

August 1, 2023

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F. Street, NE  
Washington, D.C. 20549  
Attention: Jimmy McNamara

**Re: Zivo Bioscience,  
Inc.  
Registration Statement on Form S-3  
File No. 333-273493  
Acceleration Request**

**Requested Date: August 3, 2023  
Requested Time: 4:00 P.M. Eastern Time**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, Zivo Bioscience, Inc. (the "**Company**") hereby respectfully requests that the above-referenced Registration Statement on Form S-3 (File No. 333-273493) (the "**Registration Statement**") be declared effective at the "Requested Date" and "Requested Time" set forth above, or as soon as practicable thereafter, or at such later time as the Company or its counsel may orally request via telephone call to the staff of the Division of Corporation Finance of the U.S. Securities and Exchange Commission. The Company hereby authorizes each of Jeffrey H. Kuras and Isaac Pasha of Honigman LLP, counsel to the Company, to make such request on its behalf.

Please confirm the effectiveness of the Registration Statement with Jeffrey H. Kuras of Honigman LLP by telephone at (313) 465-7446 or Isaac Pasha of Honigman LLP by telephone at (313) 465-8138.

*[Signature page follows]*

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Sincerely,  
Zivo Bioscience, Inc.

/s/ Keith Marchiando  
Keith Marchiando  
Chief Financial Officer

cc: Jeffrey H. Kuras, Honigman  
LLP  
Isaac Pasha, Honigman LLP

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