UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM C

UNDER THE SECURITIES ACT OF 1933

(Mark one.)

☑ Form C: Offering Statement
☐ Form C-U: Progress Update
☐ Form C/A: Amendment to Offering Statement
  ☐ Check box if Amendment is material and investors must reconfirm within five business days.
☐ Form C-AR: Annual Report
☐ Form C-AR/A: Amendment to Annual Report
☐ Form C-TR: Termination of Reporting

Name of issuer
Spinal Surgical Strategies, Inc. dba Kleiner Device Labs

Legal status of issuer

Form
Corporation

Jurisdiction of Incorporation/Organization
Nevada

Date of organization
March 18, 2013

Physical address of issuer
999 Driver Way, Incline Village, NV 89451

Website of issuer
http://www.kleinerlabs.com/

Address of counsel to the issuer for copies of notices
BEVILACQUA PLLC
1050 Connecticut Avenue, NW
Suite 500
Washington, DC 20036
Attention: Louis A. Bevilacqua, Esq.

Name of intermediary through which the Offering will be conducted
EquiFund Crowd Funding Portal Inc. ("EquiFund" or, the "Intermediary")

CIK number of intermediary
0001705665

SEC file number of intermediary
007-00115

CRD number, if applicable, of intermediary
288900

Amount of compensation to be paid to the intermediary, whether as a dollar amount or a percentage of the Offering amount, or a good faith estimate if the exact amount is not available at the time of the filing, for conducting the Offering, including the amount of referral and any other fees associated with the Offering
The Intermediary will receive a commission equal to seven percent (7%) of the amount raised in the offering.

Any other direct or indirect interest in the issuer held by the intermediary, or any arrangement for the intermediary to acquire such an interest
The Intermediary will receive a number of shares of common stock of the issuer that is equal to seven percent (7%) of the total number of shares of common stock sold by the issuer in the offering.

Type of security offered
Common Stock

Target number of Securities to be offered
7,142 shares of common stock

Price (or method for determining price)
$3.50 per Share

Target offering amount
$ 24,997

Oversubscriptions accepted:
☑ Yes
☐ No

Oversubscriptions will be allocated:
☐ Pro-rata basis
☐ First-come, first-served basis
☑ Other; At the Company's discretion

Maximum offering amount (if different from target offering amount)
$ 1,069,999

Deadline to reach the target offering amount
April 20, 2022

NOTE: If the sum of the investment commitments does not equal or exceed the target offering amount at the offering deadline, no Securities will be sold in the offering, investment commitments will be cancelled and committed funds will be returned. Affiliates of our company, including officers, directors and existing stockholders of our company, may invest in this offering and their funds will be counted toward us achieving the target amount.

Current number of employees
0. We currently have independent contractors only.

Summary financial information is provided below for calendar 2020 (most recent fiscal year end) and 2019 (prior fiscal year end).

	Most recent fiscal year-end (December 31, 2020)	Prior fiscal year-end (December 31, 2019)
Total Assets	$585,816	$282,262
Cash & Cash Equivalents	$140,141	$173,413
Accounts Receivable	$6,920	$9,531
Short-term Debt	$694,592	$863,509
Long-term Debt	$6,724	$12,666
Revenues/Sales	$43,333	$29,812
Cost of Goods Sold	$8,454	$6,348
Taxes Paid	$0	$0
Net Income/Loss	-$1,570,970	-$784,549

The jurisdictions in which the issuer intends to offer the Securities:
Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District Of Columbia, Florida, Georgia, Guam, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virgin Islands, U.S., Virginia, Washington, West Virginia, Wisconsin, Wyoming, American Samoa, and Northern Mariana Islands

INTENDED FOR REVIEW BY POTENTIAL INVESTORS ON EQUIFUND CROWD FUNDING PORTAL ONLY. DO NOT COPY OR DISTRIBUTE.

OFFERING STATEMENT

Spinal Surgical Strategies, Inc.

Offering of a
Minimum of 7,142 Shares of Common Stock ($24,997)
up to a
Maximum of 305,714 Shares of Common Stock ($1,069,999)

Address for Notices and Inquiries:

Spinal Surgical Strategies, Inc.

Jeffrey Kleiner, MD
CEO and President

999 Driver Way
Incline Village, NV 89451
650.720.4766
jeff.kleiner@kleinerlabs.com

With a Copy of Notices to:

Bevilacqua PLLC

Louis A. Bevilacqua, Esq.

1050 Connecticut Ave., NW, Suite 500
Washington, DC 20036
202.869.0888
lou@bevilacquapllc.com

OFFERING STATEMENT
SPINAL SURGICAL STRATEGIES, INC.

Offering of a
Minimum of 7,142 Shares of Common Stock ($24,997)
up to a
Maximum of 305,714 Shares of Common Stock ($1,069,999)

	Offering Price	Crowdfunding Platform Commissions [(1)]	Proceeds to Company [(2)]
Per Share of Common Stock	**$3.50**	**$0.245**	**$3.255**
Minimum Shares of Common Stock Sold	**$24,997**	**$1,749.79**	**$23,247.21**
Maximum Shares of Common Stock Sold	**$1,069,999**	**$74,899.93**	**$995,099.07**

We are offering shares of our common stock at a price per share of $3.50. We are offering a minimum of 7,142 shares for $24,997 and up to a maximum of 305,714 shares for $1,069,999. The minimum investment that you may make is $437.50. Our 2020 financial statements have been reviewed. We are in the process of auditing our 2020 financial statements and expect to terminate this offering and initiate a new offering once the auditing process is completed. Upon launching the new offering, we will increase our maximum offering amount to $5,000,000. The price per share at which we sell our securities in a subsequent offering under Regulation CF will be subject to change. We are offering the shares of our common stock to prospective investors through the crowdfunding platform available at http://www.equifund.com/ and each subdomain thereof, which we refer to as the Platform. The Intermediary, who operates the Platform, is registered with the Securities and Exchange Commission, which we refer to as the SEC, as a funding portal and is a funding portal member of the Financial Industry Regulatory Authority, which we refer to as FINRA. We are required to pay a commission to the Intermediary equal to 7% of gross monies raised in the offering and to issue to the Intermediary a number of shares of our Common Stock equal to 7% of the total shares of Common Stock sold in the offering.

(1) In addition to the commission payable to the Intermediary, we will incur offering costs. The offering costs primarily consist of legal and accounting expenses payable to our counsel and accounting firm. We expect that the offering costs will total approximately $50,000 not including marketing costs. We are also required to issue to the Intermediary as additional consideration a number of shares of our common stock equal to 7% of the shares sold in the offering.

(2) No assurance can be given that all or any portion of the securities offered hereby will be sold. Your funds will be held in an escrow account established by the Intermediary with Prime Trust, who we refer to as the escrow agent, in compliance with applicable securities laws, until the minimum offering amount is reached. The subscription amount for the shares may be paid to the escrow account by wire transfer or other electronic funds transfer in accordance with the instructions provided on the Platform and will be held in escrow until satisfaction of all the conditions to the closing. The closing of this offering is subject to, among other things, subscriptions for the $24,997 minimum amount being received in the escrow account from qualified investors, which qualified investors may include executive officers and directors of our company and their affiliates. This offering may be closed at any time after the minimum number of shares of common stock is sold, in one or more closings, and on or before April 20, 2022. If we do not raise the minimum amount offered by April 20, 2022, then we will return all funds received in the escrow account to investors without interest.

The date of this offering statement is May 5, 2021

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LIST OF EXHIBITS

GENERAL OFFERING INFORMATION

This offering statement is furnished solely to prospective investors through the crowdfunding platform available at http://www.equifund.com/ and each subdomain thereof. EquiFund Crowd Funding Portal Inc., which, collectively with its subsidiaries and affiliates, we refer to as EquiFund or the Intermediary, operates the Platform and is registered with the SEC and is a member of FINRA.

Spinal Surgical Strategies, Inc., d/b/a Kleiner Device Labs, which we refer to as KDL, the Company, we, us or our, is a medical device company focused on the design and development unique and patented products for spine surgery, with a particular focus on the growing minimally invasive spinal surgical market. We were originally formed in Colorado as a limited liability company under the name of Spinal Surgical Strategies, LLC on March 18, 2013. On May 30, 2014, Spinal Surgical Strategies, LLC was re-domesticated from Colorado to Nevada under the same name and subsequently converted to a Nevada corporation, effective as of November 5, 2020. We are offering shares of our common stock at a price per share of $3.50. We are offering a minimum of 7,142 shares for $24,997 and up to a maximum of 305,714 shares for $1,069,999. The minimum investment that you may make is $437.50.

We are offering shares of our common stock in reliance on the exemption from registration requirements of the Securities Act of 1933, as amended, which we refer to as the Securities Act, pursuant to Section 4(a)(6) thereof and the regulations promulgated with respect to such section.

A crowdfunding investment involves risk. You should not invest any funds in this offering unless you can afford to lose your entire investment.

In making an investment decision, investors must rely on their own examination of the issuer and the terms of the offering, including the merits and risks involved. These securities have not been recommended or approved by any federal or state securities commission or regulatory authority. Furthermore, these authorities have not passed upon the accuracy or adequacy of this document.

The U.S. Securities and Exchange Commission does not pass upon the merits of any securities offered or the terms of the offering, nor does it pass upon the accuracy or completeness of any offering document or literature.

These securities are offered under an exemption from registration; however, the U.S. Securities and Exchange Commission has not made an independent determination that these securities are exempt from registration.

The Company will file a report with the SEC annually and post the report on its website, no later than 120 days after the end of each fiscal year covered by the report. We may terminate our reporting obligations in the future in accordance with Rule 202(b) of Regulation CF (§227.202(b)) by (1) being required to file reports under Section 13(a) or Section 15(d) of the Securities Exchange Act of 1934, as amended, (2) filing at least one annual report pursuant to Regulation CF and having fewer than 300 holders of record, (3) filing annual reports for three years pursuant to Regulation CF and having assets equal to or less than $10,000,000, (4) the repurchase of all the Securities sold in this offering by the Company or another party, or (5) the liquidation or dissolution of the Company.

The shares being offered may not be transferred by any investor during the one year period beginning when the shares are issued, unless the shares are transferred: (i) to our Company; (ii) to an "accredited investor" as defined in Rule 501(a) of Regulation D; (iii) as part of an offering registered with the SEC; or (iv) to a member of the family of the investor or the equivalent, to a trust controlled by the investor, to a trust created for the benefit of a member of the family of the investor or the equivalent, or in connection with the death or divorce of the investor or other similar circumstance. In addition, there is no ready market for the sale of the shares and it may be difficult or impossible for an investor to sell or otherwise dispose of the shares.

No person other than our Company has been authorized to provide prospective investors with any information concerning our company or the offering or to make any representation not contained in this offering statement. To invest in the shares being offered, each prospective investor will be required to (i) register for an investor account

with the Platform, (ii) make representations regarding the investor's investment eligibility and complete a questionnaire to demonstrate his or her understanding of the risks involved in investing in the shares and (iii) execute the subscription documents. We reserve the right to modify any of the terms of the offering and the subscription documents at any time before the offering closes.

Certain information contained in this offering statement constitutes "forward looking statements" that can be identified by the use of forward looking terminology such as "may," "will," "should," "expect," "anticipate," "estimate," "intend," "continue," or "believe" or the negatives or variations thereof. Furthermore, any forecasts or other estimates in this offering statement, including estimates of returns or performance, are "forward looking statements" and are based upon certain assumptions that may change. Due to various risks and uncertainties, actual events or results or the actual performance of the securities may differ materially from those contemplated in such forward looking statements. Moreover, actual events are difficult to project and often depend upon factors that are beyond the control of our Company or the Intermediary. Neither the delivery of this offering statement at any time nor any sale of securities under this offering statement shall under any circumstances create an implication that the information contained herein is correct as of any time after the earlier of the relevant date specified herein or the date of this offering statement.

TERM SHEET

Company	Spinal Surgical Strategies, Inc., d/b/a Kleiner Device Labs is a Nevada corporation that was originally formed in Colorado as a limited liability company under the name of Spinal Surgical Strategies, LLC on March 18, 2013. On May 30, 2014, Spinal Surgical Strategies, LLC was re-domesticated from Colorado to Nevada under the same name and subsequently converted to a Nevada corporation, effective as of November 5, 2020. We are a medical device company focused on the design and development of unique and patented products for spine surgery, with a particular focus on the growing minimally invasive spinal surgical market. We are committed to developing a system of instruments and implants for spinal surgery that delivers improved clinical outcomes and quality of life for patients, greater efficiency and efficacy for surgeons, and reduced costs to hospitals and payors.
Use of Proceeds	We are seeking financing through the sale of the shares of our common stock (as described below under Securities Offered) in order to provide funding for initial inventory build, payments to staff and contractors, engineering costs to develop our pipeline of intellectual property, building and maintaining the patent portfolio, business development, and general working capital for operations. See "Question 10" below for further information.
Securities Offered	Shares of common stock of our company for $3.50 per Share in a minimum amount per investor of $437.50.
Targeted Offering Amount; Oversubscriptions Accepted; Maximum Offering Amount	The targeted offering amount is 7,142 shares of common stock or $24,997. We will accept subscriptions in excess of the targeted amount in our discretion. The maximum offering amount is 305,714 shares of our common stock or $1,069,999.
Low Target Amount; No other funds may be Raised	The initial purchasers of our common stock in this offering risk that we will not raise sufficient funds to sustain the growth of our company. The minimum amount of securities that must be sold for our company to accept subscriptions is $24,997 of securities. Once we raise the $24,997 minimum in this offering, we intend to accept subscriptions as they are received. Thus, investors who purchase securities prior to the offering being subscribed in full will bear the risk of whether there will be additional investors to complete the offering or that our company would be able to raise funds in another manner. Even if we raise the maximum amount, we will need to raise additional capital in the future. Our officers and directors may invest in this offering and any funds that they invest would be counted toward our achievement of the minimum offering amount.
Authorized Capitalization	As of the date of this offering statement, our authorized capital stock consists of 400,000,000 shares of common stock, $0.0001 par value per share ("Common Stock") and 100,000,000 shares of blank check preferred stock, par value $0.0001 per share ("Preferred Stock"). The Company designated 2,365 shares of blank check preferred stock as Series A Preferred Stock, which the preferences and relative and other rights, and the qualifications, limitations or restrictions thereof, are set forth in the certificate of incorporation filed with the Secretary of the State of the State of Nevada on November 5, 2020. As of the date of this offering statement, a total of 7,393,750 shares of common stock and 2,365 shares of Series A Preferred Stock are issued and outstanding, and excludes: • 740,000 shares of common stock issuable upon the exercise of outstanding

