Dominion Democracy Suite 5.10
Security and Telecommunications Test Report

CDV-19013-STR-01

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<tr>
<th>Vendor Name</th>
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Accredited by the Election Assistance Commission (EAC) for Selected Voting System Test Methods or Services
Revision History

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Overview

This test report provides results for the security and telecommunications testing of the Dominion Democracy Suite 5.10 Voting System.

Security and telecommunications testing covered:

- Top-level system design and architecture
- System documentation and procedures
- Testing of relevant software and operating system configuration for pertinent vulnerabilities
- Testing of hardware, including examination of unused hardware ports and security measures applied to those ports
- Testing of system communications, including encryption of data as well as protocols and procedures for access authorization

Testing was implemented without any prior knowledge of the source code.

The testing was divided into three phases.

Phase I included review of all pertinent documents for appropriate processes and procedures for implementing a secure system. This included review of the system design and architecture.

Phase II included testing of relevant software, operating systems, and hardware configurations.

Phase III included testing of all telecommunications aspects of the system.
Phase I – Documentation Review

During Phase I testing, documentation was reviewed to verify and validate the following requirements:

- Top-level system design and architecture
- System documentation and procedures

During Phase I testing, documentation was reviewed to verify and validate the following California Voting System Standards (CVSS) requirements:

- 7.2.2 Access Control Identification
- 7.3.1 Polling Place Security
- 7.3.2 Central Count Location Security
- 7.4.1 Software and Firmware Installation
- 7.4.2 Protections Against Malicious Software
- 7.4.3 Software Distribution and Setup Validation
- 7.4.4 Software Distribution
- 7.4.5 Software Reference Information
- 7.4.6 Software Setup Validation
- 7.8.1 Access Control
- 7.8.2 Data Interception and Disruption
- 9.6 System Security Specification

See the applicable section below for more details on these requirements and the review results.

During Phase I testing, an issue log of any errors and omissions found in the documentation or anomalies encountered was maintained.

7.2.2 Access Control Identification

a. The voting system shall identify users and processes to which access is granted and the specific functions and data to which each entity holds authorized access.

b. Voting system equipment that implements role-based access control shall support the recommendations for Core RBAC in the ANSI INCITS 359-2004 American National Standard for Information Technology Role Based Access Control document.

c. Voting system equipment shall allow the administrator group or role to configure the permissions and functionality for each identity, group, or role to include account and group/role creation, modification, and deletion.
Results: Review of the Technical Data Package (TDP) validated that the requirement was satisfactorily covered

7.3.1 Polling Place Security

For polling place operations, manufacturers **shall** develop and provide detailed documentation of measures to enable poll workers to physically protect and perform orderly shutdown of voting equipment to counteract vandalism, civil disobedience, and similar occurrences.

The measures **shall** allow the immediate detection of tampering with vote casting devices and precinct ballot counters.

Results: Review of the TDP validated that the requirement was satisfactorily covered

7.3.2 Central Count Location Security

Manufacturers **shall** develop and document in detail the measures to be taken in a central counting environment. These measures **shall** include physical and procedural controls related to the handling of ballot boxes, preparing of ballots for counting, counting operations and reporting data.

Results: Review of the TDP validated that the requirement was satisfactorily covered

7.4.1 Software and Firmware Installation

The system **shall** meet the following requirements for installation of software, including hardware with embedded firmware:

a. Air Gap Architecture
   
i. Every voting system **shall** be capable of being deployed in a segregated dual-installation architecture to protect against propagation of viruses. The architecture **shall** allow elections officials to use one or more, permanent server(s) and set of central-office voting devices, known to be running unaltered, certified software and firmware to create memory cards before each election and to use another, physically separate “sacrificial” server and set of voting devices after the election to tabulate results and generate reports. The architecture **shall** allow transfer of the election definition and tally database from the permanent server(s) to the sacrificial server using a write-once medium, such as a CD-R. The voting system architecture **shall** allow each installation to use its own Ethernet network, port server, and central-office vote-recording units, including any DRE and optical scan units, permitting the two
installations to be segregated and air-gapped to ensure that there are no cross connections. An air gap is established by keeping two installations/networks physically separate and seeing that no device attached to the sacrificial installation/network is connected (directly or indirectly) to the first network, ensuring that data cannot flow from one installation/network to the other.

ii. The TDP for the voting system **shall** provide full procedures and instructions, to be incorporated into the Official Use Procedures for the voting system, to implement the segregated dual-installation architecture.

### b. Voting and Tabulating Units

i. If software is resident in the system as firmware, the manufacturer **shall** require and state in the system documentation that every device is to be retested to validate each ROM prior to the start of elections operations.

ii. To prevent alteration of executable code, no software **shall** be permanently installed or resident in the voting system unless the system documentation states that the jurisdiction must provide a secure physical and procedural environment for the storage, handling, preparation, and transportation of the system hardware.

iii. The voting system bootstrap, monitor, and device-controller software may be resident permanently as firmware, provided that this firmware has been shown to be inaccessible to activation or control by any means other than by the authorized initiation and execution of the vote counting program, and its associated exception handlers.

iv. The election-specific programming may be installed and resident as firmware, provided that such firmware is installed on a component (such as a computer chip) other than the component on which the operating system resides.

v. After initiation of Election Day testing, no source code or compilers or assemblers **shall** be resident or accessible.

