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MICHIGAN HOUSE OF REPRESENTATIVES

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November 19, 2026
Director Nick Anderson
245 Murray Lane
Washington, DC 20528-0380
Cybersecurity and Infrastructure Security Agency
U.S. Department of Homeland Security

Re: Request for a physical configuration audit of Michigan voting equipment before any vendor maintenance, update, replacement, or upgrade alters its as-deployed configuration

Dear Director Anderson:

We, the undersigned members of the Michigan House of Representatives, request that the Cybersecurity and Infrastructure Security Agency (CISA) conduct, or arrange and supervise, a physical configuration audit (PCA) of voting equipment fielded in Michigan. We ask that the audit be completed before the equipment's vendor performs any maintenance, firmware or software update, hardware repair or replacement, refurbishment, or upgrade on the units to be audited. Documented identifying marks on ImageCast Precinct 2 (ICP2, PCOS-330A) tabulators fielded in at least three Michigan counties differ from the unit documented in certification testing. Michigan's Department of State has said it cannot guarantee that the state's election equipment is free of materials from companies of concern. Once a vendor services or replaces these units, the as-deployed configuration can no longer be verified.

1. Why the Audit Must Precede Vendor Work

A PCA compares the components actually present against the documented, certified configuration. Its value depends on examining equipment in the state in which it was used. Firmware reloads, board or component swaps, refurbishment, and replacement all overwrite or remove that evidence, even when performed in good faith.

The window is closing:

New system pending. Liberty Vote, which acquired Dominion's voting system business, has said its Frontier 1.0 system "is expected to be certified in December of this year, with deployments following shortly thereafter" [1]. The company also states that it is "actively retiring outdated hardware and legacy systems" [2].

Vendor control of maintenance. Michigan's statewide contract makes the vendor responsible for service and maintenance of the tabulators it supplies [3]. Under MCL 168.795a(6), any improvement or change to an approved electronic voting system must be submitted to the Board of State Canvassers for approval [4].

Independence. An audit that verifies a vendor's product should be performed before, and independently of, the vendor's own access to the units examined.

2. The Documented Discrepancies

The certified baseline for the ICP2 is the unit documented in the EMC/EMI test report prepared by TÜV SÜD Canada for the federally accredited laboratory Pro V&V (Report 7169006118E-000, June 17, 2019). That unit bears serial number FAL18480532 and a "Made in USA" label. The report records that its Ethernet and USB ports were service ports not loaded during testing, and answers "No" to "Transmits RF energy?" [5]. Units fielded in Michigan carry different identifying marks:

Location	Serial number	Origin label	Source
Certified test unit	FAL18480532	Made in USA	EMC/EMI test report [5]
Barry County	VAL23250334-004	Made in Taiwan	DOJ referral, Oct. 6, 2026; photograph attributed to Sheriff Dar Leaf [6]
Saugatuck, Allegan County	VAL24280001-005	Made in Taiwan	DOJ referral, Oct. 6, 2026; photograph attributed to County Clerk Bob Genetski [6]
Wayne County (3 units)	VAL22440180-004, VAL23100014-004, VAL23230084-004	Made in Taiwan	Personal observation by former State Senator Patrick Colbeck during October 2026 logic and accuracy testing [7]

Production configuration. EAC Engineering Change Order 100843 (April 18, 2022) defines ICP2 Production Configuration 4, which removed an Ethernet port and its supporting chip from the motherboard [8]. The Allegan County unit carries a "-005" suffix. The October 6 referral identified no public ECO that defines Production Configuration 5 [6].

Manufacturing source. Michigan's contract states that "Tabulators provided to counties in Michigan will be newly manufactured by Flextronics in their Plano, Texas manufacturing facility." Later change notices added the ICP2 for early voting, including an initial 673 units, without stating where it is manufactured [3]. The facility producing the VAL-series units has not been publicly identified.

Supply chain. According to the referral, a 2020 Dominion parts table showed 177 of 365 ICP2 parts (48.49%) by count as Chinese-origin [6]. EAC ECO 100762 (June 2021) added Avalue Technology, headquartered in Taiwan, as a supplier of the ICP2 display and touch-panel assembly [9]. In April 2026, the Michigan Department of State told Rep. Rachelle Smit that it "could not guarantee that the state's election equipment does not include materials from companies of concern" [10]. The House passed House Bill 4720, which addresses this risk for new equipment, on April 14, 2026 [10].

Certification controls. On October 22, 2026, the EAC Office of Inspector General reported that the Certificate of Conformance for Democracy Suite 5.20, which is certified for use in Michigan, "erroneously listed a scanner that had not been tested by the voting system test laboratory." The OIG called this a breakdown in the controls meant to ensure that certified configurations reflect the components actually tested. Its broader review of physical configuration audits for systems tested by Pro V&V is ongoing [11].

Communications capability. The state contract describes ImageCast Precinct tabulators as "equipped with internal dial-up modems" and able to "transmit results via an external cellular modem" [3]. Michigan law requires that results not be generated, printed, or reported before 8 p.m. on election day, makes early disclosure a felony, and requires precinct tabulators to have a method for rendering them inoperable if totals are revealed before polls close [12]. Whether fielded units contain network or radio hardware capable of communicating before 8 p.m. is a factual question that only physical inspection can answer.

3. Basis for CISA Involvement

Election infrastructure has been designated critical infrastructure since January 2017, and CISA's 2026 Election Infrastructure Security Plan calls its security "a vital national interest." The plan also identifies "inconsistent transparency from election system vendors regarding vulnerabilities and patch status" as a risk and recommends that vendors provide a software bill of materials with all delivered products [13]. CISA may, upon request, provide technical assistance, risk management support, and incident response capabilities to non-federal entities, and may deploy hunt and incident response teams [14]. It has previously carried out direct examinations of election-related software at the request of system owners [15].

