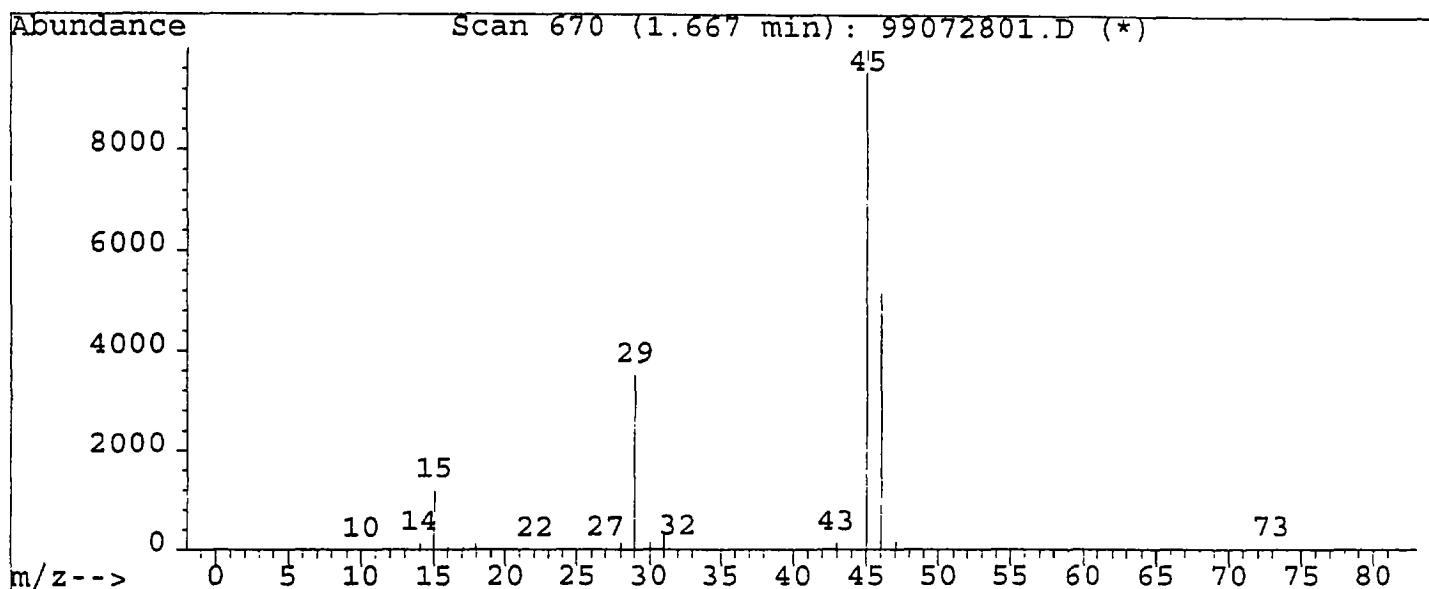
31

File : C:\HPCHEM\1\DATA\99072801.D  
Operator : Bhavi Jain  
Acquired : 28 Jul 99 8:36 am using AcqMethod GAS  
Instrument : 5971 - In  
Sample Name: 99-860-5277-01  
Misc Info : 35 deg isothermal  
Vial Number: 1



32 ✓

Library Searched : C:\DATABASE\NBS75K.L  
Quality : 83  
ID : Dimethyl ether



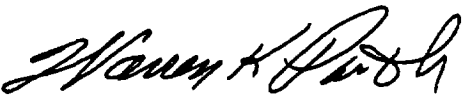
23

97-860-527  
DC  
7/28/99


SAMPLE NO. 99-860-527	
SIGNATURE <i>Cecil O. Smith</i>	
PRINT NAME & TITLE (CPSC REPRESENTATIVE) Cecil O. Smith	
7	DATE 7-21-99
with investigator	
SEAL BROKEN BY DC	
DATE 7/28/99	

