

LIMIT CASES: SOVEREIGN CITIZENS AND A JURISPRUDENCE OF CONSEQUENCES

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INTRODUCTION

A handful of years before Miller published his 1965 article on a ‘jurisprudence of consequences’, Arthur Porth, in 1961, refused to file his US income tax returns by drawing on Sovereign Citizen arguments that can still be heard today in courts all around the world. Porth lost his case, and so has anyone else who denies the sovereign hold of the state over their person in a court of law. And yet exactly the same cases keep coming back, argued with exactly the same arguments, often by exactly the same people. Sixty years after Porth lost his case, Sovereign Citizen numbers are steadily growing, as the movement itself finds a footing in dozens of countries.

The Sovereign Citizen movement is puzzling and has so far largely escaped the attention of empirical legal scholars. From the point of view of a ‘jurisprudence of consequences’, however, the matter is far from trivial. Sovereign Citizens embody a wholesale rejection of the legal system – the limit consequence, one might say, of any jurisprudence. How might we account for Sovereign Citizenship, and, in turn, what light might Sovereign Citizenship shed on a ‘jurisprudence of consequences’?

Such questions are difficult to answer. This is so primarily because empirical data about these people and their concerns are all but missing (Baldino & Lucas, 2019; Sarteschi, 2021; Vargen & Challacombe, 2023), particularly in the Netherlands (De Boer, 2024a, 2024b, forthcoming; Siegel, 2024). We know next to nothing about who these people are, what motivates them to seek recourse to Sovereign Citizenship, or what segment of society they belong to, let alone what their views are on law and the legal system. We also know next to nothing about the street-level bureaucrats that engage with Sovereign Citizens on a day-to-day basis or about the kinds of concerns these legal officials bring to their interactions with Sovereign Citizens.

There is one exception to this lack of empirical data: case law. Hundreds of cases featuring Sovereign Citizens have been issued by judiciaries all over the world. What such data allow for in terms of empirical analysis differs for

each jurisdiction. Case reports in all countries disclose the topic and the verdict. American and Canadian court documents also liberally share information about the parties considered private in other jurisdictions. These can be profitably mined for demographic questions such as age, gender, marital status and even socio-economic status. Dutch and German court cases afford fewer answers to such questions. Yet for these two countries, too, one can ascertain case activity (quantity), the geographic distribution of cases, limited demographic information (gender and, to a lesser extent, age), and, still more limited, information on socio-economic status (mean income, homeownership).

This case law data, however, is as yet unexplored in scholarship. In this chapter, I explore extant Dutch Sovereign Citizen case law, using demographic data to gain provisional insights into this group of people. My research question for this chapter is as follows: what demographic and socio-economic patterns appear in Dutch Sovereign Citizen legal cases, and how might these be explained in future research? To answer this question, I begin with a treatment of the legal (Section 2) and analytical (Section 3) frameworks. Following this, the section on methodology walks through the database that has been compiled for the purposes of this study (Section 3). Based on the data drawn from Dutch case law, I present the results for case activity, the geographic distribution of cases, demographic information and socio-economic status (Section 4). In the ensuing discussion section, I connect my findings with the scarce empirical data available in secondary literature, especially on Germany, the United States and Canada. Building on existing literature, I then propose potential explanations and avenues for further research by means of which these combined data can potentially be accounted for (Section 5). A brief conclusion ends the article (Section 6).

2 LEGAL FRAMEWORK

Sovereign Citizens reject the legal system in its entirety. In theory, this means that their interactions with the law run the gamut of legal fields and can involve the private, administrative and criminal legal domain. In practice, Sovereign Citizen case activity occurs predominantly in the following situations (De Boer, 2024a; Netolitzky, 2023):

1. to avoid the obligation to pay (income) tax, fines, insurance premiums or other payment obligations;
2. to attack or obstruct government and institutional officials (often by challenging the judge);
3. to avoid prosecution in criminal cases.

This means that practically all cases feature the government as a party and predominantly fall within the domain of tax law, administrative law and criminal

law; Sovereign Citizen cases in which the other party is an ordinary citizen are rare. The first (1) category constitutes the vast majority both in the Netherlands and internationally (De Boer, 2024a; Netolitzky, 2023; Slater, 2016). Some 40% of the cases concern income tax (and often the national insurance premium). A few cases concern motor vehicle, municipal, water board or corporate taxes; cases about traffic fines are similarly frequent. Cases in which judges are challenged by Sovereign Citizens (so-called ‘*wrakingszaken*’) comprise approximately 25% of the total number, whereas criminal cases make up only a small percentage (ca. 5%).

