

# PELS RIJCKEN

## **Court of North-Netherlands**

Roll seat of 3 September 2025

Case-/rollnumber C/17/190788 / HA ZA 2023-172

## **Conclusion of rejoinder**

regarding

### **Willem Henry Gates III**

Living in [REDACTED] (United States of America)

### **defendant sub 15**

lawyer: mr. W. Heemskerk in The Hague

against

1. [REDACTED] living in Sneek,  
municipality Súdwest-Fryslân,
  2. [REDACTED], living in  
Sneek, municipality Súdwest-Fryslân,
  3. [REDACTED], living in  
Sneek, municipality Súdwest-Fryslân,
  4. [REDACTED], living in  
Doetinchem,
  5. [REDACTED], living in  
Doetinchem,
  6. late [REDACTED], having lived in  
Zaandam, municipality Zaanstad,
  7. [REDACTED], living in  
Leeuwarden,
- eisers,**  
lawyer: mr. P.W.H. Stassen in Leeuwarden.

## 1 INTRODUCTION

- 1.1 Defendant 15, Mr. William Henry Gates III ("Gates"), has taken cognizance of the reply of plaintiffs ("█████ et al.") dated 11 June 2025. This reply shows that █████ et al., despite the defense of defendants, adhere to the incorrect premise that defendants are part of a global evil conspiracy aimed at bringing about a 'Great Reset'.
- 1.2 In Gates's statement of defense (and in the statements of defense of the other defendants), this line of reasoning was extensively and convincingly refuted. For example, it was explained that the coronavirus does indeed exist<sup>1</sup>, that the coronavirus vaccines have been tested, found safe, and approved for the (European) market according to applicable procedures and by the competent authorities,<sup>2</sup> and that the vaccines do not contain graphene oxide or other toxic or dangerous substances.<sup>3</sup> There is no malicious conspiracy involving the defendants. The unlawful conduct alleged by █████ et al. does not exist. Therefore, the basis for █████ et al.'s claims is invalid.
- 1.3 █████ et al., however, refuse to believe this. They ignore the defense of Gates and the other defendants, and in their reply, they dismiss it as lies and "the preferred reality." The arguments of Gates and the other defendants are not substantively addressed. In their reply, █████ et al. merely state more of the same.
- 1.4 In his rejoinder, Gates therefore explicitly upholds everything he argued in his statement of defense. This alone implies that the claims of █████ et al. must be dismissed. For the sake of completeness, Gates adds the following.

## 2 RESPONSE TO THE REPLY OF MINKS ET AL.

- 2.1 First, the reply by █████ et al. again demonstrates that they are taking positions that are unsupported by the facts. Nor are these positions supported by the exhibits █████ et al. rely on. The positions of █████ 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 █████ et al.:

- The incorrect interpretation of the statement by former General Van Kappen, which

<sup>1</sup> See the State's Statement of Defence, Chapter 2, Appendix 1 to Gates's statement of defence. See also Bourla's Statement of Defence, Introduction, Appendix 2 to Gates's statement of defence.

<sup>2</sup> See the State's Statement of Defence, Chapter 5, Appendix 1 to Gates's statement of defence. See also Bourla's Statement of Defence, §§ 3.1 and 3.2, Appendix 2 to Gates's statement of defence.

<sup>3</sup> See the State's Statement of Defence, § 6.4, Appendix 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, Appendix 2 to Gates's statement of defence.

Suggested that the world's population would be presented with a 'preferred reality'<sup>4</sup>. Van Kappen made his statement in the specific context of a discussion about (information) warfare in geopolitical conflicts, where propaganda is a frequently used and well-known tactic. He did not mention a secret conspiracy, nor did he mention the structural manipulation of everyday reporting on, for example, healthcare (such as the coronavirus vaccine). Van Kappen's words were taken out of context and distorted by █████ et al.

- The incorrect description of the purpose and activities of the Centre of Excellence for Strategic Communications ("StratCom"). █████ et al. wrongly claim that StratCom, at NATO's behest, secretly creates and disseminates false narratives that contribute to the so-called "preferred reality."<sup>5</sup> However, according to public sources, StratCom is in fact a knowledge center that focuses on studying and combating disinformation and advises NATO member states on this subject in the context of developing and implementing effective communication..<sup>6</sup> StratCom apparently has an advisory role, not operational powers. Furthermore, StratCom is not subordinate to any NATO entity.<sup>7</sup> and StratCom is certainly not operating secretly now that it is publishing its reports.<sup>8</sup> That StratCom secretly creates a 'preferred reality' is therefore incorrect and this does not follow from production 96 in the reply.
- The incorrect conclusions that █████ et al. draw from the production 139 submitted by them. Contrary to what █████ et al. state,<sup>9</sup> The Nine for News article does not suggest that Gates influenced government coronavirus policies. The article refers to a response letter from the New Zealand government to a request for information, which reveals the communication that took place between the Prime Minister of New Zealand and the Gates Foundation.<sup>10</sup> over a certain period, but provides no insight into what was discussed and certainly not that the Gates Foundation exerted a decisive influence on New Zealand government policy<sup>11</sup>.

