

August 29, 2007

US House of Representatives
Subcommittee on Commerce, Trade and Consumer Protection
Committee on Energy and Commerce
Washington, D.C 20515-6115

Dear Mr. Rush,

The following are answers to the questions contained in your letter of August 22, 2007:

1. Please see attached information for rings which we are currently working with the CPSC on.
2. Please see attached information on Charmed and Crossed Jewelry.
3. I do not know the name of the manufacturer or facility that produced the items. The company I worked with is:

Yane International Trade Col, LTD
Room 201, 22th Buliding, No. 1 Unit B, Qingyan Liu
District, Yiwu City, Zhejiang Province, China

4. I have no agreements with my China supplier, but I did provide them with information on CPSC testing standards for lead and asked that all product be tested prior to shipment.
5. The products are tested in China prior to shipment. Since, the incident we have hired an outside test facility in the USA to retest the products when we receive them.
6. I received a phone call from Dan Case, President of the National Bulk Vendors Association on March 28, 2007. He had seen our new product and thought, based on his experience, the product might contain lead. He suggested we purchase a home lead test kit at the hardware store and test the product to be sure. We did and it failed. I contacted the CPSC by phone on March 29, 2007.
7. The following recall actions have been taken by my company:
 - a. The CPSC was contacted as soon as we realized the problem.
 - b. Letters were sent to our customers who received lead tainted products requesting product be returned for full refund.. We also telephoned each customer..
 - c. A recall notification is posted on our website
 - d. A joint press release with the CPSC was issued on May 15, 2007.

e. A toll free telephone hot line was established.

All communications were in English. I do not have any information on underserved communities.

8. The attached monthly reports requested by the CPSC provides the requested information.

Best Regards,


Kevin Dumphy



U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OFFICE OF COMPLIANCE & FIELD OPERATIONS
Recalls and Compliance Division
Email: fkrivda@cpsc.gov

JUL 17 2007

Frank J. Krivda
Associate Director
Tel: 301-504-7580
Fax: 301-504-0359

CERTIFIED MAIL/ FAX 480-517-1058

Kevin Dumphy, Manager
Spandrel Sales & Marketing
1721 West 10th Pl.
Suite 3B
Tempe, AZ 85281

Children's Ring with clown face
CPSC Sample Number 07-302-3734

Dear Mr. Dumphy:

You sent to the staff of the U.S. Consumer Product Safety Commission the above referenced sample and it was assigned the above referenced CPSC sample number 07-302-3734. The staff determined this product contains accessible lead.

Our analyses of this sample indicates that two of the rings contain a total lead content of 76 percent by weight from one ring and total lead content of 55 percent by weight from the second ring. The total lead acid extraction of 1,428 micrograms was determined on the first ring and 3,298 micrograms was determined on the second ring. See enclosed test report for these analyses. The lead content in this ring is accessible to children and would raise the blood lead levels to a dangerous level if children are exposed to this necklace.

The Commission staff requests that you cease immediately the distribution of this product and any other children's metal jewelry that contain hazardous amount of accessible lead and initiate a voluntary recall of the product from consumers. We request that you conduct this recall to the consumer level by doing the following:

- ✓ Issue a joint Press Release with the Commission notifying the public of the recall;
- ✓ Send direct mail notification of the recall to relevant retailers and distributors;
- Send point-of-purchase posters to the relevant retail stores;

CPSC Hotline: 1-800-638-CPSC(2772) CPSC's Web Site: <http://www.cpsc.gov>
Fast Track Recall Program is an Innovations in American Government Award Winner

Attachment Question 1 (91)

- ✓ Provide consumers with a full refund or replacement;
- ✓ Establish a toll-free telephone number to provide consumers with information about the recall program; and
- Post the notification of the recall on your firm's Web site.

This product is a hazardous substance based on accessibility of the lead and is considered toxic as described under section 2(f)(1)(A)(i) of the FHSA, 15 U.S.C. § 1261(f)(1)(A)(i). As this item is a children's product, it is a banned hazardous substance under section 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 prohibited 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, your firm could be subject to fines of up to \$1.825 million and imprisonment for not more than one year, or both.

Sections 15 and 37 of the CPSA contain requirements for the reporting of certain information regarding products which you manufacture, import or distribute. Chapter 5 of the Handbook describes the procedures applicable to you. If you wish to receive confidential treatment of the information you submit in response to this letter, Chapter 7 of the Handbook includes information on how to do so. In addition, there is a reporting requirement for choking incidents under 16 C.F.R. Part 1117.

Please respond in writing within two weeks from the date you receive this letter outlining the specific corrective actions you plan to take to address the sale of these products and any other products that contain accessible lead. Please direct your response to me at Office of Compliance, U.S. Consumer Product Safety Commission, Room 613, 4330 East West Highway, Bethesda, MD 20814-4408. The Office of Compliance telefax number is (301) 504-0359.

