



# Wisconsin Elections Commission

201 West Washington Avenue | Second Floor | P.O. Box 7984 | Madison, WI 53707-7984  
(608) 266-8005 | elections@wi.gov | elections.wi.gov

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## Via U.S. Mail and Email

October 3, 2023

Russ Dawson  
Certification Program Manager  
Clear Ballot Group, Inc.  
2 Oliver Street, Suite #607  
Boston, MA 02109

Dear Mr. Dawson:

On September 7, 2023, the Wisconsin Elections Commission (“WEC” or “Commission”) granted approval for the ClearVote 2.3 voting system.

A complete listing of the hardware and software components that were tested and approved as part of this system can be found in Appendix A.

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, Inc. 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. Should a valid request for inspection of software components under Wis. Stat. § 5.905(4) be made, the Commission will use this list to assist in making its determination as to what is available for inspection under Wis. Stat. § 5.905(2).
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.

*Wisconsin Elections Commissioners*

Don M. Millis, chair | Marge Bostelmann | Joseph J. Czarnecki | Ann S. Jacobs | Robert Spindell | Mark L. Thomsen

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Administrator  
Meagan Wolfe

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 U.S. EAC (or other Federal agency responsible for voting systems certification), or revocation of approval by the Commission of ClearVote 2.3 (including any component), Clear Ballot Group, Inc. 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 enacted additional requirements for ClearVote 2.3. The Commission determined that the following continuing conditions shall remain ongoing for purchasing jurisdictions as well as Clear Ballot Group, Inc.:

1. As a continuing condition of the WEC's approval, Clear Ballot Group, Inc. may not impose customer deadlines contrary to requirements provided in Wisconsin Statutes, as determined by the WEC. To enforce this provision, local jurisdictions purchasing Clear Ballot Group, Inc. equipment shall also include such a provision in their respective purchase contract or amend their contract if such a provision does not currently exist.
2. As a continuing condition of the WEC's approval, voting systems purchased and installed as part of ClearVote 2.3 be configured in the same manner in which they were tested, subject to verification by the Commission or its designee. Once installed, the configuration must remain the same and may not be altered by Clear Ballot Group, Inc. nor by state, county, or municipal officials except as approved by the Commission.
3. Election inspectors shall continue to check both the write-in bin, where applicable, and main ballot bin for validly cast write-in votes after the close of polls in each election, and not rely upon the optional write-in report.
4. Any absentee ballot returned by the tabulation equipment with an overvote or crossover vote notification must be reviewed by election inspectors prior to being overridden or remade. If necessary, ballots must be remade pursuant to approved procedures listed in the Election Day and Election Administration manuals.
5. Any absentee ballot returned which has been marked with non-black ink be remade by election inspectors prior to any attempt at processing on the tabulation equipment.
6. Ballots marked with the ClearAccess are to be included as part of the pre-election public test.
7. As a continuing condition of the WEC's approval, that this system must always be configured to include the following options:
  - a. Automatic rejection of crossover and overvoted ballots with or without the option to override.
  - b. Automatic rejection of all improper ballots except blank ballots.
  - c. Digital ballot images shall be captured for all ballots tabulated by the system.
  - d. Provide visual warning messages, utilizing Commission approved language, to voters when overvotes and crossover votes are detected.

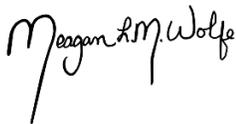
8. As part of US EAC certificate: CBG-CV-23, only equipment included in this certificate can be used together to conduct an election in Wisconsin. Previous versions that were approved for use by the former Elections Board and the G.A.B. are not compatible with the new Clear Ballot Group, Inc. voting system and are not to be used together with the equipment seeking approval by the WEC, as this would void the US EAC certificate. If a jurisdiction upgrades to ClearVote 2.3, it needs to upgrade each and every component of the voting system to the requirements of what is approved herein.
9. As a condition of approval, Clear Ballot Group, Inc. shall abide by applicable Wisconsin public records laws. If, pursuant to a proper public records request, the customer receives a request for matters that might be proprietary or confidential, customer will notify Clear Ballot Group, Inc., providing the same with the opportunity to either provide customer with the record that is requested for release to the requestor, or shall advise customer that Clear Ballot Group, Inc. objects to the release of the information, and provide the legal and factual basis of the objection. If for any reason, the customer concludes that customer is obligated to provide such records, Clear Ballot Group, Inc. shall provide such records immediately upon customer's request. Clear Ballot Group, Inc. shall negotiate and specify retention and public records production costs in writing with customers prior to charging said fees. In absence of meeting such conditions of approval, Clear Ballot Group, Inc. shall not charge customer 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 that is defined and interpreted in Wisconsin law, plus shipping, handling, and chain of custody.
10. The Wisconsin application for approval contains a condition that requires the vendor to reimburse the WEC for all costs associated with the testing campaign and certification process. Clear Ballot Group, Inc. agreed to this requirement on the application submitted to WEC on February 3, 2023, requesting the approval of ClearVote 2.3.

