

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF ANTRIM**

WILLIAM BAILEY

Plaintiff

Case No. 20-9238-CZ

v.

ANTRIM COUNTY

HON. KEVIN A. ELSENHEIMER

Defendant

SECRETARY OF STATE JOCELYN
BENSON

Intervenor-Defendant.

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EXHIBIT 4

**PLAINTIFF'S COLLECTIVE RESPONSE TO DEFENDANTS' and NON-PARTY
COUNTIES' MOTIONS TO QUASH AND FOR PROTECTIVE ORDERS**

Respectfully submitted

DePERNO LAW OFFICE, PLLC

Dated: April 9, 2021

/s/ Matthew S. DePerno _____
Matthew S. DePerno (P52622)
Attorney for Plaintiff

Exhibit 4

Douglas G. Frank, PhD, presentation

Nine Michigan Counties

*Collected Demographics for
Populations, Registrations, & Ballots*

with Statistical Confirmation of Algorithm Use

November 2020 United States General Election

Douglas G Frank, PhD

4/6/2021

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Proprietary and confidential analysis.

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Sources

- ***Data shown in the graphs are compiled from THREE different databases.***
- Population data are from census.gov (*estimates as of July, 2019*)
- State registration database is labeled October, 2020, downloaded November 6th.
- State voter database is from January, 2021
- Current official registration values are from vote.michigan.gov/VoterCount/Index

Custom extraction, collation, and graphing software prepared by Douglas G Frank, PhD

Michigan Counties Included

- 
- Antrim
 - Barry
 - Charlevoix
 - Grand Traverse
 - Kent
 - Livingston
 - Macomb
 - Oakland
 - Wayne

(List provided by Matt DePerno)

General Conclusions

- Voter registration is consistently near, or exceeding county population demographics.
- There are over 66,000 ballots recorded that are not associated with a registered voter in the October database.
- The ability to predict ballot demographics with such remarkable precision (average correlation coefficient of **R = 0.997**) demonstrates the activity of a regulating algorithm.
- This confirms, as seen in several other states, that **ballots are being harvested at the precinct level, regulated at the county level, and determined at the state level.**
- The degree of precision observed confirms that algorithms had access to voting databases and voting activity before, during, and following the November 3, 2020 election.

Notes

- For a ballot to count as a ballot in the following graphs, not only must it be *listed* in the voter database, but the voter ID must *match* a voter ID in the registration database.
- As indicated in the following table, there were 66,196 ballots tallied from these counties with a voter ID not found in the October registration database.
- A list of these voters can be provided upon request.

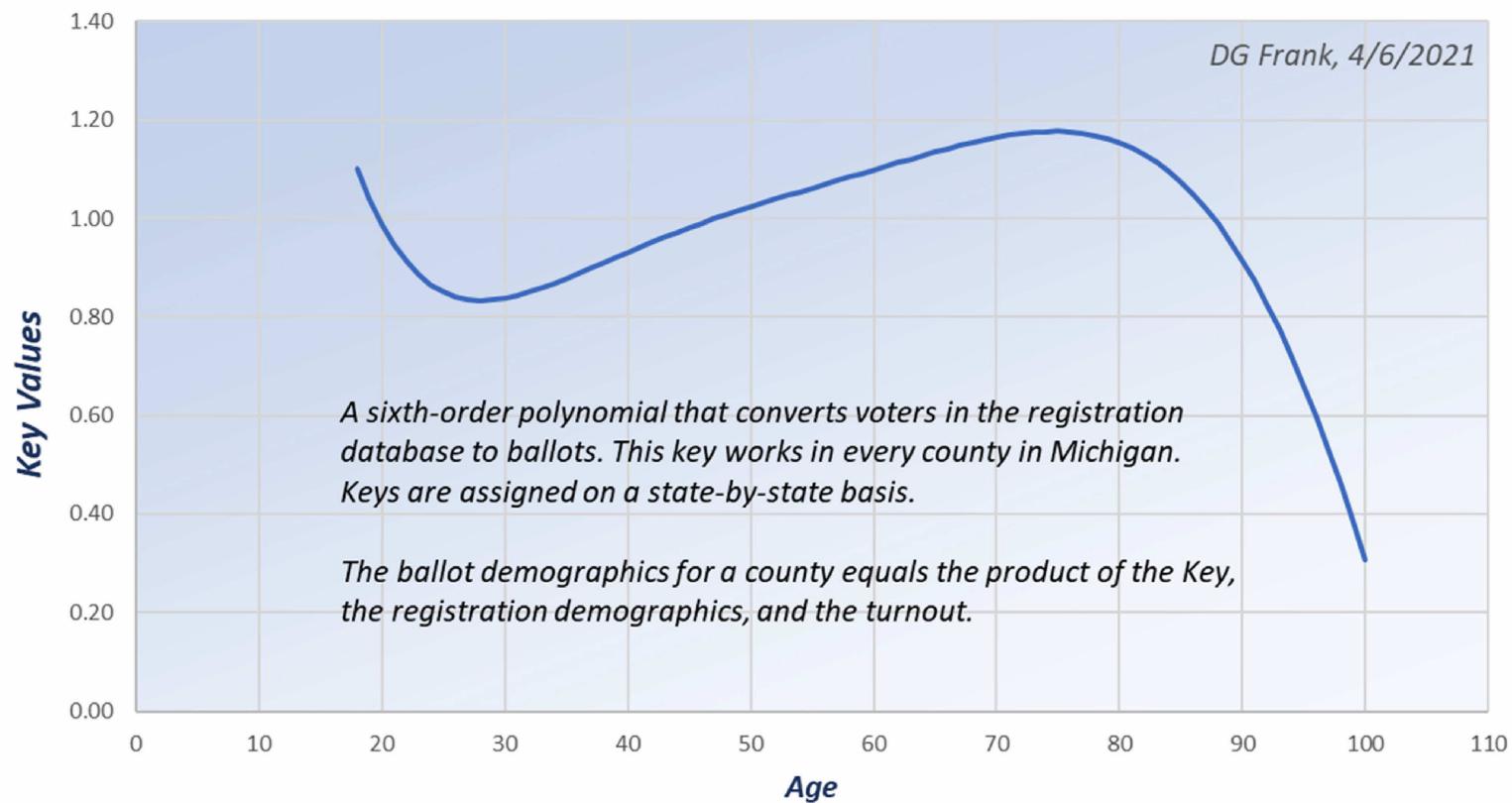
Antrim is the only county where registrations have dropped since the election.