Sincerely,



Frank J. Krivda
Recalls and Compliance Division

Enclosures: Interim Enforcement Policy for Children's Metal Jewelry Containing Lead
Test record for the above referenced CPSC Sample
Regulated Products Handbook

Laboratory Report	Product: CHILDERN'S RINGS	1. Sample Number: 07-302-3734																		
2. Seals: none	3. Date Received: 6-04-2007	5. Laboratory: LSC																		
6. Sample Description: 5 units of sample were received in a plastic bag. Sample was not sealed.																				
7. Labeling: N/A	8. Custom Entry # N/A	9. Lot/Model # N/A																		
9. Product Description: Silver color adjustable metal rings. There are 5 sub-samples, identified as 07-302-3734, sub 01-05, JJH.																				
11. Analytical Results: Total lead in sample was determined using Standard Operating Procedure for Determining Lead (Pb) and its extractability in Children's Metal Jewelry 2-3-2005 Total lead: <table border="1" data-bbox="228 877 721 968"> <thead> <tr> <th>Sub #</th> <th>1</th> <th>2</th> </tr> </thead> <tbody> <tr> <td>Description</td> <td>ring</td> <td>ring</td> </tr> <tr> <td>% lead (wt/wt)</td> <td>76.9</td> <td>55.490</td> </tr> </tbody> </table> Acid Extractions: <table border="1" data-bbox="228 1024 995 1123"> <thead> <tr> <th>Sub #</th> <th>Description</th> <th>Extractable Lead (ug) after 6 hours</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>ring</td> <td>1428.73</td> </tr> <tr> <td>2</td> <td>ring</td> <td>3298.56</td> </tr> </tbody> </table>			Sub #	1	2	Description	ring	ring	% lead (wt/wt)	76.9	55.490	Sub #	Description	Extractable Lead (ug) after 6 hours	1	ring	1428.73	2	ring	3298.56
Sub #	1	2																		
Description	ring	ring																		
% lead (wt/wt)	76.9	55.490																		
Sub #	Description	Extractable Lead (ug) after 6 hours																		
1	ring	1428.73																		
2	ring	3298.56																		
12. Reserve Sample: Two used sub-samples and remaining four intact sub-samples were sealed in plastic bag and kept in storage room for warehouse pick up.																				
13. Analyst Signature: <i>Shawna Jain</i> chemist		Date: 06-14-2007																		
14. Check Analyst Signature:		Date:																		
15. Report Checked by: <i>Jodi Ricketts</i>		Date: 6/28/2007																		

U.S. CPSC Laboratory Report

Q1

Laboratory ContinuationSample Number:
07-302-3734**Procedure:****Total lead:**

The Standard Operating Procedure for determining Lead (Pb) and its extractability in Children's Metal Jewelry 2-3-05 based on Canadian method CO2.4 was also used for total lead in jewelry sample. Small pieces of sample were grounded using high speed drill. Aliquots of grounded sample were used for digestion.

Sub #	Description	Weight (mg)
1	Ring	27.1
2	Ring	47.0
	NIST control-54D	29.7
	NIST control-1129	18.9

Analysis:

Concentrations of lead in aliquots were determined using Varian ICP spectrometer. Following instrument conditions were used:

Plasma flow	15.0 L/min	Auxiliary gas flow	1.5 L/min
Nebulizer flow	0.75 L/min	Wavelength	220.353
Pump rate	15 rpm	Power (kW)	1.2

Working standard:

Standard of known concentration was prepared by dilution of Fisher primary Reference Standard of 1000 ppm (Lot # 061332-24) expiration March 2008.

Standard	ml of primary standard	diluted to ml
1.0 ppm	0.1	100
5.0 ppm	0.5	100
10.0 ppm	1.0	100
25.0 ppm	2.5	100

Acid Extractions:

Acid extractions were carried out according to The Standard Operating Procedure for Determining Lead (Pb) and its extractability in Children's Metal Jewelry 2-3-05. Intact jewelry items were extracted for 6 hours in 0.07 N HCl.

