

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

June 28, 2022

Scott Cox President and Principal Executive Officer Verde Bio Holdings, Inc. 5750 Genesis Ct Suite 220B Frisco, TX 75034

Re: VERDE BIO HOLDINGS, INC.

Registration Statement on Form S-1 Filed June 22, 2022 Amendment No. 1 to Registration Statement on Form S-1 Filed June 27, 2022 File No. 333-265753

Dear Mr. Cox:

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 Arthur Tornabene-Zalas at (202) 551-3162 or Liz Packebusch, Staff Attorney, at (202) 551-8749 with any questions.

Sincerely,

Division of Corporation Finance Office of Energy & Transportation

cc: J. Martin Tate, Esq.