**Results:** Review of the TDP validated that the requirement was satisfactorily covered

### 7.4.2 Protection against Malicious Software

Voting systems **shall** deploy commercial-off-the-shelf (COTS) protection against the many forms of threats to which they may be exposed such as file and macro viruses, worms, Trojan horses, and logic bombs.
Manufacturers shall develop and document the procedures to be followed to ensure that such protection is maintained in a current status. Virus and malware protection software and updates shall be installed using transportable portable media only and shall not be installed by download from the Internet.

**Results:** Review of the TDP validated that the requirement was satisfactorily covered

### 7.4.3 Software Distribution and Setup Validation

Subsections 7.4.4, 7.4.5 and 7.4.6 specify requirements for the distribution of voting system software and the setup validation performed on voting system equipment. These requirements are applicable to voting systems that have completed certification testing.

#### 7.4.4 Software Distribution

The manufacturer shall document all software including voting system software, third party software (such as operating systems and drivers) to be installed on the certified voting system, and installation programs.

a. The documentation shall have a unique identifier (such as a serial number or part number) for the following set of information: documentation, software manufacturer name, product name, version, the certification application number of the voting system, file names and paths or other location information (such as storage addresses) of the software.

b. The documentation shall designate all software files as static, semi-static or dynamic.

**Results:** Review of the TDP validated that the requirement was satisfactorily covered

#### 7.4.5 Software Reference Information

(Pertinent excerpt being addressed from CVSS requirement 7.4.5)

a. The manufacturer shall provide the NSRL, any California certified escrow facility, pursuant to Title 2, Division 7, Chapter 6 of the California Code of Regulation, and the Office of the Secretary of State with a copy of the software installation disk, including the executable binary images of all third party software. Further, the manufacturer shall deposit the source code, tools, and documentation, to allow the complete and successful compilation of a system in its production/operation environment.

i. The manufacturer shall document that the process used to verify the software distributed on unalterable storage media is the certified
software by using the reference information provided by the NSRL or other designated repository before installing the software.

c. The manufacturers shall document to whom they provide voting system software.

Results: Review of the TDP validated that the requirement was satisfactorily covered

7.4.6 Software Setup Validation

(Pertinent excerpt being addressed from CVSS requirement 7.4.6)

g. Setup validation methods shall verify the contents of all system storage locations (e.g., system registers, variables, files, etc.) containing election specific information (e.g., ballot style, candidate registers, measure registers, etc.).

ii. The manufacturer shall document the default values of all system storage locations that hold election specific information.

Results: Review of the TDP validated that the requirement was satisfactorily covered

7.8.1 Access Control

The accredited testing laboratory shall conduct tests of system capabilities and review the access control policies and procedures submitted by the manufacturer to identify and verify the access control features implemented as a function of the system.

Specific activities to be conducted by the S-ATA shall include:

a. A review of the manufacturer’s access control policies, procedures and system capabilities to confirm that all requirements have been addressed completely.

Results: Review of the TDP validated that the requirement was satisfactorily covered

7.8.2 Data Interception and Disruption

For systems that use telecommunications, as provided for in section 6 of the Standards and consistent with California law, to transmit official voting data, the S-ATA shall review, and conduct tests of, the data interception and prevention safeguards specified by the manufacturer in its TDP. The S-ATA shall evaluate safeguards provided by the manufacturer to ensure their proper operation,
including the proper response to the detection of efforts to monitor data or otherwise compromise the system.

**Results:** Review of the TDP validated that the requirement was satisfactorily covered.

### 9.6 System Security Specification

Manufacturers shall Document in the TDP all aspects of the system design, development and proper usage that are relevant to system security. This includes but is not limited to the following:

- System security specification that Addresses the security requirements.
- The means used to keep the security capabilities of the system current to respond to evolving threats.
- Specific security risks addressed by the system.
- All hardware and software security mechanisms.
- Development procedures employed to ensure absence of malicious code.
- Initialization, usage, and maintenance procedures necessary to secure operation.
- All attacks the system is designed to resist or detect.
- Any security vulnerabilities known to the manufacturer.

**Results:** Review of the TDP validated that the requirement was satisfactorily covered.

### Phase II – Functional Security Testing

Phase II testing included:

- Testing of relevant software and operating system configuration for pertinent vulnerabilities
- Testing of hardware, including examination of unused hardware ports and the security measures applied to those ports

During Phase II, functional tests were exercised in order to verify and validate the following CVSS requirements:

- 5.4.3 In-process Audit Records
- 7.2.1 General access control
- 7.2.2 Access control identification
- 7.2.3 Access control authentication
- 7.2.4 Access control authorization
- 7.3 Physical security measures
7.3.1 Polling place security
7.3.2 Central count location security
7.4.1 Software and firmware installation
7.4.2 Protection against malicious software
7.4.3 Software distribution and setup validation
7.4.5 Software Reference Information
7.4.6 Software Setup Validation
7.6 Telecommunications and data transmission
7.6.1 Maintaining Data Integrity
7.6.2 Election Returns
7.8.1 Access Control
7.8.2 Data Interception and Disruption

See the applicable section below for more details on these requirements and the test results.

