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

WILLIAM BAILEY Plaintiff	Case No. 20-9238-CZ
v.	
ANTRIM COUNTY Defendant	HON. KEVIN A. ELSENHEIMER
SECRETARY OF STATE JOCELYN BENSON Intervenor-Defendant,	

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EXHIBIT 10

PLAINTIFF'S FIRST AMENDED COMPLAINT

Respectfully submitted

DePERNO LAW OFFICE, PLLC

Dated: May 17, 2021

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

Exhibit 10

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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Sources

- ***Data shown in the graphs are compiled from THREE <u>different</u> 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

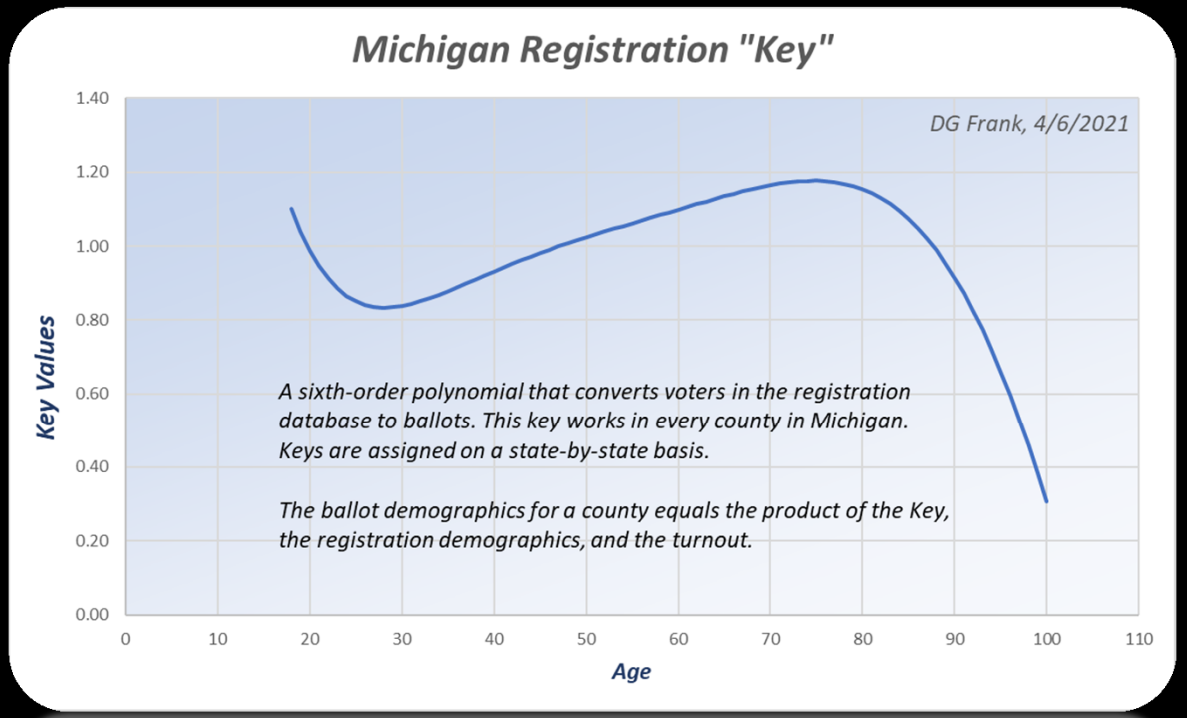
- For a ballot to count as a ballot in the following graphs, not only must it be *listed* in the voter database, but the voter ID must *match* a voter ID in the registration database.
- As indicated in the following table, there were 66,196 ballots tallied from these counties with a voter ID not found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

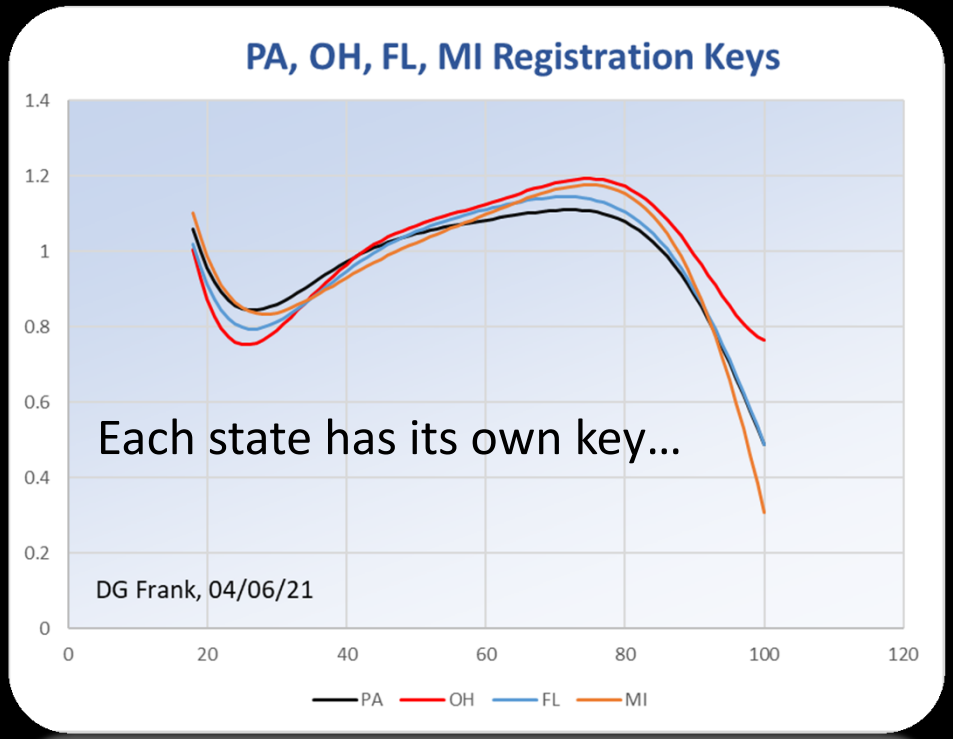
Antrim is the only county where registrations have dropped since the election.

