

**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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PLAINTIFF'S SUPPLEMENTAL BRIEF

Plaintiff, WILLIAM BAILEY ("Plaintiff"), by and through his attorney, DePerno Law Office, PLLC, submits the following for his Supplemental Brief to his collective response to Defendants' joint motion for protective order and the motions to quash subpoena filed by Barry, Livingston, Macomb, and Grand Traverse Counties.

Plaintiff's attorney made a mistake in the first paragraph of page 3 of Plaintiff's brief filed earlier today. The replaced paragraph reads as follows:

This brief will help clarify that these election voting machines Defendant Benson and Sheryl Guy (as the elected clerk of Antrim County), and Dana Nessel are wrong in their press releases and campaign to vilify attorneys. They are wrong on the facts. They are wrong in their false assertion that this was the safest election in history [Exhibit 2].¹ In order to set the record straight and compel production of the evidence requested, this brief exposes the algorithm and foreign and domestic interference used in Antrim County (and the state of Michigan) to regulate and shifts votes in the 2020 election. We reveal that Antrim County failed to provide a proposed purchase order regarding a quotation for 17 USB wireless external modems that would allow their machines to connect to the internet. We reveal that a county in Michigan had at least one incoming connection through the internet to Taiwan and Germany. In addition, the court should be aware that Defendants have not produced important information. In addition, the court should be aware that Defendants have not produced important information. For instance, on March 26, 2021, Defendants produced a report written by J. Alex Halderman titled "*Analysis of the Antrim County, Michigan November 2020 Election Incident*." This report which casually describes election fraud as an "incident" reveals that while Defendants have delayed production of information and even argued that they should not be required to produce data, their expert has been in possession of many of the same items Plaintiff has requested. This report could not have been completed otherwise.

Respectfully submitted

DePERNO LAW OFFICE, PLLC

/s/ Matthew S. DePerno

Matthew S. DePerno (P52622)

Attorney for Plaintiff

Dated: April 9, 2021

¹ This is supported by the recent Court of Claims ruling in which Judge Christopher M. Murray ruled that Defendant Benson violated the Administrative Procedures Act by ignoring matching laws on absentee ballots in the 2020 election. See *Robert Genetski v Jocelyn Benson and Jonathan Brater*, Case No. 20-000216-MM, Michigan Court of Claims (03/09/2021).

PROOF OF SERVICE

On the date set forth below, I caused a copy of the following documents to be served on all attorneys of record at the addresses listed above

1. Plaintiff's Supplemental Brief

Service was electronically using the MiFile system which will send notification of such filing of the foregoing document to all attorneys of record.

Dated: April 9, 2021

/s/ Matthew S. DePerno
Matthew S. DePerno (P52622)