

**Maxim Group LLC
405 Lexington Avenue
New York, New York 10174**

May 26, 2021

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, DC 20549

**Re: Zivo Bioscience, Inc.
Registration Statement on Form S-1, as amended
File No. 333-251221
Request for Acceleration of Effective Date**

Ladies and Gentlemen:

Pursuant to Rule 461 of the General Rules and Regulations of the U.S. Securities and Exchange Commission (the "**Commission**") under the Securities Act of 1933, as amended (the "**Securities Act**"), Maxim Group LLC, as representative of the underwriters, hereby joins the request of Zivo Bioscience, Inc. (the "**Company**") that the effective date of the above-referenced Registration Statement be accelerated so that it will become effective at **4:00 p.m. Eastern Time on Thursday, May 27, 2021**, or as soon thereafter as practicable.

Pursuant to Rule 460 of the General Rules and Regulations of the Commission under the Securities Act, please be advised that there will be distributed to each underwriter or dealer, who is reasonably anticipated to participate in the distribution of the securities in this offering, as many copies of the preliminary prospectus as appears to be reasonable to secure adequate distribution of the preliminary prospectus.

The undersigned confirms that it has complied with and will continue to comply with, and it has been informed or will be informed by participating dealers that they have complied with or will comply with, Rule 15c2-8 promulgated under the Securities Exchange Act of 1934, as amended, in connection with the above-referenced issue.

Very truly yours,

MAXIM GROUP LLC

*As Representative of the Several Underwriters
Named in the Underwriting Agreement*

By: */s/ Clifford Teller*

Name: Clifford Teller
Title: Executive Managing Director and Head of Investment
Banking