	Wayne County	Oakland County	Macomb County	Kent County	Livingston County	Grand Traverse County	Barry County	Charlevoix County	Antrim County
Total Population	1,749,284	1,257,532	873,922	656,900	191,938	93,030	61,489	26,089	23,266
Total 18+ Population	1,339,405	999,630	694,156	500,078	152,390	74,536	48,094	21,337	19,2[illegible]
Current Registered (4/6/2021)	1,383,669	1,016,125	685,385	492,643	159,774	79,954	49,724	23,57[illegible]	21,935
Total Registrations (October Database)	1,365,392	1,011,669	670,592	489,234	157,667	79,537	48,628	23,27[illegible]	24,118
Total Ballots in Database	840,810	750,232	477,718	348,880	123,642	57,888	34,913	16,574	14,60[illegible]
Ballots not found in October Database	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"
DG Frank, 4/6/2021
A sixth-order polynomial that converts voters in the registration database to ballots. This key works in every county in Michigan. Keys are assigned on a state-by-state basis.
The ballot demographics for a county equals the product of the Key, the registration demographics, and the turnout.
Key Values
Age
1.40
1.20
1.00
0.80
0.60
0.40
0.20
0.00
0
10
20
30
40
50
60
70
80
90
100
110


PA, OH, FL, MI Registration Keys
1.4
1.2
1
0.8
0.6
0.4
0.2
0
0
20
40
60
80
100
120
Each state has its own key…
DG Frank, 04/06/21
PA
OH
FL
MI

"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

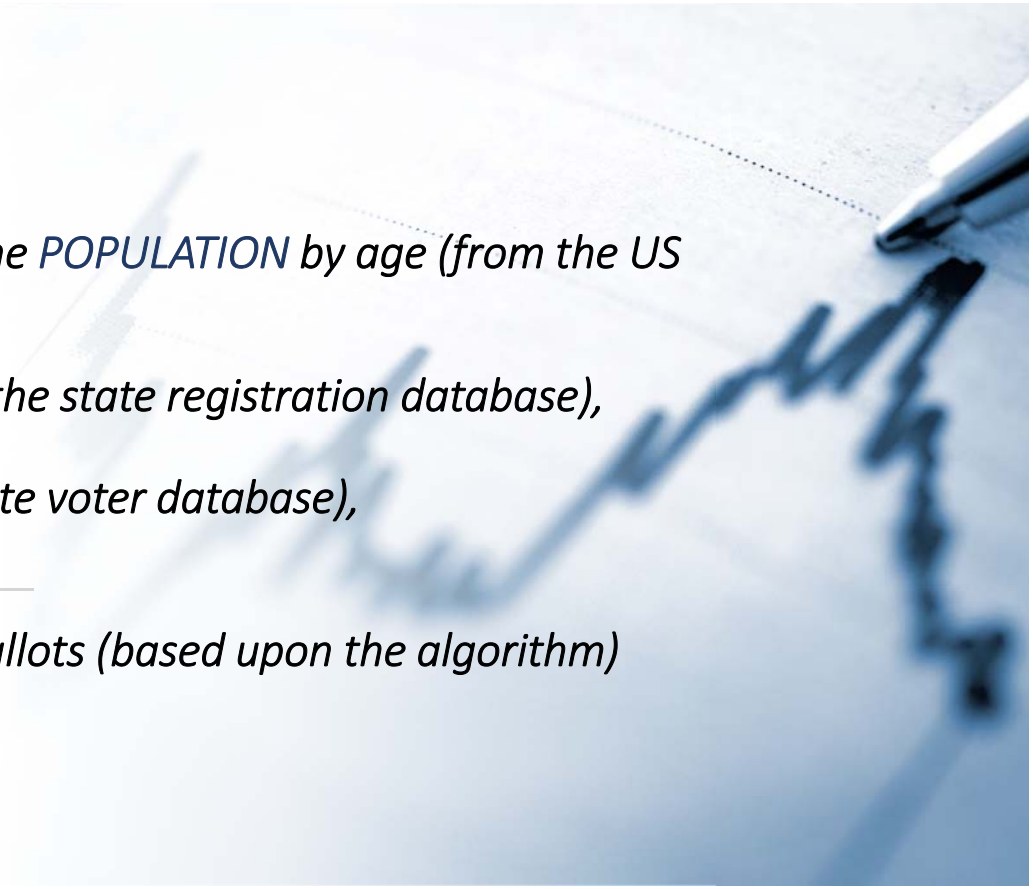
(In decreasing order by population)

"That ain't natural, buddy."