Analyst Signature

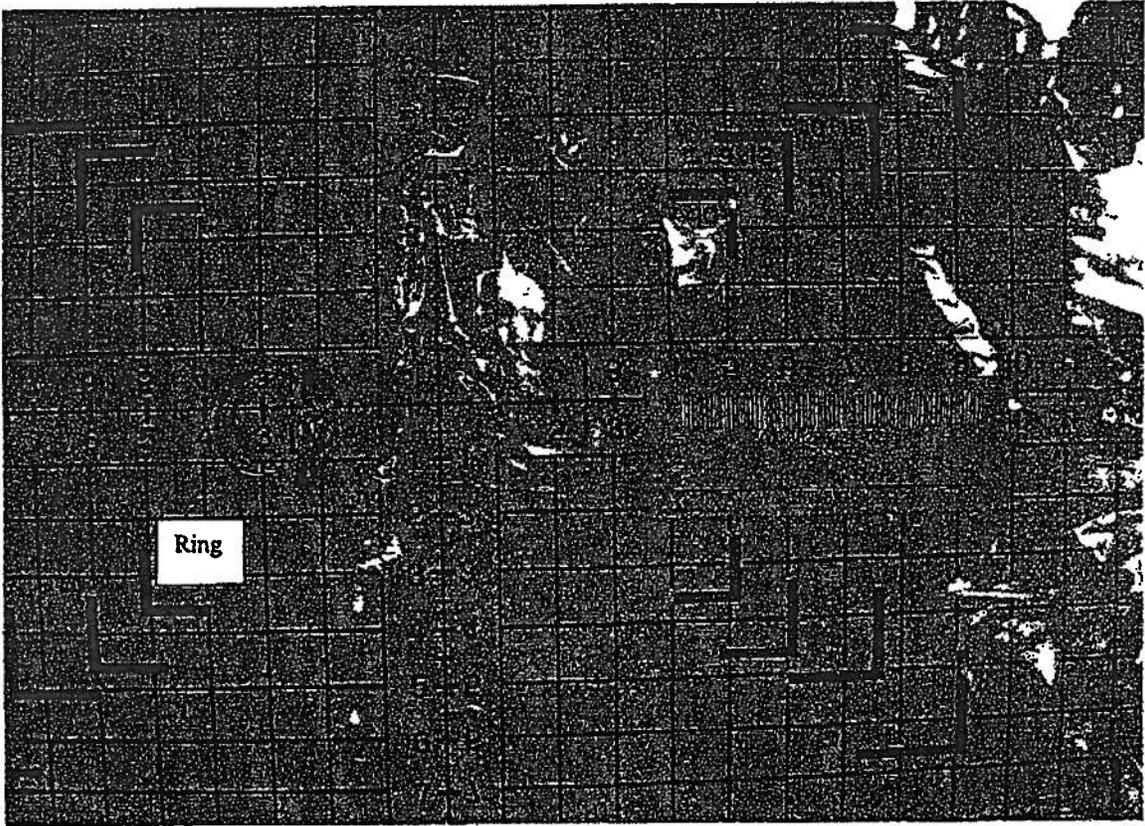
Blawong Jain chemist

Date:

06-14-2007

Laboratory Continuation

Sample Number:
07-302-3734



Analyst Signature

Shaway Jain chemist

Date:

06-14-2007

91

Laboratory Continuation

Sample Number:
07-302-3734

Results and calculations:

Total Lead:

Sub #	Description	ppm lead	dil. Factor	total Pb (µgs)	sample wt. (mgs)	% lead
1	ring	4.168	5000	20840	27.1	76.900
2	ring	5.216	5000	26080	47.0	55.489
NIST 54D		3.619	50	180.95	29.7	0.609
NIST 1129		1.382	5000	6910	18.9	36.561

Acid extractions:

Sub #	Weight of item(gm)	Extraction time (hour)			Total Lead 1+2+3= 6 hours µg lead extracted
		1	2	3	
		µg lead extracted			
1 (ring)	0.576	252.75	418.41	757.57	1428.73
2 (ring)	0.622	586.56	1189.11	1522.89	3298.56

Analyst Signature

Blawie Davis chemist

Date:

06-14-2007

July 27, 2007

Office of Compliance
US Consumer Product Safety Commission
4330 East West Highway, Room 710
Bethesda, MD 20814

CPSC Sample Number 07-0302-3734

Dear Mr. Krivda,

Thank you for your assistance in this matter.

We have this date completed the following actions:

1. Distribution of these rings was halted effective March 1, 2007.
1. Direct mail notification of the recall to relevant retailers and distributors has been made this date..
2. Full refund or replacement has been offered
3. Our toll free number with information on the recall is 1-877-213-0500.
4. The information concerning the recalled rings has been place on our website.

Sincerely,

Kevin Dumphy

1YF021 JUL 30, 2007 ACT WT 1.0 LBS #PK 1
SERVICE 3DS BILL WT 1 LBS
TRACKING# 1Z1YF0211245365203 ALL CURRENCY USD
REF 1:
REF 2:
HANDLING CHARGE 3.32 DV AMT 1.00
REFERENCE RATE CHARGES: SERVICE 13.28 USD
DV 0.00 COD 0.00 RS 0.00
DC 0.00 HZMT 0.00 SD 0.00
AH 0.00 NTFY 0.00 SP 0.00
TOT REF CHG 13.28 REF+HANDLING 16.60



U.S. CONSUMER PRODUCT SAFETY COMMISSION
4330 EAST WEST HIGHWAY
BETHESDA, MD 20814

OFFICE OF COMPLIANCE & FIELD OPERATIONS
Recalls and Compliance Division
Email: jharman@cpsc.gov

APR 13 2007

Jason J. Harman
Compliance Officer
Tel: 301-504-7591
Fax: 301-504-0359

Certified Mail/Telefax 480-517-1058

Kevin Dumphy
Spandrel Sales & Marketing
1721 W. 10th Pl., Suite 3B
Tempe, AZ 85281

RE: CPSC File No. RP070278
CPSC Sample No. 07-302-0161 – Cross Rings and Necklaces, Item #CM01
CPSC Sample No. 07-302-0162 – Charmed Rings and Necklaces, Item #CJ01

Dear Mr. Dumphy:

Thank you for your telephone report of April 2, 2007, under section 15(b) of the Consumer Product Safety Act, as amended, 15 U.S.C. § 2064(b). In your report, you indicated that the above-referenced products imported and distributed by your firm, Spandrel Sales & Marketing, contain excessive accessible lead, such that they are considered toxic under the Federal Hazardous Substances Act ("FHSA"). As a result, the products are banned hazardous substances and are therefore prohibited from being sold in the United States. You also reported that your firm has stopped distribution and sale of the products.

