

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:



JACKY LN

SHENZHEN SAM's TECHNOLOGY Co

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,

- 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 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.

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:

A handwritten signature in black ink that reads "Jacky Ln". The script is cursive and fluid, with the first letters of "Jacky" and "Ln" being capitalized and prominent.

JACKY LN
SHENZHEN SAM's TECHNOLOGY Co.

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

CRAVE MAX CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable-Clear- 30mg x 10 pack box	28.19

CRAVE MAX ULTRA CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- ULTRA Clear- 30mg x 10 pack box	28.19

CRAVE MAX -KIK NEW CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE - KIK	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- NEW Clear- 30mg x 10 pack box	28.19

CRAVE MAX NAKED

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE - KIK	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Naked- 30mg x 10 pack box	28.19

CRAVE MAX MR. FREEZE

Brand	SKU	SKU Description	Nicotine mg/ml
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CRAVE	Disposable - CRAVE 6.5ml - 30mg- 10pk	Disposable- Mr. Freeze- 30mg x 10 pack box	28.12
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CRAVE MAX MR. WHITE

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Mr. White- 30mg x 10 pack box	28.09

CRAVE MAX ARCTIC CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Arctic Clear- 30mg x 10 pack box	27.96

CRAVE MAX CLASSIC CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Classic Clear- 30mg x 10 pack box	28.09

CRAVE MAX CLEAR 100

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Clear 100- 30mg x 10 pack box	28.12

CRAVE MAX FRESH CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Fresh Clear- 30mg x 10 pack box	27.95

CRAVE MAX EMERALD

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Clear Emerald- 30mg x 10 pack box	28.15

CRAVE MAX CLEAR 2.0

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-30mg- 10pk	Disposable- Clear 2.0- 30mg x 10 pack box	28.15

Exhibit B – Smoke Shop Store list (greater than 35 nicotine mg/ml)

Includes Exhibit A

CRAVE MAX CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable-Clear-50mg x 10 pack box	48.09

CRAVE MAX ULTRA CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- ULTRA Clear- 50mg x 10 pack box	48.09

CRAVE MAX -KIK NEW CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE - KIK	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- NEW Clear-50mg x 10 pack box	48.09

CRAVE MAX NAKED

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE - KIK	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- Naked-50mg x 10 pack box	48.09

CRAVE MAX MR. FREEZE

Brand	SKU	SKU Description	Nicotine mg/ml
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CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- Mr. Freeze- 50mg x 10 pack box	47.92
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CRAVE MAX MR. WHITE

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- Mr. White- 50mg x 10 pack box	48.72

CRAVE MAX WHITE ICE

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- White Ice- 50mg x 10 pack box	49.03

CRAVE MAX ARCTIC CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- Arctic Clear- 50mg x 10 pack box	48.87

CRAVE MAX CLASSIC CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- Classic Clear- 50mg x 10 pack box	47.89

CRAVE MAX CLEAR 100

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- Clear 100- 50mg x 10 pack box	48.75

CRAVE MAX FRESH CLEAR

Brand	SKU	SKU Description	Nicotine mg/ml
CRAVE	Disposable - CRAVE 6.5ml-50mg- 10pk	Disposable- Fresh Clear- 50mg x 10 pack box	48.10

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The document has been completed.