

SHENZHEN SAM'S TECHNOLOGY CO., LTD
ADDRESS: ZHONGXIN RD, SHAIJING AREA, BAO'AN DISTRICT,
SHENZHEN, CHINA

Date: August 12, 2024

Re: Compliance with Local BOH Regulations and State Law
To Whom

It May Concern:

It has come to our attention that in Massachusetts some local town or regional health departments have incorrectly suggested that all ENDS labeled "clear", "smooth" or "fresh" "have a characterizing flavor other than the taste or aroma of tobacco" and are therefore

prohibited from being sold under the Massachusetts laws prohibiting flavored tobaccos. We recognize that Massachusetts law prohibits flavored tobacco products, but in the case of Crave+ products the assumption that these products have a flavor other than tobacco is incorrect.
Current

Massachusetts

law

(105

CMR

665.010)

defines

"Characterizing

Flavor"

as

"a

distinguishable taste or aroma, other than the taste or aroma of tobacco, imparted or detectable before or during consumption of a tobacco product including, but not limited to, a taste or aroma relating to any fruit, chocolate, vanilla, honey, candy, cocoa, dessert, alcoholic beverage,

menthol, mint, wintergreen, herb, or spice; provided, however, that no tobacco product shall be determined to have a characterizing flavor solely because of the provision of ingredient information or the use of additives or flavorings that do not contribute to the distinguishable taste or aroma of the product".
However, none of the Crave products listed below have any added flavor and therefore do not have

"characterizing
flavor"

as defined

above.

We

also

refer you

to our

Manufacturers

Certification Letter attached as an appendix to this letter.
SHENZHEN SAM'S TECHNOLOGY CO., LTD certifies that the disposable brand CRAVE MAX
CLEAR, CRAVE MAX ULTRA CLEAR, CRAVE MAX- KIK CLEAR, CRAVE MAX MR. FREEZE, CRAVE
MAX MR. WHITE, CRAVE MAX WHITE ICE, CRAVE MAX ARCTIC CLEAR, CRAVE MAX CLASSIC
CLEAR,

CRAVE

MAX

CLEAR

100, CRAVE

MAX

FRESH

CLEAR,

CLEAR

EMERALD,

CLEAR

2.0

AND CRAVE MAX WHITE CLEAR are not flavored, and therefore may be sold in
Massachusetts
effective after June 1, 2020.

Signed by:

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JACKY LN
SHENZHEN SAM'S TECHNOLOGY Co

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SHENZHEN SAM'S TECHNOLOGY CO., LTD
ADDRESS: ZHONGXIN RD, SHAIJING AREA, BAO'AN DISTRICT, SHENZHEN,
CHINA

Subject: Manufacturers Letter of Certification

Date: August 12, 2024

As you are aware, the Commonwealth of Massachusetts has passed a law covering certain tobacco products. We are pleased to be able to certify certain Crave vapor

products that comply with the law in Massachusetts and is legal to sell or buy all of our

wholesale and retail customers in Massachusetts.

The contents of the letter are a true and accurate, and reflect information known to us.

The manufacturer will immediately provide an update letter to correct any inaccuracies.

The signatory of this Letter of Certification is authorized on behalf of the manufacturer

to sign this letter.

Massachusetts has banned the sale of any flavored tobacco product or tobacco product

enhancer in any traditional retail establishment, online or through any other means to

any consumer in the commonwealth. The marketing or advertising of such a sale is also

prohibited. 270 Mass. GEN LAws § 28 (2019), available at <https://www.mass.gov/info-details/mass-general-laws-c270-ss-28>.

Accordingly,

e

Prohibits the sale of all flavored nicotine vaping liquids. Nicotine vapor products

with a distinguishable taste or aroma, other than the aroma of tobacco may not

be sold effective June 1, 2020. We will advise you of any developments.

SHENZHEN

SAM'S TECHNOLOGY

CoO., LTD certifies that the

disposable brand CRAVE MAX CLEAR, CRAVE MAX ULTRA CLEAR, CRAVE MAXKIK CLEAR, CRAVE MAX MR. FREEZE, CRAVE MAX MR. WHITE, CRAVE MAX WHITE ICE, CRAVE MAX ARCTIC CLEAR, CRAVE MAX CLASSIC CLEAR, CRAVE MAX CLEAR 100, CRAVE MAX FRESH CLEAR, CLEAR EMERALD, CLEAR 2.0 AND CRAVE MAX WHITE CLEAR are not flavored, and therefore may be sold in Massachusetts effective after June 1, 2020.

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Please keep a copy of this Certification Letter for your records as a recently enacted
Massachusetts regulation requires: "The owner, retailer, or other person in charge of the retail establishment must maintain record of the nicotine content submitted by the manufacturer for each electronic nicotine delivery system sold and that the other tobacco products do not meet the definition of a flavored tobacco product or tobacco product flavor enhancer which are offered for sale within the retail establishment, and provide such records upon request of any authorized enforcement agent, including Boards of Health or their agents and the Department or its agents." 105 CMR 665.010 (2020).

Signed by:

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JACKY LN
SHENZHEN SAM'S TECHNOLOGY Co.