According to your report, you imported approximately 123,000 units of the above products, which you received on or around January 1, 2007. These products were analyzed for lead content, and test results indicated that they contain high levels of accessible lead. You provided samples of the products to Commission staff on April 11, 2007.

Because of the risk of death or serious injury associated with these products, your firm has agreed to take the following corrective actions:

- Immediately initiate a voluntary recall of all previously distributed products to the consumer level by:
 - Establishing a toll-free telephone number to provide consumers with information about the recall program;

CPSC Hotline: 1-800-638-CPSC (2772) *CPSC's Web Site: <http://www.cpsc.gov>
Fast Track Recall Program Is an Innovation in American Government Award Winner

Attachment Question 2 (92)

- Sending direct mail notification of the recall to relevant retailers and distributors;
- Issuing a joint Press Release with the Commission notifying the public of the recall program;
- Posting notification of the recall on your firm's Web site;
- Posting notification of the recall on relevant retailer Web sites;
- Posting point-of-purchase signs in all relevant retail stores; and
- Providing consumers with a full refund or replacement.

In addition, please provide the following:

- Name and address of the manufacturer(s);
- Confirmation of the total number of products involved;
- Confirmation of the dates when the products were manufacturer/imported, distributed and sold at retail;
- Number of products in possession of the manufacturer/importer, distributor, retailer and consumer; and
- Names and addresses of all distributors, retailers and other purchasers, and quantities sold to each.
- Digital image (preferably in .JPG format) of the products to be used in the Press Release.

These products are hazardous substances based on the accessibility of lead and are considered toxic under section 2(f)(1)(A)(i) of the FHSA, 15 U.S.C. § 1261 (f)(1)(A)(i). As these items are children's products, they are banned hazardous substances under section 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 prohibited 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, your firm could be subject to fines of up to \$1.825 million and imprisonment for not more than one year, or both.

Sections 15 and 37 of the Consumer Product Safety Act contain requirements for reporting to the Commission information on certain products you manufacture, import, or distribute. Chapter 5 of the *Regulated Product Handbook (Handbook)* describes the reporting requirements applicable to your firm. To assure you of the confidential treatment of information you submit, please review Chapter 7 of the *Handbook*. If you disagree with the staff's conclusion that your firm is in violation of the regulation, you may present your views to the staff orally or in writing. Chapter 2 of the *Handbook* describes the procedures for doing so. In addition, there is a reporting requirement for choking incidents under 16 C.F.R. Part 1117.

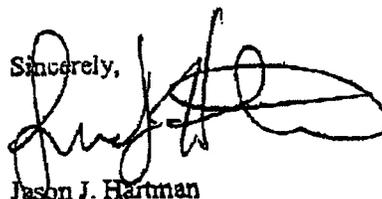
Please respond in writing within 10 working days from the date that you receive this letter outlining the specific corrective actions you plan to take to address the violations described herein. If you seek assistance or have any questions, you may contact me at: 301-504-7591. Please address your correspondence to me at: Office of Compliance, U.S. Consumer Product Safety Commission, Room 710, 4330 East West Highway, Bethesda, MD 20814-4408.

(P2)

Page 3

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason J. Hartman", written over the word "Sincerely,".

Jason J. Hartman

Enclosures:

Regulated Products Handbook
Compilation of Statutes

(92)



中華人民共和國揚州進出口玩具檢驗所

YTI

YANGZHOU IMP. & EXP. TOY INSPECTION INSTITUTE OF P.R.C.

Add:105 Wenhuaq Road West, Yangzhou, Jiangsu, China
TEL:0086-514-7885906 7882465
FAX:0086 514-7885882
P.C.:225009
E-mail:yz.yti@public.yz.js.cn
Website:http://www.ytli.com

ORIGINAL

TEST REPORT

No :3210/FB60238
Date :Aug.21,2006

Applicant
Address

: YANE INTERNATIONAL TRADE CO., LTD
: ROOM 201,22TH BUILDING, NO.1 UNIT B,QINGYAN LIU
DISTRICT,YIWU CITY,ZHEJIANG PROVINCE,CHINA

Sample Description

: Two pieces of samples submitted by the applicant said to be
Coating used for (finger ring)

Item No.

: _____

Place of Origin

: China

Date of Sample Received

: Aug.10, 2006

Testing Period

:Aug.21, 2006

Test Requested

: To determine the Lead Contents in the metal parts of the submitted
samples.

Test Method

: 1)Total Lead content – As specified in CPSC standard operating
procedure for determining Lead (Pb) and its Availability in
children's Metal Jewelry (2/3/2005) section I : Screening Test
for total Lead.
2)Extractable Lead content – As specified in CPSC standard
operating procedure for determining Lead (Pb) and its Availability
in children's Metal Jewelry(2/3/2005) section II :Acid Extraction
Test.