3 ANALYTICAL FRAMEWORK

Sovereign Citizenship has rarely been the subject of academic attention and still more rarely of legal academic attention. The existing legal scholarship concentrates primarily on mapping the interactions between Sovereign Citizens and the legal system, covering recurrent Sovereign Citizen arguments, topics of interest, and advancing policy recommendations with which one can respond to Sovereign Citizens (US: e.g., Barrows, 2021; Kalinowski, 2018; Ligon, 2021; McRoberts, 2019; Canada: e.g., Netolitzky, 2017, 2018 and 2023; Netherlands: De Boer, 2024a, 2024b; Australia and New Zealand: Hobbs et al., 2023). Scholarship that seeks to grasp the intellectual foundations of this movement (de Boer, forthcoming; Levin, 2001; Levin & Mitchell, 1999), that interprets it as a form of legal pluralism or legal populism (Arnold & Fletcher, 2023; Harris, 2005; Koniak, 1996), or that sociologically accounts for its rise and current popularity (Fuchs & Kretschmann, 2019; Hodge, 2019; Schönberger & Schönberger, 2023; Siegel, 2024) is much rarer. Equally rare are accounts that advance such interpretations for the phenomenon as an *international* phenomenon, and not solely as a national one (De Boer, forthcoming; Hobbs et al., 2023). Altogether absent, finally, is scholarship that enlists the phenomenon of Sovereign Citizenship to shed light on larger debates in legal research, either in legal philosophy (e.g. the relationship of law to violence), legal history (e.g. the long history of states and state resistance), or in legal sociology (e.g. notions of legal consciousness or legal alienation).

The absence of empirical data has rendered such analyses impossible. In this chapter I begin by connecting Sovereign Citizenship to larger research concerns by exploring the quantitative data available in extant Dutch case law. Such data can yield patterns among Sovereign Citizen characteristics and, in due course, generate and test hypotheses explaining these patterns.

4 DATA & METHODOLOGY

The data on which this chapter is based comprises 166 cases lodged in Dutch courts by Sovereign Citizens. The earliest available cases are from 2013; the database includes cases that were published up to October 26, 2024, when the

final systematic search was conducted. Both the public database administered by the Dutch Judiciary (<https://rechtspraak.nl>) and the paid legal database InView (<https://inview.nl>) have been consulted.

Previous research has detailed the difficulties in assembling Sovereign Citizen cases (De Boer, 2024a; Griffin, 2022, pp. 63-90; Netolitzky, 2017, 2018, 2023; Slater, 2016, pp. 22-23; Smith, 2016, pp. 26-27). In contradistinction to Germany or the USA, Dutch court decisions involving Sovereign Citizens are rarely labelled as such. A simple search for 'Sovereign Citizen' ('autono*' or 'soeverein*') yields only a handful of Dutch cases, which are rarely cross-referenced with other cases. Slater (2016), on the other hand, found 530 US cases with the single search term 'Sovereign w/1 Citizen'; searching German databases with the search term 'Reichsbürger' or 'Selbstverwalter' is similarly effective (~700 hits). As in Canada (Netolitzky, 2017, 2018, 2023), the so-called 'snowball method' is most effective for the Netherlands: beginning with the secure cases of self-identified Sovereign Citizens, one can search for distinct Sovereign Citizen terminology used in those secure cases (e.g., 'levende mens', 'mens van vlees en bloed') to find more examples. Those further examples, in turn, yield more special terminology that can be used to accumulate more cases (e.g. 'motu proprio', 'Plakkaat van Verlatinghe', 'SHAEF'). At times, certain recurring Sovereign Citizen organisations ('Nationale Bond Overheid(s)zaken') or gurus recurrently helping Sovereign Citizens in court ('P. Dolleman', 'Y. Plate') yield further results. Existing scholarship on the phenomenon (De Boer, 2024a; Siegel, 2024) or other external sources, such as books written by Sovereign Citizens (e.g. Van Leeuwen, 2023) and media reports, help further identify recurring patterns, language and legal topics and sometimes specific cases. In sum, the search words 'autono*', 'soeverein*', 'levende mens', 'mens van vlees en bloed', 'motu proprio', 'Plakkaat van Verlatinghe', 'SHAEF' have all been used (including plural forms) to find cases. These searches were supplemented by additional cases found through the alternative routes described previously.¹

These court cases have subsequently been mined first for formal information (date, location, topic), and, subsequently, the texts themselves have been systematically checked for information on gender (searching for key words like 'he/she', 'his/hers'), age (searching for date of births), and socio-economic status (searching for reported income in tax cases; evidence of home ownership, leases or debts; evidence of occupation (self-employed; salaried; benefits)). The assembled data has been compiled into Excel data lists: for cases, listed in Excel on the Y-axis, I wrote down the presence or absence of this data on the X-axis. These lists were then loaded into the programming language R and converted into computer code by the author. Additional data was brought in for a map of Dutch provinces; for the province population density in 2024; and for median Dutch incomes between

1. A copy of the database is available upon contacting the author.

2013 and 2024. In all these cases, I have taken publicly available data from the Dutch Central Bureau of Statistics (<https://cbs.nl>), which publishes this data as downloadable R packages, which were subsequently matched in R with my court case data. In R, I subsequently created graphs and tables that give an overview of the collected data.