An issue log of any errors, omissions, or anomalies found in the documentation was maintained.

**5.4.3 In-process Audit Records**
(Pertinent excerpt being addressed from CVSS requirement 5.4.3)

iv. Notification of system login or access errors, file access errors, and physical violations of security as they occur, and a summary record of these events after processing

**Testing performed:** As all other requirements were being tested, the Audit log was reviewed to verify that appropriate records were recorded for the events occurring.

The examination also included:

- Attempts to modify or corrupt audit logs / records
- Attempts to disable or turn off audit logging capabilities
- Attempts to falsify audit logs located on removable election media

**Results:**

- All attempts to circumvent, modify, or disable in-process audit logs or capabilities were unsuccessful
- Testing showed that the ICX device does not provide monitoring of physical security
7.2.1 General Access Control

a. Voting system equipment shall provide access control mechanisms designed to permit authorized access to the voting system and to prevent unauthorized access to the voting system.
   i. Access control mechanisms on the EMS shall be capable of identifying and authenticating individuals permitted to perform operations on the EMS.

b. Voting system equipment shall provide controls that permit or deny access to the device’s software and files.

c. The default access control permissions shall implement the minimum permissions needed for each role or group identified by a device.

d. The voting device shall prevent a lower-privileged process from modifying a higher-privileged process.

e. An administrator of voting system equipment shall authorize privileged operations.

f. Voting system equipment shall prevent modification to or tampering with software or firmware through any means other than the documented procedure for software upgrades.

Testing performed:

- System wide authentication checks, including both positive and negative testing to verify that the systems under examination allowed authorized users the ability to complete tasks while preventing all unauthorized users from accessing critical controls or processes
- Attempts to access systems files or software via an unauthorized method or process
- System wide permission checks to determine if user accounts and passcodes only allowed the appropriate levels of permission / roles to perform the task at hand
- Examined solution specific users and roles to confirm permissions and task / actions
- Attempts to escalate privileges from a lower privileged account in an attempt to perform or access roles or tasks not specifically assigned to users
- Examined the system to determine if the software or firmware could be tampered with or modified through other means besides the documented procedure
• Enumerated each system as able, pulling audit logs, firewall rules, running processes, network configurations, user lists, and security settings

**Applicable to:** EMS, Adjudication, ICC, ICE, ICP2 and ICX.

**Results:** Testing validated that the requirement was satisfactorily covered

### 7.2.2 Access Control Identification

- a. The voting system **shall** identify users and processes to which access is granted and the specific functions and data to which each entity holds authorized access.

- b. Voting system equipment that implements role-based access control **shall** support the recommendations for Core RBAC in the ANSI INCITS 359-2004 American National Standard for Information Technology Role Based Access Control document.

- c. Voting system equipment **shall** allow the administrator group or role to configure the permissions and functionality for each identity, group, or role to include account and group/role creation, modification, and deletion.

**Testing performed:**

- Confirmed that the documented users and roles are the same as those documented in the TDP

- Confirmed all solution roles and responsibilities

- Confirmed administrative group’s roles and permissions

**Applicable to:** EMS, Adjudication, ICC, ICE, ICP2 and ICX.

**Results:** Testing validated that the requirement was satisfactorily covered

### 7.2.3 Access Control Authentication

The following authentication requirements apply to all voting system equipment.

- a. Voting system equipment **shall** authenticate users prior to granting them access to system functions or data.

- b. When private or secret authentication data is stored in voting system equipment, the data **shall** be protected to ensure that the confidentiality and integrity of the data is not violated.

- c. Voting system equipment **shall** allow the administrator group or role to set and change passwords, pass phrases, and keys.
d. Voting system equipment shall allow privileged groups or roles to be disabled and allow new individual privileged groups or roles to be created.

e. Voting system equipment shall lock out groups, roles, or individuals after a specified number of consecutive failed authentication attempts within a predefined time period.

f. Voting systems shall allow the administrator group or role to configure the account lock out policy, including the time period within which failed attempts must occur, the number of consecutive failed access attempts allowed before lock out, and the length of time the account is locked out.

g. If the voting system uses a user name and password authentication method, the voting system shall allow the administrator to enforce password strength, histories, and expiration.

h. The voting system shall allow the administrator group or role to specify password strength for all accounts, including minimum password length, use of capitalized letters, use of numeric characters, and use of non-alphanumeric characters.

i. The voting system shall enforce password histories, and allow the administrator to configure the history length.

j. Voting system equipment shall ensure that the username is not used in the password.

k. Voting systems shall provide a means to automatically expire passwords in accordance with the voting jurisdiction’s policies.