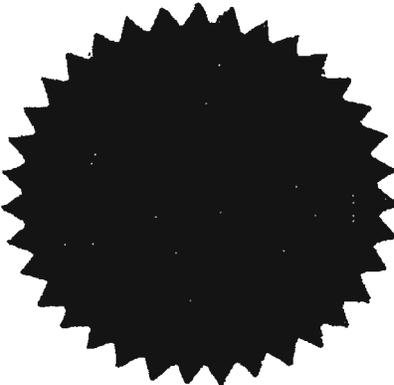
Results

: Please see the following page(s)

Conclusion

: 1)When tested as specified, the Lead contents in the metal parts of the
submitted sample complies with the requirement of CPSC Interim
Enforcement Policy for Children's Metal Jewelry Containing Lead-
2/3/2005.

2)After subjected to the acid extraction test, the Lead contents in the
metal parts of the submitted sample complies with the requirement
of CPSC Interim Enforcement Policy for Children's Metal Jewelry
Containing Lead – 2/3/2005.



Signed for and on behalf of YTI

94

Cheng Yu Long
Assistant Technical Manager



中華人民共和國揚州進出口玩具檢驗所

YANGZHOU IMP. & EXP. TOY INSPECTION INSTITUTE OF P.R.C.

Add:103 Wenchang Road West, Yangzhou, Jiangsu, China
TEL:0086-514-7805904 7862165
FAX:0086-514-7886888
P.C.:225009
E-mail:yz.ytii@public.yz.js.cn
Website:http://www.ytii.com

ORIGINAL

TEST REPORT

No :3210/FB60238

Date :Aug.21,2006

Result:

1)Total Lead contents in metal parts

	<u>No.1</u>	<u>Limit</u>
Total Lead content	47µg /g	600µg /g

2)Extractable Lead contents in metal parts

	<u>No.1</u>	<u>Limit</u>
Extractable Lead content	<20µg	175µg

Specimen Description:

*Group 01: Slivery metal coating

*Remark: Extractable mass of trace amount of group 1=0.37g.

End of Report



中華人民共和國揚州進出口玩具檢驗所

YANGZHOU IMP. & EXP. TOY INSPECTION INSTITUTE OF P.R.C.

Add:105 Wenchang Road West, Yangzhou, Jiangsu, China
TEL:0086-514-7885904 7882465
FAX:0086-514-7885882
P.C.:225009
E-mail:yz.ytii@public.yz.js.cn
Website:http://www.ytiicn.com

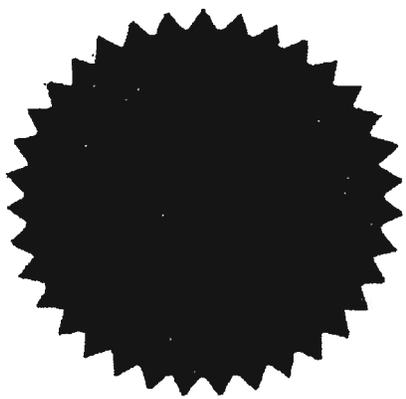
ORIGINAL

TEST REPORT

No :3210/FA60119

Date :May.12,2006

Applicant : YANE INTERNATIONAL TRADE CO., LIMITED
Address : _____
Sample Description : One piece sample submitted by the applicant said to be Silvery Coating(on metal) said to be used for (Finger Ring, Bracelet, Pendant, Necklace)
Item No. : _____
Place of Origin : China
Date of Sample Received : May.08, 2006
Testing Period : May.11, 2006
Test Requested : To determine the Lead Contents in the metal parts of the submitted samples.
Test Method : 1)Total Lead content – As specified in CPSC standard operating procedure for determining Lead (Pb) and its Availability in children's Metal Jewelry (2/3/2005) section I : Screening Test for total Lead.
2)Extractable Lead content – As specified in CPSC standard operating procedure for determining Lead (Pb) and its Availability in children's Metal Jewelry(2/3/2005) section II :Acid Extraction Test.
Results : Please see the following page(s)
Conclusion : 1)When tested as specified, the Lead contents in the metal parts of the submitted sample complies with the requirement of CPSC Interim Enforcement Policy for Children's Metal Jewelry Containing Lead-2/3/2005.
2)After subjected to the acid extraction test, the Lead contents in the metal parts of the submitted sample complies with the requirement of CPSC Interim Enforcement Policy for Children's Metal Jewelry Containing Lead – 2/3/2005.



Signed for and on behalf of YTII

Cheng Yu Long
Assistant Technical Manager



中華人民共和國揚州進出口玩具檢驗所
YANGZHOU IMP. & EXP. TOY INSPECTION INSTITUTE OF P.R.C.