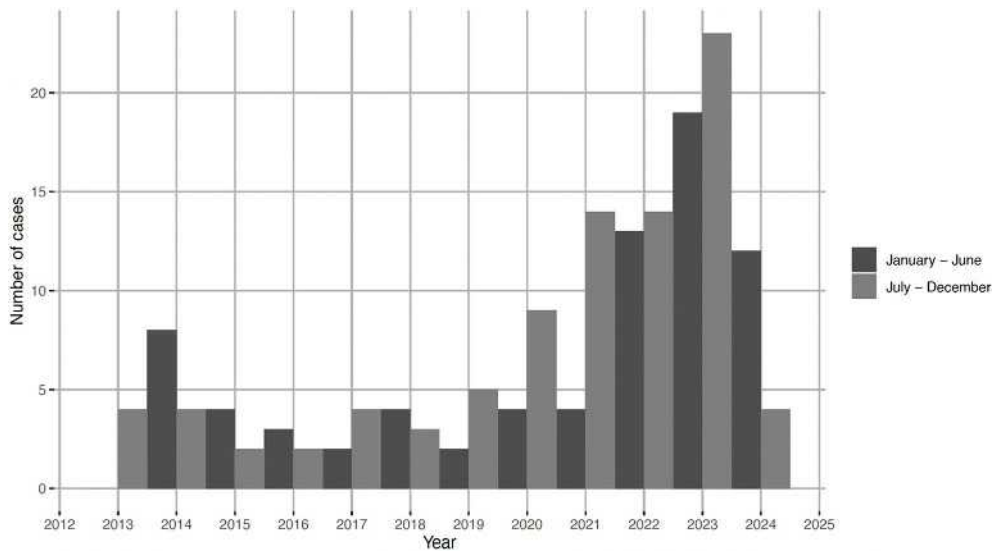
The present collection of cases is assuredly incomplete and offers, in addition, an assuredly incomplete picture of the movement at large: only 4.17% of all court cases end up being published, while still fewer disputes actually make it to court – and this is true even as the Dutch Sovereign Citizens can be characterised as litigious (Rechtspraak Jaarverslag, 2023; Van der Tak, 2024). But among the published cases, too, many Sovereign Citizen cases remain unidentified. On rare occasions, for example, I have come across self-published court documents of Sovereign Citizens which, in the Netherlands, are not attached to rulings. The corresponding, published judgment would frequently bear no trace of Sovereign Citizen language; it is carefully erased. Such erasure, in all likelihood, is the norm. Sovereign Citizen cases are normally clear-cut from a legal perspective and Sovereign Citizen arguments legally irrelevant. As a consequence, not every published judgment will include Sovereign Citizen arguments or language, making it all but certain that many cases are being overlooked. These considerations should be taken into account when assessing the results.

5 RESULTS

A comprehensive collection of extant case law on Sovereign Citizens in the Netherlands has yielded 166 cases, spanning the period 2013 to 26 October 2024. The results presented in this section are based on this corpus. The results cover, in turn, trends in case activity (1); geographic distribution of cases across Dutch Provinces (2); demographic information (gender and age; 3); and socio-economic information (mean income; employment; housing situation; 4). I will now present these in turn.

5.1 *Case Volume*

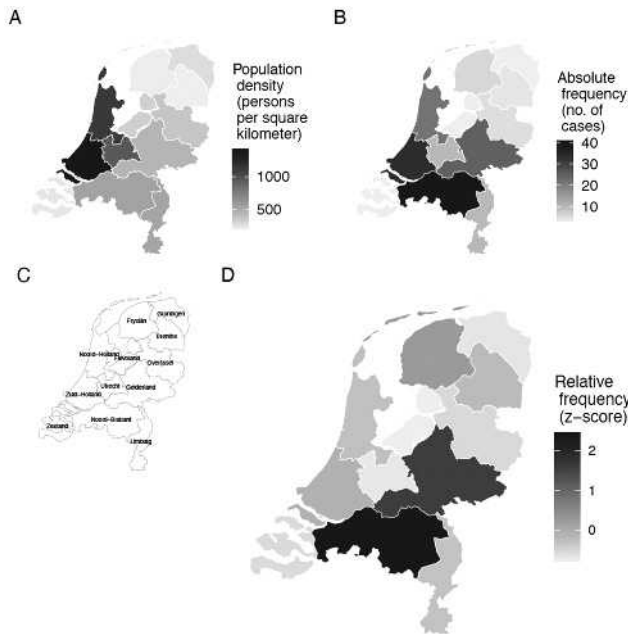
The case volume is presented here in blocks of 6 months (January to June and July to December in black and grey colors, respectively), particularly to ensure an accurate representation for the incomplete year 2024 (Figure 1). On the Y axis, the number of cases is plotted, which hover between 0 and 23; on the X-axis, the years have been plotted in blocks of 6 months, starting in the second half of 2012 and ending with the first half of 2025. The data clearly indicates the growth of this phenomenon in recent years, especially since 2020. Until this year, more than five cases every 6 months was exceptional, but thereafter, more than ten cases becomes the norm, with well over 40 cases in the year 2023.

Figure 1 **Distribution of Dutch Sovereign Citizen Cases over Time, 2012-2024**

5.2 *Geographic Distribution*

The geographic distribution of cases across the Dutch Provinces shows the frequency of Sovereign Citizen cases in different regions of the Netherlands. Four maps are presented here (Figure 2), representing, and in that order, the population density of Dutch provinces (map A), the absolute frequency of Sovereign Citizen cases per province (map B), and the relative frequency of Sovereign Citizen cases per province (map D); map C is a legend map, indicating the names of all Dutch provinces. The relative frequency is calculated by plotting the number of cases per province relative to its population density. Map D is thus designed to capture the geographic distribution of cases across the Netherlands, corrected for population density.