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 myself, Rob Kehoe, or Cody Davies.

Sincerely,

**Wisconsin Elections Commission**



Megan Wolfe  
Administrator

Appendix A: ClearVote 2.3 Hardware and Software Components as Tested and Approved

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
ClearAccess software	2.3.0			ClearAccess
ClearCast software	2.2.9			ClearCast
ClearCast Go software	2.2.a			ClearCast Go
ClearCount software	2.3.1			ClearCount
ClearDesign software	2.3.0			ClearDesign
EloPOS driver pack	2019.12.5		COTS software	ClearAccess
Google Chrome	97.0.4692.99		COTS software	ClearAccess
jquery	1.10.2		COTS software	ClearAccess
jsmin	2019.10.30		COTS software	ClearAccess
nsis	3.01		COTS software	ClearAccess
DataTables	1.10.16		COTS software	ClearAccess
pefile	2018.8.8		COTS software	ClearAccess
PyInstaller	3.2		COTS software	ClearAccess
Pyserial	3.2.1		COTS software	ClearAccess
Python	2.7.10		COTS software	ClearAccess
Python-future	0.15.2		COTS software	ClearAccess
pywin	223		COTS software	ClearAccess
webpy	0.38		COTS software	ClearAccess
Zebra CoreScanner Driver	3.07.0004		COTS software	ClearAccess
Windows 10 Pro	Build 1607		Windows 10 Pro	ClearAccess
DataTables	1.10.16		COTS software	ClearCast
chromium-browser	92.0.4515.159		COTS software	ClearCast
jquery	1.12.4		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
libScanAPI.a	2.0.0.0		COTS software	ClearCast
OpenSSL (standard)	1.0.2g		COTS software	ClearCast
OpenSSL - FIPS	2.0.10		COTS software	ClearCast
Pyinstaller	3.2.1		COTS software	ClearCast
Ubuntu	18.04.5 LTS		COTS software	ClearCast
boot_merger	1.31		COTS software	ClearCast Go
chromium-browser	92.0.4515.159		COTS software	ClearCast Go

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System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
DataTables	1.10.16		COTS software	ClearCast Go
jQuery	1.12.4		COTS software	ClearCast Go
jQuery.NumPad	1.4		COTS software	ClearCast Go
jquery.ui	1.11.3		COTS software	ClearCast Go
JTSage DateBox	4.0.0		COTS software	ClearCast Go
libScanAPI.a	1.0.0.1		COTS software	ClearCast Go
libssl	1.0_1.0.2n		COTS software	ClearCast Go
Linux kernel	5.4.52		COTS software	ClearCast Go
openssl	1.0.0_1.0.2n		COTS software	ClearCast Go
rk3399_bl31	1.35		COTS software	ClearCast Go
Rk3399_ddr-800MHz	1.25		COTS software	ClearCast Go
rk3399_loader	1.24.126		COTS software	ClearCast Go
Rk3399_miniloader	1.26		COTS software	ClearCast Go
rkdeveloptool	1.2		COTS software	ClearCast Go
trust_merger	1.0 (2015-06-15)		COTS software	ClearCast Go
U-boot	2020.10		COTS software	ClearCast Go
Ubuntu	18.04.6 LTS		COTS software	ClearCast Go
Apache	2.4.29		COTS software	ClearCount
auditd	2.8.2 - 1		COTS software	ClearCount
debconf	1.5.66		COTS software	ClearCount
Fujitsu fi-6400	PaperStream IP (TWAIN) 2.10.3		Windows 10 Pro	ClearCount
Fujitsu fi-6800	PaperStream IP (TWAIN) 2.10.3		Windows 10 Pro	ClearCount
Fujitsu fi-7180	PaperStream IP (TWAIN) 2.10.3		Windows 10 Pro	ClearCount
Fujitsu fi-7800	PaperStream IP (TWAIN) 2.10.3		Windows 10 Pro	ClearCount
Fujitsu fi-7900	PaperStream IP (TWAIN) 2.10.3		Windows 10 Pro	ClearCount
Google Chrome	87.0.4280.141		COTS software	ClearCount
J JavaScript jQuery-migrate library	1.2.1		COTS software	ClearCount
JavaScript Bootstrap library	2.3.2, & 4.3.1		COTS software	ClearCount
JavaScript bootstrap-vue library	2.0.2		COTS software	ClearCount
JavaScript Chosen library	1.8.7		COTS software	ClearCount
JavaScript DataTables Buttons	1.5.6		COTS software	ClearCount

