



UNITED STATES OF AMERICA

Before the

SECURITIES AND EXCHANGE COMMISSION

SECURITIES AND EXCHANGE ACT OF 1934

ADMINISTRATIVE PROCEEDING

File NO.3-19419

In the Matter of

1. ERHC Energy Inc.

and

2. IDdriven Inc.

Respondents

ANSWER TO ORDER INSTITUTIONG ADMINSTRATIVE PROCEEDINGS AND

NOTICE OF HEARING PURSUANT TO SECTION 12(1) OF THE SECURITIES

EXCHANGE ACT OF 1934

1. This Answer is given on behalf of ERHC Energy Inc.
2. ERHC Energy Inc. is not affiliated or connected in any way with the second-named Respondent, IDdriven Inc. and does not purport hereby to make any representations on behalf of the said second-named Respondent. ERHC Energy Inc.'s Answer is limited to allegations made against ERHC Energy Inc.

3. Prior to and including the filing of its quarterly report on Form 10-Q for the period ended June 30, 2017 (hereinafter “Last 10-Q,”) ERHC Energy Inc. (hereinafter “ERHC” or the “Respondent”) had duly and timeously filed its periodic reports for over 10 years.
4. ERHC’s business model, in sum, is to obtain and monetize rights to oil and gas exploration blocks, and fund ERHC’s operations thereby in the ordinary and usual course of business including meeting its regulatory obligations.
5. From October 2017 however, ERHC was subjected to debilitating, convoluted and resource-draining litigation by a U.S. based company group whose securities are also registered with the Securities and Exchange Commission.
6. In a suit, cause # 2017-71987, before the 157th Judicial District Court of Harris County, Texas, the said adverse claimant sought and obtained temporary restraining orders preventing ERHC from dealing with or in any way transacting on ERHC’s prime asset, to wit, the rights to an oil and gas exploration block in the Democratic Republic of Sao Tome & Principe (hereinafter “EEZ Block 4”).
7. The temporary restraining order prevented ERHC from monetizing its prime asset, EEZ Block 4, which would have guaranteed ERHC the resources to continue to meet its obligations without exception, including but not limited to timeously filing its periodic filings.

8. The claimant also obtained a sealing order, restraining any disclosure of the litigation by the parties, which effectively prevented ERHC from making any disclosures regarding the litigation for fear of significant court sanction.
9. ERHC expected the litigation to last only a few months at the very worst, after which ERHC would be able to resume its filings but the litigation ended up lasting nearly two years, up till July 2019 when it was withdrawn by the claimant and dismissed.
10. The claimant had also brought legal proceedings overseas against ERHC's wholly-owned overseas subsidiary, those legal proceedings contributing to depriving ERHC of the resources to meet certain regulatory obligations.
11. ERHC filed a form 8-K on November 14, 2018, with the SEC, alluding to the fact of the overseas legal proceedings and the effect on ERHC's resources.
12. The overseas legal proceedings also ended at the end of July 2019.
13. ERHC is currently in discussions with the relevant authorities of the Government of Sao Tome & Principe with a view to monetizing EEZ Block 4 so that ERHC can, inter alia, resume funding the substantial professional advisory and external accounting work required to produce the significant portions of the quarterly and other periodic reports.
14. In the premises, ERHC 's prayer to the Securities and Exchange Commission is as follows:

- I. That the SEC take cognizance of ERHC's constrained circumstances aforesaid, as well as impending resolution of the material constraints, and ERHC's prior long history of prompt filings, and lift the suspension on trading in ERHC's securities; and
- II. That the SEC permit ERHC a reasonable time within which to resume its periodic filings and bring up-to-date, the arrears of filing, in view of the impending resolution of the bars to monetizing EEZ Block 4.

ERHC respectfully pleads and is willing to provide such clarifications, if any, as might be required.

Yours faithfully,

For: **ERHC Energy Inc.**



Peter Ntephe

President/CEO