Figure 2 **Maps for Province Population Density (A), the Absolute (B) and Relative (D) Distribution of Dutch Sovereign Citizen in the Netherlands, Including a Legend (C)**



On a scale which corrects for population density, the data shows certain provinces, like North-Brabant and Gelderland, to be hotbeds of Sovereign Citizen litigation. Other provinces, like North-Holland and South-Holland, score high in terms of absolute number of cases but also have a high population density, resulting in a lower relative frequency score. Friesland, on the other hand, whose absolute number of cases is relatively modest, has a higher relative frequency score on account of its few inhabitants.

Some caution should be observed in using this data. Since cases are anonymised, the personalised data of Sovereign Citizens (zip codes) involved in cases cannot be collected. Instead, the data represented are the court venues in which the respective cases were handled. It may well be, however, that certain cases are decided in places very different from where Sovereign Citizens live. This could happen for a number of reasons, for example because rules of jurisdiction result in many Zeeland cases ending up being judged in North-Brabant or because cases involving traffic fines will be brought before the court closest to where the defendant was fined, even if they live elsewhere. Other cases had to be excluded altogether because the designated court (such as the Administrative Court for Trade and Industry in Utrecht) has its seat in one place. Another caveat is potential differences in publication practices between courts: North-Brabant,

for example, might publish a relatively higher percentage of its cases than, say, Groningen. Here, too, caution is required, because we have no information about such publication practices. A more complete picture would require access to the non-anonymised data of the Dutch judiciary.

5.3 *Gender and Age*

The case law data set, when checked for gender, breaks down into the following eight categories: male, female, couple, two men, mixed group, male group, group (composition unknown) and unknown. See Table 1 for an overview of this breakdown.

Table 1 Gender Distribution in Dutch Sovereign Citizen Cases (N = 166)

Gender	Frequency (Percentage of Total)
Male	95 (57.23)
Female	42 (25.30)
Couple	1 (0.60)
Two men	3 (1.81)
Mixed group	4 (2.41)
Male group	1 (0.60)
Group, composition unknown	10 (6.02)
Unknown	10 (6.02)
Total	166 (100)

This data shows that for every 100 male Sovereign Citizens who appear in court, the number of female Sovereign Citizens who appear is about 42. In the 137 cases in which there is one Sovereign Citizen and the gender is known, 30.7% of the cases involves a woman (42 cases divided by a total of 137).

The data set, when checked for age, yields limited results: only 11 of 166 cases included a birthdate. In this small sample, pieced together by data which the courts disclosed by accident, the median year of birth was 1967 ($SD = 10.18$; $n = 11$). This amounts to an average age of 56 years. Dates of birth are not usually published by the Dutch judiciary, and a more accurate picture will require access to the judiciary's internal database.

5.4 *Socio-Economic Status*

The case law data set, when checked for hints of socio-economic status, yield multiple factors, which have here been grouped into three categories:

modal income; employment (self-employed/small business owner; salaried employment); housing situation (homeowner; rent) (Tables 2-4).²

The reported income has been set against that year's modal income, as reported by the Dutch Central Planning Bureau (Macro Economic Exploration Report, 2023). Three cases reported either debts or payment difficulties; other cases did not yield information on this front.

Table 2 presents the available data disclosing Sovereign Citizen incomes, which amounts to 18% of the cases. The mean income in these cases falls below the mean Dutch income and comes in at 0.86 of the modal income, with – as the standard deviation shows – few exceptions. They go as far back as to 2009 (and have always been set against that year's mean income), and incomes range from €10,000.- to €45,000.-, with the vast majority falling between €25,000.- and €35,000.-.

Table 2 **Income Distribution in Dutch Sovereign Citizen Cases (N = 122)**

Income	
Reported (in tax cases)	22 (18%)
Unknown	100 (82%)
Total	122 (100%)
Mean reported income, ranging from ca. €10,000.- to €45,000.- (2009-2023)	0.86 modal income; Standard Deviation 0.36

Table 3 presents the available data on employment of Sovereign Citizens, grouped into four categories: self-employed or small business owner; salaried employment; on government benefits; or unknown. In about 25% of the cases such information is forthcoming, and 17.21% of these cases involve self-employed individuals. Salaried individuals or individuals on benefits are much rarer (at 2.46% and 5.74%).

Table 3 **Employment Data in Dutch Sovereign Citizen Cases (N = 122)**

Employment	
Self-employed/small business owner	21 (17.21%)
Salaried employment	3 (2.46%)
(Partial) benefits	7 (5.74%)
Unknown	91 (74.60%)
Total	122 (100%)

2. The data set has been corrected for recurrent cases (first, second and third instance), and N = 122.

Table 4 shows the scant available data on housing, grouped into three categories: homeowner; rent; or unknown. Such information was available only in 10 of 122 cases. Of these ten, six were homeowners and four were renting property.

