

WISCONSIN ELECTIONS COMMISSION

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Via U.S. Mail and Email

March 2, 2018

Mr. Ed Smith
 Vice President of Product
 Clear Ballot Group
 7 Water Street; Suite Seven
 Boston, MA 02109

Mr. Smith:

On December 12, 2017 the Wisconsin Elections Commission (“WEC” or “Commission”) granted conditional approval for the Clear Ballot Group ClearVote 1.4.

WEC staff tested and the Commission conditionally approved the following hardware versions for the Clear Ballot Group ClearVote 1.4:

<i>Equipment</i>	<i>Hardware Version(s)</i>	<i>Firmware Version</i>	<i>Type</i>
ClearCast	Model 1	A	Polling Place Digital Scanner and Tabulator
ClearCount			Central Count Digital Scanner
Dell Latitude Laptop	5580		
Dell PowerEdge Server	T330		
Dell OptiPlex AIO	7440		
Dell Precision Workstation	T3620		
Fujitsu Scanner	fi-7180		
Fujitsu Scanner	fi-6800		
Fujitsu Scanner	fi-6400		
ClearDesign			Election Management System
Dell Latitude Laptop	5580		
Dell PowerEdge Server	T630		
Dell 24-inch Monitor	SE2416H		
Dell 22-inch Monitor	E2216HV		
Dell Mini Tower	T3620		

TP-LINK VPN Router	TL-R600VPN		
Lenovo USB Portable DVD Burner	LN-8A6NH11B		
Brother Printer	HL-L2340DW		
ClearAccess			Ballot Marking Device
Dell OptiPlex AIO	5250		
Dell 15” Inspiron	7000 series		
Brother Laser Printer	HL-L2340DW		
Oki Data Laser Printer	B432dn		

A complete list of the components that were tested as part of the ClearVote 1.4 system can be found in Appendix A.

Staff also reviewed and the Commission approved the following software, which is included in the ClearVote 1.4 suite:

<i>Software</i>	<i>Version</i>
ClearDesign	1.4.3
ClearCount	1.4.2
ClearAccess	1.4.1
ClearCast	1.4.2

In order to maintain approval for use in Wisconsin, a voting system manufacturer must comply with the requirements of Chapter EL 7 of the Wisconsin Administrative Code. A copy of this chapter has been enclosed for your review. Specifically, Clear Ballot Group must:

1. Pay the WEC’s costs for testing this voting system. An invoice will arrive separately.
2. Furnish a copy of the programs, documentation, and source code for these systems to be placed in escrow with EscrowTech International, Inc.
3. Provide the WEC with a list of software components, pursuant to Wis. Stat. § 5.905, that “record and tally the votes cast with this system.” For the purposes of this condition, “software components” include vote-counting source code, table structures, modules, program narratives and other human-readable computer instructions used to count votes with this system.
4. Ensure that the election results from this system can be exported on election night into the WisVote system in a format specified by the Commission.
5. Inform the WEC regarding any municipalities in Wisconsin which agree to use this voting system as well as any states or other jurisdictions which approve this voting system for use.

6. Complete the attached Certificate of Performance Compliance: Delivery of Voting System for each municipality. One certified copy must be provided to the municipality upon delivery of the voting system and one certified copy must be provided to the WEC.
7. Immediately notify the WEC of any changes to this voting system. The Wisconsin Elections Commission will determine the procedures for approving any changes for use in Wisconsin on a case-by-case basis.
8. Submit an Engineering Change Order via an approval application for de minimis changes; however, any material changes require a full application and review process.
9. In the instance of voluntary withdrawal, involuntary decertification by the US EAC (or other Federal agency responsible for voting systems certification), or revocation of approval by the Commission of ClearVote 1.4 (including any component), Clear Ballot Group shall provide affected customers with substitute tabulation equipment such that any impacted election may be properly tabulated pursuant to Wis. Stat. § 5.40.

Furthermore, the WEC has enacted additional requirements for the ClearVote 1.4. The Commission determined that the following continuing conditions shall remain ongoing for purchasing localities and Clear Ballot Group:

1. The Commission's approval is contingent upon staff review and approval of on-screen language used when providing ballot instructions to voters.
2. As a continuing condition of the Commission's approval, that Clear Ballot Group may not impose customer deadlines contrary to requirements provided in Wisconsin Statutes, as determined by the Commission. In order to enforce this provision, local jurisdictions purchasing Clear Ballot Group equipment shall also include such a provision in their respective purchase contract or amend their contract if such a provision does not currently exist.
3. As a continuing condition of the Commission's approval, this system must always be configured to satisfy the following requirements:
 - a. Automatic rejection of crossover ballots.
 - b. Automatic rejection of all improper ballots except blank ballots.
 - c. Capture digital images of all ballots tabulated by the system.
4. Election inspectors shall remake any absentee ballots automatically rejected where the override function is not used so that the ballot count is consistent with total number of voters.
5. As part of US EAC certificate: **CBG-CV-14**, only equipment and software included in this system, as tested, are allowed to be used in combination to conduct an election in Wisconsin. All subsequent system version or component upgrades released by Clear Ballot

Group must be submitted as a new system to the Wisconsin Elections Commission for testing and certification prior to use in any Wisconsin election.

