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**Los Angeles County  
Voting Solutions for All People (VSAP 4.0)**

**Staff Report**

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Voting Systems Technology Assessment**

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# **I. INTRODUCTION**

## **1. Scope**

This report presents the test results for all phases of the certification test of the Los Angeles County Voting Solutions for All People (VSAP 4.0) voting system. The purpose of the testing is to test the compliance of the voting system with California and Federal laws. Testing also uncovers other findings, which do not constitute non-compliance, and those findings are reported to the voting system vendor to address the issues procedurally. The procedures for mitigating any additional findings are made to the documentation, specifically the VSAP 4.0 Use Procedures.

## **2. Summary of the Application**

Los Angeles County applied for the testing for certification of the VSAP 4.0 voting system on January 30, 2025. The system is comprised of the following major components:

- Tally Version 4.1.5
- FormatOS Version 4.0.1
- Ballot Marking Device (BMD) Version A0.1, A0.2, A0.3, and A0.4
- Ballot Marking Device BASI 4.0.1
- Ballot Marking Device BESI 4.0.1
- Ballot Marking Device Management Network (BMG) 4.0.1
- VSAP Ballot Layout (VBL) 4.1.5
- Enterprise Signing Authority (ESA) 3.0
- Fujitsu Scanner 1 - Fi-7180
- Fujitsu Scanner 2 - Fi-7800
- Scanner IBML Fusion 8400 and ImageTrac 6400

In addition to these major components, which includes the executable code and the source code, the Los Angeles County was required to submit the following: 1) the technical documentation package (TDP); 2) all the hardware components to field two complete working versions of the system, including all peripheral devices, one for the Functional Test Phase and one for the Security and Telecommunications Penetration Test Phase; 3) all the peripherals that would be in the polling place; and 4) the VSAP 4.0 Use Procedures.

## **3. Contracting and Consulting**

Upon receipt of a complete application, the Secretary of State released a Request for Quote (RFQ) for assistance with the Functional, Volume, Software (Source Code) Review, Security and Telecommunications (Red Team Penetration) Usability Accessibility and Privacy Testing.

Through the formal California contracting process, the Secretary of State awarded a contract to SLI Compliance, a division of Gaming Laboratories International, LLC, to serve in the capacity as the state-approved testing agency or expert technician to examine the voting system.

## II. **SUMMARY OF THE SYSTEM**

The VSAP 4.0 system consists of the following components:

- **Tally Version 4.1.5** – Tally captures and processes ballot images to digitally count voter selections from paper ballots. Tally scans and creates images of ballots, converts the images into Cast Vote Records (CVRs), tabulates them, and allows the election results to be exported. Tally is responsible for counting votes at the end of an election.
- **FormatOS Version 4.0.1** – Application used to wipe the ballot marking devices.
- **Ballot Marking Device (BMD) Version A0.1, A0.2, A0.3, and A0.4** - The BMD is the primary touchpoint for the voter and hub of the voting system, guiding users with screen prompts and symbols. The BMD features a touchscreen, an audio and tactile controller, and dual-switch input that voters use to generate, verify, and cast a paper ballot. Completed ballots are transferred to the Integrated Ballot Box, which can be detached for unloading. Through the BMD, voters participate in elections.
- **Ballot Marking Device BASI 4.0.1** – Application software for the ballot marking devices.
- **Ballot Marking Device BESI 4.0.1** – Application for election software for the ballot marking device.
- **Ballot Marking Device Management Network (BMG) 4.0.1** - The BMG manages and maintains the BMDs. It allows operators to manage software, configurations, and data. The BMG provides files necessary for BMDs to present election data such as candidate information, multi-lingual audio, and supporting text. The BMG is the manager and custodian of the voting system.
- **VSAP Ballot Layout (VBL) 4.1.5** - The VBL enables election managers to configure and generate ballot layouts. The VBL subsystem ingests election information files and generates ballot layout files to be used by other components of the system. The VBL makes setting up elections possible.

