

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 94063 / January 26, 2022**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-20717**

**In the Matter of**  
  
**KinerjaPay Corp.,**  
  
**Respondent.**

**ANSWER TO ORDER INSTITUTING  
ADMINISTRATIVE PROCEEDINGS AND  
NOTICE OF HEARING PURUSANT TO  
SECTION 12(J) OF THE SECURITIES  
EXCHANGE ACT OF 1934**

Now comes Respondent KINERJAPAY CORP., by and through undersigned counsel and submits this Answer in response to the Order Instituting Administrative Proceedings and Notice of Hearing Pursuant to Section 12(j) of the Securities Exchange Act of 1934 (the "Order"). The Order alleges that the Respondent is in violation of the Exchange Act Section 13(a) and Rules 13a-1 and 13a-13 thereunder.

While the Respondent does not dispute that it is in violation of the Exchange Act Section 13(a) and Rules 13a-1 and 13a-13 thereunder, Respondent asserts that it was unable to timely file annual and quarterly reports in 2020 and 2021 due to combined difficulties of ascertaining financial data from Indonesia as well as the impact and restrictions on travel and work as a result of the Covid-19 pandemic. Prior to 2020, the Respondent was current in its reporting and had been current for the preceding years; in fact, the Respondent filed a Form 10-K for its fiscal year ended December 31, 2019, in October of 2020 and plans to begin filing past due quarterly reports on Form 10-Q by or around the middle of the second quarter 2022, becoming fully current by or before the fourth quarter of 2022. The Respondent anticipates that it can and will become current in its reporting within the next several months if afforded the opportunity to do so.

March 23, 2022

Respectfully submitted,



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