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

0.997 ***Average Correlation***

Let's have a closer look at each county…

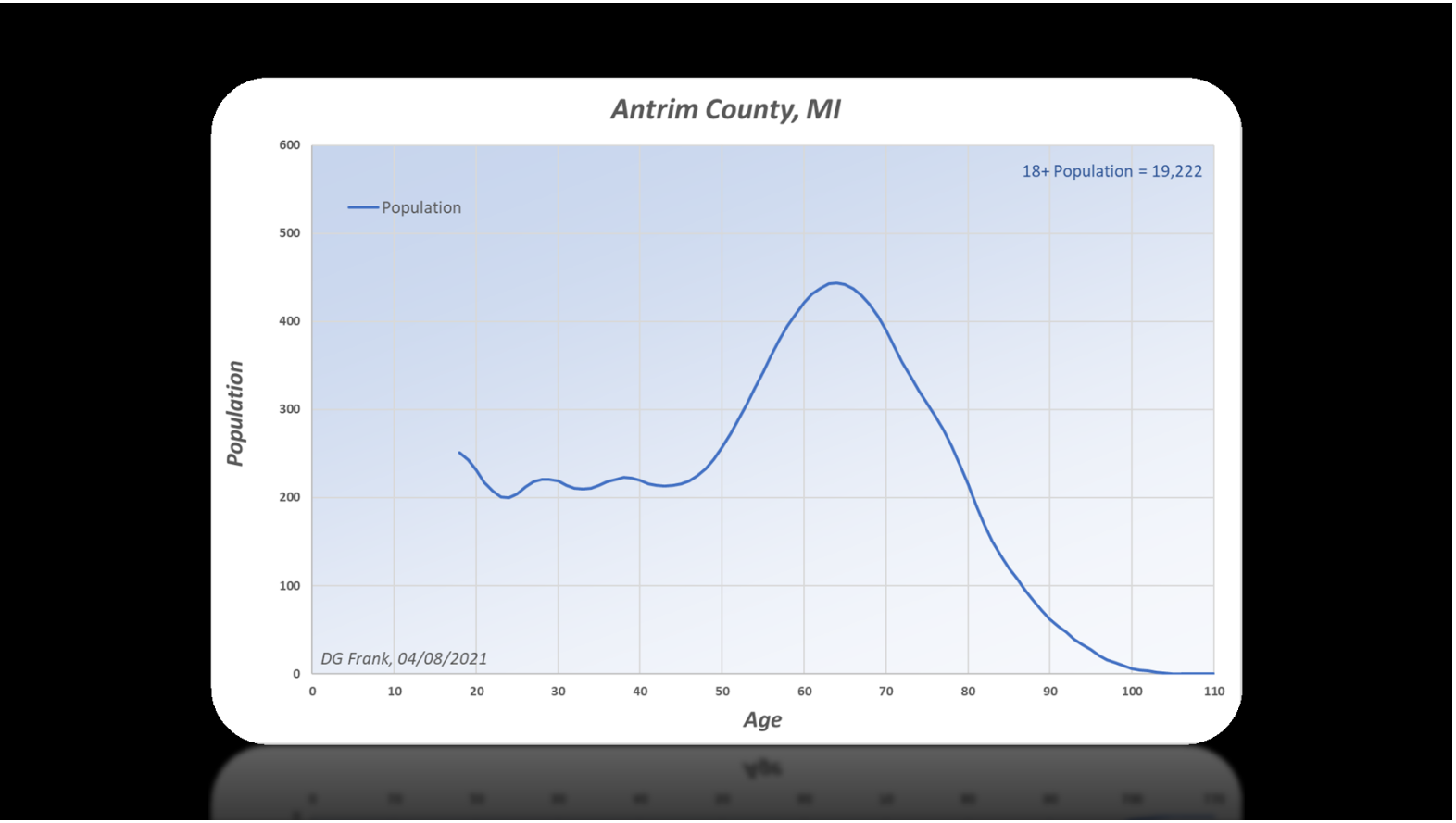


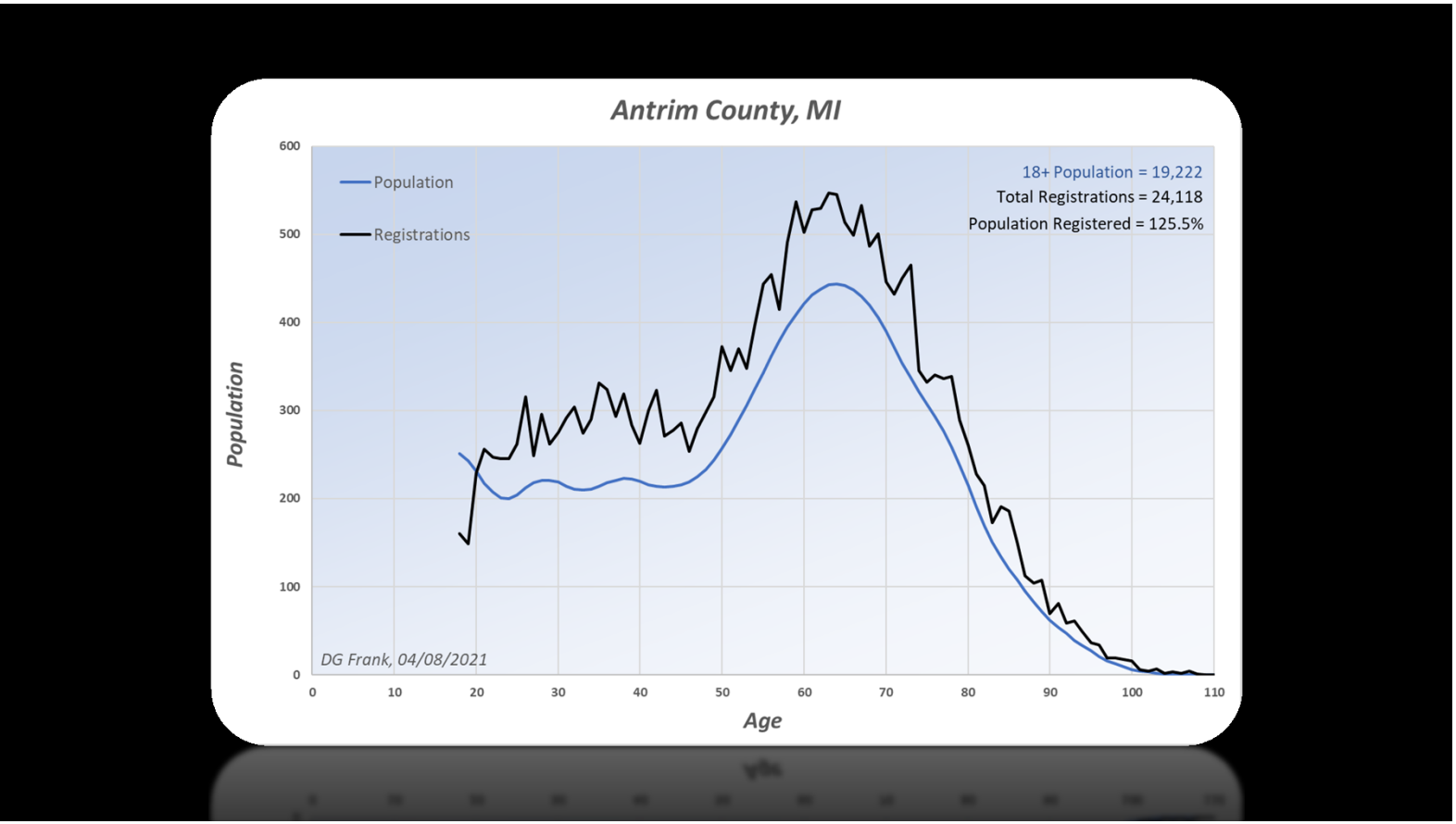
Each graph shows the POPULATION by age (from the US Census),

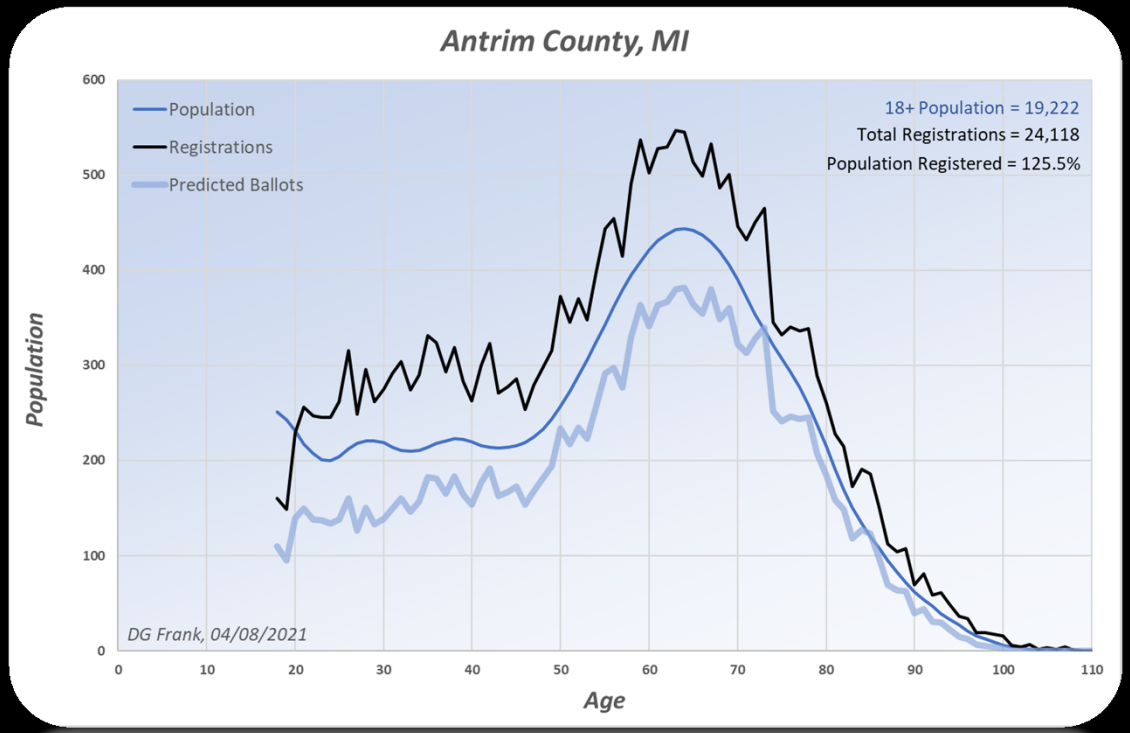
Registrations (from the state registration database),

