STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ERIC T. SCHNEIDERMAN
ATTORNEY GENERAL

DIVISION OF SOCIAL JUSTICE
ENVIRONMENTAL PROTECTION BUREAU

April 21, 2016

Chairman Elliot Kaye
United States Consumer Product Safety Commission
4330 East West Highway
Bethesda, Maryland 20814

RE: *Request for National Recall of Cra-Z-Art Children's Products Containing Lead in Excess of Consumer Product Safety Standard of 100 parts per million*

Dear Chairman Kaye:

Please accept this letter on behalf of the Office of the New York State Attorney General to convey to the Commission the results and findings of an investigation into the sale and distribution of Cra-Z-Art children's products in New York that contain lead concentrations in excess of 100 parts per million. Distribution of these products constitutes a violation of the Consumer Product Safety Improvement Act, 15 U.S.C. § 1278a(a)(2)(C), and warrants the Commission's initiation of an immediate nation-wide recall.

In October 2015, November 2015, and February 2016, investigators from the Attorney General's Office visited several stores throughout New York State and purchased a number of products intended for use by children. We sent those products to a laboratory accepted as accredited to perform analytical testing for lead under 15 U.S.C. § 2063. The analytical results indicated that certain children's products exceed the CPSC's lead standard.

The following children's products contain lead above 100 ppm:

- *Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine (UPC 884920174504)*
- *Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Gem Charm and Slider Bracelets (UPC 884920174849)*
- *My Look Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Machine (UPC 884920466340)*

Specifically, the components of these children's products that contained excess levels of lead were bands that resemble leather. Lead content in the products tested ranged from 120 ppm to 980 ppm. Attached are the sampling results showing that they contain lead in excess of 100

ppm, along with photographs of the products (Exhibit A). We believe these items present a risk to children due to their high lead content and that a national recall is warranted.

Retailers

The following retailers sold and offered for sale the products listed above in stores in New York and/or on-line via internet sites:

Offered for Sale In-Store and On-Line	*Offered for Sale On-Line*
Toys "R" Us	*Amazon.com*
Kmart	*Walmart.com*
Target	*Sears.com*
	Yoyo.com
	Fishpond.com
	Jet.com

Distributors

We have identified the following distributors who we believe have imported, distributed, or caused these products to be available for sale:

Shepher Distr's and Sales Corp.
LaRose Industries LLC d/b/a Cra-Z-Art

Note that there may be additional importers and distributors of these products.

It is in the public interest to remove these products, and any items that might be made of similar materials, from store shelves and from internet sites. We therefore request that the CPSC implement a nationwide recall of these products and any other products that contain excessive concentrations of lead.

The Attorney General's Office has notified the stores and distributors of the testing results and has requested that they initiate a voluntary recall. We have informed the retailers and distributors that these products should immediately be removed from shelves and from availability over the internet, but should not be destroyed or otherwise made unavailable.

The Attorney General is committed to protecting the health and safety of the children of our State and takes CPSIA compliance issues very seriously. Our focus on children's exposure to toxic chemicals is critical to that commitment. Peer-reviewed studies have documented lead's high toxicity, especially to children under 7 years of age, and have confirmed that there is no safe level of lead in blood. Indeed, even small amounts of lead are known to cause neurological damage, learning disabilities, attention deficits, hyperactivity, irritability, and other behavioral problems. At high levels, lead can cause brain damage and even death. Many of lead's health effects can be permanent. Children are at special risk due to their small body mass and rapid physical development. Ensuring the safety of children's toys is therefore crucial.

Thank you for considering our request for attention to this important matter and we look forward to working with you further on assuring that children's products meet the CPSC's safety standards. We are available to discuss this matter further with a CPSC representative.

Very truly yours,

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Exhibit A

"Cra-Z-Art" Children's Products With Parts Found to Contain Lead In Excess Of 100 ppm Federal Child Safety Limit

Item Name	UPC Code	Item Part	Lead Content (ppm)	Retail Store	Store Location
My Look Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920466340	Tan Material (Band)	**770**	Target	999 Corporate Drive, Westbury, NY 11590
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920174504	Tan Material (Band)	**880**	Toys "R" Us	117 Old Country Road, Carle Place, NY 11514
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Gem Charm and Slider Bracelets	884920174849	Tan Material (Band 1)	**720**		
		Tan Material (Band 2)	**680**		
		Pink Material (Band 3)	**120**		
		Tan Material (Band 3)	**920**		
		Pink Material (Band 4)	**130**		
		Tan Material (Band 4)	**980**		
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920174504	Tan Material (Band)	**670**	Kmart	250 W 34th St, New York, NY 10119
My Look Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920466340	Pink Material (Band)	**120**	Target	340 Towne Dr, Fayetteville, NY 13066
		Tan Material (Band)	**550**		
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920174504	Pink Material (Band)	**210**	Kmart	8007 Oswego Road, Liverpool, NY 13090
		Tan Material (Band)	**640**		
Shimmer N' Sparkle Cra-Z-	884920174849	Pink Material (Band 1)	**120**	Toys "R" Us	4155 NY-31 Great
		Tan Material (Band 1)	**640**		

Art Cra-Z-Jewelz Gem Creations Gem Charm and Slider Bracelets		Pink Material (Band 2)	**120**		Northern Mall, Clay, NY 13041
		Tan Material (Band 2)	**470**		
		Tan Material (Band 3)	**650**		
		Tan Material (Band 4)	**590**		
My Look Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920466340		not tested	Target	600 Greece Ridge Center Drive, Rochester NY 14623
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920174504		not tested	Kmart	3049 West Ridge Road, Rochester, NY 14626
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Gem Charm and Slider Bracelets	884920174849		not tested	Toys "R" Us	1530 Ridge Road West, Rochester NY 14615
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920174504	Tan Material (Band)	**540**	Kmart	2055 Walden Avenue, Cheektowaga, NY 14225
My Look Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920466340	Tan Material (Band)	**580**	Target	2626 Delaware Avenue, Buffalo, NY 14216
Shimmer N' Sparkle Cra-Z-Art Cra-Z-Jewelz Gem Creations Ultimate Gem Machine	884920174504	Pink Material (Band)	**210**	Toys "R" Us	3030 Sheridan Drive, Amherst, NY 14226
		Tan Material (Band)	**740**		

Photographs of the products are below:

NEW!
6+
shimmer 'n sparkle
CraZJewelz
GEM CREATIONS
Design & Create
Amazing
Gemstone
Jewelry!
Real
Gem
Jewelry!
Set,
Press &
Bling!
GEM CHARM &
SLIDER BRACELETS