Table 4 Housing Data in Dutch Sovereign Citizen Cases (N = 122)

Housing Situation	
Homeowner	6 (4.92%)
Rent	4 (2.46%)
Unknown	112 (91.80%)
Total	122 (100%)

5.5 *Reflection on the Data*

In the previous section, I have presented the available data for Sovereign Citizen cases in the Netherlands, homing in on four variables: case activity; geographical distribution; gender (and age?) of the Sovereign Citizen(s) involved; socio-economic status of the Sovereign Citizen(s) involved. In this section, I will compare these results with data available from other countries and suggest potential explanations that follow from the patterns identified. These might explain *why* people are attracted to Sovereign Citizenship and should be verified in future large-scale quantitative case law analysis.

5.5.1 *Case Activity*

In previous research, the steady growth of this phenomenon is often stipulated but never backed up with publicly available data. For example, Dutch security agencies, presumably by tracking online activity, provide size estimates, claim a strong growth in the recent past and predict growth for the foreseeable future (AIVD, NCTV, 2023). The current data set illustrates when the phenomenon first found its way to the courts (in 2013). This occurred a few years after the phenomenon is said to have developed in the Netherlands (2010; AIVD, NCTV, 2023) and when its popularity sharply increased (in 2020; AIVD, NCTV, 2023). This would mean that court activity broadly corresponds to Sovereign Citizen activity in society at large. If this is true, the extant cases perhaps yield another result. While it is too early to draw firm conclusions on this front, the data does not seem to bear out the predicted future growth for 2024 and beyond. The data perhaps even hints at a decline of Sovereign Citizen activity in 2024 compared to previous years, something which has also been tentatively suggested in a recent report (Geurtjens et al., 2024).

Data on Sovereign Citizen case activity in other countries is limited. A number of studies list substantial numbers of cases but do not plot these on a temporal axis (see the overview for all contributions in Table 5). Two exceptions to this

trend, however, make for interesting comparative material to our results. In a US study (Slater, 2016), 530 cases were analysed and in a Canadian study (Netolitzky, 2023), 1,298 cases. The US study has assembled cases for the years 2006-2015 and demonstrated a sharp increase in numbers starting in 2011 all the way through a part of 2016, when the trend flattened (Slater, 2016, p. 6). The data on Canada, which covers the period 1995 to 2021, similarly demonstrates a marked uptick in the year 2011, peaking in 2013, and slowly coming down until 2021 (but never down to the pre-2011 level).

Table 5 Sovereign Citizen Case Law Data Sets Abroad

Country	Number of Cases	Years	Authors
USA	150	N/A	Smith (2016)
USA	156	1973-2017	Kalinowski (2018)
USA	530	2006-2015	Slater (2016)
Canada	725	N/A	Netolitzky (2017)
Canada	1,298	1995-2021	Netolitzky (2023)
Australia and New Zealand	>200	1980-2023	Hobbs et al. (2023)
Germany	>700	2006-2025	Unstudied

Scholarship has often understood the Sovereign Citizen phenomenon as a (sometimes protracted) response to severe socio-economic crises (de Boer, 2024a, p. 314; de Boer, forthcoming; Hodge, 2019; Kent, 2015; Netolitzky, 2023; Siegel, 2024, p. 207). One example is the American farm crisis of the 1980s, whose devastating impact is often held responsible for the contemporaneous growth of the phenomenon in the USA (e.g., Levitas, 2002, pp. 168-176; Schlatter, 2006, pp. 84-123). It is the 2008 financial crisis, in particular, however, that has often been identified to explain sharp rises in Sovereign Citizen activity in many countries in the late 2000s and early 2010s, and the data of Slater 2016 and Netolitzky 2023, both of which show a marked increase from 2011 onwards, can likewise be explained against the backdrop of this crisis. Our data, too, becomes legible when understood as a response to a prolonged, societal crisis: the Covid-19 crisis. Following its outbreak in March 2020, the case numbers shoot up drastically, just as the first Sovereign Citizen activity in the Netherlands temporally coincides with the aftermath of the 2008 financial crisis; analogous explanations have also been advanced in Germany, but these were not backed up by data (Hüllen & Homburg, 2017, p. 31).

5.5.2 *Regional Distribution*

International scholarship has thus far scarcely collected regionally distributed data of Sovereign Citizen activity and, with the exception of Netolitzky (2023), has never corrected data for population density numbers. Slater (2016), for

example, presents the ten US states with the most Sovereign Citizen activity between 2006 and 2015; eight of these states belong to the eleven most populated US states. On the basis of these absolute numbers, he rejects the possibility of a 'rural' or 'American Frontier' reading of Sovereign Citizenship, for which one would expect the Pacific Northwest and the Western Great Plains regions (e.g. Idaho, the Dakotas, Montana, Wyoming) to be overrepresented (Slater, 2016, pp. 31-33). But it is surely relevant that these are some of the least populated states in the USA, so that one would have to correct for population density. Netolitzky (2023), in his discussion of the volume and frequency of Sovereign Citizen decisions, does correct for population and identifies British Columbia as Canada's pseudolaw centre but offers no substantive explanation that accounts for regional differences. Hüllen and Homburg (2017) have collected data for Brandenburg, one of Germany's eastern *Bundesländer*, distributed across the different municipalities (without correcting for population density). They conclude that Sovereign Citizenship is a rural phenomenon, particularly because city municipalities have lower numbers (Hüllen & Homburg, 2017, pp. 31-33). But their conclusions are hampered by their having failed to take population density numbers into account: the four municipalities with the highest numbers (Potsdam-Mittelmark, Oberhavel, Dahme-Spreewald, Elbe-Elster) include the two largest municipalities (Potsdam-Mittelmark, Oberhavel), population-wise.