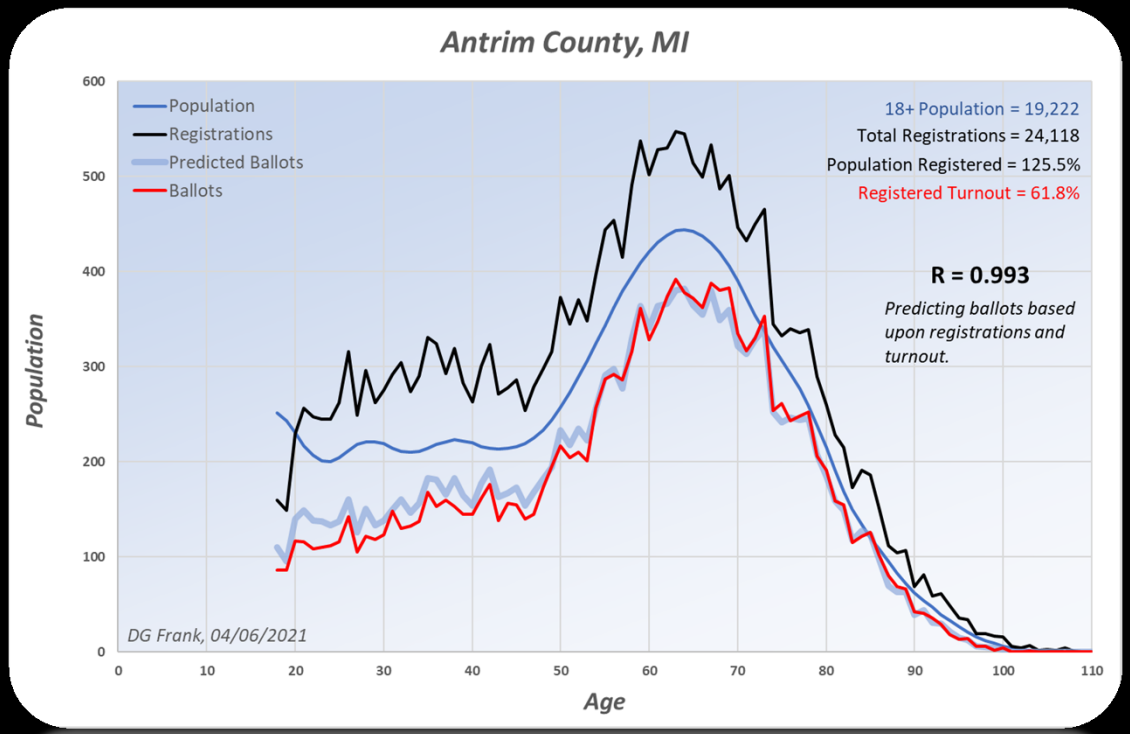
Ballots (from the state voter database),

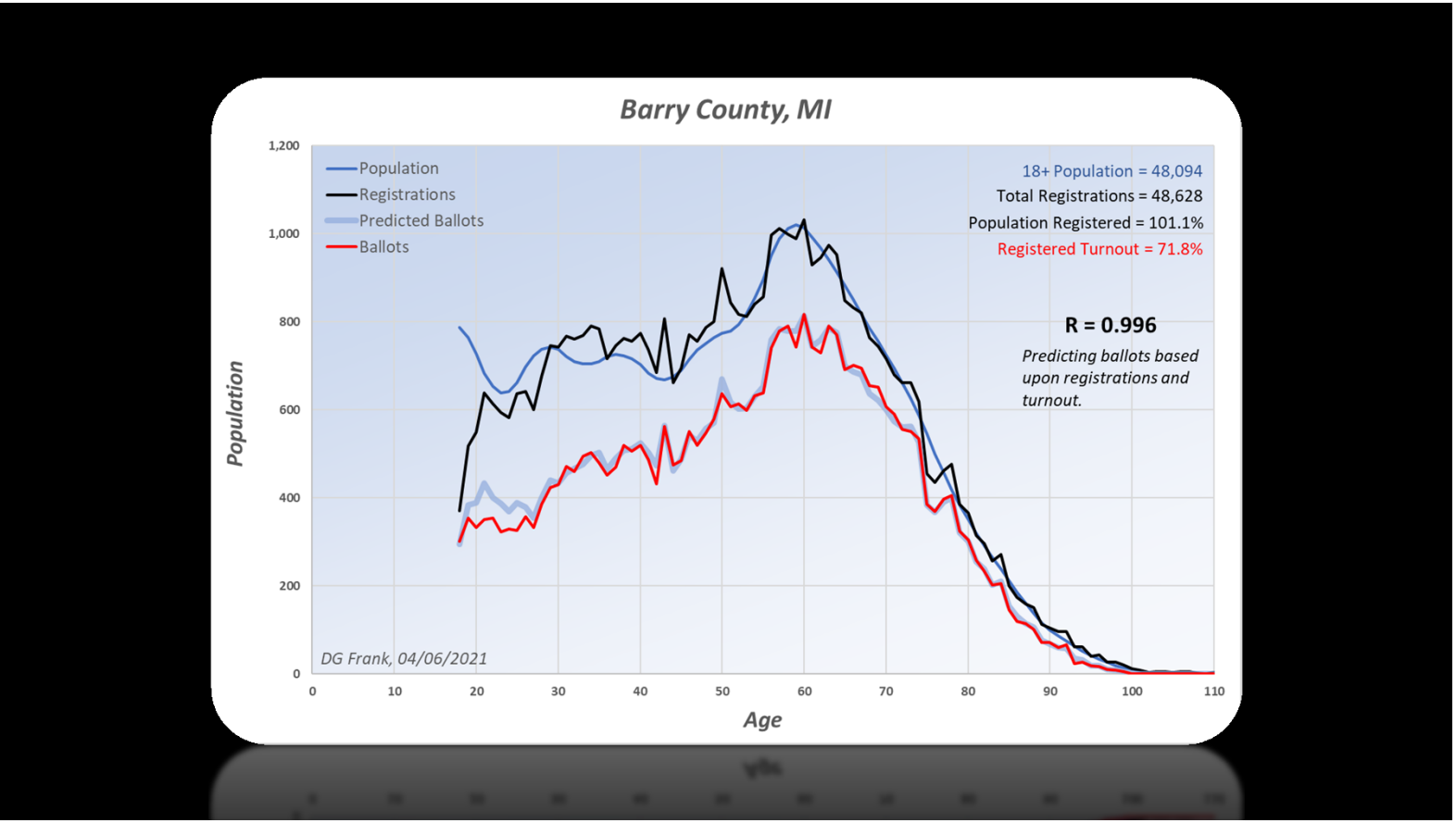
and the predicted ballots (based upon the algorithm)