	stock options at an exercise price of $2.00 per share.
Dividends	Dividends will be declared if and when determined by the board of directors of our company in its sole discretion. We do not expect to declare any dividends for the foreseeable future.
Voting and Control	Holders of Common Stock are entitled to one vote per share of Common Stock. We do not have any voting agreements in place.
Anti-Dilution Rights	The shares of common stock do not have anti-dilution rights, which means that future equity financings will dilute your ownership percentage of our company.
Board of Directors; Management Team; Board of Advisors	The business and affairs of our company are managed, and all corporate powers are exercised by or under the direction of our board of directors. The current board members are Jeffrey Kleiner, Harris Kirschner, Daniel Murray, Stewart Peabody and Scott Minick. The senior executives of the Company oversee the day-to-day operations of our company subject to the board's oversight. Jeffrey Kleiner serves as the CEO and Chief Medical Officer of our company and oversees all of our operations. Harris Kirschner serves as the CFO and Secretary of our company and oversees the accounting function and operations of our company. Konstantin Caploon serves as the Chief Legal Officer of our company and oversees the legal function and operations of our company.
Shares Being Sold under 4(a)(6) Crowdfunding Exemption	We are offering the securities in reliance on the exemption from registration requirements of the Securities Act, pursuant to Section 4(a)(6) thereof and the regulations promulgated with respect to such section. The following limitations apply to investment amounts by individual investors who are not accredited investors: • Individual investors, over the course of a 12-month period, are permitted to invest in the aggregate across all crowdfunding offerings up to: • If either their annual income or net worth is less than $107,000, then the greater of: ◦ $2,200 or ◦ 5 percent of the greater of their annual income or net worth. • If both their annual income and net worth are equal to or more than $107,000, then 10 percent of the greater of their annual income or net worth. The aggregate amount of securities sold to all investors during the 12-month period preceding the date of such offer or sale, including the securities offered in this offering, shall not exceed $5,000,000.
Transfer Restrictions	The securities will be issued without registration under the Securities Act pursuant to the crowdfunding exemption under Section 4(a)(6) of the Securities Act. The securities may not be transferred by any purchaser of such securities during the one- year period from when the securities were first issued unless such securities are transferred: (1) to the issuer of the securities; (2) to an accredited investor; (3) as part of an offering registered with the SEC; or (4) to a member of the family of the purchaser or the equivalent, to a trust controlled by the purchaser, to a trust created for the benefit of a member of the family of the purchaser or the equivalent, or in

	connection with the death or divorce of the purchaser or other similar circumstance. We will be under no obligation to register the resale of the securities under the Securities Act.
High-Risk Investment	An investment in the securities involves a high degree of risk and is suitable only for investors who can afford to lose their entire investment.

THE COMPANY

1. **Name of Issuer.**

The name of the issuer is Spinal Surgical Strategies, Inc., d/b/a Kleiner Device Labs. The issuer is a Nevada corporation.

ELIGIBILITY

2. **[X] Check this box to certify that all of the following statements are true for the issuer:**

- Organized under, and subject to, the laws of a State or territory of the United States or the District of Columbia.
- Not subject to the requirement to file reports pursuant to Section 13 or Section 15(d) of the Securities Exchange Act of 1934.
- Not an investment company registered or required to be registered under the Investment Company Act of 1940.
- Not ineligible to rely on this exemption under Section 4(a)(6) of the Securities Act as a result of a disqualification specified in Rule 503(a) of Regulation Crowdfunding.
- Has filed with the Commission and provided to investors, to the extent required, the ongoing annual reports required by Regulation Crowdfunding during the two years immediately preceding the filing of this offering statement (or for such shorter period that the issuer was required to file such reports).
- Not a development stage company that (a) has no specific business plan or (b) has indicated that its business plan is to engage in a merger or acquisition with an unidentified company or companies.

3. **Has the issuer or any of its predecessors previously failed to comply with the ongoing reporting requirements of Rule 202 of Regulation Crowdfunding? [ ] Yes [X] No**

Explain: Not applicable.

DIRECTORS OF THE COMPANY

4. **Provide the following information about each director (and any persons occupying a similar status or performing a similar function) of the issuer:**

Jeffrey Kleiner, MD, Chairman of the Board **Dates of Board Service: May 2019 - Present**

Dr. Kleiner graduated with honors from Stanford University in 1978 and then obtained his Doctor of Medicine from the University of Colorado medical school in 1983 where he earned Alpha Omega Alpha honors. Dr. Kleiner completed his surgical internship at Rush University Medical Center in Chicago in 1984, and his residency and NIH postdoctoral fellowship at the University of California at San Diego in 1990. Upon returning to Colorado in 1991, Dr. Kleiner specialized in adult and pediatric reconstructive spinal surgery at the Colorado Spine Center and University of Colorado. During 25+ years of practice he performed more than 6,000 spinal surgeries, until retiring in 2016 to focus on Kleiner Device Labs. Dr. Kleiner is board certified by the American Board of Orthopaedic Surgery and American Board of Spinal Surgery.

Dr. Kleiner's Business Experience for the Last Three Years

Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: CEO, President, Chief Medical Officer and Chairman of the Board
Dates of Service: March 2013 - Present
Responsibilities: Responsible for all aspects of the company, including strategy and development of business plan, investor relations, product development, strategic partnerships and day-to-day operations.

Education: B.S. in Biology, with honors from Stanford University; M.D. with honors, AOA from University of Colorado.

Harris Kirschner, Director **Dates of Board Service: May 2019 – Present**

Mr. Kirschner has served as the Chief Financial Officer, Secretary and Operations Manager since the inception of our Company and a Director since May 2019. He has filled many of the operational and management roles. He is responsible for the financial sustainability of the company and has relied upon disciplined economic platform. He has coordinated the contractual arrangements with partners, contractors, and has supervised investor relations, planning/budgeting/forecasting, general management, and day-to-day transactions of the company. He helped raise over $1.3 million through networks and the Sierra Angels of Incline Village for KDL. Since June 2010, he has also served as a Partner at 3rd Creek Investments, an investment advisory firm based in Incline Village, Nevada.

Mr. Kirschner's Business Experience for the Last Three Years

Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: Chief Financial Officer and Director
Dates of Service: March 2013 - Present
Responsibilities: Mr. Kirschner runs operations from bookkeeping, filing tax returns, A/R, A/P, inventory management, setting up financial arrangements with partners and contractors, investor relations, planning/budgeting/forecasting, general management, and responsibility for the day-to-day transactions of the company.

Employer: 3rd Creek Investments
Employer's Principal Business: Financial advisory services
Title: Partner
Dates of Service: June 2010 - Present
Responsibilities: As a Partner, Mr. Kirschner helped raise assets under management from $35 million in 2010 to over $110 million. He also assists with several startups with raising capital, forming a company, and serving as the initial CFO. He completed hundreds of hours of audits, reviews, and compilations, prepared and reviewed hundreds of tax returns for individuals, businesses, estates, and foundations and served on the board for 3rd Creek Foundation.

Education: BSBA, major in finance, minor in economics and international studies from University of Denver, Daniels College of Business.

Daniel Murray, Director **Dates of Board Service: May 2019 - Present**

Mr. Murray has over 35 years of finance and operational experience in a broad range of medical device and technology companies, from small start-up organizations to large, multinational, public corporations. He was Chief Operating Officer and Chief Financial Officer of SI-BONE, Inc., a minimally invasive sacroiliac joint surgery company, where he drove commercialization of the iFuse Implant System from zero to over 16,000 procedures and over $150 million of cumulative revenue in five years. Prior to that, he was the Corporate Controller for St. Francis Medical Technologies, and was instrumental in the $725 million acquisition of St. Francis by Kyphon Inc. Mr. Murray has served as a member of our board of directors since May 2019. His deep industry knowledge and executive oversight has added immediate value and a reliable resource business decisions.

Mr. Murray's Business Experience for the Last Three Years

Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: Director
Dates of Service: May 2019 - Present

Responsibilities: Mr. Murray Mr. Murray joined the board of directors in May 2019. His deep industry knowledge and executive oversight has added immediate value and a reliable resource for business decisions.

Employer: Moximed, Inc.
Employer's Principal Business: Medical device company
Title: Consulting Chief Financial Officer
Dates of Service: November 2016 - Present
Responsibilities: Mr. Murray is responsible for all aspects of finance and accounting.

Education: Master of Business Administration from University of Texas at Austin.

Stewart Peabody, Director **Dates of Board Service: May 2019 – Present**

Mr. Peabody has served as a member of our board of directors since May 2019. He also has served as Second Vice President for Business Unit Financial Analysis at Northern Trust, a corporate financial management company in Chicago since November 2016. Mr. Peabody has developed his role as head of investor relations, has served as the editor for the KDL biannual report, and secretary for the KDL board meetings.

Mr. Peabody's Business Experience for the Last Three Years

Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: Director
Dates of Service: May 2019 - Present
Responsibilities: Mr. Peabody is responsible for investor relations.

Employer: Northern Trust
Employer's Principal Business: Corporate Financing Management
Title: Second Vice President – Business Unit Financial Analysis
Dates of Service: November 2016 – Present
Responsibilities: Mr. Peabody is responsible for conducting and documenting complex financial analysis projects for a global busines unit.

Education: BSBA, major in finance, minor in economics from University of Denver, Daniels College of Business.

Scott Minick, Director **Dates of Board Service: May 2019 – Present**

Mr. Minick has served as a member of our board of directors since May 2019. He also has served as the Venture Partner for ARCH Venture Partners, a corporate financial management company in San Francisco since 1998. Mr. Minick has helped to lead the KDL board of directors which has relied upon him as an invaluable and experienced resource in the business world. His real-life experience in the boardroom of large and successful companies has translated into a disciplined and no-nonsense approach to the way that KDL conducts itself.

Mr. Minick's Business Experience for the Last Three Years

Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: Director
Dates of Service: May 2019 - Present
Responsibilities: Mr. Minick provides governance through his role on the board.

Employer: StrongHolt

Employer's Principal Business: biotechnology company that seeks to cure Duchenne Muscular Dystrophy
Title: Chief Executive Officer; Member, Board of Directors
Dates of Service: 2016 – Present
Responsibilities: Mr. Minick helps to demonstrated in preclinical models the ability to treat this fatal disease using gene therapy.

Employer: Aira Tech Corp
Employer's Principal Business: leading developer of remote assistance technology
Title: Executive Chairman; Member, Board of Directors
Dates of Service: 2016 – 2020
Responsibilities: Mr. Minick worked with the Board, CEO and management team to develop and execute strategic plan, raise capital and develop strategic partnerships.

Employer: ARCH Venture Partners
Employer's Principal Business: venture capital firm
Title: Currently Venture Partner; formerly Managing Director until 2010
Dates of Service: 1998 – Present
Responsibilities: Mr. Minick has served as an advisor to numerous academic institutions, medical centers and national research labs on technology transfer and company formation.

Education: MBA degree awarded with concentration in Marketing and Finance from Northwestern University Graduate School of Management; Bachelor of Arts degree awarded with honors in Biology and Psychology from the University of California, San Diego; and postgraduate training in neurobiology at the Salk Institute.

OFFICERS OF THE COMPANY

5. **Provide the following information about each officer (and any persons occupying similar status or performing a similar function) of the issuer:**

Jeffrey Kleiner, MD, Founder, Chief Executive Officer, President, Chief Medical Officer
See "Directors of the Company" section above.

Harris Kirschner, Chief Financial Officer, Secretary and Operations Manager
See "Directors of the Company" section above.

Daniel Murray, CPA, Chief Operating Officer
See "Directors of the Company" section above.

Konstantin Caploon, Esq., Chief Legal Officer

Mr. Caploon has over 20 years of experience as an attorney, specializing in Intellectual Property. Before forming his own law firm, Corner Counsel in 2015, he was the General Counsel for Biomet Bone Healing, an electrical bone growth stimulation business, and head of Intellectual Property for several of Biomet's other global businesses. Prior to obtaining his law degree from Seton Hall in 2001, Mr. Caploon spent 3 years working as an engineer in the medical device space, which gives him a uniquely valuable perspective as an IP attorney. Mr. Caploon joined KDL in December of 2019, leveraging many facets of his professional background to guide the firm's Intellectual Property, legal, and strategic concerns. His unique and extensive mix of experience in the Intellectual Property and Medical Device industries makes him ideally suited to add value to our company.

Mr. Caploon's Business Experience for the Last Three Years
Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: Chief Legal Officer

Dates of Service: December 2019 to present
Responsibilities: Mr. Caploon helps to manage the general legal matters of the company.

Employer: Corner Counsel
Employer's Principal Business: Legal practice
Title: CEO
Dates of Service: February 2015 to present
Responsibilities: Mr. Caploon addresses operations, finance, HR, insurance and business development as the CEO and provides intellectual property and business law-related legal services to corporate and individual clients as attorney.

Employer: Loon Capital Group
Employer's Principal Business: Angel investor services
Title: Founding Member
Dates of Service: July 2015 to December 2019
Responsibilities: Mr. Caploon provided consultative services to healthcare innovators to increase the value of their innovations, brought them to industry partners, and negotiated licensing and acquisition transactions.

Education: Juris Doctorate from University of Seton Hall Law School; Master of Science in Biomedical Engineering from New Jersey Institute of Technology; and Bachelor of Science in Mechanical Engineering from New Jersey Institute of Technology.

Jack Maertens, Chief Commercial Officer

Mr. Maertens is an accomplished leader in the medical device industry with multi-faceted experience in sales and marketing for over 20 years. He has held leadership roles in sales and marketing at companies which include Zimmer Spine for 8 years, Globus Medical for 7 years, and Smith and Nephew for 5 years. Mr. Maertens is currently using his expertise and experience to set up the Alpha Launch for KG™2. One of his notable prior successes was a product launch that generated 18M in year one and 27M in year two at Zimmer Spine.

Mr. Maertens' Business Experience for the Last Three Years

Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: Chief Commercial Officer
Dates of Service: December 2020 to present
Responsibilities: Mr. Maertens helps guide the alpha launch and commercial development of the KG™2.

Employer: J2M Consulting
Employer's Principal Business: Sales and Marketing Consultant
Title: Principal
Dates of Service: July 2019 to Present
Responsibilities: Mr. Maertens was responsible for sales, marketing and business development consulting in the medical device market.

