



DIVISION OF  
CORPORATION FINANCE

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

December 26, 2018

Kathleen T. Karloff  
Chief Executive Officer  
INVO Bioscience, Inc.  
407 Rear Mystic Avenue, Suite 34C  
Medford, Massachusetts 02155

**Re: INVO Bioscience, Inc.**  
**Registration Statement on Form S-1**  
**Filed December 20, 2018**  
**File No. 333-228928**

Dear Ms. Karloff:

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 Michael Fay at 202-551-3812 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Electronics and Machinery

cc: Scott Museles, Esq.