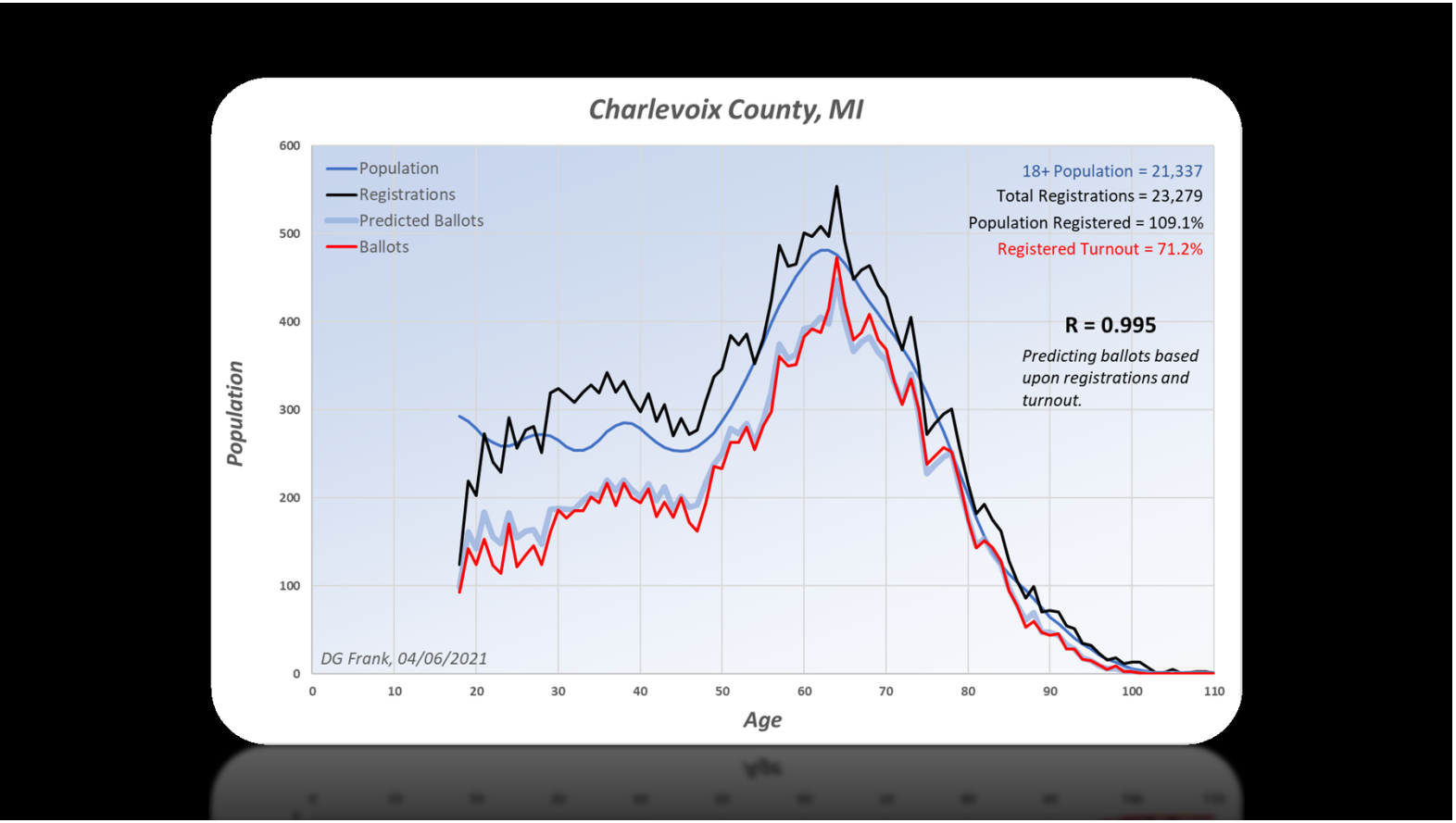

Antrim County, MI
18+ Population = 19,222
Population
DG Frank, 04/08/2021
Population
Age
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
110

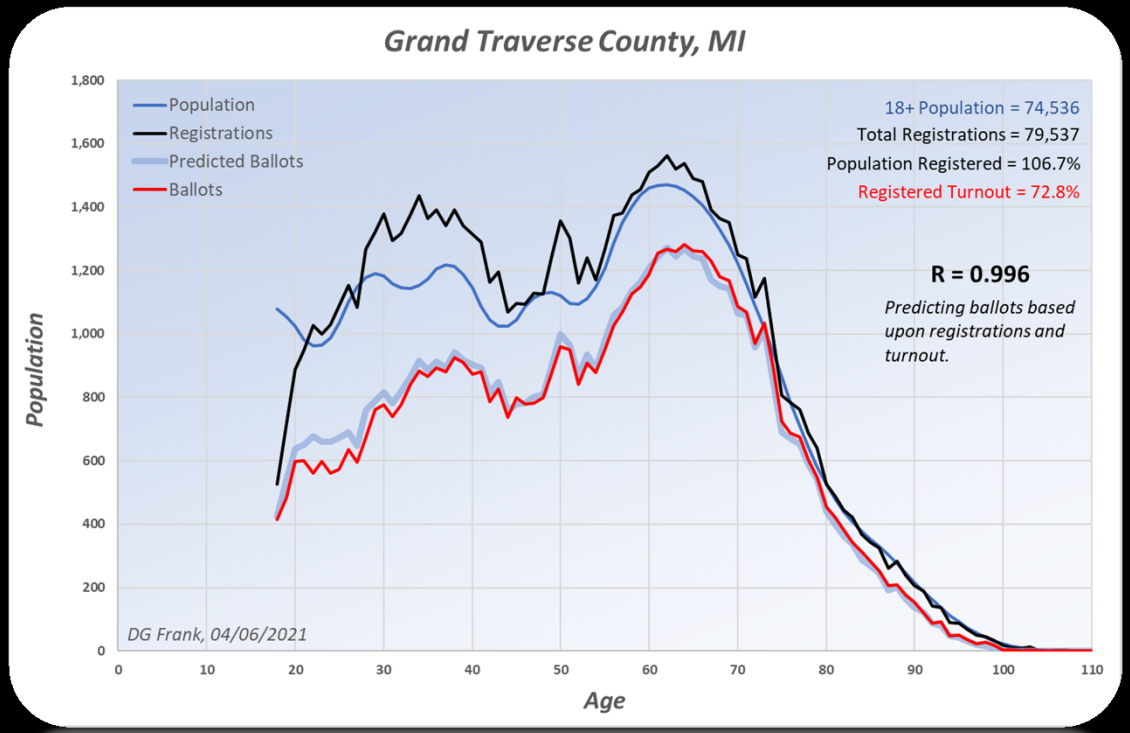

Antrim County, MI
Population
Registrations
18+ Population = 19,222
Total Registrations = 24,118
Population Registered = 125.5%
DG Frank, 04/08/2021
Population
Age
0
100
200
300
400
500
600
0
10
20
30
40
50
60
70
80
90
100
110