Employer: RTI Surgical-Novel Products Group
Employer's Principal Business: surgical implant supplier
Title: Senior Product Manager
Dates of Service: February 2019 to July 2019
Responsibilities: Mr. Maertens was hired to hired to transition the Paradigm acquisition into the RTI organization and manage the coflex® business. This business resided in RTI's "Novel Therapies Group".

Employer: Smith & Nephew-Robotics Division
Employer's Principal Business: orthopedic reconstruction and advanced wound care.
Title: Customer Program Manager
Dates of Service: 2015-2019

Responsibilities: Mr. Maertens worked collaboratively with sales & marketing to drive sales of NAVIO and utilization of the NAVIO robotic knee replacement system.

Education: Bachelor of Science Degree from St. Cloud State University.

Alan Burkholder, Chief Technology Officer and Lead Product Development Engineer

Mr. Burkholder has been working in spine product development for the last 13 years, during which time he served as Director of new product development for Zimmer Biomet Spine. He started his engineering career over 20 years ago at Energizer Battery Company working on high-speed production equipment design. Mr. Burkholder graduated from Case Western Reserve University with an MS and BS in Mechanical engineering and from Goshen College with a BA in Physics. Mr. Burkholder has served as our Chief Technology Officer since August 2019. He has been working with Dr. Kleiner and Dr. Causey over the past 2 years on the development of the KG™2 flow-through fusion system scheduled for FDA submission March 2021 and a Q2 2021 alpha launch.

Mr. Burkholder's Business Experience for the Last Three Years

Company: Kleiner Device Labs
Company's Principal Business: Medical device company
Title: Chief Technology Officer and Lead Product Development Engineer
Dates of Service: August 2019 to present
Responsibilities: Mr. Burkholder leads the design and engineering team for KG™2, the KDL flow-through fusion implant system. He has spearheaded the plans for the Q2 2021 alpha launch of the KG™2 product and the development of the KDL endplate preparation tool, DragonTail. Mr. Burkholder has vetted and organized contract engineers to assist with the development and prototyping of the KDL pipeline of spinal surgical devices.

Employer: Devise
Employer's Principal Business: Engineering and design company with a focus on medical device development
Title: President
Dates of Service: February 2016 – August 2019
Responsibilities: Mr. Burkholder provided all aspects of product development including concept generation, design controls, FDA submissions, and product launches.

Education: M.S. Mechanical Engineering from Case Western Reserve University.

PRINCIPAL SECURITY HOLDERS

6. **Provide the name and ownership level of each person, as of the most recent practicable date, who is the beneficial owner of 20 percent or more of the issuer's outstanding voting equity securities, calculated on the basis of voting power.**

Name of Holder	No. and Class of Securities Now Held	% of Voting Power Prior to Offering
Jeffrey Kleiner	3,200,000 shares of common stock	43.28%(1)
Theseus Capital Ltd.	1,479,750 shares of restricted stock	20.01%(1)(2)

(1) Based on 7,393,750 shares of common stock issued and outstanding, but excludes 740,000 shares of common stock issuable upon the exercise of outstanding stock options at an exercise price of $2.00 per share.
(2) Consists of 1,479,750 shares of restricted stock that are subject to vesting based upon the achievement of various milestones. See "Question 17 – Description of Securities," below.

BUSINESS AND ANTICIPATED BUSINESS PLAN

7. **Describe in detail the business of the issuer and the anticipated business plan of the issuer.**

Business Overview

Spinal Surgical Strategies, Inc., d/b/a Kleiner Device Labs, which we refer to as KDL, the Company, we, us or our, is a medical device company focused on the design and development unique and patented products for spine surgery, with a particular focus on the growing minimally invasive spinal surgical market. We were originally formed in Colorado as a limited liability company under the name of Spinal Surgical Strategies, LLC on March 18, 2013. On May 30, 2014, Spinal Surgical Strategies, LLC was re-domesticated from Colorado to Nevada under the same name and subsequently converted to a Nevada corporation, effective as of November 5, 2020.

We are committed to developing a system of instruments and implants for spinal surgery that delivers improved clinical outcomes and quality of life for patients, greater efficiency and efficacy for surgeons, and reduced costs to hospitals and payors. Minimally Invasive Surgery ("MIS") procedures, in general, are in high demand by patients and payors due to their inherently quicker recovery, lower complication rates and reduced costs. We develop and deliver products that fulfill the unmet needs in the open and MIS surgery market. By offering superior design, improved functionality, and a reduction in surgical steps, good surgeons are made better, and clinical outcomes improve.

Our Kleiner Device Labs KG™ System is a complete bone graft delivery system designed to deliver hydrated allograft or autographed to an orthopedic surgical site, which is provided in a sterile, single-use form. We have received approval under Section 510(k) of the Federal Food, Drug and Cosmetic Act, which we refer to as Section 510(k), for our first product, KG™1. KG™1 works by maximizing the delivery of bone graft to the surgical site. It has shown a spinal fusion rate increase from an average of 75% to 92% without the use of expensive and potentially hazardous chemical adjuvants such as rhPMP-2. The KG™2 platform offers a unique and comprehensive system for all aspects of spinal interbody fusion. It changes the function of a conventional, incarcerated fusion cage to a conduit which directs graft into all prepared areas of the prepared disk space. This new surgical solution will create a foundational change in the approach to spinal surgery. It is planned to be submitted to the FDA in the first quarter of 2021 for 510(k) clearance.

Business Plan

We believe that KDL devices are a superior choice for any interbody procedure. The KG™1 device was designed and developed to maximize the delivery of bone graft in a single step allowing the surgeon an easier path for inserting a fusion cage. The KG™2 system builds upon this philosophy by retaining a rectangular, biportal insertion system, maximizing graft delivery and combining steps for implant insertion. The result is a simpler and superior device and technique which is agnostic to bone graft type or surgical approach. In addition to the foundational change which the KG™2 system imparts to interbody fusion, it was designed as a sterile, pre-packed, single-use system which does not require re-processing or preoperative set preparation. The less expensive, efficacious and reduced labor involved in the set makes it extremely attractive to hospitals. The COVID 19 pandemic has created an unprecedented and accelerated demand for treatment outside of hospitals. Patients and physicians are desirous of moving their procedures to ambulatory surgery centers (ASCs) in order to decrease the risk of viral exposure. The criteria for treatment at an ASC are directly impacted by procedure complexity and is further limited by surgical instrument cleaning and re-processing. The KG™2 system is unique in the industry by providing a design which excels in the inpatient and outpatient setting by eliminating the role of surgical tray re-processing, simplifying the mechanics of the surgical procedure by combining steps and by flattening the learning curve for MIS surgery on the spine. The result is a system which solves multiple unmet needs in the spinal surgical arena, enables ASC's to treat a broad spectrum of spinal surgical conditions which were previously out of bounds and provides a comprehensive strategy which satisfies the needs of all stakeholders in spinal surgery.

Our launches of next generation technologies are expected to include the KG™2, a solid state fusion implant; KG™3, expandable fusion implant and DragonTail, an endplate preparation instrument. The timing of the KG™2 device release corresponds with a solution to the needs for outpatient surgery. The KG™2 is slated for FDA 510K submission in March 2021, and the KG™3 is in development. Both the KG™2 and KG™3 will offer a single step,

integrated solution for making spinal fusion surgeries more efficient, cost effective, and clinically successful. DragonTail is a disc material removal instrument which addresses another significant and currently unmet need in MIS surgery: Standardizing and simplifying the preparation of the interbody space for fusion; the more complete the disk space preparation, the more graft can be inserted into the fusion site which results in a higher incidence of successful fusion.

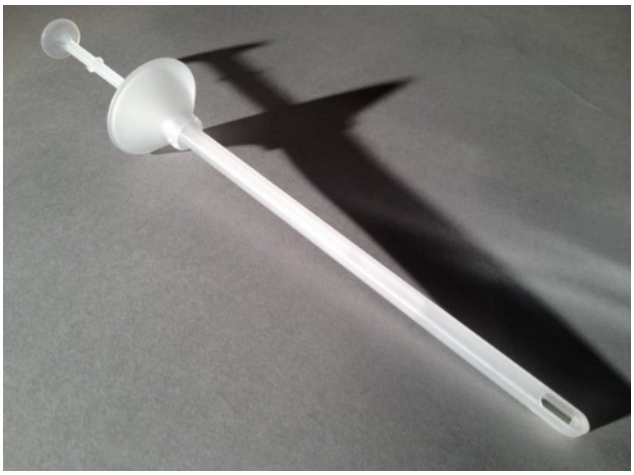
See Question 10 for additional information on the use of proceeds from this offering in executing the business plan.

Our Products and Services

Our product portfolio consists of unique and patented products for spine surgery, with a particular focus on the growing minimally invasive spinal surgical market.

KG™1

Our first product, KG™1, is a single patient use, rectangular, bi-portal bone graft delivery device used for the introduction of bone graft into the prepared disc space during spinal fusion surgeries performed either with an open or a minimally invasive technique. It has undergone quality and strength testing to meet stringent medical standards. The KG™1 is a 21 cm rectangular syringe barrel for surgical site access and graft material delivery, a compatible syringe plunger for pushing the bone graft material into the operative site and an attachable funnel reservoir for loading prepared bone graft material. Its unique tip is wedge shaped which allows introduction into a disk space and its biportal configuration allows graft material to distribute throughout the disk space, leaving a natural void for application of a fusion cage. The KG™1 has achieved Class II FDA clearance is commercially available and sold in the US and outside of the US, or OUS.



KG™1 and related intellectual property is protected by 10 US and international patents, which has prevented competitors from designing similar products. To date, no other product exists that matches the superior functionality and performance of the KG™1.

The KG™1 completed a clinical trial that was published in a peer reviewed journal in 2016 (Kleiner, et. al., Med Devices and Tech, 2016). The findings demonstrated a 92% fusion success rate without the use of BMP, compared with a 75% fusion success rate using the conventional bone graft delivery tool.

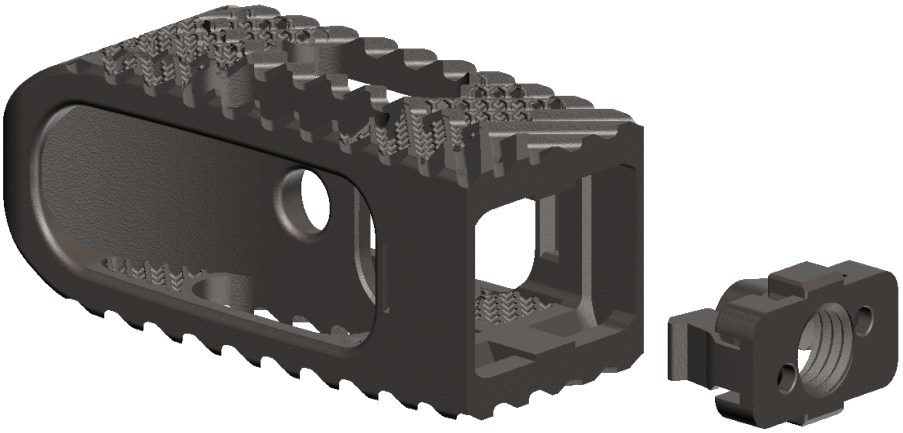
The KG™1 is manufactured for KDL by JG Plastics, and packaged, sterilized and drop-shipped by Pro-Tech Designs (two California companies that have extensive experience in manufacturing FDA approved medical devices).

KG™2

Our pipeline of products are built upon the proven strategy of maximizing bone graft delivery. The KG™2 solid state fusion platform is consistent with this philosophy. By combining implant insertion with near-simultaneous

graft delivery, the surgical complexity and neurological risk are reduced and the learning curve for MIS surgery is flattened. The fusion rate of open spine or MIS surgery is improved. KG™2 does not have FDA clearance at this time. It is planned to be submitted to the FDA in the first quarter of 2021 for 510(k) clearance.

The KG™2 system preserves the flow-through graft delivery design while being integrated with a 3D-printed solid-state implant. The surface topography of the implant enhances bone ingrowth form the vertebral endplates. Because implant insertion and graft delivery are combined as a single step, a working operative channel is established that reduces the number of instrument passes necessary to perform a fusion to a fraction of the number with competitive products.

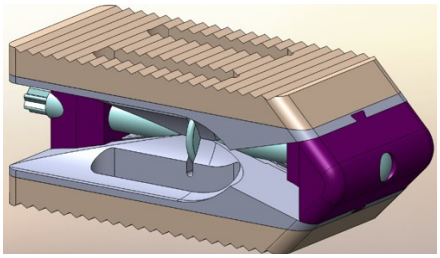


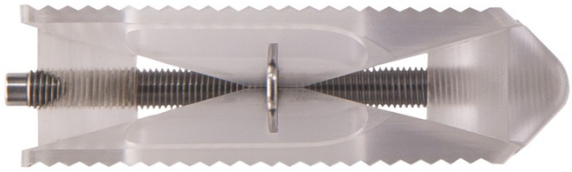
The KG™2 device (above) integrated with its inserter graft delivery tool (below).

The KG™2 graft delivery and integrated fusion platform has BAAT, a Dutch company, as the manufacturer of record. BAAT is an approved supplier for some of the largest medical device companies in the world, which eases any regulatory hurdles for KDL integration with strategic partnerships or purchase.

KG™3

Our third product KG™3 is a height expandable implant. The advantage of an expandable system is that it is inserted small and then allows the surgeon to customize disk space distraction. Competitive systems do not allow for effective post-cage insertion bone grafting. The KDL KG™3 system maintains the same flow-through, post insertion grafting allowing the benefits of our proven system with adjustable disk space separation. KG™3 does not have FDA clearance at this time.