<sup>4</sup> See reply, § 7, referring to production 92 in that reply.

<sup>5</sup> See reply, § 12-16, referring to production 96 in that reply.

<sup>6</sup> See: [https://stratcomcoe.org/about\\_us/about-nato-stratcom-coe/5](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, thus it is increasingly important that the Alliance communicates in an appropriate, timely, accurate and responsive manner on its evolving roles, objectives and missions. Mission of the Centre is to provide a tangible contribution to the strategic communications capabilities of NATO, NATO allies and NATO partners. It's strength is built by multinational and cross-sector participants from the civilian and military, private and academic sectors and usage of modern technologies, virtual tools for analyses, research and decision making. 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."

<sup>7</sup> See: [https://stratcomcoe.org/about\\_us/about-nato-stratcom-coe/5](https://stratcomcoe.org/about_us/about-nato-stratcom-coe/5): "NATO Strategic Communications Centre of Excellence is multi-nationally constituted and NATO-accredited international military organization, which is not part of the NATO Command Structure, nor subordinate to any other NATO entity. As such the Centre does not therefore speak for NATO." [emphasis added].

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

<sup>9</sup> See reply, § 153.

<sup>10</sup> Formerly named: Bill & Melinda Gates Foundation.

The Forbes article also has little (or rather, no) evidentiary value in this regard. It doesn't even mention the coronavirus or its vaccine; it only mentions isolated activities of Melinda French Gates.

- 2.2 These kinds of misinterpretations form the basis for █████ et al.'s idea that there is a "preferred reality." █████ et al. connect disparate events into a single, for them explanatory, but factually inaccurate narrative. Their assumption of a "preferred reality" in which malicious intent is kept secret from the public is therefore not a fact, but a consequence of misinterpretations, selective use of sources, and distrust of complex social processes.

In this context, Gates is keen to emphasize that the idea of a "preferred reality" is not only incorrect but also untenable. The international organizations and partnerships that, according to █████ et al., are leaders of this "preferred reality,"<sup>12</sup> often operate in the open. Policy documents, (minutes of) meetings, and reports are largely accessible to the public<sup>13</sup> 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 conceal facts and events would be concealed from the world.

- 2.3 Secondly, Gates reiterates that he does not determine the policies of the international organizations and partnerships mentioned by █████ et al., which they claim are implementing the "Great Reset" project. Nor did Gates consciously influence those organizations to carry out such a project. Any actions of such organizations and partnerships cannot be attributed to Gates, let alone to anyone. █████ et al. wrongly do so in their reply.<sup>14</sup>

- 2.4 In his statement of defense, Gates has already explained that neither he, nor the Gates Foundation or any other legal entity with which Gates was associated by █████ et al.

<sup>11</sup> See production 139 in the conclusion of reply.

<sup>12</sup> See, among others, the conclusion of the reply, § 9.

<sup>13</sup> For example, see NATO's various online and public databases (Newsroom, available for consultation via: [https://www.nato.int/cps/en/natohq/news\\_room.htm](https://www.nato.int/cps/en/natohq/news_room.htm)), de VN (Documents, available for consultation via: <https://www.un.org/en/our-work/documents>), de WHO (Governance, available for consultation via: <https://apps.who.int/gb/gov/>), de WEF (Publications, available for consultation via: <https://www.weforum.org/publications/>) and the EU (EUR-Lex, raadpleegbaar via: <https://eur-lex.europa.eu/>, European Parliament Plenary, available for consultation via: <https://www.europarl.europa.eu/plenary/en/home.html>, and European Council Document Register, available for consultation via: <https://www.consilium.europa.eu/en/documents/public-register/>).

