



**ALEX PADILLA** | SECRETARY OF STATE | STATE OF CALIFORNIA  
OFFICE OF VOTING SYSTEMS TECHNOLOGY ASSESSMENT  
1500 11<sup>th</sup> Street | Sacramento, CA 95814 | **Tel** 916.695.1680 | **Fax** 916.653.4620 | [www.sos.ca.gov](http://www.sos.ca.gov)

May 8, 2018

County Clerk/Registrar of Voters (CC/ROV) Memorandum #18112

**TO:** All County Clerks/Registrars of Voters

**FROM:** /s/ Susan Lapsley  
Deputy Secretary of State and Counsel

**RE:** Voting Technology: Approval of Dominion Voting Systems, Inc.'s Image  
Cast Remote Version 5.2 Remote Accessible Vote by Mail System

The California Secretary of State has approved Dominion Voting Systems, Inc.'s ImageCast Remote 5.2 Remote Accessible Vote by Mail System.

Attached is a copy of the Approval document.

Attachment: (1)



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May 8, 2018

Waldeep Singh  
Executive Vice-President, Sales  
Dominion Voting Systems, Inc.  
1201 18th Street, Suite 210  
Denver, Colorado 80202

Dear Mr. Singh:

Pursuant to California Elections Code section 19281, the California Secretary of State's Office of Voting Systems Technology Assessment performed an examination and review of the ImageCast Remote 5.2 remote accessible vote by mail system.

Based on the results of the examination and review, the California Secretary of State has conditionally approved the ImageCast Remote 5.2 remote accessible vote by mail system for use in California. The conditional approval is subject to the terms in the attached certification document.

Additionally, ImageCast Remote 5.2 is subject to California Code of Regulations, Title 2, Chapter 6 Escrow of Source Codes. Compliance is mandatory prior to use in any California Election.

Sincerely,

A handwritten signature in blue ink that reads 'Susan Lapsley'.

Susan Lapsley  
Deputy Secretary of State and Counsel  
California Secretary of State



## SECRETARY OF STATE

### **CONDITIONAL APPROVAL OF Dominion Voting Systems, Inc. ImageCast Remote 5.2 REMOTE ACCESSIBLE VOTE BY MAIL SYSTEM**

**Whereas**, pursuant to California Elections Code section 19281, no remote accessible vote by mail system, in whole or in part, may be used unless it has received the approval of the Secretary of State; and

**Whereas**, a remote accessible vote by mail system, in whole or in part, may be used for the sole purpose of marking an electronic vote by mail ballot remotely, outside a polling location, for a voter with disabilities or a military or overseas voter who would then be required to print the paper cast record to be submitted to the elections official; and

**Whereas**, Dominion Voting Systems, Inc., submitted an application for certification of the ImageCast Remote 5.2 remote accessible vote by mail system, submitted on or about September 5, 2017 and;

**Whereas**, during a series of tests conducted by the Secretary of State's office, the remote accessible vote by mail system performed in a manner consistent with California law; and

**Whereas**, the remote accessible vote by mail system was able to successfully and accurately execute all test cases, scenarios, and scripts developed by the Secretary of State's office; and

**Whereas**, the request for approval of the remote accessible vote by mail system as described above was considered at a public hearing held April 27, 2018, at Sacramento, California.



**Therefore, I, Alex Padilla, Secretary of State for the State of California, find and determine, pursuant to Division 19 of the Elections Code, as follows:**

For the reasons set forth above, Dominion Voting Systems Inc.'s ImageCast Remote 5.2 remote accessible vote by mail system is hereby conditionally approved.

Use of Dominion Voting Systems Inc.'s ImageCast Remote 5.2 remote accessible vote by mail system is subject to the following terms and conditions:

1. Jurisdictions shall allow voters using the system to return the paper cast record in an envelope of the voter's choosing or in an accessible "two-hole punched signature guide" envelope supplied by the jurisdiction, however the voter must sign the sealed envelope as required by law.
2. Dominion Voting Systems Inc. and/or jurisdictions using the remote accessible vote by mail system must configure the following attestation language within the remote accessible vote by mail system landing page in substantially the following form:

Under California law, only voters in the military, overseas voters, and voters with disabilities are eligible to use this accessible vote-by-mail system.

- I am either a voter with a disability or a military or overseas voter, and therefore I am eligible to use this accessible vote-by-mail system.
- I understand that my selections marked by this system and submitted to [insert local election jurisdiction name] will be transferred onto a ballot by an election official to be tabulated.
- I understand that my selections marked by this system must be printed by me and submitted to [insert local election jurisdiction name], no later than 8:00 p.m. Pacific Standard Time on Election Day.

☐ I certify that all of the above are true.