Add:105 Wenchang Road West, Yangzhou, Jiangsu, China
TEL:0086-514-7885904 7882465
FAX:0086-514-7885882
P.C.:225000
E-mail:yz.ytii@public.yz.js.cn
Website:http://www.ytii.cn.com

ORIGINAL

TEST REPORT

No :3210/FA60119
Date :May.12,2006

Result:

1)Total Lead contents in metal parts

	<u>No.1</u>	<u>Limit</u>
Total Lead content	47mg/kg	600mg/kg

2)Extractable Lead contents in metal parts

	<u>No.1</u>	<u>Limit</u>
Extractable Lead content	<20µg	175µg

Specimen Description:
Group 01: Silvery coating

Note: -<=Less than

End of Report



Test Report

No. SH7078088/CHEM

Date: Jul. 23, 2007

Page 1 of 2

YANE INTERNATIONAL TRADE CO., LTD
NO.437 3F NANMEN STREET YIWU CITY ZHEJIANG PROVINCE 322000 CHINA

The following sample(s) was submitted and identified by/on behalf of the client as:

Sample Name : METAL RING
SGS Ref No. : SHD2708106
Manufacturer : YANE INTERNATIONAL TRADE CO., LTD
Exported to : USA

Sample Receiving Date : Jul.18, 2007
Testing Period : Jul.18-23, 2007

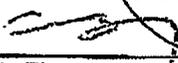
Test Requested : To determine the Lead content in the submitted samples for compliance with US CPSC Interim Enforcement Policy for Children's Metal Jewelry Containing Lead - 2/3/2005.

Test Method : (1) With reference to US CPSC Directorate for laboratory Sciences, Standard Operating Procedure for determining lead and its availability in Children's metal jewelry, dated Feb 3, 2005, Clause I - Screening test .
Analysis was performed by Atomic Absorption Spectrometry or Inductively Coupled Argon Plasma - Atomic Emission Spectrometry (ICP-AES).

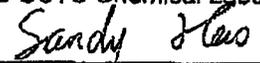
Test Results : Please refer to next pages.

Conclusion : The metal part of the submitted sample complies with the requirement as stated in US CPSC Interim Enforcement Policy for Children's Metal Jewelry Containing Lead - 2/3/2005.

Signed for and on behalf of
SGS-CSTC Chemical Laboratory


Ella Zhang
Sr. Section Head

Signed for and on behalf of
SGS-CSTC Chemical Laboratory


Sandy Hao
Lab Manager

Attachment Question 5 (Q5)



Test Report

No. SH7078088/CHEM

Date: Jul. 23, 2007

Page 2 of 2

Test results by chemical method (Unit: %)

<u>Test Item(s):</u>	<u>Method (refer to)</u>	<u>1</u>	<u>MDL</u>	<u>Permissible Limit</u>
Total Lead (Pb) Content	(1)	ND	0.001	0.060

Sample Description:

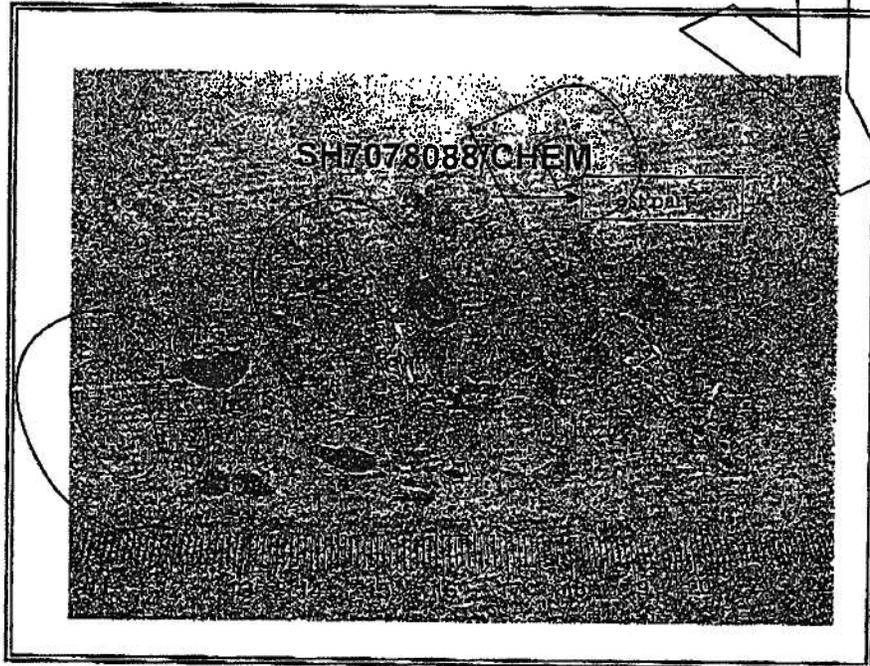
1. Silvery metal ring part

Note : (1) 1mg/kg=1ppm=0.0001%

(2) ND = Not detected

(3) MDL = Method Detection Limit

Sample photo:



SGS authenticate the photo on original report only

*** End of Report ***

95



chemical solutions ltd.
trace elemental analysis

ANALYTICAL REPORT

August 11, 2007

Shawn Dumphy
SSM Vending
1721 W 10th Pl, Suite 3B
Tempe, AZ. 85281

Page 1 of 1
Sample No. 07H0209

Client : SSM Vending
Client # : S7683
Description : See Below
Sample Type : Solid
Collector : Client

