
Date July 21, 2026 +

To The Gates Foundation

From WilmerHale

Re **WilmerHale Review of the Gates Foundation's Engagement with Jeffrey Epstein**

With the support of its Chair and Governing Board, the Gates Foundation engaged WilmerHale to assess the foundation's past engagement with Jeffrey Epstein, as well as its policies for vetting and developing philanthropic partnerships.¹

The review took approximately five months to complete. During that time, WilmerHale conducted more than 50 interviews with current and former foundation personnel, including Mr. Gates, and reviewed extensive written materials relevant to the review. WilmerHale received cooperation from the foundation's Legal Department throughout the process.

High-Level Summary of Findings

Based on interviews and a review of foundation records, WilmerHale found no evidence of participation in or knowledge of Epstein's ongoing sex trafficking operations or criminal activities. WilmerHale found no evidence that the foundation was contemporaneously aware of Epstein's use of the foundation's name to help advance his conduct. WilmerHale also found no evidence that Epstein was paid by the foundation.

In 2011, Epstein was introduced to Mr. Gates and other foundation personnel by an advisor who held a dual role at the foundation and in Mr. Gates's personal office. The foundation's interactions with Epstein involved two matters: (1) the potential creation of a donor-advised fund entity ("DAF"), and (2) Mr. Gates's engagement with a nonprofit organization that later became a foundation grantee. Epstein learned information about Mr. Gates and the foundation through two employees who shared sensitive information and forwarded email communications to Epstein without notifying Mr. Gates or foundation staff, which violated foundation policy.

Donor-Advised Fund

In 2011, Epstein recommended that Mr. Gates consider establishing a DAF affiliated with the foundation that would pool contributions from high-net-worth individuals to support global public health, which is core to the foundation's mission. Mr. Gates proposed in August 2011 that foundation staff discuss the DAF concept with Epstein because of Epstein's role advising his

¹ The review focused on the foundation's interactions with Epstein. WilmerHale did not have access to Mr. Gates's personal communications and did not review Epstein's interactions with Mr. Gates in a personal capacity or separate legal entities associated with Mr. Gates, including Gates Ventures and the Gates Foundation Trust.

own clients in the estate planning process, when donors may consider philanthropic giving strategies. The DAF concept was discussed with Epstein from 2011 to 2014, in several meetings focused on donor engagement and the legal aspects of establishing a DAF entity and providing tax benefits to donors. In December 2014, Epstein hosted a breakfast meeting at his Manhattan residence with Mr. Gates, foundation staff, and a group of potential donors, with the goal of securing commitments to the DAF. Epstein's guests did not appear informed about the DAF and it became clear to Mr. Gates and foundation staff that Epstein had misrepresented the potential donors' knowledge of and willingness to commit to the DAF. Soon thereafter, the foundation stopped working with Epstein on the DAF concept.

International Peace Institute

In 2012, Epstein introduced Mr. Gates to the president of the International Peace Institute ("IPI"), a nonprofit headquartered in New York. In March 2013, Mr. Gates received a presentation from IPI about its geopolitical analysis relating to polio eradication campaigns, and he subsequently requested that foundation staff make a grant to IPI. The foundation conducted diligence on IPI before doing so and then executed a grant agreement in October 2013.

At the time of the initial grant to IPI, Mr. Gates was aware that the president of IPI had a connection to Epstein. In 2020, media reported that the president of IPI had accepted personal loans from Epstein and that Epstein had donated money to the organization. After that reporting, the president of IPI resigned, and IPI commissioned an independent investigation that found no other ties to Epstein. In light of those steps, as well as the continued interest in IPI's geopolitical analysis in polio-affected regions, the foundation continued to fund the organization.

Other Findings Related to the Foundation's Engagement with Epstein

WilmerHale identified roughly 30 meetings between Epstein and ten foundation leaders and staff, including Mr. Gates, from 2011 to 2014—including one meeting on the foundation's campus and several meetings at Epstein's Manhattan residence. The foundation's meetings with Epstein appear to have focused on the DAF concept, donor engagement, the foundation's polio strategy, and introductions to IPI. Based on interviews and a review of available foundation records, WilmerHale found no evidence that these meetings were unrelated to philanthropy or involved illegal conduct.

Mr. Gates was aware of reputational concerns related to Epstein's prior conviction and sentencing for a sex-related offense when he began conversations with him in 2011. Foundation staff working on the potential DAF raised on multiple occasions the risks of associating with Epstein because of his prior conviction, and those concerns were raised to senior leadership, including Mr. Gates.

Summary of Enhancements to the Foundation's Policies and Processes

Based on the above, and in consultation with WilmerHale, the Governing Board has approved several enhancements to the foundation's governance framework and internal processes:

- **Creating a centralized vetting process** for brokers, donor advisors, co-funders, and individuals who facilitate funding partnerships and are connected to the foundation through Mr. Gates, the Governing Board, or members of the Executive Leadership Team. This will include a framework for foundation engagement with third parties that outlines the manner in which dealings between the foundation and third-party individuals, organizations, businesses, and entities be conducted—including heightened review of proposed foundation meetings that take place at personal residences.
- **Creating an escalation process for organizational risks** on projects introduced by Mr. Gates, a member of the Governing Board, or members of the Executive Leadership Team. Through this process, the foundation will define relevant organizational and reputational risks for screening and escalation to the CEO, who will then have authority to continue the proposed engagement or consult with the foundation's full Governing Board on a final decision.
- **Clarifying roles and scope of authority for personnel who hold dual roles with the foundation and other entities associated with Mr. Gates**, including personnel who are seconded to the foundation or jointly employed by the foundation and another entity associated with Mr. Gates. This enhanced coordination between the foundation and other entities associated with Mr. Gates will help clarify relevant employees' roles, responsibilities, and scope of authority within each organization, and provide employees with greater insight into whether certain individuals should have limited or no access to particular records and sensitive information.
- **Further enhancing policies that address conflicts of interest.** The foundation will expand its policies to cover a broader range of actual or potential conflicts of interest that may result in personal gain, including association with third-party brokers.
- **Further enhancing policies and training related to the handling of sensitive and/or confidential internal foundation records.** While the foundation has existing policies that address accessing and sharing sensitive or confidential records, the foundation will make further enhancements requiring approvals for the disclosure of particularly sensitive or confidential material and strengthened procedures to address any unauthorized disclosure of such material.