Testing performed:

- Attempts to access system functions and resources without successful authentication to the operating system or Dominion DS 5.10 system
- Attempts to find extra authentication data from system storage, including compact flash cards, hard drives, USB sticks, and CFast storage
- Verified the system equipment allows the administrator to change all passwords, pass phrases, and keys, if applicable
- Verified that the system(s) have the ability to lockout accounts after a specified number of failed authentication attempts
- Confirmed and tested the system’s password complexity, strength, lockout, history, length, and expiration requirements

Applicable to: EMS, Adjudication, ICC, ICE, ICP2 and ICX.
Results:

- During enumeration of the **Dominion DS 5.10** systems, it was determined that a number of passwords were able to be recovered that were stored in plain text.

- Upon investigation of access control and authentication methods for the systems it was discovered that the Dominion tech keys contain all the same default passcode and cannot be changed except by Dominion.

- It should be noted that the Dominion technician keys are not readily available. All other iButton security keys are programmable with new passcode combinations.

- It was determined that the system security system iButton keys can be changed for poll-workers for elections. In the event that the jurisdiction doesn’t want old security keys to work, the system must regenerate election security elements prior to regeneration of the election files. The documentation is unclear as to what happens if election security keys are stolen or lost during an election, as changing security keys requires rewriting the election files for the devices.

- Review of the requirement 7.2.3.e showed that there is no ability to configure lockout, password history, or expiration in the voting specific software for EMS passwords. The examination determined that the Windows Operating System controls the lockout and password policies.

- Review of the requirement 7.2.3.f, showed that for the EMS, there is no lockout, password history, or expiration in the voting specific software. The examination determined that the Windows Operating System controls the lockout and password policies.

- Review of the requirement 7.2.3.g, showed that there is no lockout, password history, or expiration in the voting specific software. The examination determined that the Windows Operating System controls the lockout and password policies.

- There is the ability to set iButton and smartcard passcode length between four and eight characters. However, there are no histories or expirations for iButtons or smartcards.

- The EMS system EED and RTR currently are forced to have 10 character complex passwords; however, there are no easily distinguished ways to set expiration of accounts nor are there ways to set a password history.

- Review of requirement 7.2.3.h showed that EMS specifications state that EED/RTR user account password complexity can be changed, Windows based operating systems have password policy requirements specified for OS login.
- During review of requirement 7.2.3.i, it was determined that password history functionality is not implemented in election system specific systems.
- During Review of the requirement 7.2.3.j, in the EED and RTR user accounts, SLI was able to create user accounts with passwords that contained usernames.
- Review of the requirement 7.2.3.k showed that SLI was unable to determine if any of the equipment has the ability to expire passwords/passcodes or user accounts.
- Testing validated that the requirement was partially covered. The findings can be mitigated by rigorous manual adherence to industry best practices of passwords/passcodes.

### 7.2.4 Access Control Authorization

a. Voting systems **shall** ensure that only authorized roles, groups, or individuals have access to election data.

b. Voting systems **shall** explicitly authorize subject’s access based on access control lists or policies.

c. Voting systems **shall** explicitly deny subject’s access based on access control lists or policies.

During the examination, the access control authorization capabilities of all the systems were examined to determine if the systems sufficiently provided controls for authorization.

**Testing performed:**

- Verification that the system only allows authorized roles, groups, and individuals access to election data
- Verified that the system has access levels based upon roles, control lists, or policies
- Verified that the system successfully denies access to the system based upon roles, lists or policies

**Applicable to:** Adjudication, ICC, ICE, ICP2 and ICX.

**Results:**

- All the systems successfully protected the system BIOS settings from tampering. This prevented all attempts to boot from unauthorized devices or to change system configuration settings at a BIOS level.
- Testing validated that the requirement was satisfactorily covered.
7.3 Physical Security Measures

a. Any unauthorized physical access **shall** leave physical evidence that an unauthorized event has taken place.

b. Voting systems **shall** only have physical ports and access points that are essential to voting operations and to voting system testing and auditing.

c. An event log entry that identifies the name of the affected device **shall** be generated if a component connected to a piece of voting system equipment is disconnected while polls are open.

d. Ports disabled while polls are open **shall** only be re-enabled by authorized administrators.

e. Access points, such as covers and panels, **shall** be secured by locks or tamper evident seals or tamper resistant countermeasures **shall** be implemented so that system owners can monitor access to voting system components through these points.

f. Ballot boxes **shall** be designed such that any unauthorized physical access results in physical evidence that an unauthorized event has taken place.

During the examination of the physical security measures, all the systems were physically secured as they normally would be during a live election.

**Testing performed:**

- Attempts to circumvent all physical security features, including picking of locks and attempts to circumvent or bypass security seals and security screws
- Examined and tested all ports and connectors
- Disconnected devices and examined audit logs, as applicable, to determine if auditing of device disconnection was present
- Identified and examined every cover, panel, and access compartment
- Attempts to circumvent all ballot boxes in an attempt to add, remove, or destroy paper ballots

**Applicable to:** EMS, Adjudication, ICC, ICE, ICP2 and ICX.

**Results:**

- Security seals, locks, and security screws can be circumvented. For this reason it is recommended that the jurisdictions have a procedure in place to efficiently manage and monitor security seals and locking devices
• Review of the requirement 7.3.d, showed that for the ICX, all ports are enabled on the system; however, physical access to these ports is restricted
• Testing validated that the requirement was partially covered

7.3.1 Polling Place Security
For polling place operations, manufacturers shall develop and provide detailed documentation of measures to enable poll workers to physically protect and perform orderly shutdown of voting equipment to counteract vandalism, civil disobedience, and similar occurrences.

