

PELS RIJCKEN

District Court of the Northern Netherlands

Hearing of 3 September 2025

Case/roll number C/17/190788 / HA ZA 2023-172

Statement of rejoinder

concerning

Willem Henry Gates III

residing in Medina (United States of America)

Defendant No. 15

represented by: W. Heemskerk, LL.B., of The Hague

against

1. [REDACTED]
[REDACTED]
2. [REDACTED]
[REDACTED]
3. [REDACTED] i [REDACTED]
[REDACTED]
4. [REDACTED]
[REDACTED]
5. [REDACTED]
[REDACTED]
6. the late [REDACTED]
[REDACTED]
7. [REDACTED]
in [REDACTED]

claimants,

solicitor: Mr P.W.H. Stassen of Leeuwarden.

1 INTRODUCTION

- 1.1 Defendant No. 15, Mr William Henry Gates III ("**Gates**"), has taken note of the plaintiffs' ("**Minks et al.**") reply of 11 June 2025. It is apparent from this that Minks et al., despite the defendants' defence, persist in the erroneous assumption that the defendants form part of a global malicious conspiracy aimed at bringing about a 'Great Reset'.
- 1.2 In Gates's statement of defence (and in the statements of defence of the other defendants), this line of argument has been comprehensively and substantively refuted. It has been explained, for instance, that the coronavirus does in fact exist,¹ that the COVID-19 vaccines have been tested in accordance with the applicable procedures and by the competent authorities, found to be safe and authorised for the (European) market,² and that the vaccines do not contain graphene oxide or any other toxic or hazardous substances.³ There is no question of a malicious conspiracy of which the defendants are alleged to be a part. The unlawful conduct on the part of the defendants, as alleged by Minks et al., does not exist. Consequently, the claims brought by Minks et al. lack any basis.
- 1.3 Minks et al., however, refuse to accept this. They disregard the defence put forward by Gates and the other defendants, and dismiss it in their reply as lies and 'preferred reality'. The arguments put forward by Gates and the other defendants are not addressed in substance. In their reply, Minks et al. merely repeat the same arguments.
- 1.4 In his rejoinder, Gates therefore expressly maintains everything he put forward in his statement of defence. It follows from this alone that the claims of Minks et al. must be dismissed. For the sake of completeness, Gates adds the following comments.

2 RESPONSE TO THE REPLY BY MINKS ET AL.

2. 1 Firstly, it is once again apparent from the reply of Minks et al. that they are putting forward arguments which are not supported by the facts. Nor are these assertions supported by the exhibits relied upon by Minks et al. The assertions of Minks et al. are based on fundamental misinterpretations of (public) statements, (policy) documents and events. By way of illustration, and without claiming to be exhaustive, Gates points to the following misinterpretations by Minks et al.:

- The incorrect interpretation of the statement by former General Van Kappen, which is said to suggest that the world population constitutes a 'preferential reality'

¹ See the State's Statement of Defence, Chapter 2, Annex 1 to Gates's Statement of Defence. See also Bourla's Statement of Defence, Introduction, Annex 2 to Gates's Statement of Defence.

² See the State's Statement of Defence, Chapter 5, Annex 1 to Gates's Statement of Defence. See also Bourla's Statement of Defence, paragraphs 3.1 and 3.2, Annex 2 to Gates's Statement of Defence.

³ See the State's statement of defence, § 6.4, Annex 1 to Gates's statement of defence. See also Bourla's statement of defence, §§ 3.3.1–3.3.3 and 3.3.6–3.3.7, Annex 2 to Gates's statement of defence.

be held against him.⁴ Van Kappen made his statement in the specific context of a discussion on (information) warfare in geopolitical conflicts, in which the use of propaganda is a widely employed and well-known tactic. He did not speak of a secret conspiracy, nor of a systematic manipulation of everyday reporting on, for example, healthcare (such as the COVID-19 vaccine). Van Kappen's words have been taken out of context and distorted by Minks et al.

- The inaccurate description of the purpose and activities of the *Centre of Excellence for Strategic Communications* ("**StratCom**"). Minks et al. wrongly claim that StratCom, on behalf of NATO, secretly creates and disseminates false narratives that contribute to the so-called 'preferred reality'.⁵ However, according to public sources, StratCom is in fact a centre of expertise that focuses on studying and countering disinformation and advises NATO member states on this matter in the context of developing and conducting effective communication.⁶ StratCom therefore appears to have an advisory role, not operational powers. Furthermore, StratCom is not subordinate to any NATO entity,⁷ and it certainly does not operate covertly, given that it publishes its reports.⁸ It is therefore incorrect to claim that StratCom secretly creates a 'preferred reality', nor does this follow from Exhibit 96 attached to the reply.
- The incorrect conclusions drawn by Minks et al. from Exhibit 139, which they submitted. Contrary to what Minks et al. assert,⁹ it cannot be concluded from the article in *Nine for News* that Gates influenced governments' COVID-19 policies. The article refers to a reply from the New Zealand government to a freedom of information request made there, which reveals what communication took place between the Prime Minister of New Zealand and the Gates Foundation¹⁰ during a specific period, but does not provide any insight into what was discussed, let alone suggest that the Gates Foundation exerted a decisive influence on New Zealand's

⁴ See reply, § 7, with reference to Exhibit 92 to that reply.

