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E-Mail: Harrison.Pollak@doj.ca.gov

November 13, 2009

Gregg W. Steinhafel  
President and Chief Executive Officer  
Target Corporation  
1000 Nicollet Mall  
Minneapolis, MN 55403

RE: Lead in Children's Product Purchased at Target (PHT 082)

Dear Mr. Steinhafel:

We just received a report about a children's product purchased in a Target store in Richmond, California that contains illegal levels of lead. The lead levels reported exceed the limits in the federal Consumer Product Safety Improvement Act ("CPSIA"). Furthermore, selling the product without a proper warning likely violates California's Safe Drinking Water and Toxic Enforcement Act of 1986, commonly known as "Proposition 65." We are writing to ask that you stop selling the product immediately and take other corrective action as needed.

The children's product is a Cherokee brand reversible "Croco" belt, Style 1139915TG, purchased at a Target store in Richmond on September 27, 2009. The SKU is 492020800102. Our internal reference number is PHT 082. Please use it in communications with our office about this. We have enclosed photographs of the product.

The item was purchased by an investigator for the Center for Environmental Health, using a grant from a fund administered by the Public Health Institute. The fund was established through a Proposition 65 settlement between our office and several companies over lead in toys. (*People v. Mattel et al.*, Alameda County Super. Ct., Civ. No. RG 07-356892.) After screening the product for lead, the Center for Environmental Health sent a sample to a federally-approved laboratory for further testing. The test results, which are enclosed, indicate 4,270 parts per million ("ppm") lead in the black artificial leather on the front surface of the belt. This exceeds federal lead limits, which deem a children's product with more than 300 ppm lead in an accessible component a "banned hazardous substance." It also appears to violate Proposition 65, which requires a clear and reasonable warning prior to exposing persons to known carcinogens and reproductive toxins, including lead. (Cal. Health & Saf. Code, § 25249.6; Cal. Code Regs., tit. 27, § 27001.)

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Lead is a toxic metal that damages the nervous system and other organs. Even at low levels of exposure, lead can impact brain development in children. Based on what appears to be violations of federal and state law, you should stop selling the product immediately. Additionally, please send us any test results you have and any representations from the manufacturer or supplier about the lead content in the product. Please contact us immediately so we can discuss what further actions your company intends to take.

Sincerely,



HARRISON M. POLLAK  
Deputy Attorney General

For EDMUND G. BROWN JR.  
Attorney General

Enclosures

cc (via electronic mail): Jeff Margulies, Esq.  
Mark Schoem, Consumer Product Safety Commission

OK2007900181  
90130682.doc



CHEROKEE  
M REVERSIBLE

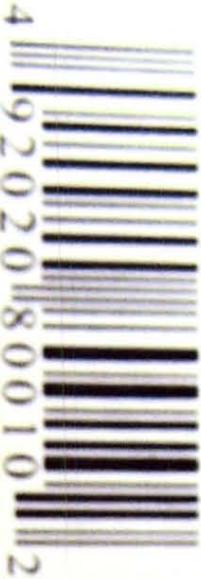
M 9.5  
CHEROKEE

M

REVERSIBLE

CHEROKEE





REVERSIBLE CROCO BELT

STYLE # 1139915TG

202 08 0010

MADE IN CHINA

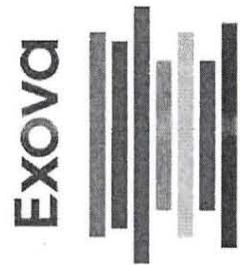
Distributed by Target Corporation, Minneapolis, MN 55403

**M**

**\$6.99**

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## Certificate of Analysis

No.: 09-013-13564-2  
Total Lead Test on Children's Product

<b>Client: Centre for Environmental Health</b> <b>Address: 2201 Broadway Suite 302, Oakland, CA 94612, U.S.A</b>	<b>Contact: Caroline Cox</b> <b>Phone: 510-655-3900</b> <b>Fax: 510-655-9100</b> <b>Email: Caroline@ceh.org</b>
<b>Date Received: November 6, 2009</b>	<b>Date Reported: November 11, 2009</b>
<b>Lab Book/Page No.:</b> Lab book 12161, pages 10 to 13	

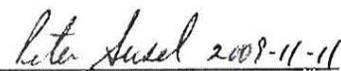
Date Analyzed: November 10, 2009

Client Sample ID	Description of Tested Sample Parts	Exova Sample ID	Method	Total Lead Content (ppm)
PHT082	Black "Croco" surface of Cherokee croco reversible belt	09-13564-38630	CPSC-CH-E1002-08	4270

Analyzed by:

Reported by:

  
2009-11-11  
Jack Li, B.Sc.  
Analyst, Trace Metals & Specialty Chemicals  
Health Sciences

  
2009-11-11  
Peter Susel, B.Sc., C. Chem.  
Mgr, Trace Metals & Specialty Chemicals  
Health Sciences

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