The measures shall allow the immediate detection of tampering with vote casting devices and precinct ballot counters.

Testing performed: Tests were performed to verify that the documented measures provide adequate polling place security.

Applicable to: ICE, ICP2 and ICX.

Results: Testing validated that the requirement was satisfactorily covered

7.3.2 Central Count Location Security
Manufacturers shall develop and document in detail the measures to be taken in a central counting environment. These measures shall include physical and procedural controls related to the handling of ballot boxes, preparing of ballots for counting, counting operations and reporting data.

Testing performed: Tests were performed to verify that the documented measures provide adequate central count location security.

Applicable to: ICC, Adjudication, and EMS.

Results: Testing validated that the requirement was satisfactorily covered

7.4.1 Software and Firmware Installation
(Pertinent excerpt being addressed from CVSS requirement 7.4.1)
The system shall meet the following requirements for installation of software, including hardware with embedded firmware:

b. Voting and Tabulating Units

ii. To prevent alteration of executable code, no software shall be permanently installed or resident in the voting system unless the system documentation states that the jurisdiction must provide a secure physical
and procedural environment for the storage, handling, preparation, and transportation of the system hardware.

iii. The voting system bootstrap, monitor, and device-controller software may be resident permanently as firmware, provided that this firmware has been shown to be inaccessible to activation or control by any means other than by the authorized initiation and execution of the vote counting program, and its associated exception handlers.

iv. The election-specific programming may be installed and resident as firmware, provided that such firmware is installed on a component (such as a computer chip) other than the component on which the operating system resides.

v. After initiation of Election Day testing, no source code or compilers or assemblers shall be resident or accessible.

Testing performed:

- Tests were performed to verify that if any software or firmware is installed, unless the documentation details how to protect it, it is inaccessible to activation or control only by authorized means
- Tests were performed to verify that no source code, compilers, or assemblers are resident or accessible after election day testing

Applicable to: EMS, Adjudication, ICC, ICE, ICP2 and ICX.

Results: Testing validated that the requirement was satisfactorily covered

7.4.2 Protection against Malicious Software

Voting systems shall deploy commercial-off-the-shelf (COTS) protection against the many forms of threats to which they may be exposed such as file and macro viruses, worms, Trojan horses, and logic bombs.

Manufacturers shall develop and document the procedures to be followed to ensure that such protection is maintained in a current status. Virus and malware protection software and updates shall be installed using transportable portable media only and shall not be installed by download from the Internet.

Testing performed: Tests were performed to verify that COTS products are implemented to protect against malicious software, as described in voting system manufacturer documentation.

Applicable to: EMS, Adjudication, ICC, ICE, ICP2 and ICX.

Results:

- Review of the requirement 7.4.2, showed that on the EMS server, the AVAST Antivirus (AV) File Shield (the real time AV monitor) was only able
to detect and clean one of the four European Institute for Computer Antivirus Research (EICAR) files. This potentially leaves the system open to zipped and double zipped viruses as well as infection strings in plain text

- The ICX system is an android tablet device and contains no form of AV protection
- The ICE and ICP2 systems are proprietary systems that utilize firmware and compact flash cards to run, load, and store election-based software. These systems contain no AV protection
- Testing demonstrated that the requirement was partially covered. The findings can be mitigated by rigorous adherence to physical security processes and procedures, which would preclude the introduction of any malicious applications.

### 7.4.3 Software Distribution and Setup Validation

Subsections 7.4.4, 7.4.5 and 7.4.6 specify requirements for the distribution of voting system software and the setup validation performed on voting system equipment. These requirements are applicable to voting systems that have completed certification testing.

**Testing performed:** This requirement is met by successful validation of 7.4.5 and 7.4.6.

**Applicable to:** EMS, Adjudication, ICC, ICE, ICP2 and ICX.

**Results:** Testing determined that the requirement was partially covered. This requirement is dependent on the successful validation of requirements 7.4.5 and 7.4.6.

### 7.4.5 Software Reference Information

(Pertinent excerpt being addressed from CVSS requirement 7.4.5)

b. The voting system equipment **shall** be designed to allow the voting system administrator to verify that the software is the certified software by comparing it to reference information produced by the NSRL or other designated repository.

**Testing performed:** Tests were performed to verify that the software can be verified to meet the National Software Reference Library (NSRL) reference information.