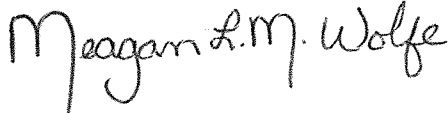
6. As a condition of approval, Clear Ballot Group shall abide by applicable Wisconsin public records laws. If, pursuant to a proper public records request, any customer of Clear Ballot Group receives a request for materials which could be considered proprietary or confidential, the customer will notify Clear Ballot Group, providing the same with the opportunity to either provide the customer with the record that is requested for release to the requestor, or to advise the customer that Clear Ballot Group objects to the release of the information, and to provide the legal and factual basis of the objection. If for any reason, the customer concludes that Clear Ballot Group is obligated to provide such records, those records shall be provided immediately upon customer request. Clear Ballot Group shall negotiate and specify retention and public records production costs in writing with customers prior to charging any associated fees. In absence of meeting such conditions of approval, Clear Ballot Group shall not charge customers for work performed pursuant to a proper public records request, except for the “actual, necessary, and direct” charge of responding to the records request, as defined and interpreted in Wisconsin law, plus shipping, handling, and chain of custody costs.

Please note that noncompliance with these, or any other requirements contained in Wisconsin Statutes or the Wisconsin Elections Commission Administrative Code, may result in the suspension or withdrawal of the Commission’s approval of this voting system.

Thank you for your attention to these issues. If you have any questions, please do not hesitate to contact Richard Rydecki of the Wisconsin Elections Commission.

Sincerely,

Wisconsin Elections Commission



Meagan McCord Wolfe
Commission Administrator

Appendix A

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
ClearAccess software	1.4.1			ClearAccess
ClearCast software	1.4.2			ClearCast
ClearCount software	1.4.2			ClearCount
ClearDesign software	1.4.3			ClearDesign
Brother printer driver	0.1.0		Windows 10 Pro	ClearAccess
ColReorder	1.1.2		COTS software	ClearAccess
ColVis	1.1.1		COTS software	ClearAccess
DataTables	1.10.5		COTS software	ClearAccess
Google Chrome	61.0.3163.100		COTS software	ClearAccess
jquery	1.10.5		COTS software	ClearAccess
jsmin	2003.12.04		COTS software	ClearAccess
nsis	3.01		COTS software	ClearAccess
Okidata printer driver 1.0	01.63.0.4		Windows 10 Pro	ClearAccess
pefile	2016.3.28		COTS software	ClearAccess
PyInstaller	3.2		COTS software	ClearAccess
Python	2.7.10		COTS software	ClearAccess
Python-future	0.15.2		COTS software	ClearAccess
pywin	220		COTS software	ClearAccess
webpy	webpy 0.38		COTS software	ClearAccess
Windows 10 Pro	Build 1607		Windows 10 Pro	ClearAccess
Adafruit tools	1.4.9		COTS software	ClearCast
Arduino tools	1.8.0		COTS software	ClearCast
DataTables	1.10.5		COTS software	ClearCast
google_chrome	62.0.3202.75-1		COTS software	ClearCast
jquery	1.10.2		COTS software	ClearCast

jQuery.NumPad	1.4		COTS software	ClearCast
jquery.ui	1.11.3		COTS software	ClearCast
JTSage DateBox	4.0.0		COTS software	ClearCast
libPDIScan.so	7.1.0		COTS software	ClearCast
OpenSSL (standard)	1.0.1f		COTS software	ClearCast
OpenSSL FIPS Object Module	2.0.10		COTS software	ClearCast
pdi_ps3_drv_scanner.ko	2.0.5		COTS software	ClearCast
Pyinstaller	3.2.1		COTS software	ClearCast
scanner_control	0.0.28		COTS software	ClearCast
Ubuntu LTS	14.04.5		COTS software	ClearCast
UPSBatteryMontior	1.0		COTS software	ClearCast
zeromq	4.2.0		COTS software	ClearCast
Apache	2.4.18		COTS software	ClearCount
ColVis	1.0.8		COTS software	ClearCount
Fujitsu fi-6400 PaperStream	1.30.0		Windows 10 Pro	ClearCount
Fujitsu fi-6800	10.10.710		Windows 10 Pro	ClearCount
Fujitsu fi-7180 PaperStream	1.4.0		Windows 10 Pro	ClearCount
Google Chrome	55.0.2883.87		COTS software	ClearCount
J JavaScript jQuery-migrate library	1.2.1		COTS software	ClearCount
JavaScript Bootstrap library	2.3.2		COTS software	ClearCount
JavaScript Chosen library	1.0.0		COTS software	ClearCount
JavaScript DataTables library	1.9.4		COTS software	ClearCount
JavaScript FixedHeader library	2.0.6		COTS software	ClearCount
JavaScript hotkeys library	1.0		COTS software	ClearCount
JavaScript jQuery library	1.10.2		COTS software	ClearCount

