

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

June 5, 2024

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

Re: Zivo Bioscience, Inc.

Form 10-K for the Fiscal Year Ended December 31, 2023

Filed March 15, 2024 File No. 001-40449

Dear Keith Marchiando:

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 Life Sciences