Customer PO :
Date Sampled :
Date Received : 08/02/07
Date Completed : 08/10/07
Discard Date : 08/23/07

07H0209		Design Rings		Lot# 2		
Parameter	Result	Units	PQL	Method	Date	Analyst
Lead	17	ppm	0.50	ICP-MS	08/10/07	SB

The sample as received consisted of eleven individual metal bands of similar style but varying ornamentation (various shapes and colors). One full band (with ornament) and three additional ornaments with different coloring were randomly selected as the sample for analysis. The sample consisted of a total weight of 1.23 grams. This sample was combined with 20 ml of an acidic solution containing 8ml of nitric acid and 2ml of hydrochloric acid. The solution (with the sample) was placed on a hot plate at 95 (+/-5) deg. C and refluxed for 30 minutes. The results shown above reflect the resulting concentration of lead from that digestion process.

Respectfully Submitted,
Chemical Solutions, Ltd.

Jan Milnes / Bg 8/14/07
Jan Milnes
President

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Q5

Monthly Progress Report for Corrective Action Plan & Incident Update

CASE #: RP070278

Compliance Officer: JASON HARTMAN

Company Name:

Product: CROSS RINGS + NECKLACE AND CHARMED RING + NECKL

Reporting Dates, From: 5/1/07 To: 5/31/07

Total# of Affected Products: 200,000 pieces

I) PRODUCTS CORRECTED/CAPTURED BY YOUR FIRM:

Location of Products	Total Products	Corrections This Period	Total Corrections	Percent Corrected
With Manufacturer				
With Distributor	<u>82,250</u>	<u>82,250</u>	<u>82,250</u>	<u>100%</u>
With Retailers	<u>117,750</u>	<u>33,250</u>	<u>33,250</u>	<u>28.2%</u>
With Consumers	<u>0</u>	<u>0</u>	<u>0</u>	<u>0%</u>
TOTAL:	<u>200,000</u>	<u>115,500</u>	<u>115,500</u>	<u>58%</u>

II) NOTIFICATION MEASURES:

(Using the categories listed below, records the numbers of notifications attempted by your firm during this reporting period, and records the total number of notifications to date.)

	Number for This Reporting Period	Total
Billing Insert		
Direct Mail Letter	<u>2 LETTERS</u>	<u>50</u>
Magazine		
Newspaper		
Pediatrician Poster		
Phone Call		
Product Catalog		
Radio		
Retail Store Poster		
Television		
Web Site	<u>1</u>	<u>1</u>
Post Office		
Thrift Store		
Other		

III) CONSUMER AWARENESS: (Using the categories below, record the way, by numerical quantity, consumers told you they learned of the corrective action, i.e. consumer received direct mail, read magazine, etc.)

	Number for This Reporting Period	Total
Billing Insert		
Direct Mail Letter		
Magazine		
Newspaper		
Pediatrician Poster		
Phone Call		
Product Catalog		
Radio		
Retail Store Poster		
Television		
Web Site		
Post Office		
Thrift Store		
Other - CPSC	<u>8</u>	<u>8</u>
Public TVL Announcement		

IV) Calls to 800 Number/Correspondence

	# From Customers This Reporting Period	Total
800 Number	<u>7</u>	<u>7</u>
E-mail	<u>1</u>	<u>1</u>
Written Requests	<u>0</u>	<u>0</u>

V) Incident Update:

	# For This Reporting Period	Total
# Incidents	<u>0</u>	<u>0</u>
# Injuries	<u>0</u>	<u>0</u>
# Deaths	<u>0</u>	<u>0</u>

NOTE: Submit completed form by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at: United States Consumer Product Safety Commission, Office of Compliance 4330 East West Highway, Room 613 Bethesda, MD 20814

OR, fax report to (301) 504-0359 or e-mail to jsmith@cpsc.gov. Address any questions to Ms. Smith at 301-504-0608 # 1377

Attachments Question 8 (98)

Monthly Progress Report for Corrective Action Plan & Incident Update

CASE #: RP0702 78
 Company Name: SSM VENDING
 Reporting Dates, From: 6/1/07 To: 6/30/07

Compliance Officer: Jason Hartman
 Product: Cross Ring & Necklaces and Charmed Ring & Necklaces
 Total# of Affected Products: 200,000

I) PRODUCTS CORRECTED/CAPTURED BY YOUR FIRM:

Location of Products	Total Products	Corrections This Period	Total Corrections	Percent Corrected
With Manufacturer				
With Distributor	<u>82,250</u>	<u>0</u>	<u>82,250</u>	<u>100%</u>
With Retailers	<u>84,500</u>	<u>0</u>	<u>33,250</u>	<u>28.2%</u>
With Consumers	<u>Unlimited</u>	<u>0</u>	<u>0</u>	<u>0</u>
TOTAL:	<u>166,750</u>	<u>0</u>	<u>115,500</u>	<u>58%</u>

II) NOTIFICATION MEASURES:

(Using the categories listed below, records the numbers of notifications attempted by your firm during this reporting period, and records the total number of notifications to date.)