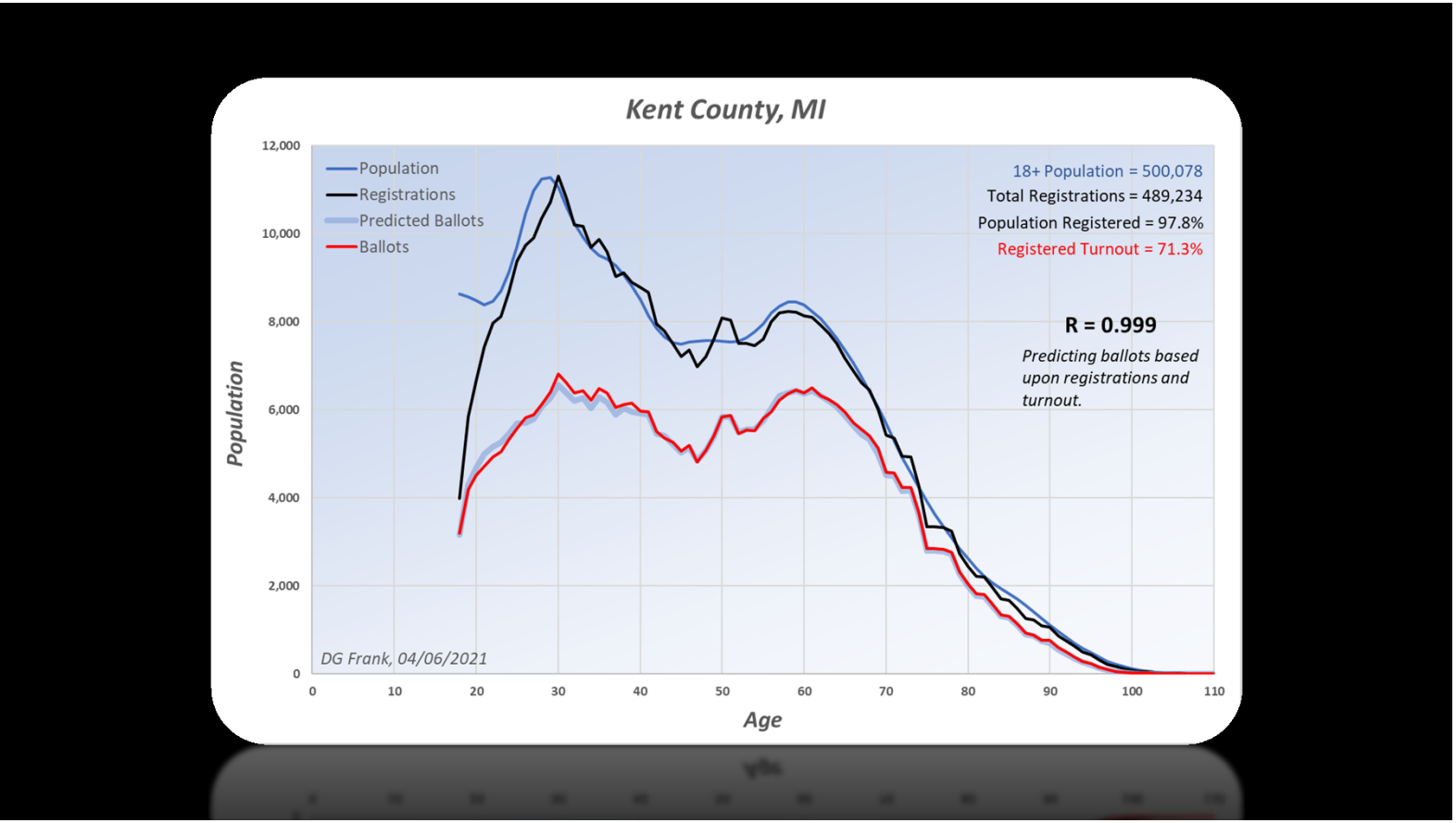

Antrim County, MI
Population
Registrations
Predicted Ballots
18+ Population = 19,222
Total Registrations = 24,118
Population Registered = 125.5%
DG Frank, 04/08/2021
Population
Age
600
500
400
300
200
100
0
0
10
20
30
40
50
60
70
80
90
100
110