⁵ See the reply, § 12–16, with reference to Exhibit 96 to that reply.

⁶ See: https://stratcomcoe.org/about_us/about-nato-stratcom-coe/5: "The NATO StratCom COE, based in Riga, Latvia, contributes to improved strategic communications capabilities within the Alliance and Allied nations. Strategic communication is an integral part of the efforts to achieve the Alliance's political and military objectives; it is therefore increasingly important that the Alliance communicates in an appropriate, timely, accurate and responsive manner regarding its evolving roles, objectives and missions. The Centre's mission is to make a tangible contribution to the strategic communications capabilities of NATO, NATO allies and NATO partners. Its strength lies in its multinational and cross-sector participants from the civilian and military, private and academic sectors, and in its use of modern technologies and virtual tools for analysis, research and decision-making. At the heart of the NATO StratCom COE is a diverse group of international experts with military, government and academic backgrounds – trainers, educators, analysts and researchers."

⁷ See: https://stratcomcoe.org/about_us/about-nato-stratcom-coe/5: "The NATO Strategic Communications Centre of Excellence is a multinational, NATO-accredited international military organisation, which is not part of the NATO Command Structure, nor subordinate to any other NATO entity. As such, the Centre does not therefore speak on behalf of NATO." [emphasis added].

⁸ See: <https://stratcomcoe.org/publications>.

⁹ See conclusion of the reply, § 153.

¹⁰ Formerly known as: the Bill & Melinda Gates Foundation.

government policy.¹¹ The *Forbes* article also has little (or, in fact, no) evidential value in this regard. That article does not even mention the coronavirus or the vaccine; it merely refers to isolated activities undertaken by Melinda French Gates.

- 2.2 Misinterpretations of this kind form the basis for the line of thinking put forward by Minks et al., who claim that there is a 'preferential reality'. Minks et al. link unrelated events into a single narrative which, whilst explanatory to them, is in fact incorrect. Their assumption of a 'preferential reality' in which malicious intentions are kept secret from the public is therefore not a fact, but a consequence of misinterpretations, selective use of sources and mistrust of complex social processes.

In this context, Gates is keen to emphasise that the idea of a 'preferential reality' is not only incorrect but also untenable. The international organisations and partnerships which, according to Minks et al., are the architects of the 'preferential reality',¹² generally operate in the public domain. Policy documents, (minutes of) meetings and reports are largely accessible to the public¹³ and are constantly the subject of debate, criticism and press coverage by independent (investigative) journalists. It is therefore inconceivable that a (to be clear: fictional) global plan to withhold facts and events could be kept secret from the world.

- 2.3 Secondly, Gates emphasises once again that he does not determine the policy of the international organisations and partnerships mentioned by Minks et al., which, according to them, are implementing the 'Great Reset' project. Nor has Gates deliberately influenced those organisations to carry out such a project. Any conduct on the part of such organisations and partnerships cannot be attributed to Gates, let alone held against him. Minks et al. do so wrongly in their reply.¹⁴
- 2.4 In his statement of defence, Gates has already explained that neither he, nor the Gates Foundation, nor any other legal entity with which Gates is associated by Minks et al.

¹¹ See Exhibit 139 to the reply.

¹² See, inter alia, the reply, § 9.

¹³ See, for example, the various online and public databases of NATO (Newsroom, available at: https://www.nato.int/cps/en/natohq/news_room.htm), the UN (Documents, available at: <https://www.un.org/en/our-work/documents>), the WHO (Governance, available at: <https://apps.who.int/gb/gov/>), the WEF (Publications, available at: <https://www.weforum.org/publications/>) and the EU (EUR-Lex, available at: <https://eur-lex.europa.eu/>, European Parliament Plenary, available at: <https://www.europarl.europa.eu/plenary/en/home.html>, and the European Council Document Register, available at: <https://www.consilium.europa.eu/en/documents/public-register/>).

