WASHINGTON

Secretary of State

Elections Division

Report of the Secretary of State on the examination of

Dominion Voting Democracy Suite 5.20 Voting System

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Overview

Application

On February 10, 2025, Dominion Voting Systems submitted an application for Washington State Certification of Democracy Suite 5.20. Dominion Voting Systems applied to certify functionality several components of the Democracy Suite voting system, specifically, ImageCast Central (ICC) high-speed ballot scanning products, ImageCast X (ICX) accessible ballot marking device (BMD), and Democracy Suite 5.20 Election Management System (EMS) suite. Copies of operating and maintenance manuals, training materials, technical and operational specifications were provided as part of the EAC's Technical Data Package.

New Voting System

This is a modification of a currently certified voting system (Democracy Suite 5.17) to the State of Washington. This system is a paper-based digital scan voting system with a commercial off the shelf (COTS) scanner.

National Certification

After the completion of testing by a certified Voting System Test Lab (VSTL) the Election Assistance Commission (EAC) certified Democracy Suite 5.20 on February 4, 2025. The hardware and software of the system that was approved by the EAC can be found in the EAC's Certificate of Conformance and Scope.

Testing & Inspection

Testing and evaluation of Democracy Suite 5.20 was conducted by Secretary of State staff at Franklin County Elections in Pasco, Washington, on March 25, 2025. Examining the system for the Office of the Secretary of State were Les Bowen, Voting Systems Lead, and Dietrich Romero, Election Integrity Lead.

Due to Democracy Suite 5.20 receiving National Certification from the EAC, a two-phase testing program was developed and approved by the Office of the Secretary of State for state certification testing: delivery acceptance testing and election results testing.

Delivery acceptance testing of the equipment and software to determine if the correct model and versions of the equipment and software are delivered and that the equipment, software, and system operate as documented by the vendor.

Election results testing to ensure that the equipment, software, and system perform each of the functions required by federal, state, and local law to administer an election from the beginning to the end.

Ballots were manually voted using the accessible voting unit, ImageCast X, and incorporated into the results to ensure proper tabulation.

Additional marks were made in the test ballots to simulate marks made by voters that would not be automatically tabulated correctly, including marks that would be automatically tabulated as overvotes and undervotes. All such marks were correctly

identified within the system and presented for review using the system's adjudication functionality.

One of the contests appearing on the test ballots was selected for a machine recount. Democracy Suite 5.20 correctly identified all ballots that included an undervoted ballot for the selected contest.

Executive Summary of Findings of Secretary of State Staff

Voting System Accuracy

Democracy Suite 5.20 successfully and accurately tabulated all ballots including additional hand-marked and manually voted ballots from the accessible voting units. Results were manually audited and reviewed by a team of two.

Results Reporting

Democracy Suite 5.20 was able to produce the state required reports for election results by precinct and cumulative.

Presidential Primary

Democracy Suite 5.20 can perform all the functions necessary to comply with current state requirements for the Presidential Primary.

Write-Ins

Democracy Suite allows the election personnel to enter write-in candidates into the system. Write-in candidates cannot be selected in adjudication until they have been added to the list of write-in candidates in the system.

System Limits

This table, containing information from the testing lab certification test report, depicts the limits of the Democracy Suite 5.20 system, as stated by Dominion Voting Systems.

Characteristics	Limit	Limiting Component
Ballot Positions	462** / 292*	22-inch ballot
Precincts in an election	1,000, 250	Memory: Standard, Express
Contests in an election	1,000, 250	Memory: Standard, Express
Candidates/counters in an election	10,000, 2,500	Memory: Standard, Express
Candidates/Counters in a precinct	462** / 240*	22-inch ballot
Candidates/Counters in a tabulator	10,000, 2,500	Memory: Standard, Express
Ballot styles in an election	3,000, 750	Memory: Standard, Express
Ballot IDs in a tabulator	200	Memory
Contests in a ballot style	153** / 38*	14-inch QR ballot** 22-inch ballot*
Candidates in a contest	231** / 240*	22-inch ballot
Ballot styles in a precinct	5	Memory
Number of political parties	30	Memory
“Vote for” in a contest	30** / 24*	22-inch ballot
Supported languages in an election	5	Memory
Number of write-ins	462** / 24*	22-inch ballot

Ballot Scanning

ImageCast Central uses InoTec and Cannon scanners. The InoTec scanner is a high-capacity scanner capable of sustained scanning speeds of up to 300 ballots per minute. The supported Canon scanners have speeds ranging from 60 to 140 ballots per minute. During testing of a ballot measuring 8.5”x17” on the Canon DR-G2140 scanner, we experienced a scanning speed just under two ballots per second.