3. The ImageCast Remote 5.2 system is not certified to be used for rank choice voting in any jurisdiction.
4. Jurisdictions using the remote accessible vote by mail system shall only make the system available within the allowed voting period for any election, including any early voting and vote by mail periods.
5. Jurisdictions using the remote accessible vote by mail system, shall make available a dedicated accessible toll free telephone line and/or email box for technical assistance to voters using the system. The accessible toll free telephone line and/or email box must be available and regularly monitored while the system is available for use, including early voting and vote by mail periods.
6. Prior to the sale or use of the system in California, the Dominion Voting Systems Inc. must provide to all jurisdictions its Use Procedures, entitled "Democracy Suite RAVBM Use Procedures Version 5.2 CA", which the Secretary of State hereby approves. Compliance with the Use Procedures by the vendor and jurisdictions is a condition of the approval of this remote accessible vote by mail system. Compliance with all requirements set forth in the Use Procedures is mandatory, whether or not a particular requirement is identified in this approval document.
7. Dominion Voting Systems Inc. is required to provide sufficient training to any jurisdiction using the system on the use of the remote accessible vote by mail system.
8. Dominion Voting Systems Inc. shall produce accessible instructions in compliance with all state and federal language accessibility requirements, including but not limited to, a closed captioned video for voters using the system. Such information shall also include standard instructions for voters to verify that they have the minimum system requirements to use ImageCast Remote 5.2.
9. Pursuant to Elections Code section 19290(a), if a remote accessible vote by mail system has been certified or conditionally approved by the Secretary of State, the vendor shall notify the Secretary of State and all local elections officials who use the system in writing of any defect, fault, or failure of the hardware, software, or firmware of the system or a part of the system within 30 calendar days after the vendor or jurisdiction learns of the defect, fault, or failure.
10. For any election that a California jurisdiction uses the remote accessible vote by mail system, the jurisdiction shall provide a report

to the Secretary of State, within 30 calendar days of certifying the election results, listing the number of voters that used the system and all technical issues reported (if any), along with any mitigations.

11. Pursuant to Elections Code section 19291, no substitution or modification of the remote accessible vote by mail system shall be made with respect to any component of the remote accessible vote by mail system, including the Use Procedures, until the Secretary of State has been notified in writing and has determined that the proposed change or modification does not impair the accuracy or efficiency of the remote accessible vote by mail system sufficient to require a re-examination and approval. This includes, but is not limited to, the hosting environment, which shall be kept current with security and anti-malware updates applicable to each component of the environment.
12. Pursuant to Elections Code section 19295, the remote accessible vote by mail system shall not have the capability, including optional capability, to allow a remote server to mark a voter's selections transmitted to the server from the voter's computer via the internet. The remote accessible vote by mail system shall not have the capability, including optional capability, to store any voter identifiable selections on any remote server, and shall not have the capability, including optional capability, to tabulate votes. All systems and transmission of data shall be configured, maintained and monitored to protect the system in a manner commensurate with the risk that would result from unauthorized access, use, disclosure, disruption, modification, or destruction of such information.
13. The Secretary of State reserves the right, with reasonable notice to the vendor and to the jurisdictions using the remote accessible vote by mail system, to modify the Use Procedures and this certification to impose additional requirements with respect to the use of the system if the Secretary of State determines that such modifications or additions are necessary to enhance the accessibility, accuracy, reliability or security of the remote accessible vote by mail system. Such modifications or additions shall be deemed to be incorporated herein as if set forth in full.
14. Jurisdictions or Vendors shall notify the Secretary of State immediately upon discovery of a breach or attempted breach in the security or information relating to the remote accessible vote by mail system.
15. The Secretary of State reserves the right to monitor activities before, during and after the election at any registrar of voters' office or vendor



hosted entity, and may, at his or her discretion, test and perform security scans or audits of the remote accessible vote by mail system.

16. Remote accessible vote by mail systems certified for use in California shall comply with all applicable state and federal requirements, including, but not limited to, those remote accessible vote by mail system requirements as set forth in the California Elections Code. Further, remote accessible vote by mail systems shall also comply with all state and federal voting technology guidelines, standards, regulations and requirements that derive authority from or are promulgated pursuant to and in furtherance of the California Elections Code or other applicable state or federal law when appropriate, including but not limited to Section 508 of the Americans with Disabilities Act.
17. Remote accessible vote by mail system manufacturers or their agents shall assume full responsibility for any representation they make that a remote accessible vote by mail system complies with all applicable state and federal requirements, including, but not limited to, those remote accessible vote by mail system requirements as set forth in the California Elections Code. In the event such representation is determined to be false or misleading, remote accessible vote by mail system manufacturers or their agents shall be responsible for the cost of any upgrade, retrofit or replacement of any remote accessible vote by mail system or its components found to be necessary for certification or otherwise not in compliance.
18. The vendor must establish a California County User Group and hold at least one annual meeting where all California users and Secretary of State staff are invited to attend and review the system.

IN WITNESS WHEREOF, I hereunto set my hand and affix the Great Seal of the State of California, this May 8, 2018.



ALEX PADILLA  
Secretary of State