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Exhibit A – Retail Store list (less than 35 nicotine mg/ml)

CRAVE MAX CLEAR

CRAVE

Disposable - CRAVE
6.5ml-30mg- 10pk

Disposable-Clear- 30mg _ | 28.19
x 10 pack box

CRAVE MAX ULTRA CLEAR

CRAVE

Disposable - CRAVE
6.5ml-30mg- 10pk

Disposable- ULTRA
Clear- 30mg x 10 pack
box

28.19

CRAVE MAX -KIK NEW CLEAR

CRAVE - KIK

CRAVE

CRAVE - KIK

Disposable - CRAVE
6.5ml-30mg- 10pk

Disposable- NEW Clear- | 28.19
30mg x 10 pack box

MAX NAKED

Disposable - CRAVE
6.5ml-30mg- 10pk

Disposable- Naked30mg x 10 pack box

28.19

CRAVE MAX MR. FREEZE

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CRAVE

Disposable - CRAVE
6.5ml - 30mg- 10pk

Disposable- Mr. Freeze30mg x 10 pack box
| 28.12

Disposable- Mr. White30mg x 10 pack box
28.09

CRAVE MAX MR. WHITE

CRAVE

Disposable - CRAVE
6.5ml-30mg- 10pk

CRAVE

CRAVE

MAX ARCTIC CLEAR

Disposable - CRAVE
6.5ml-30mg- 10pk

Disposable- Arctic Clear- | 27.96
30mg x 10 pack box

CRAVE MAX CLASSIC CLEAR

CRAVE

Disposable - CRAVE
6.5ml-30mg- 10pk

Disposable- Classic
Clear- 30mg x 10 pack
box

28.09

Disposable- Clear 10030mg x 10 pack box
28.12

CRAVE MAX CLEAR 100

CRAVE

Disposable - CRAVE
6.5ml-30mg- 10pk

CRAVE MAX FRESH CLEAR

CRAVE

Disposable - CRAVE
6.5ml-30mg- 10pk

Disposable- Fresh Clear- | 27.95

30mg x 10 pack box

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CRAVE MAX EMERALD

CRAVE

Disposable - CRAVE
6.5ml-30mg- 10pk

CRAVE

CRAVE

Disposable- Clear
Emerald- 30mg x 10 pack
box

28.15

Disposable- Clear 2.030mg x 10 pack box

28.15

MAX CLEAR 2.0

Disposable - CRAVE
6.5ml-30mg- 10pk

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Exhibit B - Smoke Shop Store list (greater than 35 nicotine mg/ml)
Includes Exhibit A

CRAVE

MAX CLEAR

Brand

CRAVE

SKU

Disposable - CRAVE
50mg- 10pk

SKU

6.5ml-

Description

Nicotine
mg/ml

Disposable-Clear50mg x 10 pack box

48.09

SKU

Nicotine
mg/ml

CRAVE MAX ULTRA CLEAR
Brand

CRAVE

SKU

Disposable - CRAVE
6.5ml-50mg- 10pk

CRAVE

CRAVE
Brand

CRAVE - KIK

CRAVE
Brand

Disposable- ULTRA
Clear- 50mg x 10 pack
box

48.09

MAX -KIK NEW CLEAR

Brand

CRAVE - KIK

Description

SKU

Disposable - CRAVE
6.5ml-50mg- 10pk

SKU

Description

Nicotine
mg/ml

Disposable- NEW Clear- | 48.09
50mg x 10 pack box

MAX NAKED
SKU

Disposable - CRAVE
6.5ml-50mg- 10pk

SKU

Description

Disposable- Naked50mg x 10 pack box

Nicotine
mg/ml
48.09

MAX MR. FREEZE
SKU

SKU

Description

Nicotine
mg/ml

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CRAVE

Disposable - CRAVE
6.5ml-50mg- 10pk

Disposable- Mr. Freeze- | 47.92
50mg x 10 pack box

CRAVE MAX MR. WHITE

CRAVE

Disposable - CRAVE
6.5ml-50mg- 10pk

Disposable- Mr. White50mg x 10 pack box

48.72

Disposable- White Ice50mg x 10 pack box

49.03

CRAVE MAX WHITE ICE

CRAVE

Disposable - CRAVE
6.5ml-50mg- 10pk

CRAVE

CRAVE

MAX ARCTIC CLEAR

Disposable - CRAVE
6.5ml-50mg- 10pk

Disposable- Arctic Clear- | 48.87
50mg x 10 pack box

CRAVE MAX CLASSIC CLEAR

CRAVE

Disposable - CRAVE
6.5ml-50mg- 10pk

Disposable- Classic
Clear- 50mg x 10 pack
box

47.89

Disposable- Clear 10050mg x 10 pack box

48.75

CRAVE MAX CLEAR 100

CRAVE

Disposable - CRAVE

6.5ml-50mg- 10pk

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CRAVE MAX FRESH CLEAR

CRAVE

Disposable - CRAVE
6.5ml-50mg- 10pk

Disposable- Fresh Clear- | 48.10
50mg x 10 pack box

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