



DIVISION OF  
CORPORATION FINANCE

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

July 31, 2023

Keith Marchiando  
Chief Financial Officer  
Zivo Bioscience, Inc.  
21 East Long Lake Road, Suite 100  
Bloomfield Hills, Michigan 48304

**Re: Zivo Bioscience, Inc.**  
**Registration Statement on Form S-3**  
**Filed July 28, 2023**  
**File No. 333-273493**

Dear Keith Marchiando:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Jimmy McNamara at 202-551-7349 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: Jeffrey H. Kuras