JavaScript LESS library	1.3.3		COTS software	ClearCount
JavaScript pep library	1.0		COTS software	ClearCount
JavaScript TableTools library	2.1.5		COTS software	ClearCount
JavaScript tooltip library	1.3		COTS software	ClearCount
libapache2-mod-fcgid	2.3.9		COTS software	ClearCount
MySQLdb (part of Ubuntu)	1.3.7		COTS software	ClearCount
OpenSSL (standard)	1.0.2g		COTS software	ClearCount
OpenSSL FIPS Object Module	2.0.10		COTS software	ClearCount
Pillow (part of Ubuntu)	3.1.2		COTS software	ClearCount
PollyReports	1.7.6		COTS software	ClearCount
PyInstaller	3.2.1		COTS software	ClearCount
Python (part of Ubuntu)	2.7.12		COTS software	ClearCount
Ubuntu LTS	16.04.1		COTS software	ClearCount
Windows 10 Pro	Build 1607		Windows 10 Pro	ClearCount
ZeroClipboard TableTools2	1.0.4		COTS software	ClearCount
Apache	2.4.7		COTS software	ClearDesign
Bootstrap	3.0.0		COTS software	ClearDesign
DataTable	1.10.5		COTS software	ClearDesign
DataTable-ColReorder	1.1.2		COTS software	ClearDesign
DataTable-ColVis	1.1.1		COTS software	ClearDesign
DataTablePlugins	1.10.10		COTS software	ClearDesign
DataTable-TableTools	2.2.3		COTS software	ClearDesign
fastclick	1.0.4		COTS software	ClearDesign
Google Chrome	55.0.2883.87		COTS software	ClearDesign
jquery	1.10.2		COTS software	ClearDesign

jquery-impromptu	5.2.3		COTS software	ClearDesign
jquery-qrcode	1.0		COTS software	ClearDesign
jquery-splitter	0.14.0		COTS software	ClearDesign
jquery-ui	1.10.4		COTS software	ClearDesign
jscolor	1.4.2		COTS software	ClearDesign
jsmin	2003.12.04		COTS software	ClearDesign
jszip	3.1.2		COTS software	ClearDesign
libapache2-mod-fcgid	2.3.9		COTS software	ClearDesign
libmp3lame	0.5.0		COTS software	ClearDesign
MySQL	5.5.55		COTS software	ClearDesign
OpenSSL (standard)	1.0.2g		COTS software	ClearDesign
OpenSSL FIPS Object Module	2.0.10		COTS software	ClearDesign
papaparse	4.1.2		COTS software	ClearDesign
PhantomJS	1.9.0		COTS software	ClearDesign
Pyinstaller	3.0		COTS software	ClearDesign
Python	2.7.6		COTS software	ClearDesign
Python DBUtils	1.1		COTS software	ClearDesign
Python Flup	1.0.2		COTS software	ClearDesign
Python FontTools library	3.0		COTS software	ClearDesign
Python JSMIN	2.2.1		COTS software	ClearDesign
Python MySQL DB	1.2.3		COTS software	ClearDesign
Python Pillow	2.3.0		COTS software	ClearDesign
Python PIP	1.5.4		COTS software	ClearDesign
Python RTF	0.2.1		COTS software	ClearDesign
Python webpy	0.38		COTS software	ClearDesign

Python XLRD	0.9.4		COTS software	ClearDesign
Samba	4.3.11		COTS software	ClearDesign
SQLAlchemy	1.0.15		COTS software	ClearDesign
tinymce	4.1.9		COTS software	ClearDesign
Ubuntu LTS	14.04.4		COTS software	ClearDesign
Unzip	6.0.9		COTS software	ClearDesign
Usbmount	0.0.22		COTS software	ClearDesign
Windows 10 Pro	Build 1607		Windows 10 Pro	ClearDesign
Zip	3.0.8		COTS software	ClearDesign
Accessibility Keypad		Storm EZ08-222013	COTS hardware	ClearAccess
Backup UPS Power Supply		APC SMT 2200	COTS hardware	ClearAccess
Ferrite		WURTH 742-416- 33S-CBG1	COTS hardware	ClearAccess
Ferrite		WURTH 742-416- 22S-CBG1	COTS hardware	ClearAccess
Ferrite		WURTH 742-716- 22S-CBG1	COTS hardware	ClearAccess
Headphones		Hamilton Buhl HA7	COTS hardware	ClearAccess
Large Ballot Printer		Oki B432dn	COTS hardware	ClearAccess
Large ClearAccess		Dell OptiPlex 5250	Windows 10 Pro	ClearAccess
Mouth Input Device		Origin AC-0313-H2	COTS hardware	ClearAccess
Small Ballot Printer		Brother HL-L2340DW	COTS hardware	ClearAccess
Small ClearAccess		Dell Inspiron 7000 Series	Windows 10 Pro	ClearAccess
Voting Privacy Screen		ElectionSource VB- 60B	COTS hardware	ClearAccess
ClearCast Ballot Box		1224UBB-CB		ClearCast
ClearCast Precinct Voting Machine		Model 1		ClearCast
Portrait Monitor Stand		Ergotron Neo Flex	COTS hardware	ClearCast
22 Inch Client Monitor		Dell E2216HV	COTS hardware	ClearCount