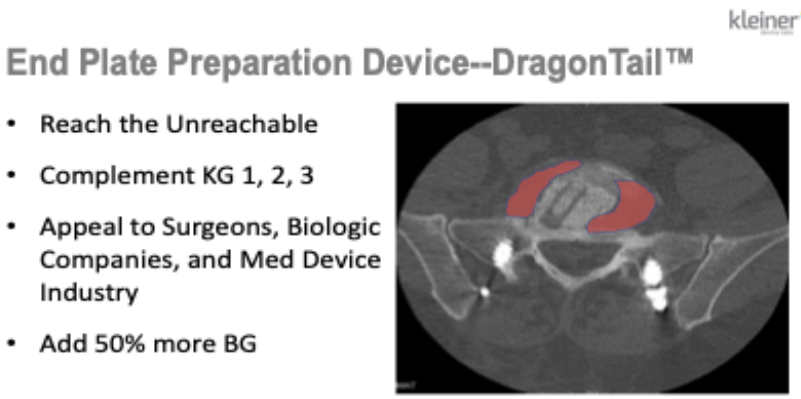


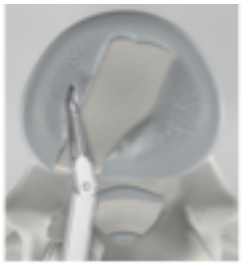
Example of an expandable cage design (Not representative of the KG™3 cage which will be integrated with an attached bone graft delivery tool).

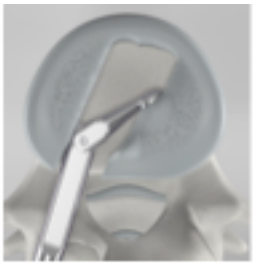
The KG™2 and KG™3 designs are protected with 13 existing US and international patents with 4 additional patents pending.

DragonTail

DragonTail is an articulating disk space preparation tool which has a single-patient use tip. The incorporation of such design provides the surgeon with a sharp instrument every time. Additionally, the endplate preparation system allows the surgeon to reach the parts of the disk space which are ordinarily unreachable. DragonTail does not have FDA clearance at this time.







Customers and Suppliers

We have existing customers for KG™1 and are developing our plans for launching KG™2. KG™1 customers include individual surgeons; hospitals; and partners, distributors and independent representatives who are selling to hospital and surgical customers. A number of these have been acquired by direct selling contact from the Company. Some were acquired from initial contact at industry conferences, of which there are a number specifically focused on spine surgery and treatment, as well as neurosurgery and general orthopedics. All of our current international

customers (Hong Kong and Brazil) were introduced at conferences. Hospital customers have predominantly been acquired by surgeon referral and independent rep and distributor connection.

Sales and Marketing

For the domestic market, we have increasingly focused on providing ready to use samples to surgeons. Since our products are designed to work in both MIS and open theatre procedures, we have the opportunity to have our products used in both arenas (hospital and ambulatory surgery center). which allows us to ride the wave of interest in surgery centers as the preferred setting for operations. To accelerate surgeon acceptance, we offer two free KG™1 samples for trial.

We have several international partners. Spinal fusion surgery is practiced worldwide, and there is significant demand for new U.S. developed medical technology.

The KG™1 supply chain is composed of JG Plastics and ProTech Design, California companies that prepare this single use instrument. The KG™2 system is prepared by US and OUS suppliers which can easily scale production to product demand. In addition to the single patient tray for the KG™2 implant, a system of reusable tools has been developed to assist the surgeon with sizing and revision procedures.

Intellectual Property

KDL has multiple issued US and OUS patents. Our intellectual property family is robust. Care has been taken to maintain its growth and our competitive position.

Trademark

We have an unregistered umbrella trademark in the US on KG™ under common law. Common law trademark rights do not provide the same level of protection that is afforded by the registration of a trademark.

Patent

We have 29 issued patents with 5 pending US patent applications for utility and design for our Kleiner Device Labs KG™ System in US, Europe, Canada, China and other countries and areas.

No.	Title and legacy ref.	Utility or Design	App. No.	Patent No.	Country /Jurisdiction	Expiration[(1)]	Brief Description
1	Tools and Methods for Spinal Fusion - Continuation 1 (SR 3762-6-1-CON)	Utility	13/277,272	8277510	US	2/6/29	Flow-through technology; serves to build fence around KDL's foundational technology.
2	Spinal Fusion Cage System with Inserter CON 3 (SR 3762-6-1-CON-2)	Utility	13/632,956	8,808,305	US	2/6/29	Flow-through technology; serves to build fence around KDL's foundational technology.
3	Spinal Fusion Cage System with Inserter (SR 3672-6-1-CON-4)	Utility	14/461,682	9,439,782	US	2/6/29	Flow-through technology; serves to build fence around KDL's foundational technology.
4	Spinal Fusion Cage System with Inserter CON 6 (SR 3762-6-1-	Utility	15/261,287	10,179,054	US	2/6/29	Flow-through technology; serves to build fence around

	CON-5)						KDL's foundational technology.
5	US Patent App. Serial No. 16/248,269 - Spinal Fusion Cage System with Inserter (SR 3672-6-1-CON-6)	Utility	16/248,269		US	TBD	Flow-through technology; serves to build fence around KDL's foundational technology.
6	Spinal Distraction Instrument Design CON 1 (SR 3762-6-3)	Design	29/415,847	D667,542	US	9/18/26	Spinal distraction instrumentation to aid in surgery.
7	Spinal Distraction Instrument Design CON (SR 3762-6-4)	Design	29/433,403	D696,399	US	12/24/27	Spinal distraction instrumentation to aid in surgery.
8	Bone Graft Delivery Device and Method of Using the Same (SR 3762-18)	Utility	12/886,452	8,906,028	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
9	Apparatus and Method of Spinal Implant and Fusion (SR 3762-18-CIP-1 (Vol .1 and 2))	Utility	13/367,295	9,060,877	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
10	Fusion Cage with Combined Biological Delivery System (SR 3762-18-CIP-2)	Utility	13/714,971	9,173,694	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
11	Fusion Cage with Combined Biological Delivery System (SR 3762-18-CIP-3 (Vol. 1 and 2))	Utility	13/947,255	8,685,031	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
12	Fusion Cage with Combined Biological Delivery System (SR 3762-18-CIP-3-CON	Utility	14/088,148	8,709,088	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
13	Fusion Cage with Combined Biological Delivery System (SR 3762-18-CIP-3-CON-CIP	Utility	14/263,963	9,186,193	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
14	Biological Delivery System with Adaptable Fusion Cage Interface (SR 3762-18-CIP-3-CON-CIP-2)	Utility	14/887,598	9,629,729	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
15	Bone Graft Delivery System and Method for Using Same (SR 3762-18-CIP-3-CON-CIP 2-CO	Utility	15/486,511	10,195,053	US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
16	Bone Graft Delivery System and Method for	Utility	16/19	10,245,159	US	9/20/30	Flow-through technology; serves to

	Using Same (SR 3762-18-CIP3-C-CIP2-C-CIP (E FILE))		8,754				build fence around KDL's foundational technology.
17	US App No 16/373,410 - Bone Graft Delivery System and Method for Using Same (SR 3762-18-CIP3-C-CIP2-CCIP2)	Utility	16/373,410		US	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
18	Fusion Cage with Combined Biological Delivery System (SR 3762-18-PEP)	Utility	1E+07	EP2618753	European Union	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
19	Fusion Cage with Combined Biological Delivery System (SR 3762-18-PEPHK)	Utility	1E+07	HK1188101	Hong Kong	9/20/30	Flow-through technology; serves to build fence around KDL's foundational technology.
20	Devices and Methods for Preparing an Intervertebral Workspace (SR 3762-36(Vol.1 and 2))	Utility	13/168,611	9,247,943	US	2/6/29	Spinal disc removal instrumentation to aid in surgery.
21	Devices and Methods for Preparing an Intervertebral Workspace (SR 3762-36-CON)	Utility	15/010,611	9,826,988	US	2/6/29	Spinal disc removal instrumentation to aid in surgery.
22	Angled Surgical Tool for Removing Tissue from Within an Intervertebral Space (SR 3762-36-CON-1)	Utility	15/810,810	10,201,355	US	2/6/29	Spinal disc removal instrumentation to aid in surgery.
23	Intervertebral Surgical Tool (SR 3762-49)	Design	29/427,387	D700,322	US	2/25/28	Spinal surgery instrumentation.
24	Bone Graft Delivery Tool (SR 3762-53)	Design	29/453,829	D723,682	US	3/3/29	Flow-through technology; serves to build fence around KDL's foundational technology.
25	Canadian Design Patent No. 153952 - Bone Graft Delivery Tool (SR 3762-53-CA)	Design	2E+05	153952	Canada	11/1/28	Flow-through technology; serves to build fence around KDL's foundational technology.
26	EU Designs (split in two) - Bone Graft Delivery Tool (SR 3762-53-EU)	Design	002337022	002337022-0001 002337022-0002	European Union	10/31/38	Flow-through technology; serves to build fence around KDL's foundational technology.
27	Japanese Design Patent No. 1497585 - Bone Graft Delivery Tool	Design	2013-25835	1497585	Japan	4/11/34	Flow-through technology; serves to build fence around

	(SR 3762-53-JP)						KDL's foundational technology.
28	Expandable Fusion Cage (Design Pat) (SR 3762-58)	Design	29/506,748	D750,249	US	2/23/31	Spinal implant for use with the flow-through technology.
29	Fusion Caged (Design Pat) (SR 3762-63)	Design	29/532,670	D789,539	US	6/13/32	Spinal implant for use with the flow-through technology.
30	Bone Graft Delivery Tool (Design Pat) (SR 3762-66)	Design	29/542,927	D797,290	US	9/12/32	Flow-through technology; serves to build fence around KDL's foundational technology.
31	Chinese Design Application No. 201530389193.X - Bone Graft Delivery Tool (SR 3762-66-CN)	Design	201530389193.X	201530389193.X	China	TBD	Flow-through technology; serves to build fence around KDL's foundational technology.
32	US CONT PAT APPLICATION ON KIT FOR BONE GRAFT DELIVERY	Utility	17/000,799		US	TBD	Flow-through technology; serves to build fence around KDL's foundational technology.
33	US NAT PHASE - Disc Space Preparation Tool	Utility	17/049545		US	TBD	Flow-through technology; serves to build fence around KDL's foundational technology.
34	US Utility Application - Bone Graft Delivery System and Method for Using Same	Utility	17/021,789		US	TBD	Flow-through technology; serves to build fence around KDL's foundational technology.

(1) Based on earliest priority date; assumes all maintenance fees and/or annuities will be paid; and no time adjustments from respective patent offices.

The patented flow through technology of the KG™2 spinal cage combines previously separate surgical steps, and effectively self-embeds the implant in graft.

The patented technology of the DragonTail disc debridement tool allows surgeons to efficiently remove more diseased disc tissue in less time, which creates more space for a larger volume of bone graft to be introduced, further increasing the likelihood of successful fusion.

Competition

We aim to compete with large, diversified orthopedic companies, including Medtronic, DePuy Synthes (Johnson &Johnson Medical Devices), Stryker, Globus, and Nuvasive. We also aim to compete with smaller spine-focused companies, including Orthofix Medical, Inc., Alphatec Holdings, Inc. and RTI Surgical Holdings, Inc. Our ability to compete successfully will depend on our ability to develop proprietary products and technologies that reach the market in a timely manner, that are cost effective and that are safe and effective.

Governmental/Regulatory Approval and Compliance

Our business has been, and will continue to be, subject to various laws, rules, and regulations governing the healthcare industry, which may include, without limitation, laws, rules, and/or regulations promulgated or enforced by the U.S. Food and Drug Administration, the Centers for Medicare and Medicaid Services, the U.S. Department of

Health and Human Services, the U.S. Department of Health and Human Services Office of Inspector General, and state agencies which regulate healthcare and the practice of medicine or marketing of healthcare services. Our business is also subject to various state and federal laws concerning the privacy and security of health-related data, including, without limitation, the Health Insurance Portability and Accountability Act (HIPAA). Further, our business is subject to laws, rules, and regulations concerning the prevention of fraud and abuse in the healthcare industry, including, without limitation, the Stark Law (42 U.S.C. 1395nn), the federal Anti-Kickback Statute (42 U.S.C. 1320a-7b), and similar anti-fraud and anti-abuse laws which are in place at the state and local levels. The increasingly complex and rapidly changing legal and regulatory environment creates additional challenges for our ethics and compliance programs. Our ability to continue to meet these challenges could have an impact on our legal, reputational and business risk.

Litigation

There are no existing legal suits pending, or to our knowledge, threatened, against our company, which would have a material effect on the business of our company.

Other

Our principal address 999 Driver Way, Incline Village, NV 89451, USA.

We conduct business majorly in Nevada.

Because this Form C focuses primarily on information concerning our company rather than the industry in which we operate, potential investors may wish to conduct their own separate investigation of our industry to obtain greater insight in assessing our prospects.

A copy of the Platform offering page and our investor pitch deck are attached to this Form C as Exhibit B and Exhibit D, respectively. You are encouraged to carefully review these exhibits to learn more about the business of our company, its industry and future plans and prospects. These exhibits are incorporated by reference into this Form C.

RISK FACTORS

A crowdfunding investment involves risk. You should not invest any funds in this offering unless you can afford to lose your entire investment.

In making an investment decision, investors must rely on their own examination of the issuer and the terms of the offering, including the merits and risks involved. These securities have not been recommended or approved by any federal or state securities commission or regulatory authority. Furthermore, these authorities have not passed upon the accuracy or adequacy of this document.

The U.S. Securities and Exchange Commission does not pass upon the merits of any securities offered or the terms of the offering, nor does it pass upon the accuracy or completeness of any offering document or literature.

These securities are offered under an exemption from registration; however, the U.S. Securities and Exchange Commission has not made an independent determination that these securities are exempt from registration.

8. **Discuss the material factors that make an investment in the issuer speculative or risky:**

An investment in the Company involves a high degree of risk. *You should carefully consider the risks described above and those below before deciding to purchase any securities in this offering. If any of these risks actually occurs, our business, financial condition or results of operations may suffer. As a result, you could lose part or all of your investment.*

Risks Related to the Company

We have a limited operating history upon which you can evaluate our performance, and accordingly, our prospects must be considered in light of the risks that any new company encounters.

We were originally formed in Colorado as a limited liability company under the name of Spinal Surgical Strategies, LLC on March 18, 2013. On May 30, 2014, Spinal Surgical Strategies, LLC was re-domesticated from Colorado to Nevada under the same name and subsequently converted to a Nevada corporation, effective as of November 5, 2020. We have limited operations and no operating revenue to date. We are in the development stage, and our future operations are subject to all of the risks inherent in the establishment of a new business enterprise. The likelihood of the success of our company must be considered in light of the problems, expenses, difficulties, complications and delays frequently encountered in connection with the development of an entity in the business of designing, developing and commercializing medical device. There can be no assurance that we will be able to generate revenues, that future revenues will be significant, that any sales will be profitable or that we will have sufficient funds available to complete our marketing and development programs or to market any new products which we may develop. We currently have operating losses, have no substantive source of operating revenue, are unable to self-finance operations, have limited resources, and there can be no assurance that we will be able to develop such revenue sources or that our operations will become profitable, even if we are able to commercialize our products and build brand awareness.