**Applicable to:** EMS, Adjudication, ICC, ICE, ICP2 and ICX.

**Results:** Testing validated that the requirement was satisfactorily covered
7.4.6 Software Setup Validation

a. Setup validation methods shall verify that only authorized software is present on the voting equipment. Authorized software is COTS software components needed to run the voting system and voting software components identified by the manufacturer as authorized.

b. The manufacturer shall provide a method to comprehensively list all software files that are installed on voting systems.
   i. This method shall list version names and numbers for all application software on the voting system.
   ii. This method should list the date of installation for all application software on the voting system.

c. Setup validation methods shall include a software verification method that ensures that the voting system software has not been modified illegitimately.
   i. The voting systems shall include any supporting software and hardware necessary to conduct the software verification method.
   ii. The manufacturer shall document the process used to conduct the software verification method.
   iii. The software verification method shall not modify the voting system software on the voting system.

d. Voting systems shall include a software verification method that either verifies software prior to installation or a method that verifies software using an external interface. Voting systems may include both software verification methods. Voting systems may provide ancillary setup validation methods, including methods for verifying or identifying installed software, other than those described in this section. There are no specific requirements for ancillary setup validation methods. However, any method intended to serve as the voting system software verification method must meet the requirements outlined in this section.

e. Voting systems which implement a software verification method that verifies software prior to installation shall meet the following requirements.
   i. The voting system shall contain no more than one method for installing, updating, or removing software on a system.
      o Voting system equipment shall prevent processes from installing software except for the one specific software installation process identified by the manufacturer
The voting system manufacturer shall document the procedures for installing, updating, and removing voting system software, configuration files, and data files.

Voting system equipment shall prevent processes from installing, updating or removing software while the polls are open.

Voting system equipment shall prevent the execution of software not installed using the specified software installation process.

The voting system shall only allow authenticated administrators to install software on voting equipment. The voting system shall present the administrator with a description of the software change being performed, including:

- A list of all applications and/or file names being updated
- The type of action performed on each application and/or file (e.g., new application/file, deletion or overwriting of existing file)

Voting system equipment shall store the current version identification of all software installed on the voting system equipment.

- The current version identification shall be included as part of reports created by the voting system equipment
- The current version identification shall be displayed as part of the voting system equipment start up process

The process for installing, updating and removing software shall make software changes based on information contained in software update packages. Software update packages shall minimally contain the following information:

- A unique identifier for the software update package
- Names of the applications or files modified during the update process
- Version numbers of the applications or files modified during the update process
- Any software prerequisites or dependencies for the software involved in the update
- A description of the type of action performed on each application and/or file (e.g., new application/file, deletion or overwriting of existing file)
- The binary data of any new or updated files involved in the update process
v. The software update package shall be formatted in a non-restrictive, publicly-available format. Manufacturers shall provide a specification describing how they have implemented the format with respect to the manufacturer’s specific voting devices and data, including such items as descriptions of elements, attributes, constraints, extensions, syntax and semantics of the format, and definitions for data fields and schemas.

vi. Software update packages shall be digitally signed by using a NIST approved algorithm with a security strength of at least 112 bits.

vii. The software installation process shall verify digital signatures, software version identification, software prerequisites and dependencies, and manufacturer specific authorization information associated with the software before the software is installed. The software installation process shall not install software with invalid digital signatures, version numbers, or manufacturer specific authorization information, and shall not install software on systems that do not meet the update requisites.

viii. The voting system shall have the capability to prevent the installation of previous versions of applications or files.

ix. The software installation process shall result in information being stored in the voting system equipment’s log such that altering or deleting log entries or the log was detected.

x. The minimum information to be included in the voting system equipment log shall be:

- Success or failure of the software installation process
- Cause of a failed software installation (such as invalid version identification, digital signature, etc.)
- Application or file name(s), and version number(s)
- A description of the type of action performed on each application and/or file (e.g., new application/file, deletion or overwriting of existing file)
- A cryptographic hash of the software update package using FIPS 1402 level 1 or higher validated cryptographic module

f. If software is verified after being installed on the voting system equipment, the voting system equipment shall provide an external interface to the location of the voting system software for software verification purposes.

i. The external interface:

- Shall be protected using tamper evident techniques
o **Shall** have a physical indicator showing when the interface is enabled and disabled

o **Shall** be disabled during voting

o Should provide a direct read-only access to the location of the voting system software without the use of installed software. The verification process should be able to be performed using COTS software and hardware available from sources other than the voting system manufacturer.

o If the process uses hashes or digital signatures, then the verification software **shall** use a FIPS 140-2 level 1 or higher validated cryptographic module.

o The verification process **shall** either (a) use reference information on unalterable storage media received from the repository or (b) verify the digital signature of the reference information on any other media.

g. Setup validation methods **shall** verify the contents of all system storage locations (e.g., system registers, variables, files, etc.) containing election specific information (e.g., ballot style, candidate registers, measure registers, etc.).

i. The manufacturer should provide a method to query the voting system to determine the value contained in all system storage locations containing election specific information.

**Testing performed:** Tests were performed to verify that the installation process for each system component is robust and maintains the integrity of the voting system.