The data of this Dutch study can provisionally be slotted into a center-periphery dynamic, inasmuch as the three provinces with the highest relative frequency (North-Brabant, Gelderland and Friesland) are habitually considered peripheral, especially in opposition to the so-called 'Randstad' (the conurbation area in the western part of the Netherlands which comprises ~41% of the country's inhabitants; Zonneveld & Nadin, 2021). For other rural provinces, however, such as Zeeland, Groningen, Overijssel, Drenthe and Limburg, the relative frequency is lower than for a 'central' province like South-Holland.

Some of the indeterminacy must be attributed to imperfect data, which are not always able to capture where Sovereign Citizens operate from. A non-public data set, for example, which contains information on paying customers with a Sovereign Citizen guru (Kouwenhoven & Smouter, 2023; $n = 1,118$), reported 233 members from the province of Limburg (where the said guru is also from), a province not well represented in our data. Moreover, the distribution across provinces papers over city-periphery dynamics within provinces, a challenge also visible in Netolitzky 2023: North-Holland, for example, includes both Amsterdam and peripheral regions and communities like West-Friesland and, for example, Volendam. Our data is unable to account for these differences, even though we know from other countries that citizens come to Sovereign Citizenship from both urban and rural areas, though perhaps for different reasons (Perry et al., 2017, pp. 23-24).

5.5.3 Gender and Age

In terms of gender, the cases show a percentage of approximately 30% of women. This is lower than the ‘small majority’ reported by Dutch journalists based on a non-public data set, containing information on paying customers with a Sovereign Citizen guru (Kouwenhoven & Smouter, 2023; $n = 1,118$).³

The female presence of 30% in Dutch cases is on the higher end when compared to data from other countries. The number of female German *Reichsbürger*, for example, hovers between 13% and 29% (Keil, 2021, pp. 258-259). See Table 6 for an overview of available German data. In the USA, data is much less readily available. Smith (2016) found a female presence of 14.7% in US Sovereign Citizen cases ($n = 150$).

Table 6 Scholarship on the Gender Distribution among German *Reichsbürger*

Studies on Gender among German <i>Reichsbürger</i>	Number of Cases	Percentage of Women (%)	Source
Hüllen and Homburg (2017, pp. 31-33)	440	29	Data of the Constitution Protection Agency Brandenburg
Keil (2015, pp. 44-45)	121	20	Police data Brandenburg
Keil (2017, pp. 60-61)	224	20.98	Police data Brandenburg
Keil (2018, pp. 128-129)	580	22.6	Police data Brandenburg
Haase (2018, pp. 31-33)	718	23	Data of the Constitution Protection Agency Sachsen
Fiebig and Köhler (2019)	487	13.76	Newspaper data
Krüger (2017)	217	14.98	Written communications

As Keil (2021) remarks, such elevated numbers for female participation indicate that Sovereign Citizens cannot easily be reduced to other, more straightforwardly criminal phenomena or, we might add, to far-right extremism (Smith, 2016 has a 7.3% female presence among far-right cases, with $n = 382$; cf. Perry et al., 2017, pp. 22-25).

This observation is further corroborated by the comparatively high age of many Sovereign Citizens, and, where such data is collected, by the movement’s racial diversity (Smith, 2016 has 32.6% non-white presence, $n = 135$). In Germany, where only data on age is collected, every second *Reichsbürger* is older than 50 (median: 50; $SD = 13$; Keil, 2021, p. 258). Smith 2016 found the mean age to be 52.3 in the USA ($n = 150$; $SD = 12.32$), whereas far-right defendants had a mean age of 38.71 ($n = 340$; $SD = 12.67$). This closely corresponds to the non-public Dutch data set

3. Unfortunately, no specific percentages were given by these journalists; between 51% and 60% seems likely.

from 2023, referred to previously, which had an average age of 56, i.e. an average birth year of 1967 (Kouwenhoven & Smouter, 2023; $n = 1,118$). A more complete picture would require access to the non-anonymised data of the Dutch judiciary.

Sovereign Citizens, then, are in a sense a *sui generis* phenomenon, comprising relatively old citizens who are and relatively well represented among females. This is an important observation because the movement is so often simply equated with right-wing extremism, especially in Germany and the USA (e.g. Hartleb & Schiebel, 2024; Huhn, 1998-1999; Koniak, 1996; Levin & Mitchell, 1999; Levitas, 2002, pp. 257-342; Schlatter, 2006; Sullivan, 1999; Rathje, 2022; cf. Schönberger & Schönberger, 2023, pp. 70-72). At the same time, there are important exceptions, which, however, rather than reinstating the idea of right-wing extremism, complicate our picture (Slater, 2016, p. 7). Particularly in the USA, for example, young male African-Americans are often attracted to the Sovereign Citizen ideas while in prison (Parker, 2014 ($n = 9$, average age of 39, with only one female; all African American); Paradis et al., 2018 ($n = 36$, mean age = 38.7, $SD = 8.32$; all male, all but one African American). All the same, while such nuances are important, we should not lose sight of the fact that older men are overrepresented in the empirical data on Sovereign Citizens. Although women may participate in substantial numbers, Sovereign Citizenship is still an overwhelmingly male affair.