Our Company has a history of incurring losses.

We have a history of incurring losses and we incurred net losses of -$1,570,970 and -$784,549 for the years ended December 31, 2020 and 2019, respectively. The extent of any future losses and whether or not the Company can generate profits in future years remains uncertain. The Company currently does not generate sufficient revenue to cover its operating expenses. We expect our capital outlays and operating expenditures to remain constant for the foreseeable future as we continue to focus on research and development and new product development, patent portfolio maintenance and business development. If we fail to generate sufficient revenue and eventually become profitable, or if we are unable to fund our continuing losses by raising additional financing when required, our shareholders could lose all or part of their investments.

Our products may never achieve significant market acceptance.

We may expend substantial funds and management effort on the development and commercializing of our Kleiner Device Labs KG™ System with no assurance that we will be successful in selling our products. Our ability to enter into distribution arrangements to successfully sell our products will depend significantly on the perception that our products can reduce patient risk and improve medical outcomes, and that our products are superior to existing tests. Our business could also be adversely affected if we expend money without any return. At present, we rely solely on the sales of our KG™1 to generate revenue, and we expect to generate substantially all of our revenue in the foreseeable future from sales of other products in the KG™ system. In order to successfully commercialize our products, we will need to continue to expand our sales and marketing efforts to strengthen existing relationships and develop new relationships with distributors and surgeons, obtain regulatory clearances or approvals for our existing products in additional markets, design, develop, obtain regulatory clearances or approvals and commercialize future potential products and achieve and maintain compliance with all applicable regulatory requirements. If we fail to successfully commercialize our products, we may never receive a return on the substantial investments that we have made in product development, sales and marketing, regulatory compliance, quality assurance, as well as further investments we intend to make, which would have a material adverse effect on our business, financial condition and results of operations.

We will need additional financing to execute our business plan, which we may not be able to secure on acceptable terms, or at all.

We will require additional financing in the near and long term to fully execute our business plan. Our success depends on our ability to raise such additional financing on reasonable terms and on a timely basis. Conditions in the economy and the financial markets may make it more difficult for us to obtain necessary additional capital or financing on acceptable terms, or at all. If we cannot secure sufficient additional financing, we may be forced to forego strategic opportunities or delay, scale back or eliminate further development of our goals and objectives, operations and investments or employ internal cost savings measures.

In order for our Company to compete and grow, we must attract, recruit, retain and develop the necessary personnel who have the needed experience.

Recruiting and retaining highly qualified personnel is critical to our success. These demands may require us to hire additional personnel and will require our existing management personnel to develop additional expertise. We face intense competition for personnel. The failure to attract and retain personnel or to develop such expertise could delay or halt the development and commercialization of our product candidates. If we experience difficulties in hiring and retaining personnel in key positions, we could suffer from delays in product development, loss of customers and sales and diversion of management resources, which could adversely affect operating results. Our consultants and advisors may be employed by third parties and may have commitments under consulting or advisory contracts with third parties that may limit their availability to us.

We may implement new lines of business or offer new products and services within existing lines of business.

There are substantial risks and uncertainties associated with these efforts, particularly in instances where the markets are not fully developed. In developing and marketing new lines of business and/or new products and services, we may invest significant time and resources. Initial timetables for the introduction and development of new lines of business and/or new products or services may not be achieved and price and profitability targets may not prove feasible. We may not be successful in introducing new products and services in response to industry trends or developments in technology, or those new products may not achieve market acceptance. As a result, we could lose business, be forced to price products and services on less advantageous terms to retain or attract clients, or be subject to cost increases. As a result, our business, financial condition or results of operations may be adversely affected.

The Company's success depends on the experience and skill of the board of directors, its executive officers and key employees.

In particular, the Company is dependent on Jeffrey Kleiner, who is the CEO and Chief Medical Officer, and Harris Kirschner, who is the CFO and Secretary, and Konstantin Caploon, who is the Chief Legal Officer and Treasurer of the Company. The loss of Jeffrey Kleiner, Harris Kirschner and Konstantin Caploon or any member of the board of directors or executive officer could harm the Company's business, financial condition, cash flow and results of operations.

We are subject to income taxes as well as non-income based taxes, such as payroll, sales, use, value-added, net worth, property and goods and services taxes, in the U.S.

Significant judgment is required in determining our provision for income taxes and other tax liabilities. In the ordinary course of our business, there are many transactions and calculations where the ultimate tax determination is uncertain. Although we believe that our tax estimates are reasonable: (i) there is no assurance that the final determination of tax audits or tax disputes will not be different from what is reflected in our income tax provisions, expense amounts for non-income based taxes and accruals and (ii) any material differences could have an adverse effect on our financial position and results of operations in the period or periods for which determination is made.

Political, economic and regulatory influences are subjecting the healthcare industry to potential fundamental changes that could substantially affect our results of operations.

Government and private sector initiatives to limit the growth of healthcare costs, including price regulation, competitive pricing, coverage and payment policies, comparative effectiveness of therapies, technology assessments and alternative payment models, are continuing in countries where we do business, including the U.S. These changes are causing the marketplace to put increased emphasis on the delivery of more cost-effective treatments. As a U.S. headquartered Company with most of our future sales being expected to come from the U.S., this healthcare reform legislation will materially impact us. Certain provisions of the legislation will not be effective for a number of years and it is unclear what the full impact of the legislation will be. Provisions of this legislation, including Medicare provisions aimed at improving quality and decreasing costs, comparative effectiveness research, an independent payment advisory board, and pilot programs to evaluate alternative payment methodologies, could meaningfully change the way healthcare is developed and delivered, and may adversely affect our business and results of operations. Further, we cannot predict what healthcare programs and regulations will be ultimately

implemented at the federal or state level, or the effect of any future legislation or regulation in the U.S. or internationally. However, any changes that lower reimbursements for our products, reduce medical procedure volumes or increase cost containment pressures on us or other participants in the healthcare industry could adversely affect our business and results of operations.

We are subject to numerous governmental regulations which can increase our costs of developing our KG™1 Technology and products based on this technology.

Our products may be subject to rigorous regulation by the FDA, Health Care and numerous international, supranational, federal, and state authorities. The process of obtaining regulatory approvals to market a medical device can be costly and time-consuming, and approvals might not be granted for future products, or additional indications or uses of existing products, on a timely basis, if at all. Delays in the receipt of, or failure to obtain approvals for, our products, or new indications and uses, could result in delayed realization of product revenues, reduction in revenues, and in substantial additional costs. In addition, no assurance can be given that we will remain in compliance with applicable FDA, Health Care and other regulatory requirements once approval or marketing authorization has been obtained for a product. These requirements include, among other things, regulations regarding manufacturing practices, product labeling, and advertising and post-marketing reporting, including adverse event reports and field alerts due to manufacturing quality concerns.

We lack published long-term data supporting superior clinical outcomes enabled by our products or technologies, which could negatively impact our sales, and we may not generate sufficient revenue to achieve and sustain profitability.

Our products are regulated as medical devices by the U.S. Food and Drug Administration (the "FDA") and substantially all have received premarket clearance under Section 510(k) of the U.S. Federal Drug and Cosmetic Act (the "FDCA"). In the 510(k) clearance process, before a device may be marketed, the FDA must determine that a proposed device is "substantially equivalent" to a legally-marketed "predicate" device, which includes a device that has been previously cleared through the 510(k) process, a device that was legally marketed prior to May 28, 1976 (pre-amendments device), a device that was originally on the U.S. market pursuant to an approved premarket approval (the "PMA") application and later down-classified, or a 510(k)-exempt device. This process is typically shorter and generally requires the submission of less supporting documentation than the FDA's PMA process and does not always require clinical studies.

Given the foregoing regulatory regime applicable to us, we lack the breadth of published long-term clinical data supporting the safety and efficacy of our products and technologies. For these reasons, surgeons may be slow to, or may not, adopt our products because we lack published long-term data supporting superior clinical outcomes enabled by our products or technologies as compared to our competitors. Additionally, future patient studies or clinical experience may not support our belief that treatment with our products improves patient outcomes. Given this, our sales could be negatively impacted and we may not generate sufficient revenue to achieve and sustain profitability.

Obtaining and maintaining our patent protection depends on compliance with various procedural, document submission, fee payment and other requirements imposed by governmental patent agencies, and KDL's patent protection could be reduced or eliminated for non-compliance with these requirements.

Periodic maintenance and annuity fees on issued United States patents and most foreign patent applications and patents must be paid to the U.S. Patent and Trademark Office, or USPTO, and foreign patent agencies, respectively, in order to maintain such patents and patent applications. The USPTO and various foreign governmental patent agencies require compliance with a number of procedural, documentary, fee payment and other similar provisions during the patent application, examination and issuance processes. While an inadvertent lapse can, in some cases, be cured by payment of a late fee or by other means in accordance with the applicable rules, there are situations in which noncompliance can result in abandonment or lapse of the patent or patent application, resulting in partial or complete loss of patent rights in the relevant jurisdiction. Non-compliance events that could result in abandonment or lapse of a patent or patent application include failure to respond to official actions within prescribed time limits, non-payment of fees and failure to properly legalize and submit formal documents. If we fail to maintain the patents and patent applications covering our product or product candidates, our competitors might be able to enter the

market with similar or identical products or technology, which would have a material adverse effect on our business, financial condition and results of operations.

We operate in a highly competitive market. We face competition from large, well established medical device manufacturers and pharmaceutical companies in the market for spine surgery. Many of these companies are very well accepted by health practitioners and have significant resources, and we may not be able to compete effectively.

Our KG™1 product faces unique groupings of competitive technologies depending on the application. Not all competitive technologies are relevant in each application and market. The market for minimally invasive surgery medical device is intensely competitive, subject to rapid change and significantly affected by new product introductions. Large pharmaceutical and medical device companies, such as Medtronic, DePuy Synthes (Johnson &Johnson Medical Devices), Stryker, Globus, and Nuvasive are in our competitive space. These competitors' products are well accepted by health practitioners and patients, and present the competitive challenge for market entry and penetration.

Many of our competitors may have significantly greater financial resources and expertise in research and development, manufacturing, preclinical testing, conducting clinical trials, obtaining regulatory approvals and marketing approved products than we do. Mergers and acquisitions in the pharmaceutical, biotechnology and diagnostic industries may result in even more resources being concentrated among a smaller number of our competitors. These competitors also compete with us in recruiting and retaining qualified scientific and management personnel and establishing clinical trial sites and patient registration for clinical trials, as well as in acquiring technologies complementary to, or necessary for, our programs. Smaller or early-stage companies may also prove to be significant competitors, particularly through collaborative arrangements with large and established companies.

The medical device industry is characterized by patent litigation and we could become subject to litigation which could be costly, result in the diversion of management's time and efforts and require us to pay damages.

The medical device industry is characterized by patent litigation and we could become subject to litigation which could be costly, result in the diversion of management's time and efforts and require us to pay damages.

The medical device industry is characterized by a large number of patents, frequent litigation and administrative proceedings over patent and other intellectual property rights. Whether a product infringes a patent involves complex legal and factual issues, the determination of which is often uncertain. Our competitors may assert that our product, its components or the methods we employ in the use of our system are covered by U.S. or foreign patents held by them. In addition, they may claim that their patents have priority over ours because their patents were filed or issued first. Because patent applications can take many years to issue, there may be applications now pending of which we are unaware, which may later result in issued patents that our product may infringe. There could also be existing patents that one or more components of our system may inadvertently be infringing, of which we are unaware. As the number of participants in the market for spine disorder treatments grows, the possibility of patent infringement claims against us increases.

Any litigation or claims against us may cause us to incur substantial costs, could place a significant strain on our financial resources, divert the attention of management from our core business and harm our reputation. If the relevant patents were upheld as valid and enforceable and we were found to infringe, we could be required to pay substantial damages and/or royalties and could be prevented from selling our products unless we could obtain a license or were able to redesign our system to avoid infringement.

If we are unable to persuade hospitals, ambulatory surgery centers and other healthcare facilities to approve the use of our products, our sales may decrease.

In order for surgeons to use our products at hospitals, ambulatory surgery centers and other healthcare facilities, we are often required to obtain approval from those hospitals, ambulatory surgery centers and healthcare facilities. Typically, hospitals, ambulatory surgery centers and healthcare facilities review the comparative effectiveness and cost of products used in the facility. The makeup and evaluation processes for healthcare facilities vary considerably, and it can be a lengthy, costly and time-consuming effort to obtain approval by the relevant healthcare facilities.

Additionally, hospitals, ambulatory surgery centers and other healthcare facilities, which manage purchasing for multiple facilities, may also require us to enter into a purchase agreement and satisfy numerous elements of their administrative procurement process, which can also be a lengthy, costly, and time-consuming effort. If we do not obtain access to hospitals, ambulatory surgery centers and other healthcare facilities in a timely manner, or at all, via their approvals or purchase contract processes, or otherwise, or if we are unable to obtain approvals or secure contracts in a timely manner, or at all, our operating costs will increase, our sales may decrease and our operating results may be adversely affected. Furthermore, we may expend significant efforts on these costly and time-consuming processes but may not be able to obtain necessary approvals or secure a purchase contract from such hospitals, ambulatory surgery centers and other healthcare facilities.

We are dependent on our collaborative agreements for the development of products and business development, which exposes us to the risk of reliance on the viability of third parties.

In conducting our research and development activities, we will in the future rely on collaborative agreements with third parties such as manufacturers, contract research organizations, commercial partners, universities, governmental agencies and not-for-profit organizations for both strategic and financial resources. The loss of, or failure to perform by us or our partners under, any applicable agreements or arrangements, or our failure to secure additional agreements for other products in development, would substantially disrupt or delay our research and development and commercialization activities. Any such loss would likely increase our expenses and materially harm our business, financial condition and results of operation.

Reliance on third-party relationships and outsourcing arrangements could adversely affect our business.

We utilize third parties, including suppliers, alliances with other pharmaceutical and biotechnology companies, and third-party service providers, for selected aspects of product development, the manufacture and commercialization of certain products, support for information technology systems, and certain financial transactional processes. Outsourcing these functions involves the risk that the third parties may not perform to our standards or legal requirements, may not produce reliable results, may not perform in a timely manner, may not maintain the confidentiality of our proprietary information, or may fail to perform at all. Failure of these third parties to meet their contractual, regulatory, confidentiality, or other obligations to us could have a material adverse effect on our business.