	Wayne County	Oakland County	Macomb County	Kent County	Livingston County	Grand Traverse County	Barry County	Charlevoi x County	Antrim County
<i>Total Population</i>	1,749,284	1,257,532	873,922	656,900	191,938	93,030	61,489	26,089	23,266
<i>Total 18+ Population</i>	1,339,405	999,630	694,156	500,078	152,390	74,536	48,094	21,337	19,722
<i>Current Registered (4/6/2021)</i>	1,383,669	1,016,125	685,385	492,643	159,774	79,954	49,724	23,576	21,935
<i>Total Registrations (October Database)</i>	1,365,392	1,011,669	670,592	489,234	157,667	79,537	48,628	23,270	24,118
<i>Total Ballots in Database</i>	840,810	750,232	477,718	348,880	123,642	57,888	34,913	16,574	17,602
<i>Ballots not found in October Database</i>	20,124	17,551	13,596	8,782	3,240	1,295	914	380	312

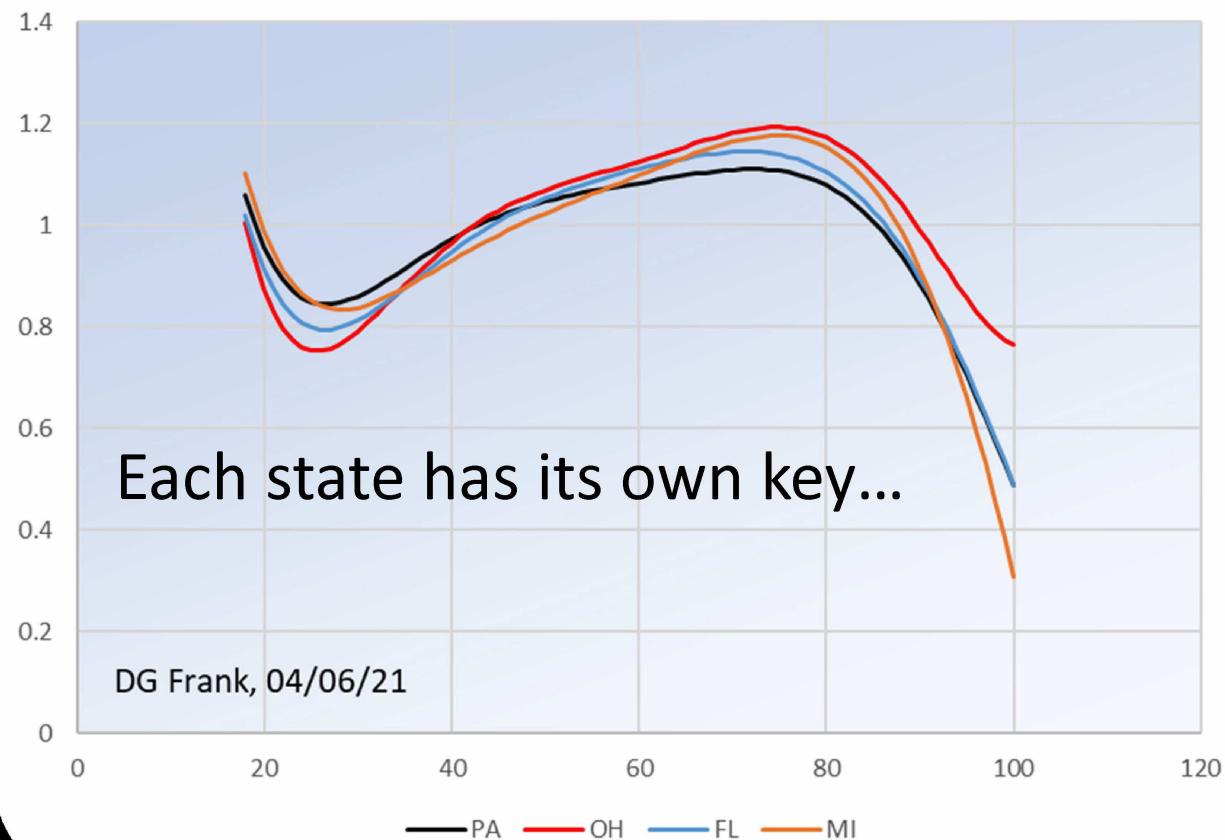
Total Unregistered Ballots Tallied = 66,194

(Ballot voter ID not found in October registration database)

Michigan Registration "Key"



PA, OH, FL, MI Registration Keys



“Correlation Coefficient, R”

A statistical value that indicates how well a set of values predicts a target set of data.

R = 1.000 *The target set is precisely correlated*

R = 0.000 *The target set is not correlated at all (random)*

R = -1.000 *The target set predicts the opposite result*

Correlations involving human behavior rarely have R values greater than 0.8

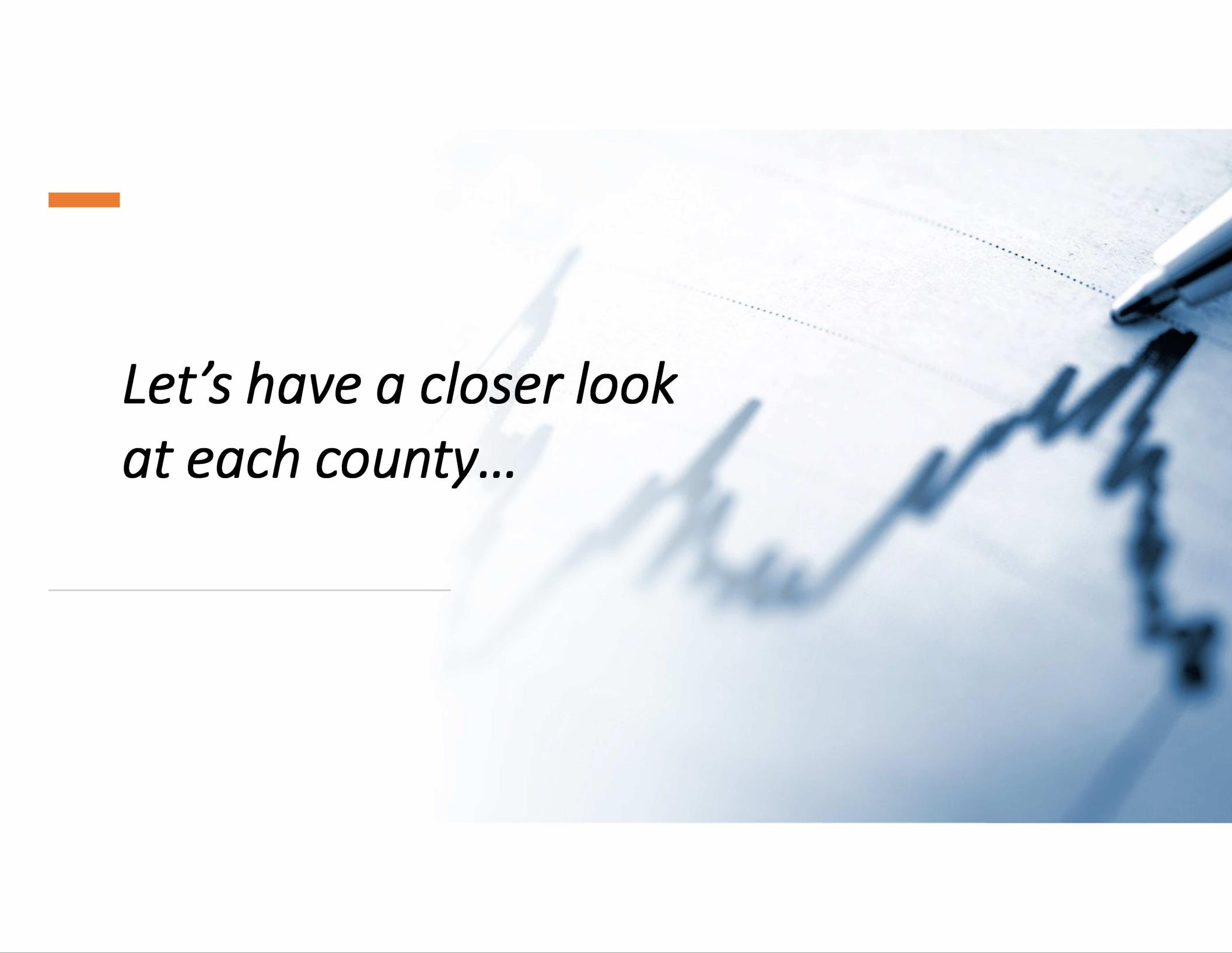
Predicting Ballots with the Registration Key