- **Enterprise Signing Authority (ESA) 3.0** - The ESA establishes the security root and chain of trust for the VSAP voting solution. This subsystem comprises the following processes: key management, distribution, and authentication. The ESA uses a cryptographic module to generate a public/private key pair, which authenticates devices and transactions. The ESA is the basis of the authorization, authentication, and data integrity for the voting system.
- **Fujitsu Scanner 1 Small Model Fi-7180PR** – Small scanner used for disaster recovery scanning of ballots.
- **Fujitsu Scanner 2 Large Model Fi-7800** – Large scanner used for disaster recover scanning of ballots.
- **IBML Fusion Scanner 8400 and ImageTrac 6400** - High speed scanners used in conjunction with the Tally software.

### III. TESTING INFORMATION AND RESULTS

#### 1. Background

The Secretary of State staff in conjunction with SLI, oversaw all phases of testing of the system, including Functional, Software Testing (Source Code Review), Security and Telecommunications (Red Team Penetration Testing), Volume, and Accessibility, Usability and Privacy Testing.

#### 2. Functional Testing Summary

##### **System Configuration:**

The system is self-contained on an air gapped network, per the CVSS requirements. SLI performed the task of creating the Trusted Build of the VSAP 4.0 voting system. The artifacts produced will be kept, and distributed by the Secretary of State. VSAP 4.0 is intended for use solely by Los Angeles County.

##### **Functional Testing Phase**

The Functional Testing consisted of following the Use Procedures to import the following six (6) test elections in **Table 2: Test Elections** into the testing environment. The vote by mail ballots (VBM) and BMD ballots used for testing were marked using predetermined ballot marking patterns. Each election was tabulated using the IBML high speed scanner. A 1% manual tally of the results was conducted for each election, and the reporting results confirmed accurate.

<b>Table 2: Test Elections</b>			
<b>Election Type</b>	<b>Election Details</b>	<b>Anomalies</b>	<b>Resolution</b>
Presidential Primary (2024)	This election tested the limitation of ballot styles that can be used with the system, in addition to language support (audio and visual).	None	N/A
Presidential General (2024)	This election tested a Presidential General election type.	None	N/A
Gubernatorial Primary (2022)	This election tested a Gubernatorial Primary election type.	None	N/A
Gubernatorial General (2022)	This election tested a Gubernatorial General election type.	None	N/A
Recall Election with Recall Question	This election tested the systems candidate capacity, with a Recall Question.	None	N/A
Special Election	This election tested two congressional districts and one municipality.	None	N/A

VSAP 4.0 was tested and confirmed to support the following languages:

- English
- Bengali
- Spanish
- Farsi
- Gujarati
- Hindi
- Armenian
- Indonesian
- Japanese
- Khmer
- Korean
- Mongolian
- Burmese
- Russian
- Telugu
- Thai
- Tagalog
- Vietnamese
- Chinese
- Portuguese
- Arabi

Marginal marks were purposely made to some ballots to test out stacking functionality. The following tools were used:

- Highlighter
- Pencil
- Black Ink
- Blue Ink
- Dry erase marker
- Black sharpie marker

Each writing tool performed as expected. The system is designed to detect marks that encompass at least 50% of the target marking area (circle) on vote by mail ballots. This threshold setting is adjustable.

Los Angeles County has added two Fujitsu Scanners to the VSAP environment Fujitsu Scanner 1 (Fi-7180PR) and Fujitsu Scanner 2 (Fi-7800). The scanners are solely intended to use for disaster recovery purposes. The scanners capture the ballot images and are imported into the Tally System for tabulation. Each scanner was tested with BMD ballots, vote by mail ballots, and poll pass ballots. The results were verified and accurate.