	Number for This Reporting Period	Total
Billing Insert	_____	_____
Direct Mail Letter	_____	<u>50</u>
Magazine	_____	_____
Newspaper	_____	_____
Pediatrician Poster	_____	_____
Phone Call	_____	_____
Product Catalog	_____	_____
Radio	_____	_____
Retail Store Poster	_____	_____
Television	_____	_____
Web Site	_____	<u>1</u>
Post Office	_____	_____
Thrift Store	_____	_____
Other	_____	_____

III) CONSUMER AWARENESS: (Using the categories below, record the way, by numerical quantity, Consumers told you they learned of the corrective action, i.e. consumer received direct mail, road magazine, etc.)

	Number for This Reporting Period	Total
Billing Insert	_____	_____
Direct Mail Letter	_____	_____
Magazine	_____	_____
Newspaper	_____	_____
Pediatrician Poster	_____	_____
Phone Call	_____	_____
Product Catalog	_____	_____
Radio	_____	_____
Retail Store Poster	_____	_____
Television	_____	_____
Web Site	_____	_____
Post Office	_____	_____
Thrift Store	_____	_____
Other - CPSC	_____	<u>8</u>
AS Announcement	_____	_____

IV) Calls to 800 Number/Correspondence

	# From Customers This Reporting Period	Total
800 Number	_____	<u>7</u>
E-mail	_____	<u>1</u>
Written Requests	_____	<u>0</u>

V) Incident Update:

	# For This Reporting Period	Total
# Incidents	<u>0</u>	<u>0</u>
# Injuries	<u>0</u>	<u>0</u>
# Deaths	<u>0</u>	<u>0</u>

NOTE: Submit completed form by the FIRST of EACH MONTH to Judy Smith, Recall Coordinator, at:
 United States Consumer Product Safety Commission, Office of Compliance
 4330 East West Highway, Room 613 Bethesda, MD 20814
 OR, fax report to (301) 504-0359 or e-mail to jsmith@cpse.gov . Address any questions to Ms. Smith at 301- 504-0608 # 1377

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Monthly Progress Report for Corrective Action Plan & Incident Update

CASE #: RP070278 Compliance Officer: Jason Hartman
 Company Name: SSM vending Product: Cross Ring & Neckband & Chained Ring & No labels
 Reporting Dates, From: 7/1/07 To: 7/31/07 Total# of Affected Products: 200,000

I) PRODUCTS CORRECTED/CAPTURED BY YOUR FIRM:

Location of Products	Total Products	Corrections This Period	Total Corrections	Percent Corrected
With Manufacturer	<u>82,250</u>	<u>0</u>	<u>82,250</u>	<u>100%</u>
With Distributor	<u>84,500</u>	<u>5819</u>	<u>39,069</u>	<u>46.2%</u>
With Retailers	<u>unknown</u>	<u>0</u>	<u>0</u>	<u>0</u>
With Consumers	<u>unknown</u>	<u>0</u>	<u>0</u>	<u>0</u>
TOTAL:	<u>166,750</u>	<u>5819</u>	<u>121,319</u>	<u>72.7%</u>

II) NOTIFICATION MEASURES:

(Using the categories listed below, records the numbers of notifications attempted by your firm during this reporting period, and records the total number of notifications to date.)

	Number for This Reporting Period	Total
Billing Insert	_____	_____
Direct Mail Letter	_____	<u>50</u>
Magazine	_____	_____
Newspaper	_____	_____
Pediatrician Poster	_____	_____
Phone Call	_____	_____
Product Catalog	_____	_____
Radio	_____	_____
Retail Store Poster	_____	_____
Television	_____	_____
Web Site	_____	<u>1</u>
Post Office	_____	_____
Thrift Store	_____	_____
Other	_____	_____

III) CONSUMER AWARENESS: (Using the categories below, record the way, by numerical quantity, Consumers told you they learned of the corrective action, i.e. consumer received direct mail, read magazine, etc.)

	Number for This Reporting Period	Total
Billing Insert	_____	_____
Direct Mail Letter	_____	_____
Magazine	_____	_____
Newspaper	_____	_____
Pediatrician Poster	_____	_____
Phone Call	_____	_____
Product Catalog	_____	_____
Radio	_____	_____
Retail Store Poster	_____	_____
Television	_____	_____
Web Site	_____	_____
Post Office	_____	_____
Thrift Store	_____	_____
Other - CPSC	_____	<u>8</u>
<u>PS Announcement</u>	_____	_____

IV) Calls to 800 Number/Correspondence

	# From Customers This Reporting Period	Total
800 Number	_____	<u>7</u>
E-mail	_____	<u>1</u>
Written Requests	_____	<u>0</u>

V) Incident Update:

	# For This Reporting Period	Total
# Incidents	<u>0</u>	<u>0</u>
# Injuries	<u>0</u>	<u>0</u>
# Deaths	<u>0</u>	<u>0</u>

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08