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
JavaScript DataTables Buttons ColVis Library	1.0.8		COTS software	ClearCount
JavaScript DataTables Buttons html5 library	1.3.3		COTS software	ClearCount
JavaScript DataTables FixedHeader library	3.1.4		COTS software	ClearCount
JavaScript DataTables library	1.10.18		COTS software	ClearCount
JavaScript DataTables pdfmaker library	0.1.36		COTS software	ClearCount
JavaScript jQuery hotkeys library	0.8		COTS software	ClearCount
JavaScript jQuery library	1.10.2J		COTS software	ClearCount
JavaScript jQuery splliter library	0.28.3		COTS software	ClearCount
JavaScript jQuery tooltip library	1.3		COTS software	ClearCount
JavaScript vue library	2.6.10		COTS software	ClearCount
libapache2-mod-fcgid	2.3.9-1		COTS software	ClearCount
MySQLdb (part of Ubuntu)	5.7.31		COTS software	ClearCount
OpenSSL (standard)	1.1.1		COTS software	ClearCount
OpenSSL FIPS Object Module	2.0.10		COTS software	ClearCount
pmount	0.9.23		COTS software	ClearCount
PollyReports	1.7.6		COTS software	ClearCount
PyInstaller	3.2.1		COTS software	ClearCount
Python (part of Ubuntu)	2.7.15~rc1-1		COTS software	ClearCount
Python-dateutil	2.8.1		COTS software	ClearCount
Samba	4.7.6		COTS software	ClearCount
Six	1.15.0		COTS software	ClearCount
sqlalchemy	1.3.4		COTS software	ClearCount
Ubuntu	18.04.5 LTS		COTS software	ClearCount
udisks	2.7.6		COTS software	ClearCount
Windows 10 Pro	Build 1607		Windows 10 Pro	ClearCount
Apache	2.4.29		COTS software	ClearDesign
Bootstrap	3.0.0		COTS software	ClearDesign
DataTable	1.10.16		COTS software	ClearDesign
DataTable Buttons	1.4.2		COTS software	ClearDesign
DataTable Buttons JSZip	2.5.0		COTS software	ClearDesign

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
DataTable Buttons Pdfmake	0.1.32		COTS software	ClearDesign
DataTablePlugins	1.10.16		COTS software	ClearDesign
Google Chrome	87.0.4280.141		COTS software	ClearDesign
jquery	2.2.4		COTS software	ClearDesign
jquery-impromptu	6.2.3		COTS software	ClearDesign
jquery-qrcode	1.0		COTS software	ClearDesign
jquery-splitter	0.27.1		COTS software	ClearDesign
jquery-ui	1.12.1		COTS software	ClearDesign
jscolor	1.4.2		COTS software	ClearDesign
jslibmp3lame	0.5.0		COTS software	ClearDesign
jsmin	4.6		COTS software	ClearDesign
jszip	3.2.0		COTS software	ClearDesign
libapache2-mod-fcgid	2.3.9-1		COTS software	ClearDesign
MySQL	5.7.31		COTS software	ClearDesign
OpenSSL (standard)	1.1.1		COTS software	ClearDesign
OpenSSL FIPS Object Module	2.0.10		COTS software	ClearDesign
paparser	4.6.0		COTS software	ClearDesign
PhantomJS	1.9.8		COTS software	ClearDesign
Pyinstaller	3.2.1		COTS software	ClearDesign
Python	2.7.15		COTS software	ClearDesign
Python DBUtils	1.3		COTS software	ClearDesign
Python Flup	1.0.2		COTS software	ClearDesign
Python FontTools library	3.4.1		COTS software	ClearDesign
Python JSMIN	2.2.1		COTS software	ClearDesign
Python MySQL DB	1.3.10		COTS software	ClearDesign
Python Pillow	5.1.0		COTS software	ClearDesign
Python PIP	9.0.1		COTS software	ClearDesign
Python RTF	0.2.1		COTS software	ClearDesign
Python webpy	0.38		COTS software	ClearDesign
Python XLRD	1.2.0		COTS software	ClearDesign
Samba	4.7.6		COTS software	ClearDesign
SQLAlchemy	1.3.3		COTS software	ClearDesign
tinymce	4.1.9		COTS software	ClearDesign
Ubuntu	18.04.5		COTS software	ClearDesign
Unzip	6.0.21		COTS software	ClearDesign