### 3. Software Review Testing Summary

The review was conducted by SLI. SLI evaluated the security and integrity of the voting system by identifying any security vulnerabilities that could be exploited to:

- Alter vote recording,
- Alter vote results,
- Alter critical data (such as audit logs), or
- Conduct a “denial of service” attack on the voting system.

SLI’s review of the VSAP 4.0 source code against the applicable standards of the CVSS in sections 5 and 7 determined the following discrepancies were found in the source code **Table 3: VSAP 4.0 Source Code Findings:**

<b>Table 3: VSAP 4.0 Source Code Findings</b>		
<b>Issue</b>	<b>Consultant Assessment</b>	<b>Mitigation</b>
Incomplete or Missing Header Comments, 335 instances (CVSS 5.2.6.a-h)	Several file/module header comments were insufficient or missing. They are not a risk factor, but a violation of the CVSS requirement for all modules with more than 10 executable lines to have an associated header.	The finding has no impact on the readability or maintainability of the code base.
Calico container security context	The potential problem with this configuration is that the container is running effectively as root.	A partial fix was provided in the recent Calico release. This will be addressed in a future version pending action from Calico, a third-party provider.

### 4. Security and Telecommunications Testing

Security and Telecommunications (Red Team Penetration) testing of the VSAP 4.0 system was conducted in December 1-5, 2025, by SLI. The Security and Telecommunications Testing resulted in the following findings requiring a resolution, response and/or mitigation. Each is described in **Table 4: Security Findings:**

<b>Table 4: Security Findings</b>			
<b>Issue</b>	<b>Status</b>	<b>Consultant Assessment</b>	<b>Vendor Mitigation</b>
7.3.2 Central Count Location Security	Unresolved	Documentation is not present regarding the physical and procedural controls related to the handling of ballot boxes, preparing ballots for counting, counting operations, and reporting data in a central count environment.	The County will provide adequate documentation regarding the physical and procedural controls related to the handling of ballot boxes, preparing ballots for counting, counting operations, and reporting data in a central count environment.
7.4.4 Software Distribution	Unresolved	Documentation did not designate all software files as static, semi-static or dynamic.	The County will provide adequate documentation designating all software files as static, semi-static or dynamic.
Open ended vulnerability (OEV): Expired SSL Certificates	Partially Resolved	BMG network analysis identified that expired SSL certificates were utilized.	The County will update BMG SSL certificates during the next release. It should be noted that because of the Air-Gap requirement, voting systems are essentially frozen at the time of Trusted Build and physically isolated from external connectivity these are mitigated.
Open ended vulnerability (OEV): Nessus Scan, multiple findings.	Partially Resolved	All components of the solution were examined. This included servers, virtualization, and networking infrastructure. Some items did not have current security patches.	The County will patch all systems during the next release. It should be noted that because of the Air-Gap requirement, voting systems are essentially frozen at the time of Trusted Build and physically isolated from external connectivity these are mitigated.

## 5. Volume Testing Summary

The Volume Test simulates conditions in which the ballot marking devices would be used on Election Day. Fifty (50) BMD units were tested during the volume test, with eighteen (18) temporary workers marking and casting one hundred (100) ballots per device over two (2) days on January 5-7, 2026. The BMD devices were each loaded with the 2024 Presidential Primary Election, including all supported languages, with complete audio files for the testers to choose from. The testing resulted in the following findings as described in **Table 5: Volume Testing Issue Log**:

<b>Table 5: Volume Testing Issue Log</b>	
<b><u>Issue Description</u></b>	<b><u>Mitigation</u></b>
Units #8 and #9 there were two (2) instances of voters on these devices having to re-insert the ballot multiple times before being accepted for each voting session.	The BMD device, by design, gently pulls the ballot into the device in a timid, push/pull manner. Testers would sometimes be too gentle or forceful in triggering the rollers, not allowing the ballot to catch.
Units #16 and #17 reported one (1) instance each of having to reinsert the ballots.	The BMD device, by design, gently pulls the ballot into the device in a timid, push/pull manner. Testers would sometimes be too gentle or forceful in triggering the rollers, not allowing the ballot to catch.
Unit #3 experienced one (1) paper jam during the initial insertion of a blank ballot to begin the voting session.	When removed from the scanner, the ballot was undamaged with no noticeable markings or bends. It was re-cast without further issues.
Unit #30 experienced one (1) paper jam during the casting of the ballot.	When removed from the scanner, the ballot was undamaged with no noticeable marking or bends. It was re-cast without further issues.