If the coverage and reimbursements for procedures using our products are inadequate or if payments are denied altogether, adoption and use of our products and the prices paid for our products may decline, which could have a material adverse effect on our business, financial condition or results of operations.

Adequate coverage and reimbursement from third-party payors, including government programs such as Medicare and Medicaid, private insurance plans and managed care programs, for procedures using our products is central to the acceptance and adoption of our existing and future products and technologies. Hospitals, healthcare facilities, surgeons and other healthcare providers that purchase and use our products generally rely on third-party payors to pay for all or part of the costs and fees associated with the procedures using our products. If third-party payors reduce their current levels of payment, if our costs of production increase faster than increases in reimbursement levels or if third-party payors deny reimbursement for our products, our products and technologies may not be adopted or accepted by the hospitals, healthcare facilities, surgeons or other healthcare providers and the prices paid for our products may decline, which could have a material adverse effect on our business, financial condition or results of operations.

When procedures using our products are performed, both the surgeon or other healthcare provider and the hospital or healthcare facility submit claims for reimbursement to the third-party payor. Generally, the hospital or healthcare facility obtains a lump sum payment, or facility fee, for spine surgery procedures. Our products are purchased by the hospital or healthcare facility, along with other supplies used in the procedure. The hospital or healthcare facility must also pay for its own fixed costs of operation, including certain operating room personnel involved in the procedure. If the costs associated with our products, the supplies and other fixed costs exceed the facility fee reimbursement, the managers of hospitals and healthcare facilities may discourage or restrict surgeons and other healthcare providers from performing procedures using our products or technologies in their facilities or use certain of our products or technologies. While we believe that the facility fee reimbursement is generally adequate for the facilities to offer procedures using our products, there can be no guarantee that the facility fee reimbursement will

not decline in the future or be denied altogether. The number of procedures using our products performed and the prices paid for our products may decline in the future if payments to facilities for spine surgery procedures decline or are denied altogether.

Additionally, market acceptance of our products and technologies in foreign markets may depend, in part, upon the availability of coverage and reimbursement within prevailing healthcare payment systems. Reimbursement and healthcare payment systems in international markets vary significantly by country and include both government-sponsored healthcare and private insurance. We may not obtain additional international coverage and reimbursement approvals in a timely manner, if at all. Our failure to receive such approvals would negatively impact market acceptance of our products in the international markets in which those approvals are sought.

The forecasts of market growth included in our business plan and investor presentations may prove to be inaccurate, and even if the markets in which we compete achieve the forecasted growth, we cannot assure you our business will grow at similar rates, if at all.

Growth forecasts are subject to significant uncertainty and are based on assumptions and estimates that may not prove to be accurate. The forecasts in our business plan and investor presentations may prove to be inaccurate. Even if these markets experience the forecasted growth described in our business plan, we may not grow our business at similar rates, or at all. Our growth is subject to many factors, including our success in implementing our business strategy, which is subject to many risks and uncertainties. Accordingly, the forecasts of market growth included in our business plan should not be taken as indicative of our future growth.

If the quality of our products and technologies does not meet the expectations of surgeons or patients, then our brand and reputation could suffer and our business could be adversely impacted.

In the course of conducting our business, we must adequately address quality issues that may arise with our products and technologies, as well as defects in third-party components or materials used in our products. Furthermore, a malfunction in one or more of our products may not be detected for an extended period of time, which may result in delay or failure to remedy the condition for which the product was prescribed. Although we have established internal procedures to minimize risks that may arise from quality issues, we may be unable to eliminate or mitigate occurrences of these issues and associated liabilities. If the quality of our products and technologies does not meet the expectations of surgeons or patients, then our brand and reputation could suffer and our business could be adversely impacted.

Changes in the manufacturing methods and configurations of our products in development may result in additional costs or delay, which could have a material adverse effect on our business, financial condition and results of operations.

As we modify existing products and develop new products through pre-clinical testing and clinical trials towards clearance or approval and commercialization, we may alter manufacturing methods and configurations of the products along the way in an effort to optimize processes and results. Any changes we make carry the risk that they will not achieve the intended objectives and instead could result in unforeseen adverse events or have undesirable effects that impact the results of any clinical trials conducted with the altered products. Such changes may also require additional testing, regulatory notification or regulatory approval, which could delay completion of pre-clinical testing or clinical trials, increase costs, delay approval of our future products and jeopardize our ability to commence or maintain sales and generate revenue as expected, all of which could have a material adverse effect on our business, financial condition and results of operations.

We may pursue additional opportunities to acquire complementary businesses, which could dilute our shareholders' ownership interests, incur expenditure and have uncertain returns.

We may seek to expand through future acquisitions of either companies or properties, however, there can be no assurance that we will locate attractive acquisition candidates, or that we will be able to acquire such candidates on economically acceptable terms, if at all, or that we will not be restricted from completing acquisitions pursuant to contractual arrangements. Future acquisitions may require us to expend significant amounts of cash, resulting in our inability to use these funds for other business or may involve significant issuances of equity. Future acquisitions

may also require substantial management time commitments, and the negotiation of potential acquisitions and the integration of acquired operations could disrupt our business by diverting management and employees' attention away from day-to-day operations. The difficulties of integration may be increased by the necessity of coordinating geographically diverse organizations, integrating personnel with disparate backgrounds and combining different corporate cultures.

Any future acquisition involves potential risks, including, among other things:

- difficulty assimilating or integrating acquired or licensed technologies, products, employees or business operations;
- issues maintaining uniform standards, procedures, controls and policies;
- unanticipated costs associated with acquisitions or strategic alliances, including the assumption of unknown or contingent liabilities and the incurrence of debt or future write-offs of intangible assets or goodwill;
- diversion of management's attention from our core business and disruption of ongoing operations;
- adverse effects on existing business relationships with suppliers, distributors, healthcare facilities, surgeons and other healthcare providers;
- risks associated with entering new markets in which we have limited or no experience;
- potential losses related to investments in other companies;
- potential loss of key employees of acquired businesses; and
- increased legal and accounting compliance costs.

At times, future acquisition candidates may have liabilities or adverse operating issues that we may fail to discover through due diligence prior to the acquisition. If we consummate any future acquisitions with unanticipated liabilities or that fails to meet expectations, our business, results of operations, cash flows or financial condition may be materially adversely affected. The potential impairment or complete write-off of goodwill and other intangible assets related to any such acquisition may reduce our overall earnings and could negatively affect our balance sheet.

Our business, results of operations and financial condition may be adversely affected by public health epidemics, including the coronavirus or COVID-19.

Our business, operations and financial condition could be materially and adversely affected by the outbreak of epidemics or pandemics or other health crises, including the recent outbreak of COVID-19. In December 2019, a novel strain of coronavirus, SARS-CoV-2, causing a disease referred to as COVID-19, was reported to have surfaced in Wuhan, China. On January 30, 2020, the World Health Organization declared the outbreak a global health emergency, on March 12, 2020, the World Health Organization declared the outbreak a pandemic and on March 13, 2020 the U.S. declared that the COVID-19 outbreak in the United States constitutes a national emergency. The outbreak has caused companies and various international jurisdictions to impose travel, gathering and other public health restrictions. While these effects are expected to be temporary, the duration of the various disruptions to businesses locally and internationally and the related financial impact cannot be reasonably estimated at this time. Similarly, we cannot estimate whether or to what extent this outbreak and the potential financial impact may extend to countries outside of those currently impacted. At this point, the extent to which COVID-19 will impact our business is uncertain and these factors are beyond our control; however, it is possible that COVID-19 may have a material adverse effect on our business, results of operations and financial condition.

Risks Related to the Company's Securities and this Offering

Affiliates of our company, including officers, directors and existing stockholder of our company, may invest in this offering and their funds will be counted toward our achieving the minimum amount.

There is no restriction on our affiliates, including our officers, directors and existing stockholders, investing in the offering. As a result, it is possible that if we have raised some funds, but not reached the minimum amount, affiliates can contribute the balance so that there will be a closing. The minimum amount is typically intended to be a protection for investors and gives investors confidence that other investors, along with them, are sufficiently interested in the offering and our company and its prospects to make an investment of at least the minimum amount. By permitting affiliates to invest in the offering and make up any shortfall between what non-affiliate investors have invested and the minimum amount, this protection is largely eliminated. Investors should be aware that no funds other than their own and those of affiliates investing along with them, may be invested in this offering.

We intend to use some of the proceeds from the offering for unspecified working capital.

This means that we have ultimate discretion to use this portion of the proceeds as we see fit and have chosen not to set forth any specific uses for you to evaluate. The net proceeds from this offering will be used for the purposes, which our management deems to be in our best interests in order to address changed circumstances or opportunities. As a result of the foregoing, our success will be substantially dependent upon our discretion and judgment with respect to application and allocation of the net proceeds of this offering. We may choose to use the proceeds in a manner that you do not agree with and you will have no recourse. A use of proceeds that does not further our business and goals could harm our company and its operations and ultimately cause you to lose all or a portion of your investment.

We are not subject to Sarbanes-Oxley regulations and lack the financial controls and safeguards required of public companies.

We do not have the internal infrastructure necessary, and are not required, to complete an attestation about our financial controls that would be required under Section 404 of the Sarbanes-Oxley Act of 2002. There can be no assurance that there are no significant deficiencies or material weaknesses in the quality of our financial controls. We expect to incur additional expenses and diversion of management's time if and when it becomes necessary to perform the system and process evaluation, testing and remediation required in order to comply with the management certification and auditor attestation requirements.

The securities being sold in this offering will not be freely tradable until one year from the initial purchase date. Although our securities may be tradable under federal securities law, state securities regulations may apply, and each investor should consult with his or her attorney.

You should be aware of the long-term nature of this investment. There is not now and likely will not be a public market for our securities. Because our securities have not been registered under the Securities Act or under the securities laws of any state or non-United States jurisdiction, our securities have transfer restrictions and cannot be resold in the United States except pursuant to Rule 501 of Regulation CF. It is not currently contemplated that registration under the Securities Act or other securities laws will be effected. Limitations on the transfer of the securities may also adversely affect the price that you might be able to obtain for our securities in a private sale. Investors should be aware of the long-term nature of their investment in the Company. Each investor in this offering will be required to represent that it is purchasing the securities for its own account, for investment purposes and not with a view to resale or distribution thereof.

Neither the offering nor the securities have been registered under federal or state securities laws, leading to an absence of certain regulation applicable to us.

No governmental agency has reviewed or passed upon this offering, our company or any Securities of our company. We also have relied on exemptions from securities registration requirements under applicable state securities laws. Investors, therefore, will not receive any of the benefits that such registration would otherwise provide. Prospective investors must therefore assess the adequacy of disclosure and the fairness of the terms of this offering on their own or in conjunction with their personal advisors.

No Guarantee of Return on Investment

There is no assurance that an investor will realize a return on its investment or that it will not lose its entire investment. For this reason, each investor should read the Form C and all Exhibits carefully and should consult with its own attorney and business advisor prior to making any investment decision.

We have the right to extend the offering deadline.

We may extend the offering deadline beyond what is currently stated herein. This means that your investment may continue to be held in escrow while we attempt to raise the minimum amount even after the offering deadline stated in this offering statement is reached. Your investment will not be accruing interest during this time and will simply be held until such time as the new offering deadline is reached without our company receiving the minimum amount, at which time committed funds will become immediately available for withdrawal from the investor's brokerage account maintained with the Intermediary without interest or deduction, or until we receive the minimum amount, at which time it will be released to us to be used as set forth herein. Upon or shortly after release of such funds to us, the securities will be issued and distributed to you.

Your ownership of the shares will be subject to dilution.

If we conduct subsequent offerings of securities, issue shares pursuant to a compensation or distribution reinvestment plan or otherwise issues additional shares, investors who purchase securities in this offering who do not participate in those other stock issuances will experience dilution in their percentage ownership of our company's outstanding shares. Furthermore, shareholders may experience a dilution in the value of their underlying shares depending on the terms and pricing of any future share issuances (including the underlying shares being sold in this offering) and the value of the our assets at the time of issuance.

Management has discretion over proceeds of this offering.

We expect to use the net proceeds of this offering, over time, for general marketing and advertising, leasing costs, debt repayment and general working capital. However, we have no current specific plans for the net proceeds of this offering other than as outlined in the use of proceeds section of this offering statement. As a result, our management will have the discretion to allocate the net proceeds to uses that investors may not deem desirable. There can be no assurance that the net proceeds can or will be invested to yield a significant return.

There can be no assurance that we will ever provide liquidity to investors through either a sale of our company or a registration of the securities.

There can be no assurance that any form of merger, combination, or sale of our company will take place, or that any merger, combination, or sale would provide liquidity for investors. Furthermore, we may be unable to register the securities for resale by investors for legal, commercial, regulatory, market-related or other reasons. In the event that we are unable to effect a registration, investors could be unable to sell their securities unless an exemption from registration is available.

The offering price in this offering may not represent the value of our securities.

The price of the securities being sold in this offering has been determined based on a number of factors and does not necessarily bear any relationship to our book value, assets, operating results or any other established criteria of value. Prices for our securities may not be indicative of the fair market value of our securities now or in the future.

THE OFFERING

9. **What is the purpose of the offering?**

The purpose of the offering is to raise capital with common stock for our research, advertising and general marketing and of our product, lease deposit and general working capital. In addition, the proceeds from this offering will be used to pay for legal and accounting costs.

10. **How does the issuer intend to use the proceeds of this offering?**

	If Target Offering Amount is Sold	If Maximum Amount is Sold[(1)(2)]
Total Proceeds	$24,997	$1,069,999
Less: Offering Expenses		
(A) Intermediary Commissions (7%)	$1,749.79	$74,899.93
(B) Legal Expenses	$0	$65,000
(C) Accounting Expenses	$0	$25,000
(D) Miscellaneous Offering Expenses	$0	$5,000
Net Proceeds	$23,247.21	$900,099.07
Use of Net Proceeds		
(E) Advertising	$0	$10,000
(F) Marketing and Other Expenses Relating to Securities Offerings	$0	$100,000
(G) Research and Development	$23,247.21	$400,000
(H) Business Development	$0	$10,000
(I) Payment to Debts[(3)]	$0	$60,000
(H) General Working Capital	$0	$320,099.07
Total Use of Net Proceeds	$23,247.21	$900,099.07

(1) We will accept proceeds in excess of the target offering amount of $24,997. We will allocate oversubscriptions on a first come first served basis. We will use the oversubscribed amount up to $1,069,999 in the manner described in the above table.