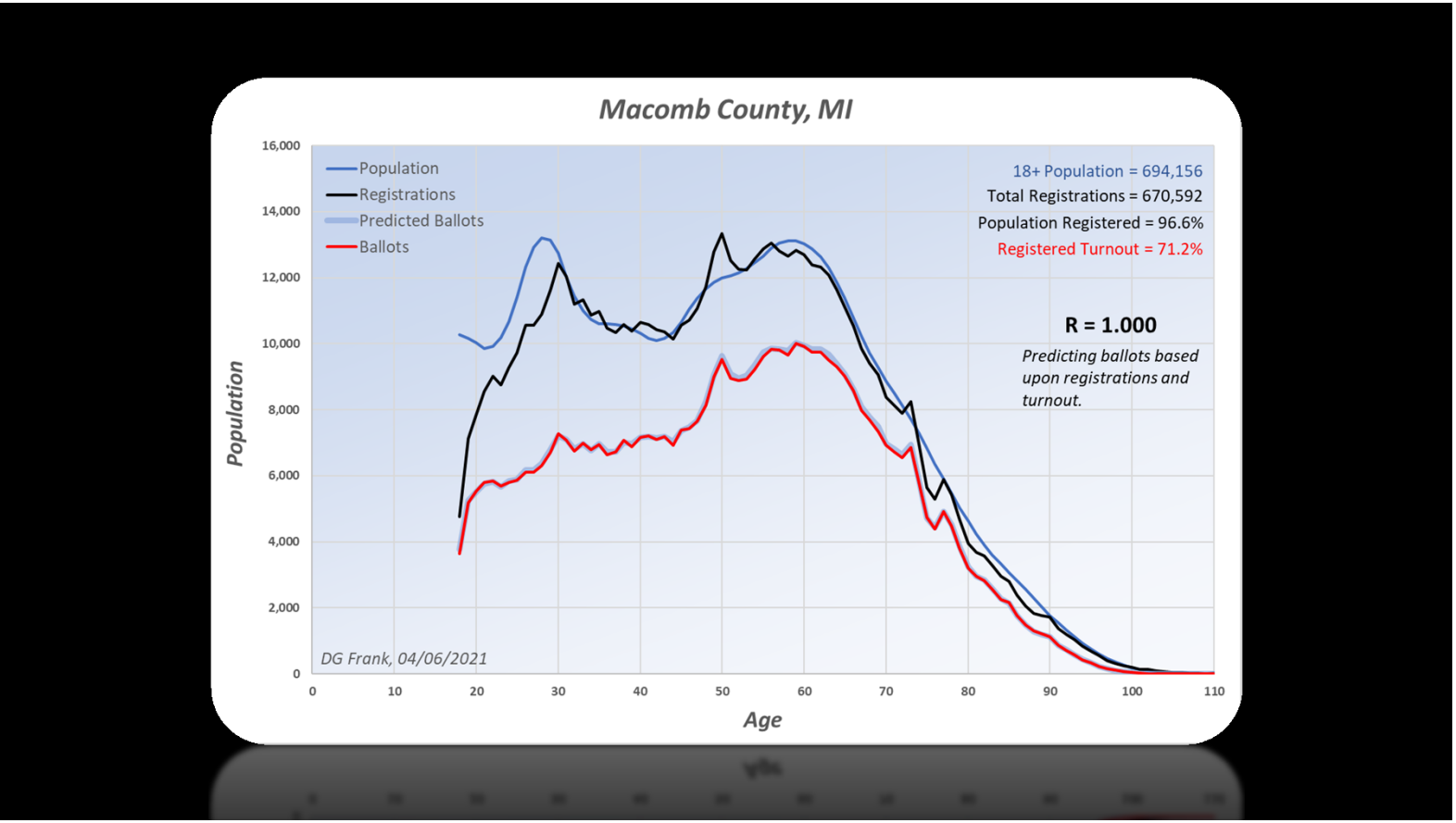

Antrim County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 19,222
Total Registrations = 24,118
Population Registered = 125.5%
Registered Turnout = 61.8%
R = 0.993
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
0
100
200
300
400
500
600
0
10
20
30
40
50
60
70
80
90
100
110

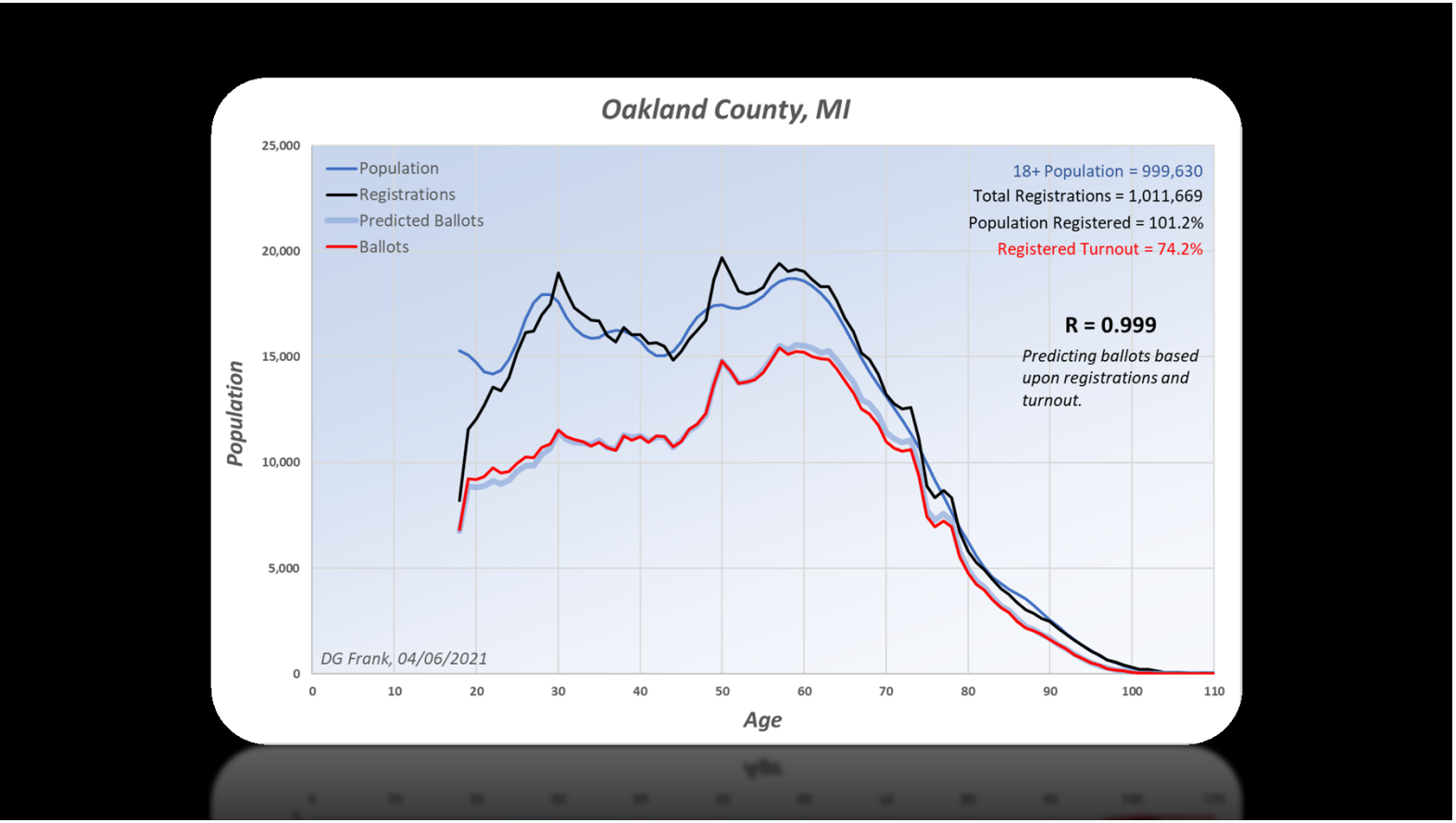

Barry County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 48,094
Total Registrations = 48,628
Population Registered = 101.1%
Registered Turnout = 71.8%
R = 0.996
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
1,200
1,000
800
600
400
200
0
0
10
20
30
40
50
60
70
80
90
100
110