¹⁴ Minks et al. appear to take the view that Gates exerts influence over virtually every government, sector or organisation in the world; see the reply, § 147. In addition to the organisations mentioned in § 2.10 above, Minks et al. also name other organisations over which Gates is alleged to exert influence; see, for example, the reply, § 150 and § 154. The same defence applies to these organisations: Gates is independent of them. Even if the Gates Foundation were to have made investments in the organisations mentioned, this does not automatically equate to having (and exercising) decisive influence. Furthermore, investments by the Gates Foundation are not investments by Gates personally.

is put forward, is decisive for the WHO's policy.¹⁵ The same applies to the other international organisations and partnerships mentioned by Minks et al., such as NATO, the UN, the WEF and the EU: Gates is not a member of the decision-making bodies of any of these organisations. Nor, incidentally, do Minks et al. claim that he is. They merely assert that Gates has determined or influenced the policies of these organisations, simply because he (or the Gates Foundation – a distinction that Minks et al. systematically, and wrongly, fail to make) is said to have invested in certain organisations or projects.¹⁶ Minks et al. do not explain exactly how Gates is said to have exerted influence on these international organisations and partnerships, nor what concrete results this is said to have led to. The overview of Gates' alleged investments¹⁷ – which, incidentally, was drawn up without citing any sources – is, in any case, wholly insufficient to support the claim that Gates exerted influence. The same applies to exhibits 138 to 140, whatever else may be said of them; nor can it be inferred from them that Gates deliberately exerted influence on the actions of governments or other international organisations and partnerships.

- 2.5 Furthermore, Gates has no special (internal) knowledge of the decision-making processes of the aforementioned international organisations. In the absence of such knowledge, Gates therefore disputes all the assertions made by Minks et al. on this matter.
- 2.6 Thirdly, Gates reiterates that the allegations made by Minks et al. are largely directed at the Gates Foundation, but that the Gates Foundation is not a party to these proceedings.¹⁸ For that reason alone, those allegations cannot be upheld.
- 2.7 Minks et al. have not set out any specific circumstances on the basis of which Gates would be personally liable. All the arguments put forward by Minks et al. concerning the alleged conduct and investments of the Gates Foundation are therefore irrelevant to the claims against Gates personally.

For the sake of completeness, Gates disputes that the conduct and investments of the Gates Foundation are, in any way whatsoever, unlawful in relation to Minks et al. Apart from the (already refuted and incorrect) assertion by Minks et al. that COVID-19 vaccines are unsafe, Minks et al. have not put forward any grounds on which the conduct and investments of the Gates Foundation could be regarded as unlawful towards them.

- 2.8 Finally, Gates notes that Minks et al., even in their reply, have failed to provide a reasoned argument and, moreover, have failed to substantiate that they have suffered damage as a result of a COVID-19 vaccine. Minks et al. have confined themselves to a single brief paragraph on damage, which refers only to generic heads of damage ("personal injury",

¹⁵ See statement of defence, § 3.3.3.

¹⁶ See reply, § 150 et seq.

¹⁷ See reply, § 150.

¹⁸ See also the statement of defence, § 3.3.2.

“psychological harm”, “economic loss”, “non-pecuniary loss”), but which do not state or explain *what* specific harm Minks et al. are alleged to have suffered individually.¹⁹ Furthermore, no further explanation is provided as to what damage the claimants Minks, Bosma, De Vries and Oudakker might have suffered, given that the medical certificates submitted by them show, in any event, that they are not experiencing any symptoms at all.²⁰

- 2.9 Furthermore, Minks et al. still do not allege or substantiate that they were vaccinated as a result of *Gates’s* conduct or statements. On the contrary: they emphatically disputed this at the hearing on 18 September 2024 (see statement of defence, § 4.4.2, p. 13) and did not retract this dispute in their statement of reply.
- 2.10 Furthermore, the evidence of vaccination submitted contains internal inconsistencies (for example, the dates in the vaccination records of claimants 4 and 5 do not correspond with the accompanying screenshots),²¹ and it is not always clear to which claimant the evidence submitted relates (as in a number of cases no names are mentioned, or names are given that differ from those in the writ of summons).²² Your court cannot therefore attach any weight to this evidence.

3 OFFER OF EVIDENCE

- 3.1 As Gates has already concluded in its statement of defence, Minks et al. have put forward entirely insufficient grounds for their claims to be upheld.²³ In these circumstances, the offer of evidence by Minks et al. must be disregarded. They have failed to fulfil their burden of proof – further evidence cannot therefore be admitted.

4 AMENDMENT OF THE CLAIM

- 4.1 Gates has taken note of the amendment to the claim by Minks et al. and considers that the new claim by Minks et al. should also be dismissed in its entirety.

5 CONCLUSION

- 5.1 As set out in the statement of defence.

¹⁹ See reply, § 115.

²⁰ See Exhibit 91 to the writ of summons. See also Gates’s statement of defence, § 4.3.6..

²¹ See Exhibit 91 to the reply.

²² See Exhibit 91 to the reply.

²³ See the statement of defence, § 2.1 et seq.

Solicitor
4.3.6..



Handled by
correspondence
telephone
email
Case No.

W. Heemskerk and P.F.B. Mulder
PO Box 11756, 2502 AT The Hague
+31 70 515 3847
willem.heemskerk@pelsrijcken.nl
11020837