(In decreasing order by population)

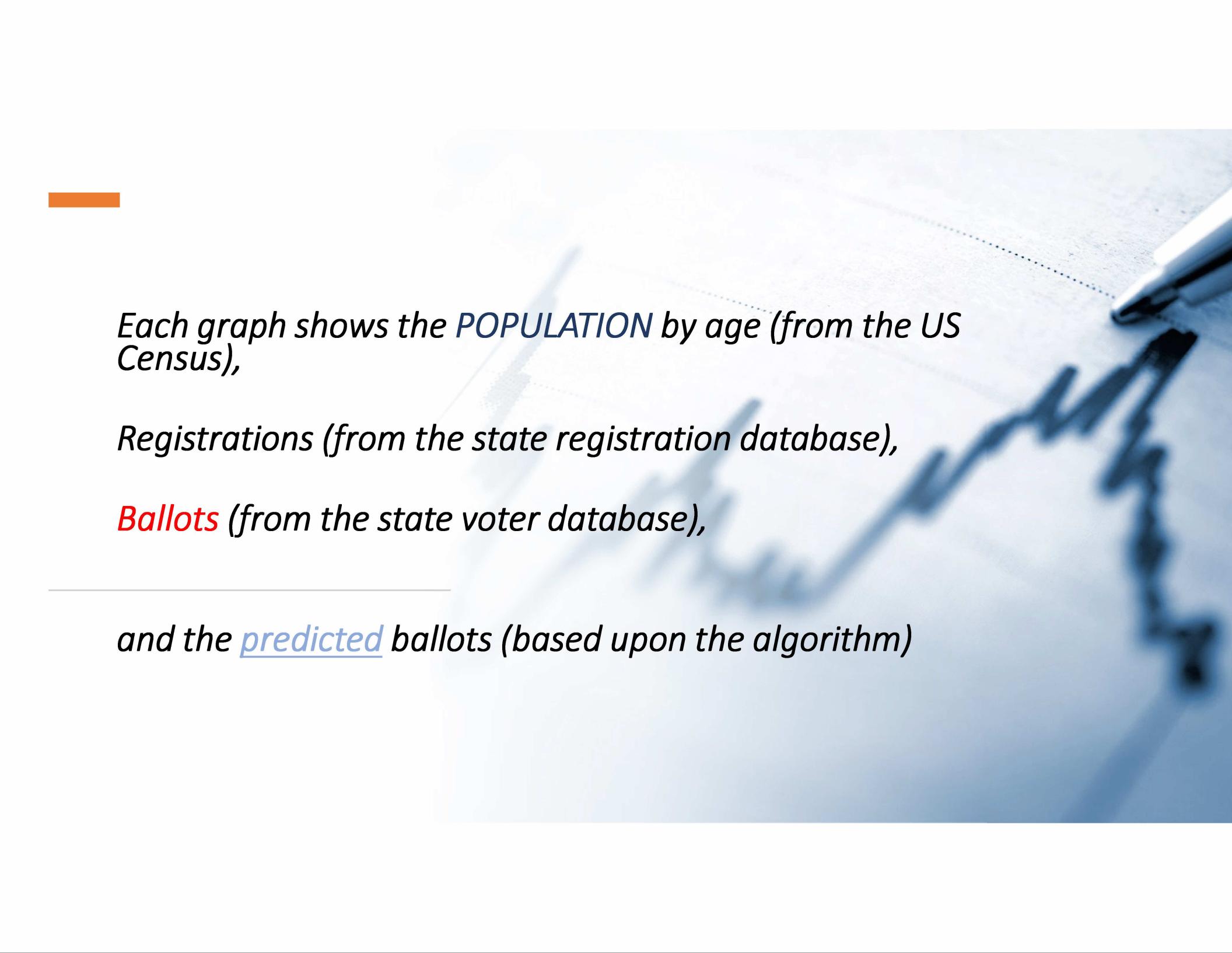
R	County Name
0.999	Wayne County
0.999	Oakland County
1.000	Macomb County
0.999	Kent County
0.999	Livingston County
0.996	Grand Traverse County
0.996	Barry County
0.995	Charlevoix County
0.993	Antrim County

"That ain't natural, buddy."

→ **0.997 Average Correlation**



**Let's have a closer look
at each county...**



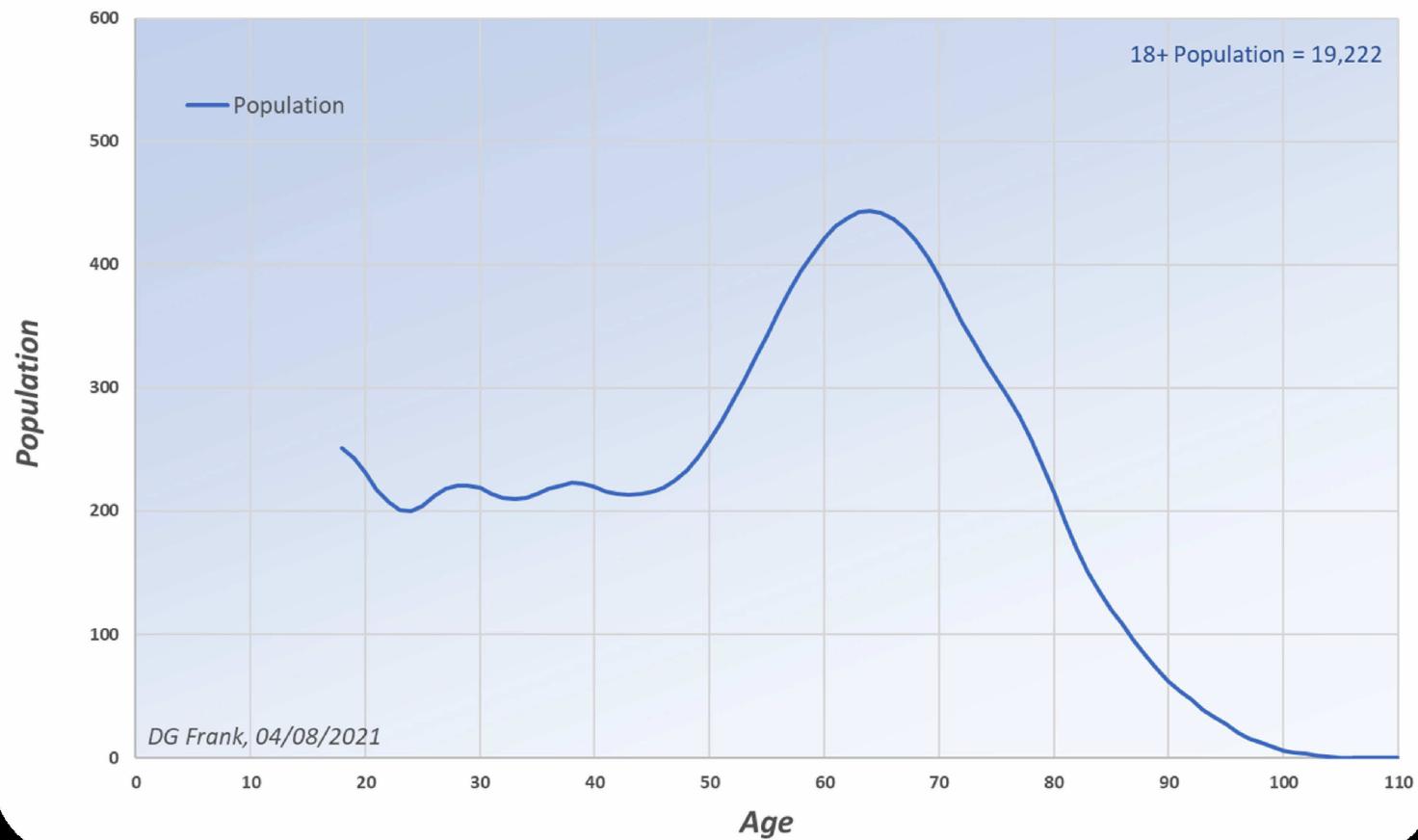
Each graph shows the **POPULATION** by age (from the US Census),