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
Windows 10 Pro	Build 1607		Windows 10 Pro	ClearDesign
Zip	3.0.11		COTS software	ClearDesign
ELO 15-inch EloPOS		EPS15E3	COTS hardware	ClearAccess
ELO 15-inch AIO		E-Series (ESY15E2)	COTS hardware	ClearAccess
Dell OptiPlex AIO		5250	COTS hardware	ClearAccess
ELO 20-inch AIO		X-Series (ESY20X2)	COTS hardware	ClearAccess
Dell Inspiron 15"		7573	COTS hardware	ClearAccess
Oki Data Laser Printer		B432dn	COTS hardware	ClearAccess
Zebra Technologies Bar Code Scanner		DS457-SR	COTS hardware	ClearAccess
Storm EZ Access Keypad		EZ08-22201	COTS hardware	ClearAccess
Storm EZ Access Keypad		EZ08-22000	COTS hardware	ClearAccess
Origin Instruments Sip/Puff Breeze with Headset		AC-0313-MUV, AC-0300-MU	COTS hardware	ClearAccess
Samson Over-Ear Stereo Headphones		SASR350	COTS hardware	ClearAccess
Monoprice Over the Ear Pro Headphones		8323	COTS hardware	ClearAccess
Hamilton Buhl Over-Ear Stereo Headphones		HA7	COTS hardware	ClearAccess
Ergotron Neo-Flex		Widescreen Lift Stand	COTS hardware	ClearAccess
Wearson LCD Stand		Adjustable LCD Monitor Stand	COTS hardware	ClearAccess
Corsair Flash Padlock 3 32 GB		Secure USB 3.0 Flash Drive	COTS hardware	ClearAccess
Corsair Flash Voyager GTX		3.1 USB Drive	COTS hardware	ClearAccess
Kingston Data Traveler Elite G2		3.0 USB Drive	COTS hardware	ClearAccess
SanDisk Extreme Go 64 GB USB		3.0 USB Drive	COTS hardware	ClearAccess
SanDisk Extreme Pro 64 GB USB		3.0 USB Drive	COTS hardware	ClearAccess
SanDisk Ultra Flair 32 GB USB		3.0 USB Drive	COTS hardware	ClearAccess
CyberPower Smart App UPS		PR1500RT2U	COTS hardware	ClearAccess
APC Smart-UPS		SMT2200	COTS hardware	ClearAccess
ClearCast		Model D, Revision 4	COTS hardware	ClearCast
ClearCast Go		Model E Revision 5	COTS hardware	ClearCast