(2) The above figures represent only estimated costs. This expected use of net proceeds from this offering represents our intentions based upon our current plans and business conditions. The amounts and timing of our actual expenditures may vary significantly depending on numerous factors, including the status of and results from operations. As a result, our management will retain broad discretion over the allocation of the net proceeds from this offering. We may find it necessary or advisable to use the net proceeds from this offering for other purposes, and we will have broad discretion in the application of net proceeds from this offering. Furthermore, we anticipate that we will need to secure additional funding for the fully implement our business plan. Please see section entitled "Risk Factors."

(3) For more information, please see question 24 entitled "Describe the terms of any indebtedness of the issuer."

11. How will the issuer complete the transaction and deliver securities to the investors?

The transaction between the issuer and the investor will be completed through the EquiFund Crowd Funding Portal, Inc. online platform, located at http://www.equifund.com/. EquiFund Crowd Funding Portal, Inc. will serve as the intermediary.

Upon acceptance of your subscription by our company and delivery of the subscription amount into the escrow account, you will be able to download a fully signed copy of the subscription agreement and a confirmation of your investment and the number of shares of our common stock acquired by you.

12. How can an investor cancel an investment commitment?

Investors may cancel an investment commitment at any time up to the cancellation deadline, which occurs at 5:00 p.m. New York time, 48 hours prior to the offering deadline identified in these offering materials, which is April 20, 2022.

Cancellation instructions can be found in the Equifund investor dashboard. Investors may cancel their investment commitment by sending an email to support@equifundcfp.com stating their intent to cancel the investment commitment. The investment commitment will be considered cancelled at that time, and the investor will be contacted directly by Equifund with further information. If Investor's investment commitment is cancelled, the

corresponding investment shall be refunded to Investor without deduction for any fee, commission or expense, and without accrued interest with respect to any money received.

Early Closing

If the target amount is reached prior to the offering deadline, the issuer may conduct an early closing. In the event that the issuer conducts an early closing, investors shall receive notice of such early closing as well as the new closing date, or the Early Closing Date. Investors shall have the right to cancel and shall have their investment commitment at any time and for any reason up until 48 hours prior to the Early Closing Date. After the target amount has been raised, the intermediary and the issuer may agree to hold multiple closings on a rolling basis.

Material Changes

If there is a material change to the terms of the offering or to the information provided by the issuer in connection therewith, EquiFund will send notice to each investor of such material change and inform the investor that the investment commitment will be cancelled unless the investor reconfirms their investment commitment within five business days. If any Investor fails to reconfirm their investment commitment within the reconfirmation period, the investment commitment will be cancelled automatically and EquiFund will send to each investor, within five business days after initial notice of the material change, a notification that the investment commitment was cancelled and a direct the refund of the investment.

No Closings

If the Company fails to reach the target offering amount by the offering deadline, each investor's investment commitment will be cancelled automatically and EquiFund will direct refund of each cancelled investment to the investor within five business days.

NOTE: Investors may cancel an investment commitment until 48 hours prior to the deadline identified in these offering materials.

The intermediary will notify investors when the target offering amount has been met.

If the issuer reaches the target offering amount prior to the deadline identified in the offering materials, it may close the offering early if it provides notice about the new offering deadline at least five business days prior to such new offering deadline (absent a material change that would require an extension of the offering and reconfirmation of the investment commitment).

If an investor does not cancel an investment commitment before the 48-hour period prior to the offering deadline, the funds will be released to the issuer upon closing of the offering and the investor will receive securities in exchange for his or her investment.

If an investor does not reconfirm his or her investment commitment after a material change is made to the offering, the investor's investment commitment will be cancelled and the committed funds will be returned.

OWNERSHIP AND CAPITAL STRUCTURE

The Offering

13. **Describe the terms of the securities being offered.**

Terms of the Offering

We are offering up to 305,714 shares of our common stock for $1,069,999. We are attempting to raise a minimum amount of $24,997 in this offering, which we refer to as the minimum amount or target amount. We must receive commitments from investors in an amount totaling the minimum amount by April 20, 2022, which we refer to as the offering deadline, in order to receive any funds. If the sum of the investment commitments does not equal or exceed the minimum amount by the offering deadline, no securities will be sold in the offering, investment commitments will be cancelled, and committed funds will be returned without interest or deductions. We have the right to extend

the offering deadline at our discretion. You have the right to cancel your investment in the event that we extend the offering deadline and you choose not to reconfirm your investment. We will accept investments in excess of the minimum amount up to $1,069,999, which we refer to as the maximum amount, and the additional securities will be allocated as set forth in Question 10 of this Form C.

The price of the securities does not necessarily bear any relationship to our company's asset value, net worth, revenues or other established criteria of value, and should not be considered indicative of the actual value of the securities.

In order to purchase the securities, you must make a commitment to purchase by completing the subscription agreement. Investor funds will be held in escrow with Prime Trust, who we refer to as the escrow agent, until the minimum amount of investments is reached. Investors may cancel an investment commitment until 48 hours prior to the offering deadline or the closing, whichever comes first using the cancellation mechanism provided by the Intermediary. We will notify investors when the minimum amount has been reached. If we reach the minimum amount prior to the offering deadline, we may close the offering at least five (5) days after reaching the minimum amount and providing notice to the investors. If any material change (other than reaching the minimum amount) occurs related to the offering prior to the offering deadline, we will provide notice to investors and receive reconfirmations from investors who have already made commitments. If an investor does not reconfirm his or her investment commitment after a material change is made to the terms of the offering, the investor's investment commitment will be cancelled, and the committed funds will be returned without interest or deductions. If an investor does not cancel an investment commitment before the minimum amount is reached, the funds will be released to our company upon closing of the offering, and the investor will receive the securities in exchange for his or her investment. Any investor funds received after the initial closing will be released to us upon a subsequent closing, and the investor will receive securities via digital registry in exchange for his or her investment as soon as practicable thereafter.

Subscription agreements are not binding on us until accepted by us. We reserve the right to reject, in whole or in part, in our sole and absolute discretion, any subscription. If we reject a portion of any subscription, the applicable prospective investor's funds will be returned without interest or deduction.

The price of the securities was determined arbitrarily. The minimum amount that a Purchaser may invest in the Offering is $437.50.

The Offering is being made through EquiFund Crowd Funding Platform, Inc., the Intermediary.

Commission/Fees

7.0% of the amount raised in the offering.

Stock, Warrants and Other Compensation

The intermediary will receive a number of shares of our common stock equal to 7% of the shares sold in the offering.

Transfer Agent and Registrar

We will act as transfer agent and registrar for the securities, which will be set forth in a stock ledger. No physical certificates will be delivered.

Restrictions on Transfer

Any securities sold pursuant to Regulation CF being offered may not be transferred by any Investor of such securities during the one-year holding period beginning when the securities were issued, unless such securities are transferred: (1) to the Company, (2) to an accredited investor, as defined by Rule 501(a) of Regulation D promulgated under the Securities Act, (3) as part of an IPO or (4) to a member of the family of the Investor or the equivalent, to a trust controlled by the Investor, to a trust created for the benefit of a member of the family of the Investor or the equivalent, or in connection with the death or divorce of the Investor or other similar circumstances. "Member of the family" as used herein means a child, stepchild, grandchild, parent, stepparent, grandparent, spouse

or spousal equivalent, sibling, mother/father/daughter/son/sister/brother-in-law and includes adoptive relationships. Remember that although you may legally be able to transfer the securities, you may not be able to find another party willing to purchase them.

14. **Do the securities offered have voting rights? [X] Yes [ ] No**

Holders of our common stock are entitled to one vote per share of common stock held.

15. **Are there any limitations on any voting or other rights identified above? [ ] Yes [X] No**

We do not have any voting agreements or shareholder/equity holder agreements in place.

16. **Explain how the terms of the securities being offered may be modified?**

The rights of the holders of common stock of our company may only be modified by the majority vote of the shares of common stock of our company outstanding and entitled to vote, unless a greater number of voting shares is required by applicable law.

NOTE: The term "accredited investor" means any person who comes within any of the categories set forth in Rule 501(a) of Regulation D, or who the seller reasonably believes comes within any of such categories, at the time of the sale of the securities to that person.

Description of Issuer's Securities

17. **What other securities or classes of securities of the issuer are outstanding? Describe the material terms of any other outstanding securities or classes of securities of theissuer.**

As of the date of this offering statement, our authorized capital stock consists of 400,000,000 shares of common stock, $0.0001 par value per share and 100,000,000 shares of blank check preferred stock, par value $0.0001 per share. The Company designated of 2,365 shares of blank check preferred stock as Series A Preferred Stock, which the preferences and relative and other rights, and the qualifications, limitations or restrictions thereof, shall be set forth in the certificate of incorporation filed with the Secretary of the State of the State of Nevada on November 5, 2020. As of the date of this offering statement, a total of 7,393,750 shares of common stock and 2,365 shares of Series A Preferred Stock are issued and outstanding, and excludes:

- 740,000 shares of common stock issuable upon the exercise of outstanding stock options at an exercise price of $2.00 per share.

Series A Preferred Stock
We designated of 2,365 shares of blank check preferred stock as Series A Preferred Stock, each share having a par value of $0.0001. 2,365 shares of Series A Preferred Stock are issued and outstanding to date.

Common Stock
We have authorized the issuance of 400,000,000 shares of our common stock, each share having a par value of $0.0001.

Restricted Stock
We issued restricted stock to our directors and advisors through restricted stock purchase agreements. As of the date of this offering statement, 238,152 shares of restricted stock were vested and 2,049,320 shares of common stock are yet to vest. The vesting schedule of the restricted stock are:

Name	Number of Restricted Stoc	Vesting Schedule
Participant A*	312,500	112,500 restricted shares vested upon the execution of the Restricted Stock Award Agreement; 160 restricted shares shall vest per hour of unbilled services performed by Participant A commencing January 1, 2021.
Participant	60,000	10,000 restricted shares vested upon the execution of the Restricted Stock

B*		Award Agreement; 75 restricted shares shall vest per hour of unbilled services performed by Participant B commencing January 1, 2021.
Participant C*	195,000	75 restricted shares shall vest per hour of unbilled services performed by Participant C commencing January 1, 2021.
Participant D*	50,000	35 restricted shares shall vest per hour of unbilled serviced performed by Participant D.
Participant E*	25,000	5,000 restricted shares shall vest on the first day of each year for five years.
Participant F*	28,000	The restricted shares will vest in equal installment of 1,167 shares monthly and all shares will be fully vested on June 1, 2021.
Participant G*	100,000	The restricted shares will vest in equal installment monthly over 36 months (2,778 shares per month) and will fully vest on the third anniversary from date of the Restricted Stock Award Agreement.
Participant H*	30,000	The restricted shares will vest in equal installment monthly over 36 months (833 shares per month) and will be fully vested on February 28, 2024.
Theseus Capital Ltd.	1,479,750	(i) 25% of the shares (369,937 shares) will be vested when the Company raises at least $2.5 million at an average pre-valuation in excess of $25 million; (ii) 50% of the shares (739,875 shares) will be vested when the Company raises at least $5 million at an average pre-valuation in excess of $25 million; (iii) 75% of the shares (1,109,812 shares) will be vested when the Company raises at least $7.5 million for the Company at an average pre-valuation in excess of $25 million; and (iv) 100% of the shares (1,479,750 shares) will be vested when the Company raises at least $10 million at an average pre-valuation in excess of $25 million.

* The restricted stockholders each holds less than 20% of shares of common stock on a fully diluted basis.

Stock Options

In November 2020, our Board of Directors adopted the Spinal Surgical Strategies, Inc., d/b/a Kleiner Device Labs 2020 Equity Incentive Plan (the "Stock Plan"). The Stock Plan provides for the grant of equity awards to our directors and certain key consultants, including stock options to purchase shares of our common stock and stock awards. Up to 740,000 shares of our common stock may be issued pursuant to awards granted under the Stock Plan, with annual increases based on the terms of the plan document, subject to adjustment in the event of stock splits and other similar events. The Stock Plan is administered by our Board of Directors, and expires ten years after adoption, unless terminated earlier by the Board. As of the date of this offering statement, 720,542 shares of stock options were vested, and 19,458 shares of stock options are yet to vest.

We may also offer preferred stock, or other debt or equity securities, including derivative securities like options, warrants and convertible debentures or notes in the future.

We reserve the right to sell our securities in a private placement transaction that occurs concurrent with this offering. Those securities may be SAFE securities (simplified agreement for future equity), preferred stock, convertible notes or other securities. Any securities that we sell for cash to investors in a private placement while this offering is ongoing will have a conversion cap, liquidation preference, conversion price, price or similar valuation mechanism that is based upon a valuation for our company equal to the valuation at which securities are being sold in this offering or higher. Investors should be aware that the securities that we sell in a concurrent private placement may have a liquidation preference, security interest, sinking fund, redemption provision or similar right that is senior to your rights as a common stockholder of this company and, accordingly, such other securities may be superior to our common stock in various ways even though they are being sold at the same valuation as we are selling our common stock in this offering.

18. **How may the rights of the securities being offered be materially limited, diluted or qualified by the rights of any other class of security identified above?**

The shares of our common stock being issued in this offering do not have anti-dilution rights, which means that future equity financings or other issuances of securities will dilute the ownership percentage that the investor will have in the company. It also means that if future financing rounds are done at a lower valuation, you will not receive the benefit of additional shares so that your valuation will remain the same. Our existing Series A Preferred Stock and any future series of Preferred Stock that we issue or any debt securities that we issue in the future have or will have a liquidation preference and if there is a liquidation of our company or sale of our company, the holders of such preferred stock or debt securities would have a preference in the payment of amounts owed to them such that you may not receive a large portion of (or any of) the assets, including any cash, to be distributed in liquidation.

19. **Are there any differences not reflected above between the securities being offered and each other class of security of the issuer?** [_] Yes [X] No

20. **How could the exercise of rights held by the principal shareholders identified in Question 6 above affect the purchasers of the securities being offered.**

If the principal shareholders exercise their voting rights, then the minority shareholders will have no ability to override the principal shareholders' votes. As a minority shareholder in the company, you will have limited ability, if at all, to influence our policies or any other corporate matters.