## 6. Usability, Accessibility and Privacy Testing Summary

The Accessibility, Usability and Privacy testing took place over one (1) day, January 12, 2026. Testing was limited to six (6) volunteer testers. The volunteers were from the Los Angeles County accessibility community. The BMD devices used for this test were programmed with the 2024 Presidential General Election. Each volunteer tester was asked to complete a ballot on their own, with assistance provided as requested. Upon completion of the session, both volunteer testers were asked to participate in a post-test survey regarding their experience.

<b>Tester</b>	<b>Survey Results</b>
Tester 1	The voter found the system intuitive. Performance feedback included noted inconsistencies in audio cadence ("jerky") and a request for higher maximum volume, though current levels were audible at adjacent stations.
Tester 2	Encountered initial navigation challenges while utilizing the NavPad but successfully completed the ballot without intervention. Feedback indicated a desire for better introductory instructions, though the voter's overall assessment of the system was positive.
Tester 3	Successfully navigated the system with minimal difficulty. Following manual volume adjustment, the voter confirmed audio adequacy and praised the screen-blanking privacy feature for audio-dependent sessions.
Tester 4	Utilized the touchscreen interface exclusively. The voter reported a high level of usability and completed the session without complications or the need for audio assistance.
Tester 5	Reported a positive user experience, successfully utilizing both touchscreen and audio interfaces. The voter observed minor audio latency following speech-rate adjustments; however, this did not impact the successful completion of the voting session.
Tester 6	Successfully completed the ballot without assistance and expressed confidence in the system.

## **IV. COMPLIANCE WITH STATE AND FEDERAL LAWS AND REGULATIONS**

### **1. Elections Code Requirements**

Six (6) sections of the California Elections Code, Sections 19101, 19203, 19204, 19204.5, 19205, and 19270, describe in detail the requirements any voting system must meet in order to be approved for use in California elections. These sections are described in detail and analyzed for compliance below.

- a. §19101(b)(1): The machine or device and its software shall be suitable for the purpose for which it is intended.
  - i. The system meets this requirement.
- b. §19101(b)(2): The system shall preserve the secrecy of the ballot.
  - i. The system meets this requirement. Vote by mail and BMD ballots can both be secretly cast.
- c. §19101(b)(3): The system shall be safe from fraud or manipulation.
  - i. The system meets this requirement. The tabulation system is wholly contained within an air-gapped environment, in addition to the Use Procedures prescribe strict chain of custody requirement, including the use of tamper evident seals, port security locks, and physical security mitigations/best practices.
- d. §19101(b)(4): The system shall be accessible to voters with disabilities pursuant to section 19242 and applicable federal laws.
  - i. The system meets this requirement. Accessibility testing conducted with members of the accessibility community verified that the system is accessible and voters with accessibility needs can cast a ballot privately and independently.
- e. §19101(b)(5): The system shall be accessible to voters who require assistance in a language other than English if the language is one in which a ballot or ballot materials are required to be made available to voters pursuant to Section 14201 and applicable federal laws.
  - i. VSAP 3.0 supports 14201 languages, as applicable to the County of Los Angeles. The system can add additional languages, to produce ballots or ballot materials, and accessible audio files pursuant to Section 14201, utilizing system functionality and outside translation.