5.5.4 Socio-Economic Status

Generally speaking, the data that could be gathered from the extant cases is limited. On this front, in particular, does the absence of non-anonymised data make itself felt. Still, some cautious remarks may be put forward about socio-economic status. They may be taken as a cautious indication of an average to below average socio-economic position, with a strong presence of self-employed individuals. The data available on housing is too scant for anything by way of substantive remarks.

Looking abroad, the data is similarly patchy, and data on income is nowhere reported. For Canada, Perry et al., 2017, pp. 24-25 report wealth inequality as a driving force of Sovereign Citizenship, yet their information is based on only one interview with a Sovereign Citizen and not backed up by a larger data set; other Canadian data is not forthcoming. The little we have from the USA on the socio-economic status of Sovereign Citizens points to an average to heightened social status. Smith 2016 found 48.9% Sovereign Citizen defendants had a college degree ($n = 94$), against 16.7% among far-right extremists ($n = 239$). The numbers are considerably lower with Parker 2014 (three out of nine) and Paradis et al. 2018 (only one; $n = 28$), but they are working with small and specific sample groups. Among the adjacent (but perhaps slightly more socio-economically elevated) German and Swiss *Querdenker*, Amlinger and Nachtwey 2022 likewise report an average to above average socio-economic status for the majority, with 31% having

finished a high school education and 34% a college education (the German and Swiss average for a college education is 18.5% and 29.6%, respectively).

Of interest within the employment data, incomplete though these, too, are, the comparatively large number of self-employed individuals or small business owners in the sample is of interest; this coincides with more anecdotal reports about Dutch Sovereign Citizens (Van der Tak, 2024, p. 29; Van Rees-Bekku, 2024, p. 28) and lines up with German data reported on the German and Swiss *Querdenker* (Amlinger & Nachtwey, 2022; $n = 1,150$), a protest group that gained traction in the Covid-19 period. The number of small business owners in this data set was 25%, thus easily exceeding the German and Swiss average of 9.8% and 12.8%, respectively. It might not be too much to venture that they, of all individuals, experience anxiety most intensely around their personal autonomy – since they are, in a sense, a pre-selected population that values the freedom to design their own life, while in practice they are not only very directly confronted with governmental regulations and control but also more dependent on the whims of the market than salaried employees. The Covid-19 pandemic drove both these types of dependencies home, and multiple cases in our database relate to small business owners seeking, and being refused, Covid-19 government support, after which Sovereign Citizen arguments appear in their cases (e.g., ECLI:NL:CBB:2022:802; ECLI:NL:CBB:2022:801; ECLI:NL:CBB:2022:783).

For Germany, Fiebig and Köhler 2019 ($n = 487$) is the only source providing more than self-reported data by *Reichsbürger* in interviews, but the search uniquely focuses on news reports about criminal and other public order offences committed by *Reichsbürger*; the data should be treated with caution. As in our data set, not every news report provided information on socio-economic status ($n = 130$). Within the collected sample that spoke to professional status, 38.46% of the *Reichsbürger* were unemployed ($n = 50$); 30% had a job ($n = 39$); 31.54% were retired ($n = 41$), making it difficult to attribute Sovereign Citizenship exclusively to financial difficulties stemming from unemployment (Fiebig & Köhler, 2019, pp. 22-23). Among the *Reichsbürger* for whom a specific profession could be determined ($n = 111$), blue-collar workers (painters, handymen, etc.) constituted 59.46% ($n = 66$), while 40.54% ($n = 45$) could be qualified as white-collar workers (engineers, doctors, etc.); of the white-collar workers, 11 out of 45 were unemployed (24.44%) when they appeared in news reports. Fiebig and Köhler 2019 also state that 106 people were experiencing financial problems (67.95%), that 70 people were experiencing professional problems (44.87%), whereas fewer experienced health or family problems (19 or 12.18% and 17 or 10.90% respectively). It is unclear, however, whether it was these problems that drove these people to Sovereign Citizenship or whether, instead, the problems were the result of identifying and acting as Sovereign Citizens.

On the whole, this foreign data aligns reasonably well with our, more limited, data and collectively point to an average to below average socio-economic status

among Sovereign Citizens; financial struggles, often associated with the movement in the public eye (Pointer, 2023; Zuidervaat, 2023), are infrequently reflected in the case law record, but should not – as the German data and a recent Dutch bailiff report show (Van Straaten et al., 2024) – therefore be considered absent from the phenomenon. In general, better data is necessary to make claims about Sovereign Citizens' socio-economic status with any degree of certainty, particularly for the Netherlands. Future research would benefit from securing access to the non-anonymised data from the Dutch judiciary and setting up broader empirical data-collection projects.