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System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
Corsair Flash Padlock 3 32 GB		Secure USB 3.0 Flash Drive	COTS hardware	ClearCast
Corsair Flash Voyager GTX		3.1 USB Drive	COTS hardware	ClearCast
Kingston Data Traveler Elite G2		3.0 USB Drive	COTS hardware	ClearCast
SanDisk Extreme Go 64 GB USB		3.0 USB Drive	COTS hardware	ClearCast
SanDisk Extreme Pro 64 GB USB		3.0 USB Drive	COTS hardware	ClearCast
SanDisk Ultra Flair 32 GB USB		3.0 USB Drive	COTS hardware	ClearCast
Ballot Bag		CV-1032-1.5, CV-1032-2.0	COTS hardware	ClearCast
Ballot Box		CV-1033-1.5, CV-1033-2.0	COTS hardware	ClearCast
Dell Precision Tower (Election Administration)		T3620	Windows 10 Pro	ClearCount
Lenovo ThinkServer (ScanServer)		TS140	Windows 10 Pro	ClearCount
Dell PowerEdge Server (ScanServer)		T130, T140, T330, T440	Ubuntu 18.04.5 LTS	ClearCount
Dell OptiPlex (Election Administration)		7440, XE3 SFF	Windows 10 Pro	ClearCount
Dell Latitude Laptop (ScanStation)		5580, 5590, 5500, 5511	Windows 10 Pro	ClearCount
Fujitsu Scanner		fi-7180	COTS hardware	ClearCount
Fujitsu Scanner		fi-6800	COTS hardware	ClearCount
Fujitsu Scanner		fi-6400	COTS hardware	ClearCount
Fujitsu Scanner		fi-7800	COTS hardware	ClearCount
Fujitsu Scanner		fi-7900	COTS hardware	ClearCount
SanDisk Extreme Go 64 GB USB		3.0 USB Drive	COTS hardware	ClearCount
SanDisk Extreme Pro 64 GB USB		3.0 USB Drive	COTS hardware	ClearCount
SanDisk Ultra Flair 32 GB USB		3.0 USB Drive	COTS hardware	ClearCount
CyberPower Smart App UPS		PR1500RT2U	COTS hardware	ClearCount

System Component	Software or Firmware Version	Hardware Version	Operating System or COTS	Comment
Cisco 8-Port Switch		SG250-08	COTS hardware	ClearCount
Cisco Catalyst 8-Port Switch		C1000-8T-2G-L	COTS hardware	ClearCount
Cisco 24-Port Switch		C1000-24T-4X-L	COTS hardware	ClearCount
NetGear 8-Port Switch		FVS318G	COTS hardware	ClearCount
TP-LINK 4-Port Switch		TL-R600VPN	COTS hardware	ClearCount
Cisco 26-Port Switch		SG250-26	COTS hardware	ClearCount
TRENDNet 8-Port Switch		TEG-S80G	COTS hardware	ClearCount
Corsair Flash Padlock 3 32 GB		Secure USB 3.0 Flash Drive	COTS hardware	ClearCount
Corsair Flash Voyager GTX		3.1 USB Drive	COTS hardware	ClearCount
Kingston Data Traveler Elite G2		3.0 USB Drive	COTS hardware	ClearCount
APC Smart-UPS		SMT-1500C	COTS hardware	ClearCount
Dell Latitude Laptop (client)		5580, 5590, 5500, 5511	Windows 10 Pro	ClearDesign
Dell Precision Tower (client)		T3620	Windows 10 Pro	ClearDesign
Dell PowerEdge Server (server)		T130, T140, T440, R440, T630	Ubuntu 16.04.4 LTS	ClearDesign
Dell OptiPlex (client)		7440	Windows 10 Pro	ClearDesign
Cisco 8-Port Switch		SG250-08	COTS hardware	ClearDesign
Cisco Catalyst 8-Port Switch		C1000-8T-2G-L	COTS hardware	ClearDesign
NetGear 8-Port Switch		FVS318G	COTS hardware	ClearDesign
TP-LINK 4-Port Switch		TL-R600VPN	COTS hardware	ClearDesign
TRENDNet 8-Port Switch		TEG-S80G	COTS Hardware	ClearDesign
Corsair Flash Padlock 3 32 GB		Secure USB 3.0 Flash Drive	COTS hardware	ClearDesign
Corsair Flash Voyager GTX		3.1 USB Drive	COTS hardware	ClearDesign

<b>System Component</b>	<b>Software or Firmware Version</b>	<b>Hardware Version</b>	<b>Operating System or COTS</b>	<b>Comment</b>
Kingston Data Traveler Elite G2		3.0 USB Drive	COTS hardware	ClearDesign
SanDisk Extreme Go 64 GB USB		3.0 USB Drive	COTS hardware	ClearDesign
SanDisk Extreme Pro 64 GB USB		3.0 USB Drive	COTS hardware	ClearDesign
SanDisk Ultra Flair 32 GB USB		3.0 USB Drive	COTS hardware	ClearDesign