Ballot Processing

ImageCast Central is a central, high-speed, digital scan ballot tabulator coupled with ballot processing applications. The ICC software runs on unmodified COTS desktop computers running the Windows operating system and supports specific models of scanners.

The ICC central-count system runs on a Windows Server operating system, with network connections to workstations running the Windows operating system. All the components are unmodified COTS that are connected via a wired, closed, and isolated network not connected to any other systems or the Internet.

The system will allow multiple users to adjudicate ballots simultaneously, including ballots in the same batch. This feature will speed up the processing of ballots by county staff. Additionally, user roles can be restricted so they can only perform certain tasks within the application which will reduce the risk of accidental or intentional changes.

This system also allows for keyboard navigation which can speed up adjudication as well as offer accessible access to election staff with disabilities.

Accessible Voting

The ImageCast X is an Android-based touchscreen accessible voting unit, which can be used with the provided accessible switches or the voter's assistive technology, such as a sip-and-puff device. At the end of the session, the voter's choices are printed on a machine-readable ballot that can be put into the voter's return envelopes and returned into a ballot drop box. The vote is not captured electronically, meaning this device is not a direct recording electronic (DRE) voting unit. Accordingly, this device does not need to be audited separately. The votes on ICX will be a part of the post-election audit, as the ballots can be mixed in with all other ballots.

Accessible voting units (AVUs) must allow voters to cast their ballot privately and independently, which required voters to have direct access to the device while using it, with limited ability for direct observation from election officials. For this reason, additional security measures are appropriate to prevent unauthorized tempering with AVUs. The ImageCast X uses a whitelist for USB devices, which prevents unauthorized devices from being connected. In addition, any changes in the USB configuration require intervention from an election official to enter a password to authorize the use of the attached device. This functionality was observed during functional testing when the configuration for the ICX was altered to switch between two whitelisted ballot printers.

System Security

Windows logs are used to track the use of the PCs by individual users in addition to the Democracy Suite audit logs. These logs can be printed. Another important feature is that every ballot scanned has an audit log attached for easy review of the history of that ballot from scanning to tabulation.

Democracy Suite uses two-step authentication by requiring the user to enter their name and password as well as having a valid "iButton" connected to the PC. Democracy Suite also incorporates security updates to address recommendations from the Cybersecurity and Infrastructure Security Agency (CISA). Democracy Suite continues to use system hardening scripts which create policies to enforce strong password usage on all Windows-based machines.

The system documentation provides procedures on how the user can check the hash checksum of the software to verify that the applications have not been modified from their certified versions.

Inspection of the system included the generation of hash checksums, which were compared to the hash checksums received from the federally accredited testing laboratory, demonstrating that the software used during the state certification test was identical to the software approved by the EAC.

Physical Security

The Democracy Suite EMS environment must be physically secured in a locked area with security access controls in place. No access to this area should be permitted to unauthorized personnel. Dominion Voting Systems requires that an access control system is utilized that will automatically log and record each person's access to the EMS Datacenter environment.

Such systems include the use of electronic passes or biometrics to enter the secure area. In addition, if cameras and/or a cardkey system are not in use, all personnel must be required to sign in and out when accessing the secure Democracy Suite EMS environment area. The access log must include name, organization, purpose of access, date, time in, time out, and signature. Buildings and rooms within those buildings which contain EMS and ICC installations must be secured. Security for these can include traditional methods such as keys and locks, cardkeys, and surveillance cameras. When voted ballot images are stored on the tabulation system, security must employ the use of numbered seals and logs, or other security measures, that document each individual's access to the voted ballot images and detect inappropriate access to the secure storage.

Conclusion

After an evaluation of the system, staff believe the system and its components meet current Washington State requirements for Presidential Primary, Special, Primary, and General Elections.