Registrations (from the state registration database),

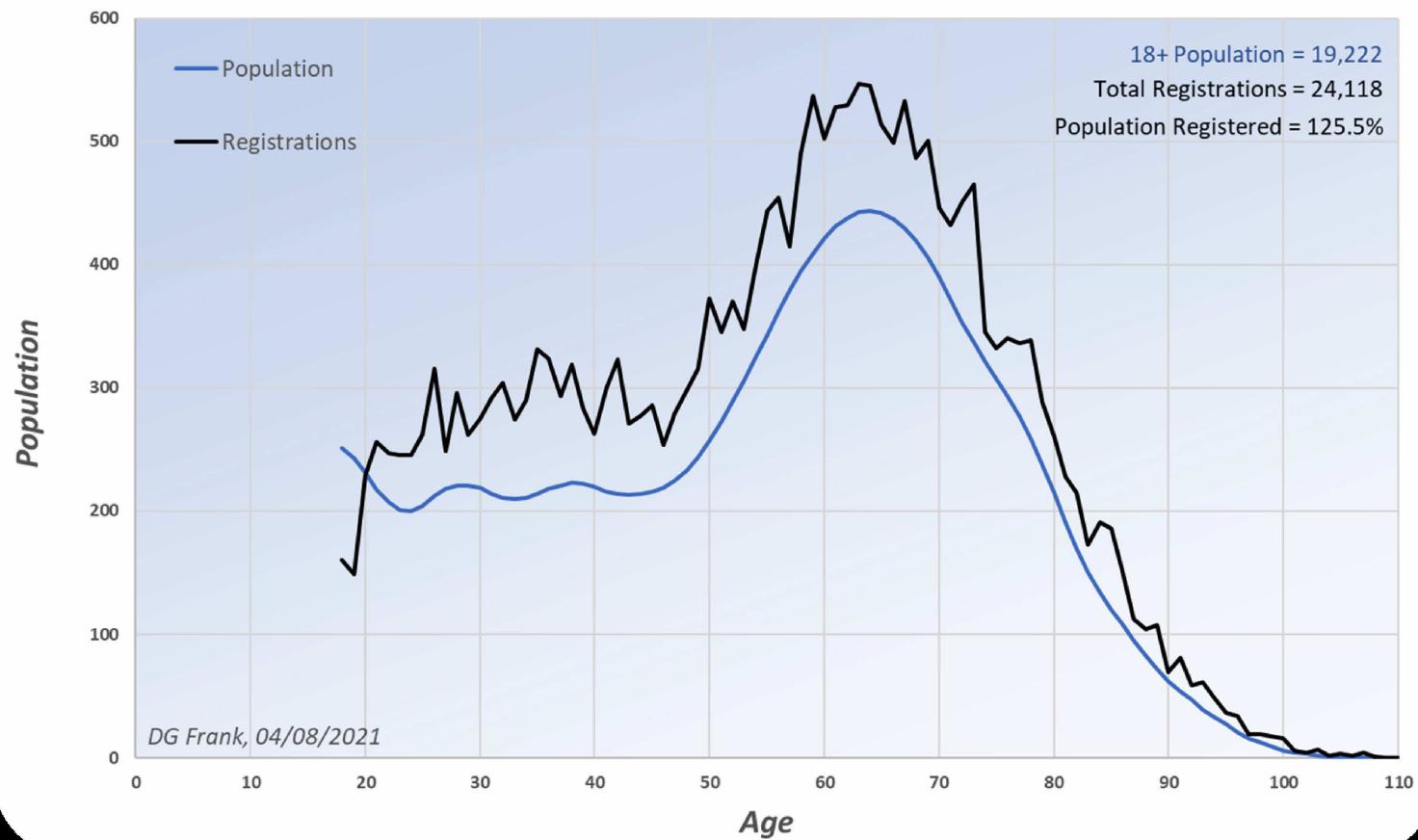
Ballots (from the state voter database),

and the **predicted** ballots (based upon the algorithm)