<sup>14</sup> █████ et al. appear to argue that Gates exerts influence on virtually every government, sector, or organization in the world; see the reply, § 147. Besides the organizations mentioned in § 2.10 above, █████ et al. also name other organizations that Gates allegedly influences; see, for example, the reply, § 150 and § 154. The same defense applies to these organizations: Gates is independent of them. To the extent that the Gates Foundation may have made investments in the aforementioned organizations, this does not equate to having (and exercising) decisive influence. Moreover, investments by the Gates Foundation are not investments by Gates personally..

has any influence on WHO policy.<sup>15</sup> The same applies to the other international organizations and partnerships mentioned by █████ 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 organizations. █████ et al., incidentally, do not claim this. The bare assertion remains that Gates determined or influenced the policies of these organizations solely because he (or the Gates Foundation—that distinction is structurally, incorrectly, not made by █████ et al.) invested in certain organizations or projects.<sup>16</sup> █████ et al. do not explain exactly how Gates allegedly exerted influence on these international organizations and partnerships, nor what this would have led to in concrete terms. The overview of Gates' alleged investments (which, incidentally, was compiled without citing the source)<sup>17</sup> is, in any case, completely insufficient to establish Gates' alleged influence. The same applies to exhibits 138 through 140, whatever their merits; they, too, do not allow the conclusion that Gates deliberately influenced the actions of governments or other international organizations and partnerships.

2.5 Moreover, Gates also has no special (internal) knowledge of the decision-making processes of the aforementioned international organizations. Due to a lack of scientific knowledge, Gates therefore disputes all the positions taken by █████ et al. on this matter.

2.6 Thirdly, Gates reiterates that the accusations of █████ et al. are largely directed at the Gates Foundation, but that the Gates Foundation is not a party to these proceedings.<sup>18</sup> These accusations cannot succeed for that reason alone.

2.7 █████ et al. have not provided any specific circumstances that would make Gates personally liable. Therefore, all █████ et al.'s assertions regarding the alleged conduct and investments of the Gates Foundation are irrelevant to the claims against Gates personally.

Gates disputes, for the sake of completeness, that the Gates Foundation's actions and investments are, in any way whatsoever, unlawful towards █████ et al. Unlike the (already refuted and incorrect) assertion by █████ et al. that coronavirus vaccines are unsafe, █████ et al. have not asserted anything that would allow the Gates Foundation's actions and investments to be considered unlawful towards them.

2.8 Finally, Gates notes that █████ et al., even in their reply, have failed to substantiate and otherwise fail to substantiate their claim that they suffered damage as a result of a coronavirus vaccine. █████ et al. limit themselves to one short paragraph about damage, which only addresses generic damages ("personal injury"),

<sup>15</sup> See conclusion of answer, § 3.3.3.

<sup>16</sup> See conclusion of reply, § 150 e.v..

<sup>17</sup> See conclusion of reply, § 150.

<sup>18</sup> See also conclusion of answer, § 3.3.2.

"psychological damage", "economic damage", "non-material damage"), but which does not state or explain what specific damage [REDACTED] et al. individually may have suffered.<sup>19</sup> Furthermore, no further explanation is given as to what damage the plaintiffs [REDACTED] Bosma, De Vries and Oudakker could have suffered, since the doctor's certificates they submitted show that they are not experiencing any complaints at all.<sup>20</sup>

2.9 Furthermore, [REDACTED] et al. still do not assert or substantiate that they were vaccinated as a result of Gates' actions or statements. On the contrary: they strongly disputed this at the hearing of September 18, 2024 (see statement of defense, § 4.4.2, p. 13) and did not retract this dispute in their statement of reply.

2.10 In addition, the submitted evidence of vaccination contains internal contradictions (for example, the dates in the vaccination booklets of claimants 4 and 5 do not correspond with the accompanying screenshots),<sup>21</sup> and that it is not always clear to which claimant the evidence submitted relates (because in some of them no names are mentioned, or names that differ from those mentioned in the summons).<sup>22</sup> Your court cannot therefore attach any value to this evidence.

### 3 EVIDENCE OFFER

3.1 As Gates already concluded in his answer, [REDACTED] et al. have failed to provide sufficient grounds for granting their claims.<sup>23</sup> In this state of affairs, the offer of proof by [REDACTED] et al. must be rejected. They have not met the burden of proof incumbent upon them – further evidence cannot therefore be permitted.

### 4 CLAIM AMENDMENT

4.1 Gates has taken note of the amendment to the claim by [REDACTED] et al. and believes that the new claim by [REDACTED] et al. should also be rejected in its entirety.

### 5 CONCLUSION

5.1 As per conclusion of answer.

<sup>19</sup> See conclusion of reply, § 115.

<sup>20</sup> See production 91 in the summons. See also conclusion of answer of Gates, § 4.3.6"

<sup>21</sup> See production 91 in the conclusion of reply.

<sup>22</sup> See production 91 in the conclusion of reply.

<sup>23</sup> See conclusion of answer, § 2.1 e.v.

Advocaat



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