



DIVISION OF  
CORPORATION FINANCE

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.