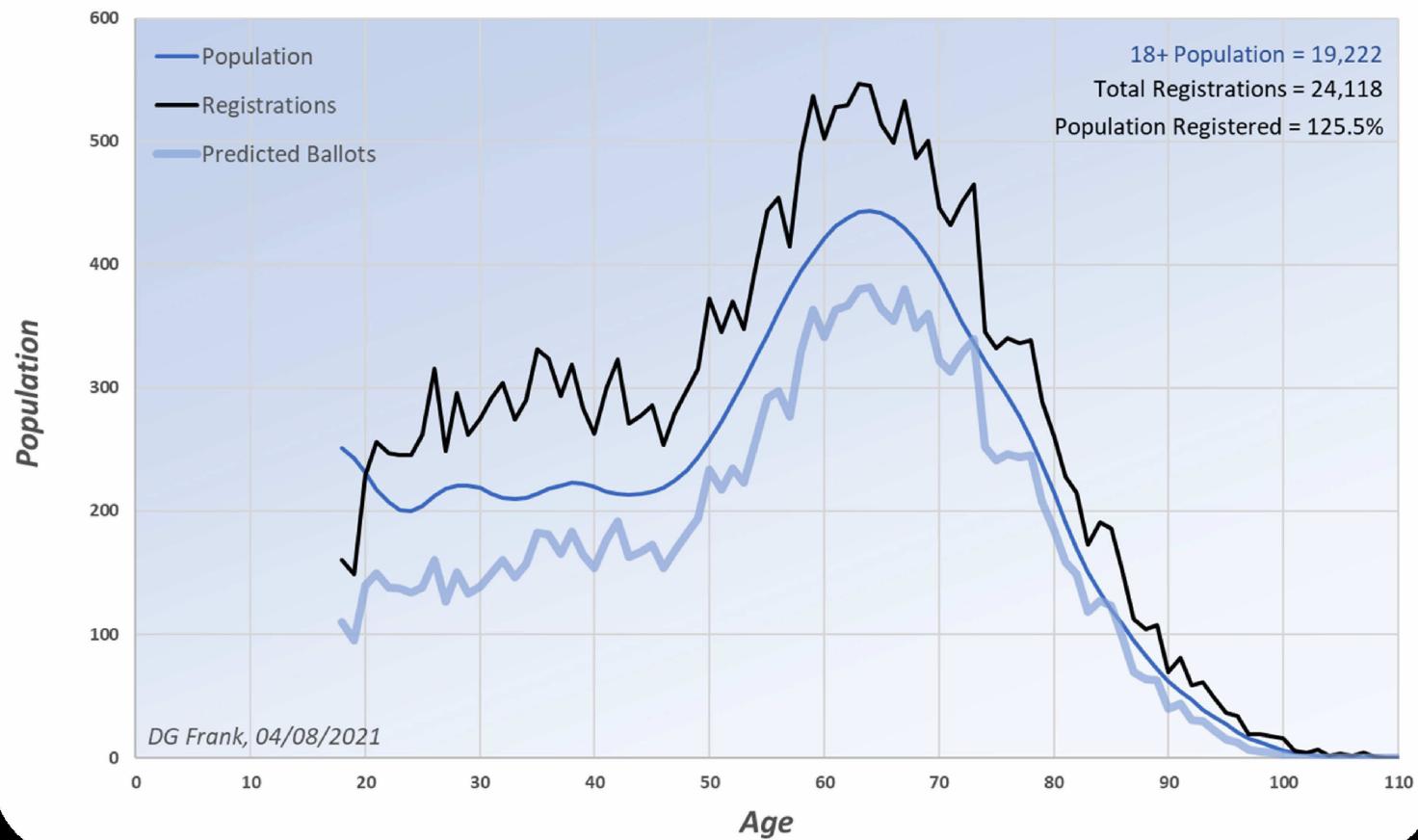
Antrim County, MI



Antrim County, MI



Antrim County, MI



Antrim County, MI



Barry County, MI

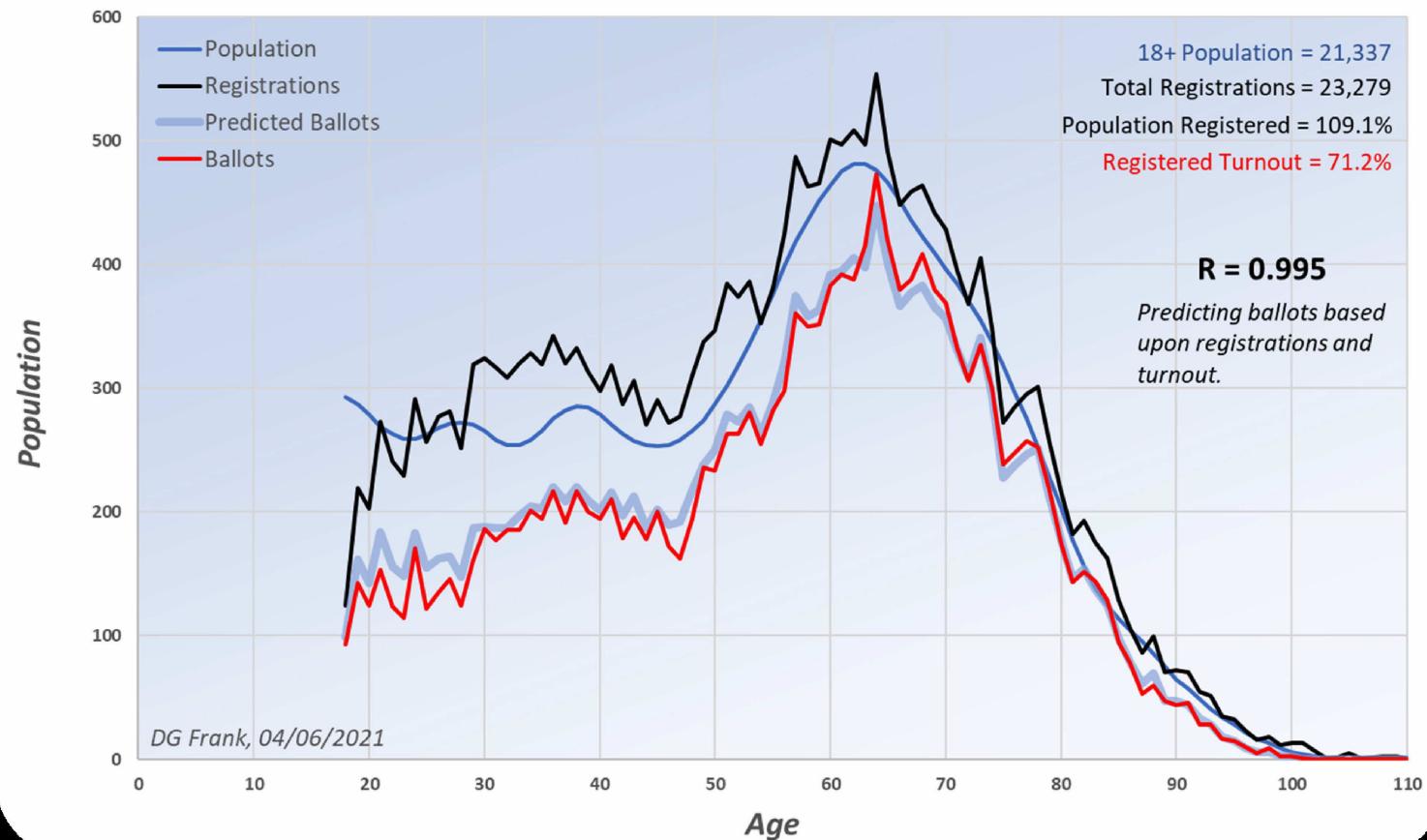


