



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

DIVISION OF  
CORPORATION FINANCE

November 26, 2018

Philip M. Rice, II  
Chief Financial Officer  
Zivo Bioscience, Inc.  
2804 Orchard Lake Rd., Suite 202  
Keego Harbor, Michigan 48320

**Re: Zivo Bioscience, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2018**  
**Filed February 21, 2018**  
**File No. 000-30415**

Dear Mr. Rice:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Healthcare & Insurance