21. **How are the securities being offered being valued? Include examples of methods for how such securities may be valued by the issuer in the future, including during subsequent corporate actions.**

The securities being offered have been arbitrarily valued. Also, see the "The offering price in this offering may not represent the value of our securities" risk factor.

22. **What are the risks to purchasers of the securities relating to minority ownership in the issuer?**

As a minority shareholder in our company, you will have limited ability, if at all, to influence our policies or any other corporate matters such as amendments to our articles of incorporation, the creation of securities that are senior to the common stock being offered, mergers, the sale of all or substantially all of our assets, the election of board members, the liquidation or dissolution of our company and all other major corporate events.

23. **What are the risks to purchasers associated with corporate actions including: additional issuances of securities, issuer repurchases of securities, a sale of the issuer or of assets of the issuer or transactions with related parties?**

The securities do not have anti-dilution rights, which means that corporate actions, including: additional issuances of securities, issuer repurchases of securities, a sale of the issuer or of assets, or transactions with related parties could dilute the ownership percentage that the Investor may eventually have in the Company. Furthermore, if future issuances of securities are accomplished at a lower valuation than the valuation used for this offering (i.e., a down round), your valuation will remain the same as you have no price based anti-dilution protection.

24. **Describe the terms of any indebtedness of the issuer.**

The debts of the issuer are $750,100.37 loan from our CEO, Jeffrey Kleiner and an $11,695.78 fixed asset loan to US Bank.

Creditor(s)	Amount Outstanding	Interest Rate	Maturity Date
Jeffrey Kleiner	$ 750,100.37[(1)]	6 %	February 24, 2026
US Bank	$ 10,713.36[(2)]	4.24 %	January 7, 2023

(1) As of April 6, 2021

(2) As of April 16, 2021

25. **What other exempt offerings has the issuer conducted within the past three years?**

On August 2018, we had a common B units offering exempt under Regulation D of the Securities Act.

Date of Offering	Exemption Relied Upon	Securities Offered	Amount Sold	Use of Proceeds
September 2018	Reg D	Common B Units	$ 634,000	Research and Development

26. **Was or is the issuer or any entities controlled by or under common control with the issuer a party to any transaction since the beginning of the issuer's last fiscal year, or any currently proposed transaction, where the amount involved exceeds five percent of the aggregate amount of capital raised by the issuer in reliance on Section 4(a)(6) of the Securities Act during the preceding 12-month period, including the amount the issuer seeks to raise in the current offering, in which any of the following persons had or is to have a direct or indirect material interest:**

(1) any director or officer of the issuer;

(2) any person who is, as of the most recent practicable date, the beneficial owner of 20 percent or more of the issuer's outstanding voting equity securities, calculated on the basis of voting power;

(3) if the issuer was incorporated or organized within the past three years, any promoter of the issuer; or

(4) any immediate family member of any of the foregoing persons.

If yes, for each such transaction, disclose the following:

Specified Person	Relationship to Issuer	Nature of Interest in Transaction	Amount of Interest
Jeffrey Kleiner	CEO and Director	Loan	$716,726.47
Theseus Capital Ltd.	Consultant	Consulting Agreement	$[1]

(1) Theseus Capital Ltd. received 1,479,750 shares of restricted stock (if fully vested) in consideration for consulting services and a nominal cash payment. See "Question 17 – Description of Securities," above.

FINANCIAL CONDITION OF THE ISSUER

27. **Does the issuer have an operating history?** [X] Yes [ ] No

28. **Describe the financial condition of the issuer, including, to the extent material, liquidity, capital resources and historical results of operations.**

Financial Information

Operations

Spinal Surgical Strategies, Inc., d/b/a Kleiner Device Labs is a development stage company with minimal operating history and minimal revenues to date. We expect to continue to generate revenue through selling our products to hospitals, surgery centers, distributors, or other medical companies. Our products are used in lumbar spinal fusions. We currently have one product in the market that has an ASP (average selling price) of $325. It is a disposable, single use item. We estimate that there are about 400,000 lumbar spine fusions annually in the US and growing at 5% a year.

The Company does not expect to achieve profitability for approximately the next 12 months and intends to focus on the following:

- We plan to target 10-12 surgical sites with surgeons who utilize different approaches for our alpha launch.
- We plan to have our KG™2 to be submitted to the FDA in the first quarter of 2021 for 510(k) clearance.
- We plan to keep developing our KG™3.

Liquidity and Capital Resources

The Offering proceeds are essential to our operations. We plan to use the proceeds to pay staff, repay loans, and add business development capability. The Offering proceeds will have a beneficial effect on our liquidity, as we currently have approximately $10,000 in cash on hand which will be augmented by the Offering proceeds and used to execute our business strategy.

There is no guarantee that the Company has, or will have, any additional sources of capital other than the proceeds from the Offering.

Capital Expenditures and Other Obligations

The Company may make material capital expenditures as determined from time to time by the Board of Directors.

Material Changes and Other Information

None.

Trends and Uncertainties

After reviewing the above discussion of the steps we intend to take, potential investors should consider whether achievement of each step within the estimated time frame is realistic in their judgment. Potential investors should also assess the consequences to us of any delays in taking these steps and whether we will need additional financing to accomplish them.

The financial statements are an important part of this Form C and should be reviewed in their entirety. The financial statements of the Company are attached hereto as Exhibit A.

29. **Include the financial information specified below covering the two most recently completed fiscal years or the period(s) since inception, if shorter:**

Attached as Exhibit A to this offering statement are the audited financial statements for the year ended December 31, 2019 and reviewed financial statements for the year ended December 31, 2020.

30. **With respect to the issuer, any predecessor of the issuer, any affiliated issuer, any director, officer, general partner or managing member of the issuer, any beneficial owner of 20 percent or more of the issuer's outstanding voting equity securities, calculated in the same form as described in Question 6 of this Question and Answer format, any promoter connected with the issuer in any capacity at the time of such sale, any person that has been or will be paid (directly or indirectly) remuneration for solicitation of purchasers in connection with such sale of securities, or any general partner, director, officer or managing member of any such solicitor, prior to May 16, 2016:**

(1) Has any such person been convicted, within 10 years (or five years, in the case of issuers, their predecessors and affiliated issuers) before the filing of this offering statement, of any felony or misdemeanor:

(i) in connection with the purchase or sale of any security? [__] Yes [X] No

(ii) involving the making of any false filing with the Commission? [__] Yes [X] No

(iii) arising out of the conduct of the business of an underwriter, broker, dealer, municipal securities dealer, investment adviser, funding portal or paid solicitor of purchasers of securities? [__] Yes [X] No

If Yes to any of the above, explain:_____

(2) Is any such person subject to any order, judgment or decree of any court of competent jurisdiction, entered within five years before the filing of the information required by Section 4A(b) of the Securities Act that, at the time of filing of this offering statement, restrains or enjoins such person from engaging or continuing to engage in any conduct or practice:

(i) in connection with the purchase or sale of any security? [__] Yes [X] No;

(ii) involving the making of any false filing with the Commission? [__] Yes [X] No

(iii) arising out of the conduct of the business of an underwriter, broker, dealer, municipal securities dealer, investment adviser, funding portal or paid solicitor of purchasers of securities? [__] Yes [X] No

If Yes to any of the above, explain:_____

(3) Is any such person subject to a final order of a state securities commission (or an agency or officer of a state performing like functions); a state authority that supervises or examines banks, savings associations or credit unions; a state insurance commission (or an agency or officer of a state performing like functions); an appropriate federal banking agency; the U.S. Commodity Futures Trading Commission; or the National Credit Union Administration that:

(i) at the time of the filing of this offering statement bars the person from:

(A) association with an entity regulated by such commission, authority, agency or officer? [__] Yes [X] No

(B) engaging in the business of securities, insurance or banking? [__] Yes [X] No

(C) engaging in savings association or credit union activities? [__] Yes [X] No

(ii) constitutes a final order based on a violation of any law or regulation that prohibits fraudulent, manipulative or deceptive conduct and for which the order was entered within the 10-year period ending on the date of the filing of this offering statement? [__] Yes [X] No

If Yes to any of the above, explain:_____

(4) Is any such person subject to an order of the Commission entered pursuant to Section 15(b) or 15B(c) of the Exchange Act or Section 203(e) or (f) of the Investment Advisers Act of 1940 that, at the time of the filing of this offering statement:

(i) suspends or revokes such person's registration as a broker, dealer, municipal securities dealer, investment adviser or funding portal? [__] Yes [X] No

(ii) places limitations on the activities, functions or operations of such person? [__] Yes [X] No

(iii) bars such person from being associated with any entity or from participating in the offering of any penny stock? [__] Yes [X] No

If Yes to any of the above, explain:_____

(5) Is any such person subject to any order of the Commission entered within five years before the filing of this offering statement that, at the time of the filing of this offering statement, orders the person to cease

and desist from committing or causing a violation or future violation of:

(i) any scienter-based anti-fraud provision of the federal securities laws, including without limitation Section 17(a)

(1) of the Securities Act, Section 10(b) of the Exchange Act, Section 15(c)(1) of the Exchange Act and Section 206(1) of the Investment Advisers Act of 1940 or any other rule or regulation thereunder? [__] Yes [X] No

(ii) Section 5 of the Securities Act? [__] Yes [X] No

If Yes to either of the above, explain:_____

(6) Is any such person suspended or expelled from membership in, or suspended or barred from association with a member of, a registered national securities exchange or a registered national or affiliated securities association for any act or omission to act constituting conduct inconsistent with just and equitable principles of trade? [__] Yes [X] No

If Yes, explain:_____

(7) Has any such person filed (as a registrant or issuer), or was any such person or was any such person named as an underwriter in, any registration statement or Regulation A offering statement filed with the Commission that, within five years before the filing of this offering statement, was the subject of a refusal order, stop order, or order suspending the Regulation A exemption, or is any such person, at the time of such filing, the subject of an investigation or proceeding to determine whether a stop order or suspension order should be issued? [__] Yes [X] No

If Yes, explain:_____

(8) Is any such person subject to a United States Postal Service false representation order entered within five years before the filing of the information required by Section 4A(b) of the Securities Act, or is any such person, at the time of filing of this offering statement, subject to a temporary restraining order or preliminary injunction with respect to conduct alleged by the United States Postal Service to constitute a scheme or device for obtaining money or property through the mail by means of false representations? [__] Yes [X] No

If Yes, explain:_____

If you would have answered "Yes" to any of these questions had the conviction, order, judgment, decree, suspension, expulsion or bar occurred or been issued after May 16, 2016, then you are NOT eligible to rely on this exemption under Section 4(a)(6) of the Securities Act.

OTHER MATERIAL INFORMATION

31. **In addition to the information expressly required to be included in this Form, include:**

(1) any other material information presented to investors; and

(2) such further material information, if any, as may be necessary to make the required statements, in the light of the circumstances under which they are made, not misleading.

Please see the exhibits to this offering statement, all of which have been made available to the offerees in connection with this offering.

ONGOING REPORTING

We will file a report electronically with the SEC annually and post the report on its website, no later than April 30, 2022 (120) days after the end of each fiscal year covered by the report). Once posted, the annual report may be found on our website at www.kleinerlabs.com. We must continue to comply with the ongoing reporting

requirements until (1) we are required to file reports under Section 13(a) or Section 15(d) of the Exchange Act; (2) we have filed at least one annual report pursuant to Regulation Crowdfunding and have fewer than 300 holders of record and has total assets that do not exceed $10,000,000; (3) we have filed at least three annual reports pursuant to Regulation Crowdfunding; (4) we or another party repurchases all of the securities issued in reliance on Section 4(a)(6) of the Securities Act, including any payment in full of debt securities or any complete redemption of redeemable securities; or (5) we liquidate or dissolve our business in accordance with state law.

SIGNATURE

Pursuant to the requirements of Sections 4(a)(6) and 4A of the Securities Act of 1933 and Regulation Crowdfunding (§ 227.100 et seq.), the issuer certifies that it has reasonable grounds to believe that it meets all of the requirements for filing on Form C and has duly caused this Form to be signed on its behalf by the duly authorized undersigned.

The issuer also certifies that the attached financial statements are true and complete in all material respects.

/s/ Jeffrey Kleiner

(Signature)

Jeffrey Kleiner

(Name)

CEO, President and Director

(Title)

Pursuant to the requirements of Sections 4(a)(6) and 4A of the Securities Act of 1933 and Regulation Crowdfunding (§ 227.100 et seq.), this Form C has been signed by the following persons in the capacities and on the dates indicated.

/s/ Jeffrey Kleiner

(Signature)

Jeffrey Kleiner

(Name)

CEO, President and Director

(Title)

May 5, 2021

(Date)

/s/ Harris Kirshner

(Signature)

Harris Kirshner

(Name)

CFO, Secretary and Director

(Title)

May 5, 2021

(Date)

/s/ Stewart Peabody

(Signature)

Stewart Peabody

(Name)

Director

(Title)

May 5, 2021

(Date)

I, Jeffrey Kleiner, being the CEO, President and Director of Spinal Surgical Strategies, Inc., d/b/a Kleiner Device Labs, a Nevada corporation (the "Company"), hereby certifies as of this date that:

(i) the accompanying audited 2019 financial statements and reviewed 2020 financial statements of the Company, which comprise the balance sheet as of December 31, 2019 and 2020 and the related statements of income (deficit), stockholder's equity and cash flows for the period from the Company's inception to December 31, 2020, and the related notes to said financial statements (collectively, the "Financial Statement"), are true and complete in all material respects; and

(ii) while the Company has not yet filed the tax return for the year ended December 31, 2020, any tax return information included in this Form C reflects accurately the information that would be reported in such tax return.

/s/ Jeffrey Kleiner
(Signature)

Jeffrey Kleiner
(Name)

CEO, President and Director
(Title)

May 5, 2021
(Date)

EXHIBITS

Exhibit A	2020 Reviewed Financial Statements and 2019 Audited Financial Statements
Exhibit B	Offering Page
Exhibit C	Subscription Agreement
Exhibit D	Pitch Deck
Exhibit E	Video Transcript

EXHIBIT A

2020 Reviewed Financial Statements and 2019 Audited Financial Statements

EXHIBIT B
Offering Page

EXHIBIT C
Subscription Agreement

EXHIBIT D
Investor Deck

EXHIBIT E
Video Transcript