DG Frank, 04/06/2021

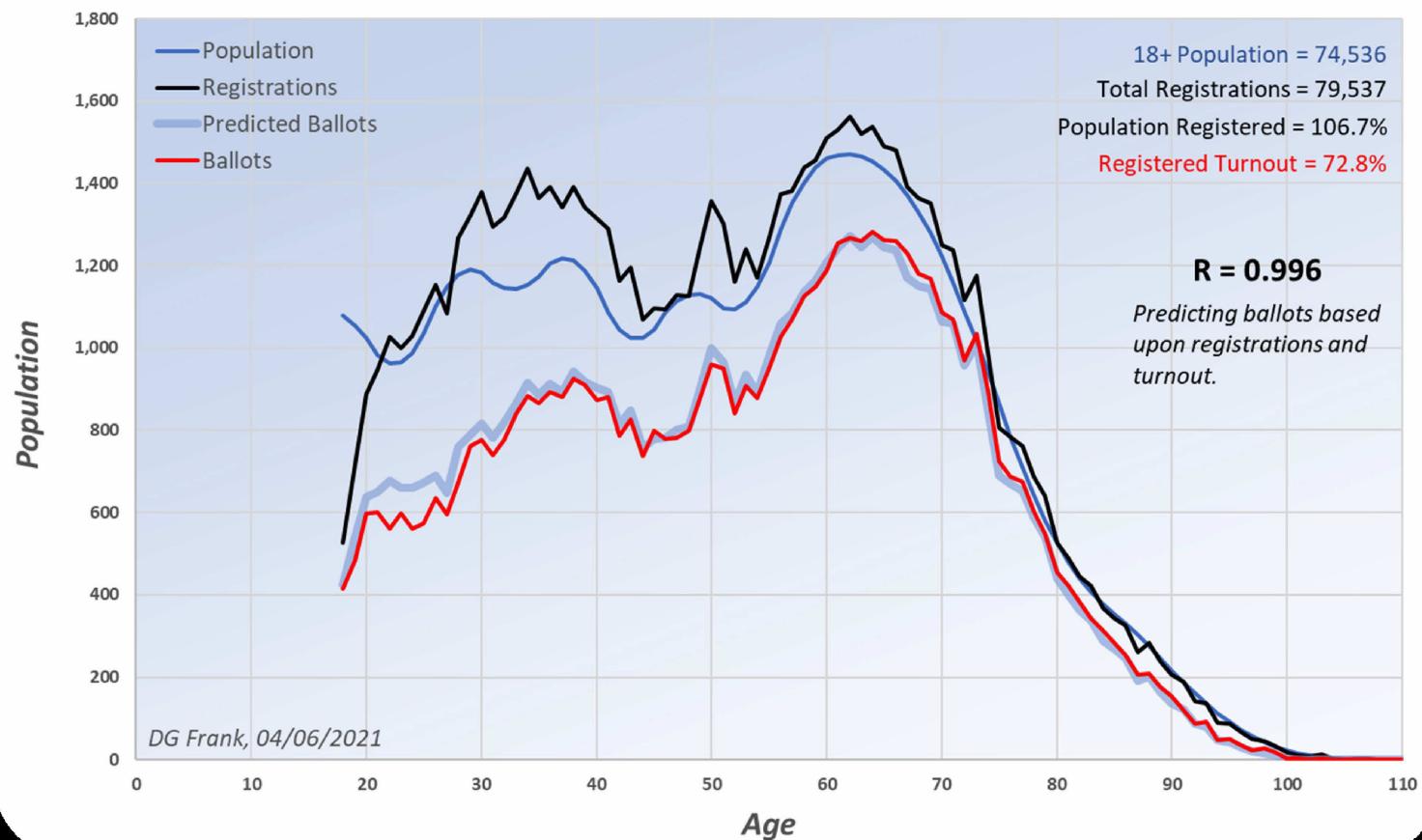
Age

Age

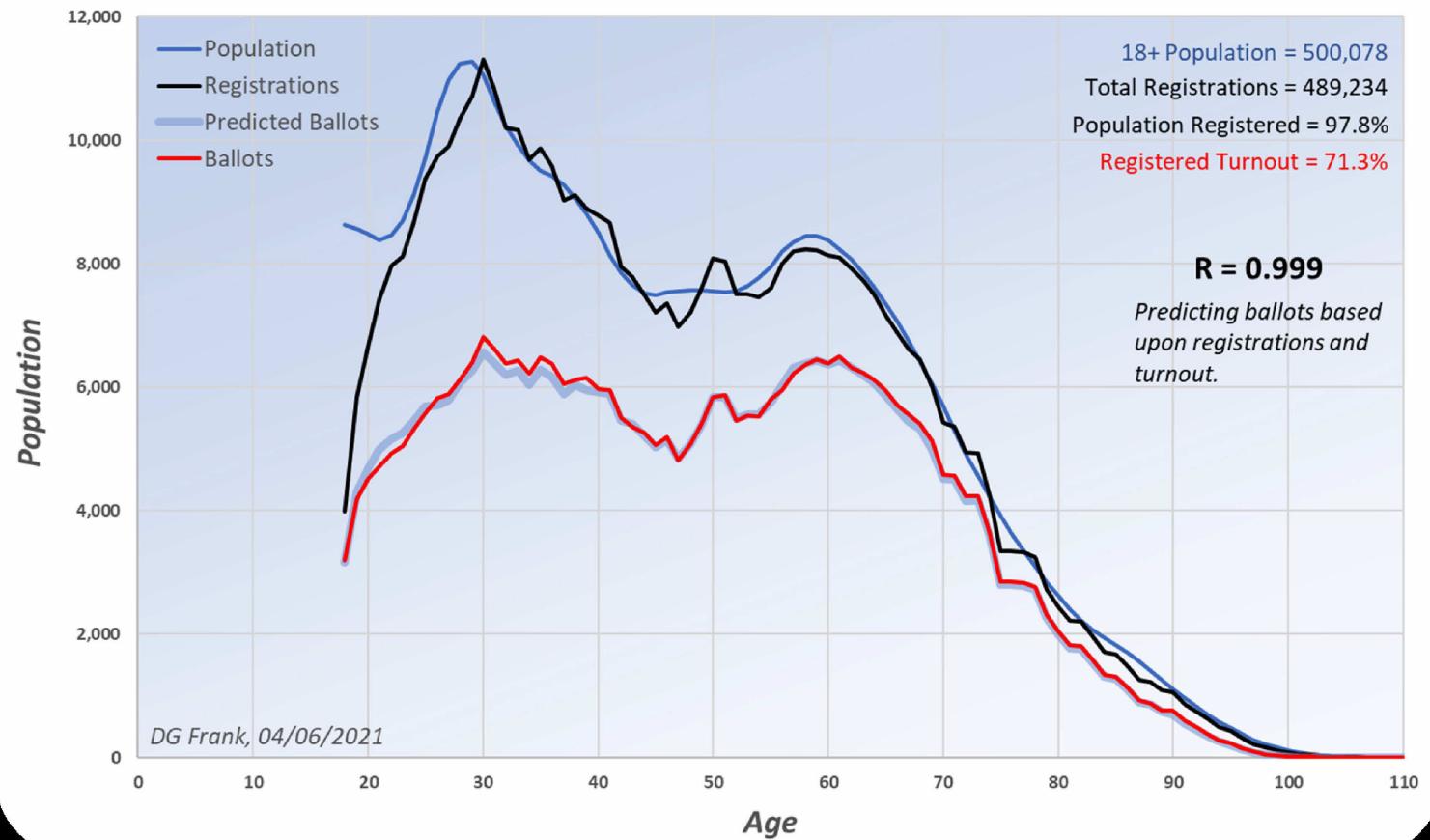
Charlevoix County, MI



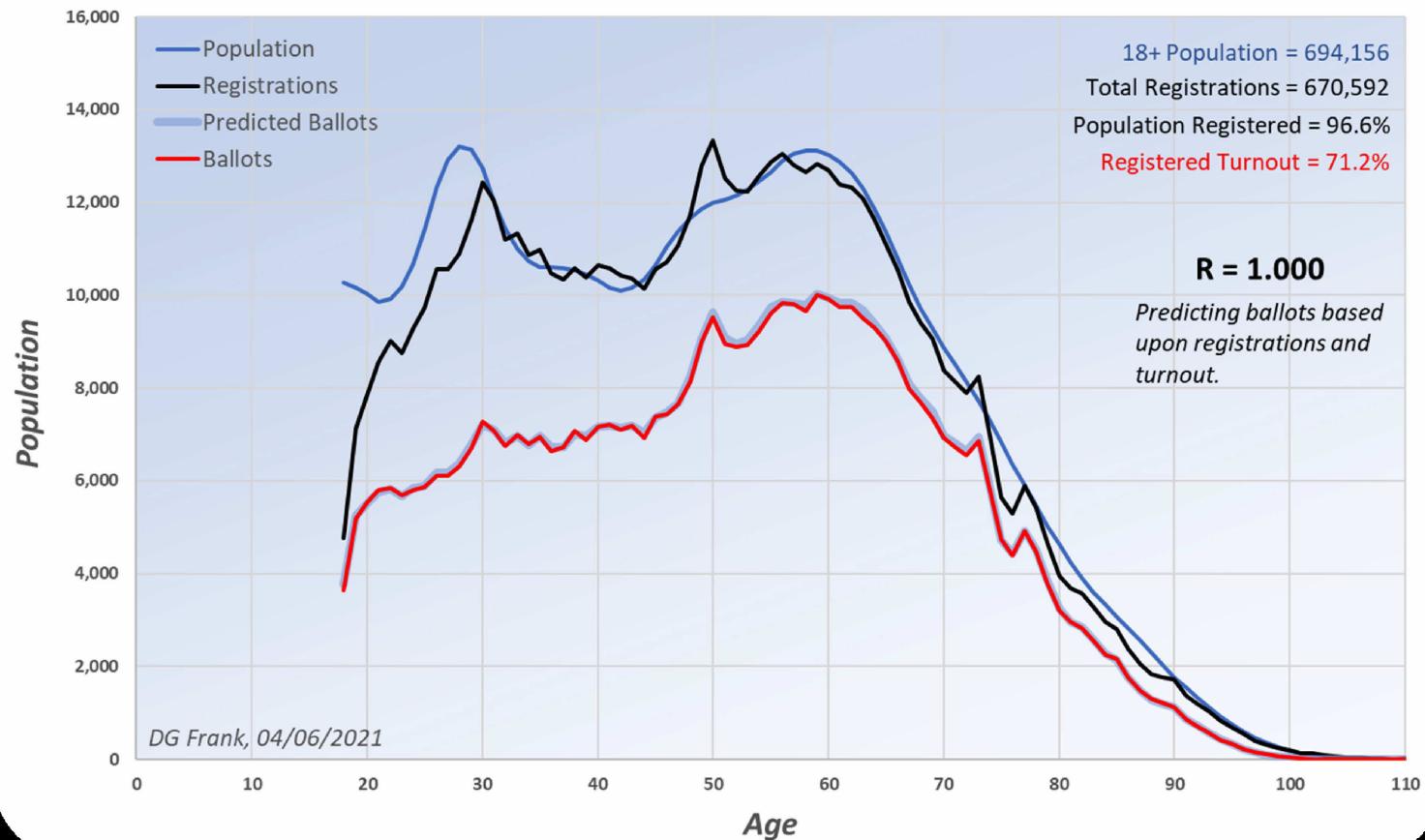