CPSC FORM 104

34

<b>LABORATORY/COMPLIANCE SUMMARY</b>		<b>Sample Number:</b> 99-860-5279
<b>2. Laboratory Summary: Crazy Ribbon Party Spray</b> <b>Flammability 16 CFR 1500.45</b> <b>Flame extension:</b> <b>Four subs were tested, two shaken and two unshaken</b>  <b>Upright</b> <b>All subs showed flame extension in excess of 18" and Flash back</b>  <b>Sideways</b> <b>The two unshaken subs showed flame extension in excess of 18" and Flash back</b> <b>One shaken sub showed no flame extension and no flash back</b> <b>One shaken sub showed flame extension in excess of 18" and Flash back</b>  <b>Inverted</b> <b>Both the shaken and unshaken subs showed no flame extension or flash back.</b>  The major solvent/propellant was di-methyl ether  <b>Original to:</b> FOWR Allen ; <b>Copies to :</b> LSC, CE -Krivda, FOWR Blend		
<b>3. Name and Title</b>		<b>Date:</b>
		July 29, 1999
Warren K. Porter, Jr., Dir. LSC		
<b>4. Firm Name:</b> _____ ; <b>Product:</b> _____		
<b>City, State:</b> _____ ; <b>Model#:</b> _____		
<b>5. Compliance Assessment:</b>		
<b>5. 11(c) Notice: Mfr/Imp.:</b> _____ <b>Retailer</b> _____ <b>Other</b> _____		
<b>Original Records to:</b> _____ ; <b>Copies:</b> _____		
<b>7. Name and Title:</b>		<b>8. Date:</b>

79

<b>LABORATORY REPORT</b>	<b>1. PRODUCT:</b> Crazy Ribbon, Party Spray	<b>2. SAMPLE NUMBERS:</b> 99-860-5279
<b>3. SEALS:</b> Intact	<b>4. DATE REC:</b> 7/27/99	<b>5. LABORATORY:</b> LSC
<b>6. SAMPLE DESCRIPTION:</b> 12 units were received in plastic bags. Sample had the following information: "99-860-5279, Cecil O. Smith, 7/21/99".		
<b>7. LABELING:</b> N/A	<b>8. CUSTOMS ENTRY NO:</b> N/A	<b>9. LOT/MODEL#:</b>
<b>10. PRODUCT DESCRIPTION:</b> Crazy Ribbon, the product sprays different color strings of materials, and is used at children's birthday parties.		
<b>11. ANALYTICAL RESULTS:</b>  <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. In the sideways position, some units showed flashback and flame extension greater than 18 inches, while others did not. See attached table.</p> <p>GC-MS: The aerosol propellant from subunits from each sample were analyzed by gas chromatography mass spectrometry (GC-MS). The major component detected in each sample is dimethyl ether. See attached GC-MS chromatographs and data sheets</p>		
<b>12. RESERVE SAMPLE:</b> Unused sample was sealed in container box and kept in storage room for warehouse pick up		
<b>13a ANALYST SIGNATURE</b> 	<b>13b DATE</b> 7/28/99	
<b>14a CHECK ANALYST SIGNATURE</b>	<b>14b DATE</b>	
<b>15a REPORT CHECKED BY</b>  MCP	<b>15b DATE</b> 7/29/99	

36



**Flammability Testing**  
**CFR 16 Section 1500.45**

Sample No. Subunit	Shaken Unshaken	Orientation	Flame Extension > 18"	Flashback to nozzle	Additional Observations
99-860-5277-02	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5277-03	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5277-05	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5277-06	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5279-01	S	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5279-03	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished
99-860-5279-04	S	Upright	Y	Y	
		Sideways	N	N	Flame extinguished
		Upside down	N	N	Flame extinguished
99-860-5279-05	U	Upright	Y	Y	
		Sideways	Y	Y	
		Upside down	N	N	Flame extinguished


Note: All units tested upright had flame extension greater than 18 inches, and flash back to the nozzle.

All units tested upside down extinguished the candle flame.

Units tested sideways yielded mixed results. Most shaken units extinguished the candle flame immediately, all unshaken units had flame extensions greater than 18" and flash back for an extended time.

37

99-860-5279  
DC  
7/28/99

	
SAMPLE NO. 99-5279	DATE 7-22-99
SIGNATURE <i>C. J. Smith</i>	
PRINT NAME, REPRESENTATIVE C. J. Smith, Investigator	
SEAL BROKEN BY DC	
DATE 7/28/99	

CPSC FORM 164

36