5.5.5 Further Research

My research captures the recent rise in Dutch Sovereign Citizen cases and their geographical distribution across Dutch Provinces. It also shows some of the demographic characteristics of Dutch Sovereign Citizens. In this section, I will suggest potential ways to account for these findings: the connection of the popularity of Sovereign Citizenship to societal crises; the phenomenon's stronger presence in rural provinces; the phenomenon's larger appeal to older men; and, finally, and more tentatively, the phenomenon's association with small business owners and citizens of lower to average socio-economic status.

As I discussed in the introduction, there is no substantial empirical research that includes Sovereign Citizen perspectives and thematises legal alienation, institutional trust and issues of procedural fairness. I will take my cue here from the literature which includes interviews with, and biographical information of, Sovereign Citizens (Keller, 2017; Perry et al., 2017; Rabe et al., 2022; Schmidt-Lux, 2020; Schönberger & Schönberger, 2023; Van der Tak, 2024; Van Rees-Bekkum, 2024), and from a larger, German empirical study on the so-called *Querdenker*, an adjacent protest movement that specifically responded to the Covid-19 pandemic (Amlinger & Nachtwey, 2022). More robust empirical studies, however, are necessary to fully account for the phenomenon.

In the existing legal empirical literature, some patterns can be discerned that explain this data. Often, a specific, negative event, which can be either biographical or socio-political in nature (e.g. the loss of steady employment or, in Germany, the dissolution of the GDR, Rabe et al., 2022, pp. 354-355; Schmidt-Lux, 2020, p. 99; Schönberger & Schönberger, 2023, pp. 31-35, 47-110), reveals the brokenness of the current system to the Sovereign Citizen and leads to feelings of impotence and, sometimes, a precarious and isolated living situation. Equally often, repeated attempts to reconnect to civil society and the workforce have failed, exacerbating existing feelings of marginality and isolation (Fiebig & Köhler, 2019; Keil, 2017, pp. 107-108; Keller, 2017, pp. 42, 55; Perry et al., 2017, pp. 41-42, 2019, p. 8; Rabe et al., 2022, pp. 350-351, 360; Schönberger & Schönberger, 2023, pp. 128-129; Van Rees-Bekkum, 2024, p. 30), a phenomenon also observed in adjacent protest movements (Amlinger & Nachtwey, 2022, p. 288).

While this is not *always* the case (Schönberger & Schönberger, 2023, p. 130), it would explain why the phenomenon is connected to societal crises and is especially pervasive among older men, in peripheral regions, and among lower to average socio-economic strata. People who were once securely woven into the fabric of civil society now find themselves dislodged from it. The immediate impetus might be a crisis like the pandemic, which hits socio-economically vulnerable populations harder (including small business owners) and can accelerate resentment around *longue durée* processes of (perceived) rural and gendered marginalisation; the loss of security and newborn feelings of precarity makes sense especially for older, male generations, who experience a jarring absence of control compared to earlier life stages (Rabe et al., 2022, p. 360). The 2020 pandemic, in either case, was such a moment of ‘collective loss of control’ (Amlinger & Nachtwey, 2022, p. 248), to which many in society responded with varied attempts of sense-making.

Since many of these factors are not gender-specific, this might also explain the robust presence of females among Sovereign Citizens, even though we should not ignore the patriarchal character of many of the phenomenon’s structures and ideas (Bischof, 2017), which is perhaps to be connected to a widespread sentiment among Sovereign Citizens that values and norms are no longer what they used to be (e.g. Keller, 2017, p. 45; Rabe et al., 2022, p. 362). The crisis might also constitute the proverbial ‘snap’ for citizens, and particularly for small business owners, who feel stifled by excessive regulation and government control (Van der Tak, 2024, p. 29; Van Rees-Bekkum, 2024, p. 28) and now decide to explore alternatives outside the system.

6 CONCLUSION

Based on a data set comprising 166 court cases involving Sovereign Citizens, this study has highlighted trends in (1) case activity, and provisionally linked the sharp, recent rise to the Covid-19 pandemic; in (2) geographic distribution of cases across Dutch Provinces, cautiously suggesting a strong presence, especially in peripheral areas; in (3) demographic information and showed a 70/30 M/F gender balance and the relatively advanced age of Sovereign Citizens; in (4) socio-economic data, which revealed a lower to average mean income and the prevalence of small business owners. For all these four findings, the imperfect nature of the present data should be stressed. Larger empirical studies that explore both the internal archive of the Dutch judiciary and expand the analysis to other countries are necessary to further buttress these conclusions.

But however provisional, the relevance of these empirical observations for a general ‘jurisprudence of consequences’ deserves to be pointed out. As mentioned previously, Sovereign Citizens reject the entire legal system – the limit consequence, one might say, of any jurisprudence. *The* question that requires an

answer is why Sovereign Citizens respond to the legal system in this way. This chapter has offered some building blocks for answering that question, and they may well have shown that the problem is more complex: if societal crises, rural marginalisation, gendered shifts in power relations, and middling socio-economic status matter for Sovereign Citizenship, then these extreme responses to the legal system are in part produced elsewhere in society. Limit cases in a 'jurisprudence of consequences', in other words, also show the porosity of the boundaries between law and society.

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