Grand Traverse County, MI



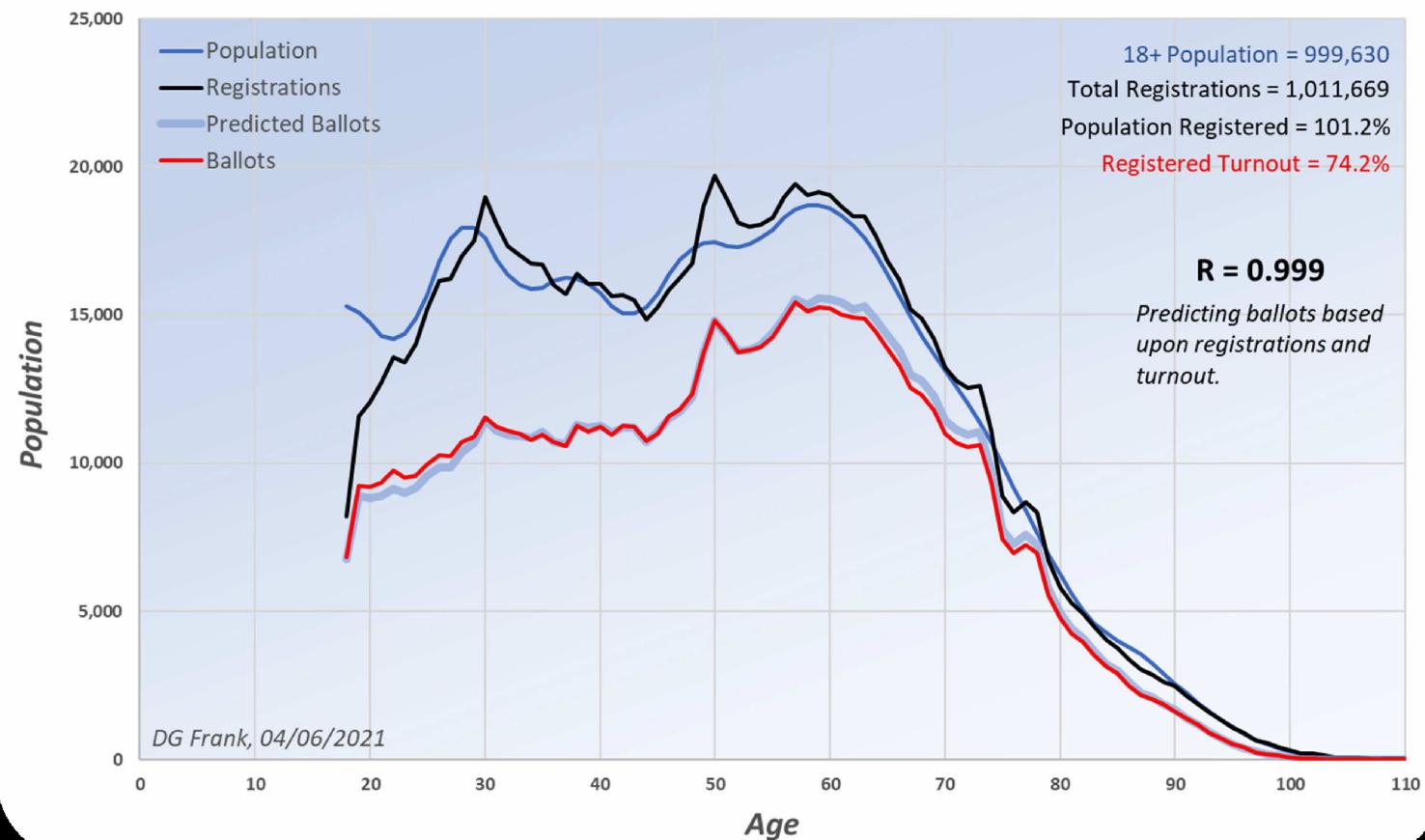
Kent County, MI



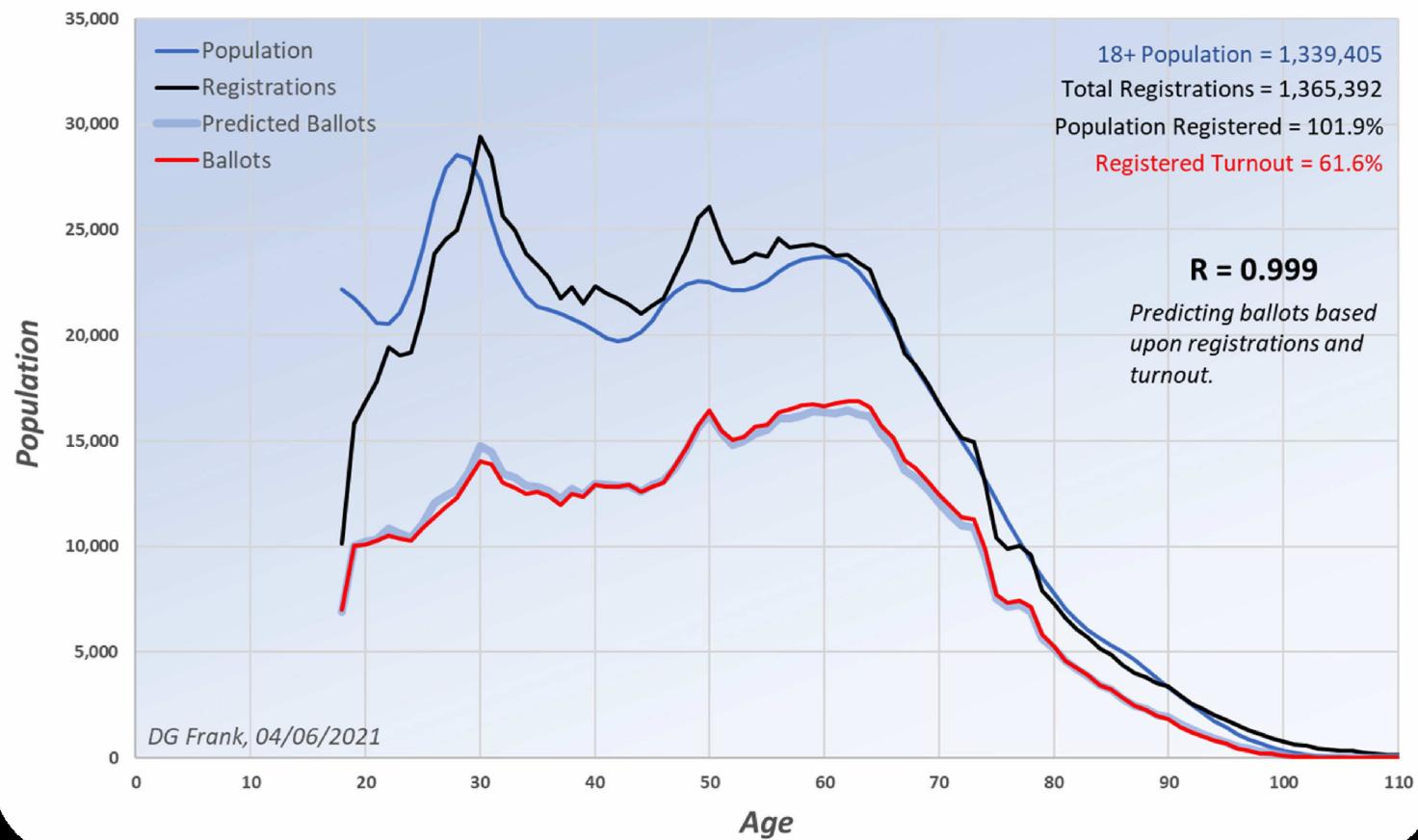
Macomb County, MI