- f. §19203: The system shall use ballot paper that is of sufficient quality that it maintains its integrity and readability throughout the retention period specified in sections 1700 through 17306.
  - i. The system meets this requirement.
- g. §19204: The system shall not include procedures that allow a voter to produce, and leave the polling place with, a copy or facsimile of the ballot cast by that voter at that polling place.
  - i. The system meets this requirement as the ballot marking devices retain the ballots, in the integrated ballot box, upon casting.
- h. §19204.5: The Secretary of State shall not certify or conditionally approve a voting system that cannot facilitate the conduct of a ballot level comparison risk-limiting audit
  - i. The system meets this requirement. The systems components in addition to processes and procedures, prepare ballots during the tabulation process for a risk-limiting audit.
- i. §19205 (a): No part of the voting system shall be connected to the internet at any time.
  - i. The system meets this requirement. No components of the voting system are connected to the internet. The system operates in a wholly contained air-gap environment.
- j. §19205 (b): No part of the voting system shall electronically receive or transmit election data through an exterior communication network, including the public telephone system, if the communication originates from or terminates at a polling place, satellite location, or counting center.
  - i. The system meets this requirement. No components of the voting system are connected to the internet. The system operates in a wholly contained air-gap environment.
- k. §19205 (c): No part of the voting system shall receive or transmit wireless communications or wireless data transfers.
  - i. The system meets this requirement. No components of the voting system have the capability, including optional capability to communicate wirelessly. The system operates in a wholly contained air-gap environment.
- l. §19270 (a): The Secretary of State shall not certify or conditionally approve a direct recording electronic voting system unless the system includes an accessible voter verified paper audit trail.
  - i. The system meets this requirement.

## 2. Elections Code Review

- a. §305.5(b): A paper cast vote record is a ballot only if the paper cast vote record is generated on a voting device or machine that complies with ballot layout requirements and is tabulated by a separate device from the device that created the paper cast vote record.
  - i. The system meets this requirement.
  
- b. §15360: During the official canvass of every election in which a voting system is used, the official conducting the election shall conduct a public manual tally of the ballots tabulated by those devices cast in one percent of the precincts chosen at random by the elections official. If one percent of the precincts should be less than one whole precinct, the tally shall be conducted in one precinct chosen at random by the elections official. In addition to the one percent count, the elections official shall, for each race not included in the initial group of precincts, count one additional precinct. The manual tally shall apply only to the race not previously counted.
  - i. The system fully supports this requirement.
  
- c. §19300: A voting machine shall, except at a direct primary election or any election at which a candidate for voter-nominated office is to appear on the ballot, permit the voter to vote for all the candidates of one party or in part for the candidates of one party and in part for the candidates of one or more other parties.
  - i. The system meets this requirement.
  
- d. §19301: A voting machine shall provide in the general election for grouping under the name of the office to be voted on, all the candidates for the office with the designation of the parties, if any, by which they were respectively nominated.

The designation may be by usual or reasonable abbreviation of party names.

  - i. The system meets this requirement.
  
- e. §19302: The labels on voting machines and the way in which candidates' names are grouped shall conform as nearly as possible to the form of ballot provided for in elections where voting machines are not used.
  - i. The system meets this requirement.
  
- f. §19303: If the voting machine is so constructed that a voter can cast a vote in part for presidential electors of one party and in part for those of

one or more other parties or those not nominated by any party, it may also be provided with: (a) one device for each party for voting for all the presidential electors of that party by one operation, (b) a ballot label therefore containing only the words “presidential electors” preceded by the name of the party and followed by the names of its candidates for the offices of President and Vice President, and (c) a registering device therefore which shall register the vote cast for the electors when thus voted collectively.

If a voting machine is so constructed that a voter can cast a vote in part for delegates to a national party convention of one party and in part for those of one or more other parties or those not nominated by any party, it may be provided with one device for each party for voting by one operation for each group of candidates to national conventions that may be voted for as a group according to the law governing presidential primaries.

