

DIVISION OF CORPORATION FINANCE

July 18, 2023

Justin De Four Chief Executive Officer Blue Heaven Coffee, Inc. 304 South Jones Boulevard Unit 8925 Las Vegas, NV 89107

> Re: Blue Heaven Coffee, Inc. Post-Qualification Amendment No. 1 to to Offering Statement on Form 1-A Filed July 12, 2023 File No. 024-12248

Dear Justin De Four:

This is to advise you that we do not intend to review your amendment.

We will consider qualifying your offering statement at your request. If a participant in your offering is required to clear its compensation arrangements with FINRA, please have FINRA advise us that it has no objections to the compensation arrangements prior to qualification.

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 Nicholas Nalbantian at 202-551-7470 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Eric Newlan