**Applicable to:** EMS, Adjudication, ICC, ICE, ICP2 and ICX.

**Results:**

- Review of the requirement 7.4.6.b.i, shows that Dominion specifies what is required to complete software validation but does not specifically supply the required software or hardware to do so. In the case of the ICX third party, Android developer tools were required to pull packages from the ICX device for hashing.

- Review of the requirement 7.4.6.c.i, shows that Dominion specifies what is required to complete software validation but does not specifically supply the required software or hardware to do so. In the case of the ICX third party, Android developer tools were required to pull packages from the ICX device for hashing.

- SLI was able to modify election specific installers utilizing a hex editor to change minor things including mouse over text and digital signature names.
SLI was able to take installers from previous versions of the installation package and use them to install older versions of the software from the Democracy Suite Installation.

SLI believes it would be possible to inject more lethal payloads into the installers given the opportunity.

Review of requirement 7.4.6.f.i.2 determined that the ICX devices have no visual indicators showing if the port is enabled or disabled.

Review of requirement 7.4.6.f.i.3 determined that the ICX devices have no visual indicators showing that the port is disabled during voting.

Review of requirement 7.4.6.f.i.3 determined that there is not a specific method to be able to verify or determine exactly all contents on the system.

Testing demonstrated that the requirement was partially covered.

### 7.6 Telecommunications and Data Transmission

There are four areas that must be addressed by telecommunications and data transmission security capabilities: access control, data integrity, detection and prevention of data interception, and protection against external threats.

#### 7.6.1 Maintaining Data Integrity

Voting systems that use telecommunications to communicate between system components and locations are subject to the same security requirements governing access to any other system hardware, software, and data function.

a. Voting systems that use electrical or optical transmission of data shall ensure the receipt of valid vote records is verified at the receiving station. This should include standard transmission error detection and correction methods such as checksums or message digest hashes. Verification of correct transmission shall occur at the voting system application level and ensure that the correct data is recorded on all relevant components consolidated within the polling place prior to the voter completing casting of his or her ballot.

i. Cryptography used to verify the receipt of vote records shall use NIST approved algorithms with security strength of at least 112 bits. Message Authentication Code (MAC) keys shall have a security strength of at least 112 bits.

**Testing performed:** Tests were performed to verify that data is properly encrypted and that receipt is verified.

**Applicable to:** EMS, Adjudication, and ICC.
Results:

- Individual public facing voting components are not networked nor do they transmit individual voting results. This includes the ICE, ICP2 and the ICX. The only telecommunications that are in use are an isolated closed network to link the EMS/ADJ/ICC devices together at a central count location.

- This requirement was determined to be not applicable.

- The only telecommunication capability utilized is an isolated closed network to link EMS Client /server configuration at a central count location, this includes adjudication and ICC scanners. Security testing captured and examined all network traffic between the networked devices and determined that all traffic between the central count scanners utilizes encrypted traffic between the ICC scanning device and the EMS server. The network communications utilized between the EMS server and the EMS client also utilize encryption when communicating between the client and the server.

- Testing determined that all results file, and election relevant data that is transmitted using these methods are encrypted.

7.6.2 Election Returns

If the voting system provides access to election returns or interactive inquiries, the system shall:

a. Allow authorized administrators the ability to disable or restrict access to election returns (for equipment that operates in a central counting environment). This requirement applies as well to polling place equipment that contains a removable memory module or that may be removed in its entirety to a central place for the consolidation of polling place returns.

b. Design voting system software and its security environment such that data accessible to interactive queries resides in an external file or database created and maintained by the elections software under the restrictions applying to any other output report:

   i. The output file or database has no provision for write access back to the system.

   ii. Persons whose only authorized access is to the file or database are denied write access, both to the file or database, and to the system.

Testing performed: Tests were performed to determine that if the system provides access to election returns or interactive queries, then the authorized administrators can disable or restrict access, and that the data resides in an external file or database governed by the voting system.
Applicable to: EMS and Adjudication.

Results: Testing validated that the requirement was satisfactorily covered

7.8.1 Access Control

For those access control features built in as components of the voting system, the S-ATA shall design tests to confirm that these security elements work as specified.

Specific activities to be conducted by the S-ATA shall include:

b. Specific tests designed by the S-ATA to verify the correct operation of all documented access control procedures and capabilities, including tests designed to circumvent controls provided by the manufacturer. These tests shall include:

i. Performing the activities that the jurisdiction will perform in specific accordance with the manufacturer’s access control policy and procedures to create a secure system, including procedures for software and firmware installation.

ii. Performing tests intended to bypass or otherwise defeat the resulting security environment. These tests shall include simulation of attempts to physically destroy components of the voting system in order to validate the correct operation of system redundancy and backup capabilities.

This review applies to the full scope of system functionality. It includes functionality for defining the ballot and other pre-voting functions, as well as functions for casting and storing votes, vote canvassing, vote reporting, and maintenance of the system’s audit trail.

Testing performed: Tests were performed to verify the documented procedures as well as attempts to defeat the implemented access control security on each system component.

Applicable to: EMS, Adjudication, ICC, ICE, ICP2 and ICX.