No straight party voting device shall be used except for delegates to a national convention or for presidential electors.

i. The system meets this requirement.

g. §19304: A write-in ballot shall be cast in its appropriate place on the machine, or it shall be void and not counted.

i. The system supports this requirement.

h. §19320: Before preparing a voting machine for any general election, the elections official shall mail written notice to the chairperson of the county central committee of at least two of the principal political parties, stating the time and place where machines will be prepared. At the specified time, one representative of each of the political parties shall be afforded an opportunity to see that the machines are in proper condition for use in the election.

The party representatives shall be sworn to perform faithfully their duties but shall not interfere with the officials or assume any of their duties. When a machine has been so examined by the representatives, it shall be sealed with a numbered metal seal. The representatives shall certify to the number of the machines, whether all of the counters are set at zero (000), and the number registered on the protective counter and on the seal.

i. The system supports this requirement.

i. §19321: The elections official shall affix ballot labels to the machines to correspond with the sample ballot for the election. He or she shall employ competent persons to assist him or her in affixing the labels and in putting the machines in order. Each machine shall be tested to ascertain whether it is operating properly.

- i. The system supports this requirement.
- j. §19322: When a voting machine has been properly prepared for an election, it shall be locked against voting and sealed. After that initial preparation, a member of the precinct board or some duly authorized person, other than the one preparing the machines, shall inspect each machine and submit a written report. The report shall note the following: (1) Whether all of the registering counters are set at zero (000), (2) whether the machine is arranged in all respects in good order for the election, (3) whether the machine is locked, (4) the number on the protective counter, (5) the number on the seal. The keys shall be delivered to the election board together with a copy of the written report, made on the proper blanks, stating that the machine is in every way properly prepared for the election.
  - i. The system supports this requirement.
- k. §19340: Any member of a precinct board who has not previously attended a training class in the use of the voting machines and the duties of a board member shall be required to do so, unless appointed to fill an emergency vacancy.
  - i. The system does not adversely impact this requirement.
- l. §19341: The precinct board shall consist of one inspector and two judges who shall be appointed and compensated pursuant to the general election laws. One additional inspector or judge shall be appointed for each additional voting machine used in the polling place.
  - i. The system does not adversely impact this requirement.
- m. §19360: Before unsealing the envelope containing the keys and opening the doors concealing the counters the precinct board shall determine that the number on the seal on the machine and the number registered on the protective counter correspond to the numbers on the envelope. Each member of the precinct board shall then carefully examine the counters to see that each registers zero (000). If the machine is provided with embossing, printing, or photography devices that record the readings of the counters the board shall, instead of opening the counter compartment, cause a “before election proof sheet” to be produced and determined by it that all counters register zero (000). If any discrepancy is found in the numbers registered on the counters or the “before election proof sheet” the precinct board shall make, sign, and post a written statement attesting to this fact. In filling out the statement of return of votes cast, the precinct board shall subtract any number shown

on the counter from the number shown on the counter at the close of the polls.

- i. The system supports this requirement.
  
- n. §19361: The keys to the voting machines shall be delivered to the precinct board no later than twelve hours before the opening of the polls. They shall be in an envelope upon which is written the designation and location of the election precinct, the number of the voting machine, the number on the seal, and the number registered on the protective counter. The precinct board member receiving the key shall sign a receipt. The envelope shall not be opened until at least two members of the precinct board are present to determine that the envelope has not been opened. At the close of the polls the keys shall be placed in the envelope supplied by the official and the number of the machine, the number written on the envelope.
  - i. The system supports this requirement.
  
- o. §19362: The exterior of the voting machine and every part of the polling place shall be in plain view of the election precinct board and the poll watchers. Each machine shall be at least four feet from the poll clerk's table.
  - i. The system supports this requirement.

