



DIVISION OF
CORPORATION FINANCE

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

December 15, 2020

Philip Rice
Chief Financial Officer
Zivo Bioscience, Inc.
2804 Orchard Lake Rd.
Suite 202
Keego Harbor, MI 48320

Re: Zivo Bioscience, Inc.
Registration Statement on Form S-1
December 9, 2020
File No. 333-251221

Dear Mr. Rice:

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 Asia Timmons-Pierce at 202-551-3754 with any questions.

Sincerely,

Division of Corporation Finance
Office of Manufacturing