Results:

- Testing validated that the requirement was satisfactorily covered, with a caveat for the networking equipment that was tested as part of the setup.
- It was determined that the Dell managed switch was not sufficiently hardened during the engagement. This included an unencrypted telnet server with default username and password combinations. The findings can be mitigated by rigorous adherence to manufacturer specifications of hardening of the switch, including encryption and use of non-default username/password combinations.
7.8.2 Data Interception and Disruption

For systems that use telecommunications, as provided for in section 6 of the Standards and consistent with California law, to transmit official voting data, the S-ATA shall review, and conduct tests of, the data interception and prevention safeguards specified by the manufacturer in its TDP. The S-ATA shall evaluate safeguards provided by the manufacturer to ensure their proper operation, including the proper response to the detection of efforts to monitor data or otherwise compromise the system.

Testing performed: Testing was performed to verify appropriate encryption, receipt validation, and data integrity against any attempts to compromise the system.

Applicable to: EMS, Adjudication, ICC, ICE, ICP2, and ICX.

Results:

- This requirement was determined to be not applicable for polling place devices. Individual public facing voting components are not networked nor do they transmit individual voting results. This includes the ICE, ICP2 and the ICX BMD
- The only telecommunications that are in use are an isolated closed network to link the EMS/ADJ/ICC devices together at a central count location
- Operating system level transmissions provided appropriate encryption, receipt validation, and data integrity
- Testing validated that the requirement was satisfactorily covered
Phase III – Telecommunications and Data Transmission Testing

During Phase III, tests were exercised in order to verify and validate the following requirements:

- Testing of system communications, including encryption of data, as well as protocols and procedures for access authorization

In this phase, tests were exercised in order to verify and validate the following CVSS requirements:

- 6.1.2 Data Transmission
- 6.2.1 Confirmation

See the applicable section below for more details on these requirements and the test results.

An issue log of any errors, omissions, or anomalies found in the documentation was maintained.

### 6.1.2 Data Transmission

These requirements apply to the use of telecommunications to transmit data for the preparation of the system for an election, the execution of an election, and the preservation of the system data and audit trails during and following an election.

While this section does not assume a specific model of voting system operations and does not assume a specific model for the use of telecommunications to support such operations, it does address the following types of data, where applicable:

**Voter Authentication**: Coded information that confirms the identity of a voter for security purposes for a system that transmits votes individually.

**Ballot Definition**: Information that describes to a voting machine the content and appearance of the ballots to be used in an election.

**Vote Count**: Information representing the tabulation of votes at any level within the control of the jurisdiction, such as the polling place, precinct or central count.

**List of Voters**: A listing of the individual voters who have cast ballots in a specific election.

Additional data transmissions used to operate a voting system in the conduct of an election, but not explicitly listed above, are also subject to the requirements of this section.
Testing performed: Testing was performed to verify appropriate encryption, receipt validation, and data integrity.

Applicable to: EMS, Adjudication, ICC, ICE, ICP2 and ICX.

Results:

- This requirement was determined to be not applicable for polling place devices
- Nessus vulnerability scans were conducted on all equipment that were connected to the private EMS network. These included the EMS server, EMS workstation, adjudication workstation, and ICC system, as well as the managed switch
- Operating system level transmissions provided appropriate encryption, receipt validation, and data integrity
- The managed switch was scanned with Nessus and determined to have twelve medium vulnerabilities and four low vulnerabilities
- Testing demonstrated that the requirement was partially covered. The findings can be mitigated by rigorous adherence to manufacturer specifications of hardening of the switch, including encryption and use of up to date security certificates.

6.2.1 Confirmation

Confirmation occurs when the system notifies the user of the successful or unsuccessful completion of the data transmission, where successful completion is defined as accurate receipt of the transmitted data. To provide confirmation, the telecommunications components of a voting system shall notify the user of the successful or unsuccessful completion of the data transmission. In the event of unsuccessful transmission the user shall be notified of the action to be taken.

Testing performed: Testing was performed to verify appropriate confirmation of data transmission to the user and actions to be taken, if any.

Applicable to: EMS, Adjudication, and ICC

Results:

- This requirement was determined to be not applicable for polling place devices
- Nessus vulnerability scans were conducted on all equipment that were connected to the private EMS network. These included the EMS Server, EMS workstation, Adjudication workstation, and ICC system
- Operating system level transmissions provided confirmation
- Testing validated that the requirement was satisfactorily covered
Final Report

During the CVSS requirements examination and the OEVT portion of the testing, issues were noted related to audit logging, passwords, anti-virus, and installation aspects of the voting system. It should be noted that these issues do not directly affect the overall function of the voting systems and could potentially be alleviated with manual processes and procedures. In many cases the issues discovered were not in relation to public facing voting system components and required elevated systems permissions for access or manipulation.

It should also be noted that proper secure utilization of the voting system solution is reliant upon properly trained personnel, as well as following all processes and procedures set forth by the voting vendor to ensure properly configured and secured equipment for use in a live election environment.

As directed by the California Secretary of State, this report does not include any recommendation as to whether or not the system should be approved.

End of Security and Telecommunications Test Report