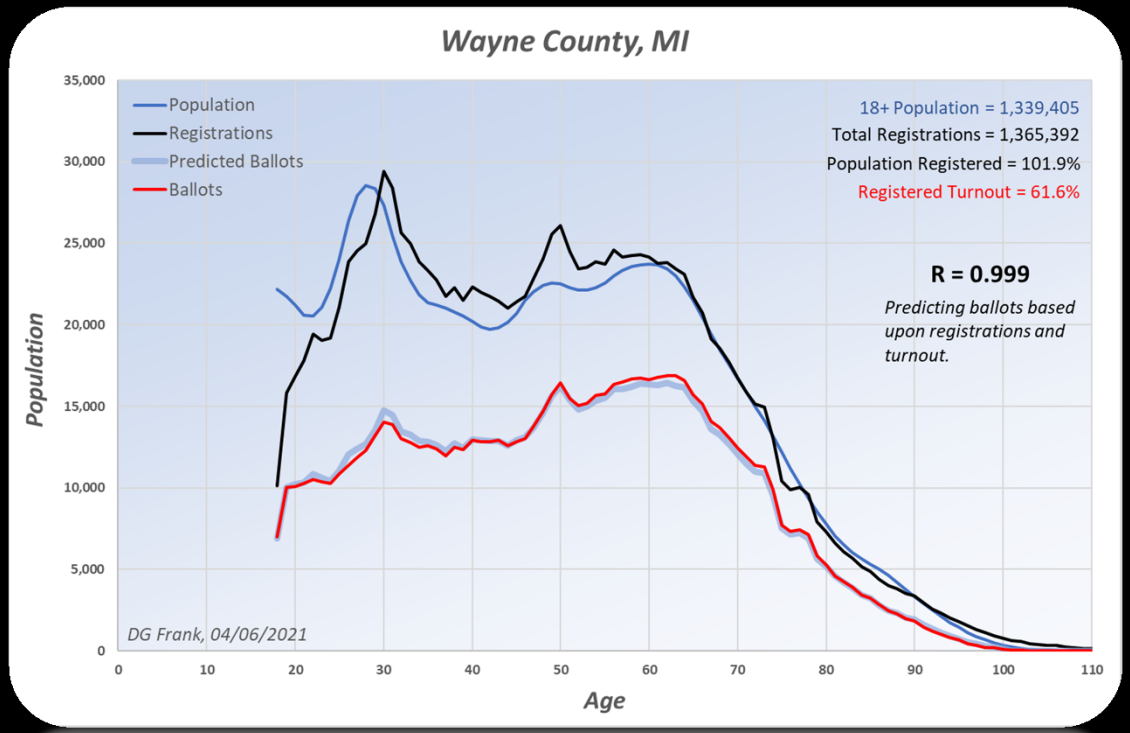

Charlevoix County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 21,337
Total Registrations = 23,279
Population Registered = 109.1%
Registered Turnout = 71.2%
R = 0.995
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
0
100
200
300
400
500
600
0
10
20
30
40
50
60
70
80
90
100
110

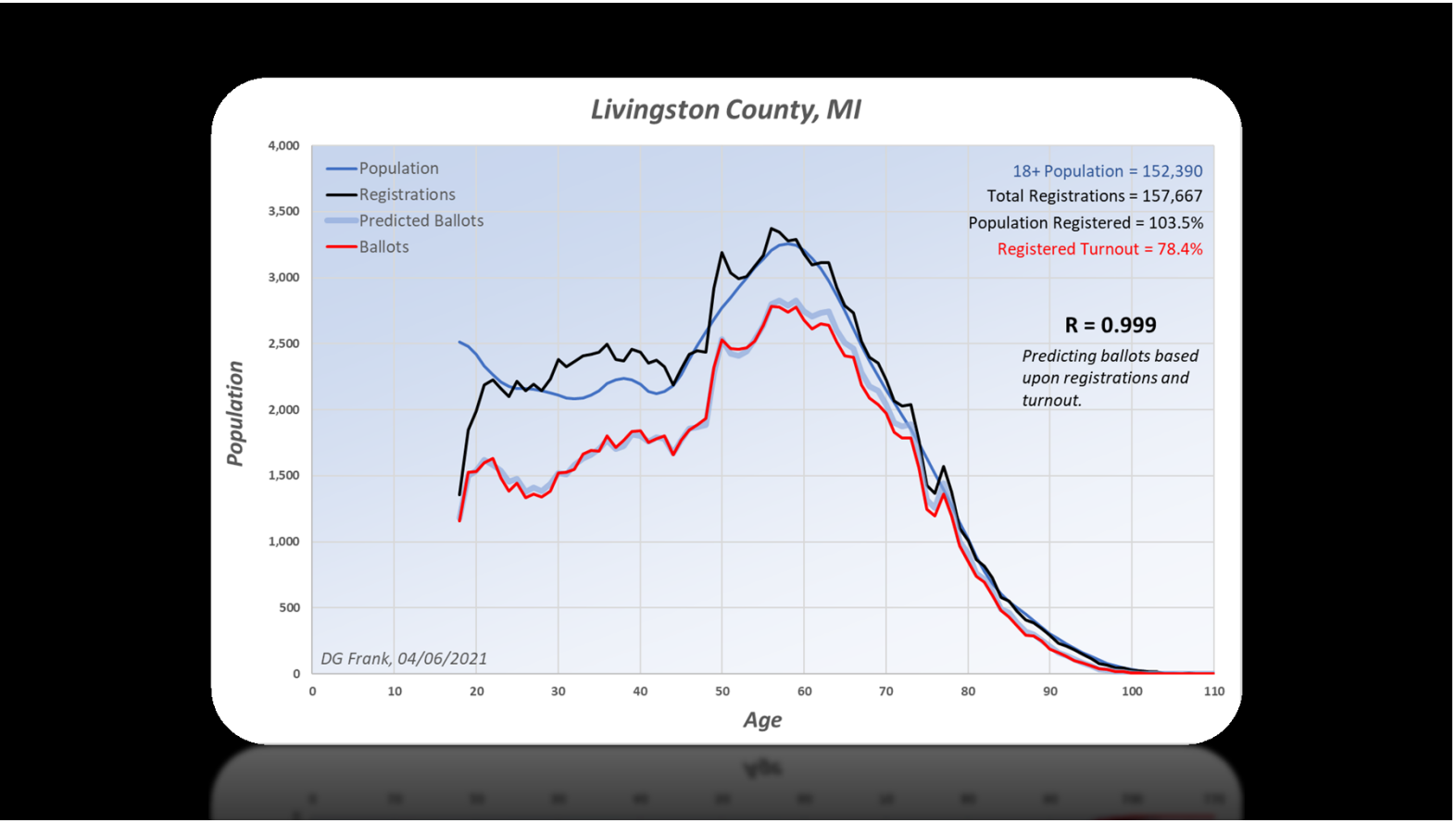

Grand Traverse County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 74,536
Total Registrations = 79,537
Population Registered = 106.7%
Registered Turnout = 72.8%
R = 0.996
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
1,800
1,600
1,400
1,200
1,000
800
600
400
200
0
0
10
20
30
40
50
60
70
80
90
100
110


Kent County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 500,078
Total Registrations = 489,234
Population Registered = 97.8%
Registered Turnout = 71.3%
R = 0.999
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
12,000
10,000
8,000
6,000
4,000
2,000
0
0
10
20
30
40
50
60
70
80
90
100
110


Macomb County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 694,156
Total Registrations = 670,592
Population Registered = 96.6%
Registered Turnout = 71.2%
R = 1.000
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
16,000
14,000
12,000
10,000
8,000
6,000
4,000
2,000
0
0
10
20
30
40
50
60
70
80
90
100
110


Oakland County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 999,630
Total Registrations = 1,011,669
Population Registered = 101.2%
Registered Turnout = 74.2%
R = 0.999
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
25,000
20,000
15,000
10,000
5,000
0
0
10
20
30
40
50
60
70
80
90
100
110


Wayne County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 1,339,405
Total Registrations = 1,365,392
Population Registered = 101.9%
Registered Turnout = 61.6%
R = 0.999
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
35,000
30,000
25,000
20,000
15,000
10,000
5,000
0
0
10
20
30
40
50
60
70
80
90
100
110


Livingston County, MI
Population
Registrations
Predicted Ballots
Ballots
18+ Population = 152,390
Total Registrations = 157,667
Population Registered = 103.5%
Registered Turnout = 78.4%
R = 0.999
Predicting ballots based upon registrations and turnout.
DG Frank, 04/06/2021
Population
Age
4,000
3,500
3,000
2,500
2,000
1,500
1,000
500
0
0
10
20
30
40
50
60
70
80
90
100
110

The Citizen Primer

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