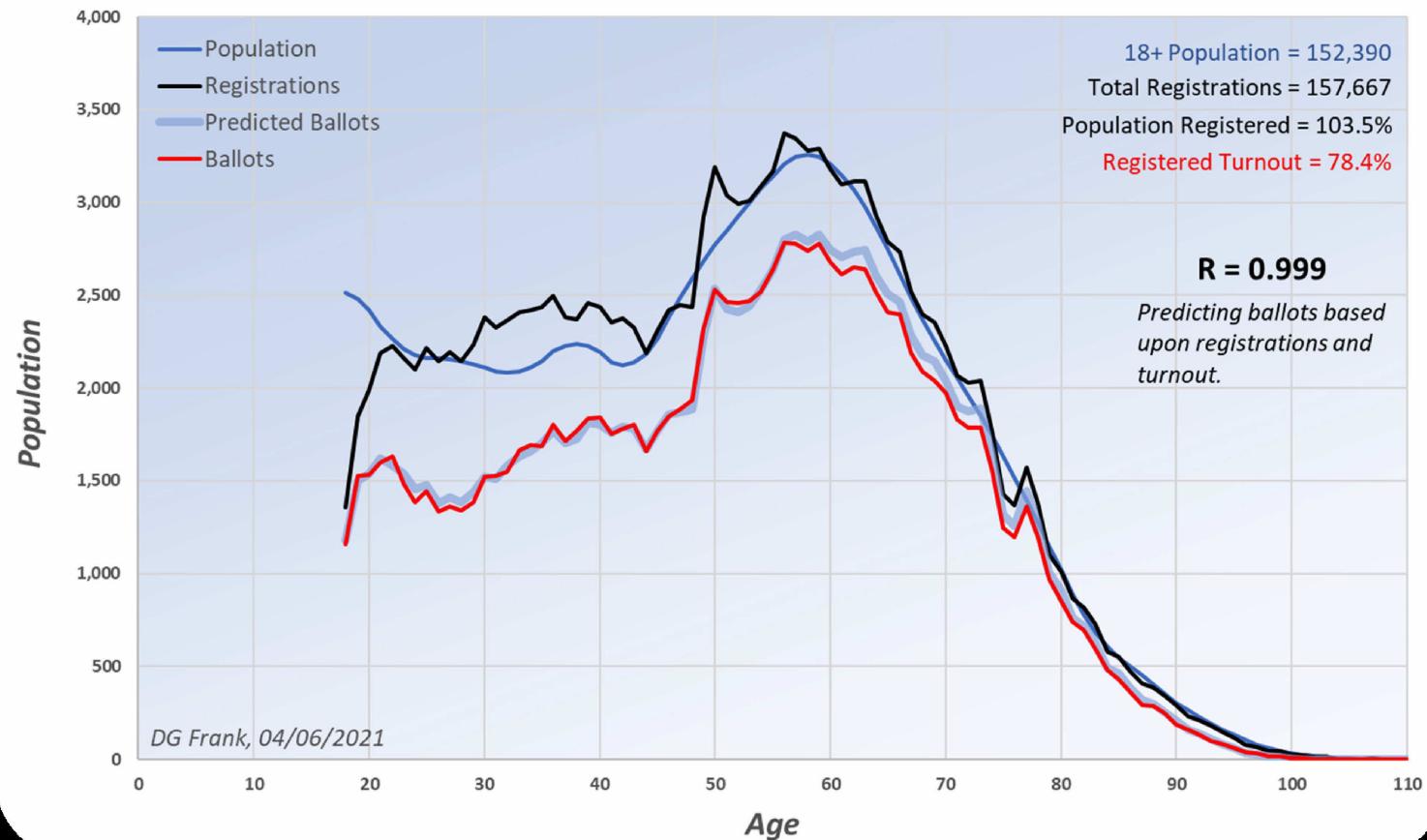
Oakland County, MI



Wayne County, MI



Livingston County, MI



The Citizen Primer

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