### **3. Review of Federal Statutes or Regulations.**

- a. The Voting Rights Act (VRA) of 1965, as amended (42 U.S.C. 1973), requires all elections in certain covered jurisdictions to provide registration and voting materials and oral assistance in the language of a qualified language minority group in addition to English. Currently in California, there are eleven VRA languages (English, Spanish, Cambodian, Chinese, Hindi, Japanese, Khmer, Korean, Tagalog, Thai, and Vietnamese) as prescribed under the law.
  - i. The system meets this requirement. The system's paper ballots can be easily printed in these languages, as well as any others. Further, the BMD can be programmed to display the ballot in any of these languages on the touch screen interface and to provide audio instruction in any of these languages.
  
- b. The National Voter Registration Act of 1993 (42 U.S.C. 1973gg and 11 CFR 8) allows for the casting of provisional ballots through Fail-Safe Voting procedures.

- i. The system meets this requirement. Provisional ballots can easily be cast with this system. The BMD only marks ballots (or verifies the marking of a ballot), it has no impact on provisional voting.
- c. The Voting Accessibility for the Elderly and Handicapped Act of 1984 (42 U.S.C. 1973ee through 1973ee-6) requires each political subdivision conducting elections within each state to assure that all polling places for federal elections are accessible to elderly and handicapped voters, except in the case of an emergency as determined by the state's chief election officer or unless the state's chief election officer: (1) determines, by surveying all potential polling places, that no such place in the area is accessible or can be made temporarily accessible, and (2) assures that any handicapped voter assigned to an inaccessible polling place will, upon advance request under established state procedures, either be assigned to an accessible polling place or be provided an alternative means of casting a ballot on election day.
  - i. This system supports this requirement.
- d. The Retention of Voting Documentation (42 U.S.C. 1974 through 1974e) statute applies in all jurisdictions and to all elections in which a federal candidate is on a ballot. It requires elections officials to preserve for 22 months all records and papers which came into their possession relating to an application, registration, payment of a poll tax, or other act requisite to voting. Note: The US Department of Justice considers this law to cover all voter registration records, all poll lists and similar documents reflecting the identity of voters casting ballots at the polls, all applications for absentee ballots, all envelopes in which absentee ballots are returned for tabulation, all documents containing oaths of voters, all documents relating to challenges to voters or absentee ballots, all tally sheets and canvass reports, all records reflecting the appointment of persons entitled to act as poll officials or poll watchers, and all computer programs used to tabulate votes electronically. In addition, it is the Department of Justice's view that the phrase "other act requisite to voting" requires the retention of the ballots themselves, at least in those jurisdictions where a voter's electoral preference is manifested by marking a piece of paper or by punching holes in a computer card.
  - i. The system meets this requirement. All votes in this system are recorded on paper ballots that can be easily retained.

#### **4. Help America Vote Act (HAVA) Requirements**

The Help America Vote Act (HAVA) §301(a) mandates several requirements for voting systems, including:

- a. The ability to verify the vote choices on the ballot before that ballot is cast and counted,
- b. Notification to the voter of over-votes on a ballot,
- c. Auditability with a permanent paper record of votes cast,
- d. Accessibility for individuals with disabilities, including nonvisual accessibility for the blind and visually impaired, in a manner that provides the same opportunity for access and participation (including privacy and independence)
  - i. This system supports these requirements in the following manner:
    1. The paper ballots themselves lend themselves to visual inspection and verification.
    2. The BMD provides its users with a ballot review screen prior to printing the ballot. Further, any voted ballot can be inserted into the unit for review and verification.
    3. The BMD prevents over-voting a contest.
    4. Because all ballots in this system are paper based, there is a fully auditable and permanent record of the election.
    5. Deployment of the BMD in a precinct provides accessibility for persons with disabilities at the polling place.

#### **V. CONCLUSION**

The VSAP 4.0 voting system meets applicable California and Federal Elections laws. The system does however have some remaining findings, which the Los Angeles County will address or has addressed in the appropriate mitigation areas of this report. Los Angeles County will provide responses and/or mitigations to those findings, which will be evaluated by the California Secretary of State.