We recognize that CISA's election services are voluntary and provided at the request of the officials responsible for the systems [16]. The equipment is held by Michigan's county, city, and township clerks under the supervision of the Secretary of State. We are therefore asking the Secretary of State and the clerks of affected jurisdictions to invite and consent to this audit, and to defer non-emergency vendor access to the units selected for audit until it is complete. We ask CISA to offer the audit to them and to coordinate all access through them. This request does not seek to delay or affect certification of the November 3, 2026 election.

4. Requested Scope

1. Sample selection. Select a statistically meaningful sample of ICP2 tabulators, including units from Allegan, Barry, and Wayne counties, together with ImageCast X ballot-marking devices and county election management system components. Sampled units should be identified and sealed promptly, with no vendor access to them until the audit is complete.

2. Configuration inventory. For each sampled unit, record the serial number, production-configuration suffix, origin label, and hardware revision. Compare each against the configuration documented in EAC and Board of State Canvassers certification records.

3. Board-level inspection. Inspect for any modem, cellular, Wi-Fi, Bluetooth, Ethernet, or other radio or network component, and determine whether each is present, connected, or capable of being enabled.

4. Firmware and software verification. Compare installed firmware and software against the certified trusted build by hash comparison, before any reload or update.

5. Log review. Review system, audit, and communications logs for any network or radio activity, particularly during the early voting period and before 8:00 p.m. on November 3, 2026.

6. Supply-chain provenance. Obtain hardware and software bills of materials, identify the facility or facilities producing VAL-series units, and identify components sourced from the People's Republic of China.

7. Independent examiners. Perform the work with CISA personnel or examiners CISA selects who are independent of the vendor. Vendor personnel may assist only under CISA direction.

8. Coordination. Coordinate with the EAC under §§ 8.5–8.6 of its Testing and Certification Program Manual, which provide for manufacturing site audits and, on invitation of a state or local election authority, reviews of fielded systems to confirm they match the certified configuration [17]. Also coordinate with the EAC Office of Inspector General's ongoing review [11].

9. Reporting. Provide written findings to the undersigned, the Secretary of State, the Board of State Canvassers, and the affected clerks, with a public version redacted only as security requires.

5. What This Letter Does and Does Not Claim

This letter does not allege that any vendor has altered or will alter any voting equipment, that manufacturing in Taiwan is unlawful, that any Michigan tabulator was accessed remotely, or that any vote total was changed. It asks

that documented configuration discrepancies be resolved by an independent physical inspection, and that the inspection take place while the equipment remains in its as-deployed state.

We respectfully request a response within five business days indicating whether CISA will offer this assistance, together with a point of contact. Thank you for your time and attention to this important matter.

With Liberty,

Representative Rachelle Smit
Chair of the MI House Election Integrity Committee
Michigan's 43rd House District

Representative Joseph D. Fox
Vice Chair of the MI House Election Integrity Committee
Michigan's 101st House District

cc: Michigan Secretary of State,
Michigan Bureau of Elections Director,
Michigan Board of State Canvassers,
Allegan County Clerk,
Barry County Clerk,
Wayne County Clerk
U.S. Election Assistance Commission (Testing and Certification Program)
U.S. Election Assistance Commission (Office of Inspector General)
Secretary of Homeland Security Hon. Markwayne Mullin Secretary of Homeland Security

References

[1] TIPP Insights, "Georgia Election Vendors Seek To Win Over Committee Members, Take Two" (remarks of Liberty Vote VP Robert Giles). https://tippinsights.com/georgia-election-vendors-seek-to-win-over-committee-members-take-two/
[2] Liberty Vote, home page. https://libertyvote.com/
[3] State of Michigan Contract No. 071B7700117, Dominion Voting Systems (Schedule A § 2.1; Exhibits 4 and 7; Schedule C change notices). https://www.michigan.gov/dtmb/-/media/Project/Websites/dtmb/Procurement/Contracts/MiDEAL-Media/008/7700117.pdf
[4] MCL 168.795a. https://legislature.mi.gov/documents/mcl/pdf/MCL-168-795A.pdf
[5] TÜV SÜD Canada Inc. for Pro V&V Inc., EMC/EMI Test Report 7169006118E-000, ICP2 V1, Model PCOS-330A (June 17, 2019). Copy available on request.
[6] Patrick Colbeck, Election Crime Bureau, Request for Investigation — Country of Origin Misrepresentation, referral to the U.S. Department of Justice (Oct. 6, 2026), findings 15–22 and Exhibits 1–3. Copy available on request.

[7] Patrick Colbeck, letter to the Wayne County Board of Canvassers (Nov. 2026), with photographs. Copy available on request.
[8] EAC, ECO Analysis Form 100843 (Apr. 18, 2022). https://www.eac.gov/sites/default/files/eocdocuments/ECO%20Analysis%20Form%20100843.pdf
[9] EAC, ECO Analysis Form 100762 (June 24, 2021). https://www.eac.gov/sites/default/files/eocdocuments/ECO%20Analysis%20Form%20100762%20signed.pdf
[10] Michigan House Republicans, "Rep. Smit leads House passage of plan cracking down on foreign parts in state election equipment" (Apr. 14, 2026). https://gophouse.org/posts/rep-smit-leads-house-passage-of-plan-cracking-down-on-foreign-parts-in-state-election-equipment
[11] EAC Office of Inspector General, Interim Report: Review of Physical Configuration Audits Supporting EAC Voting System Certifications, P26HQ0007-27-01 (Oct. 22, 2026). https://www.oversight.gov/sites/default/files/documents/reports/2026-10/P26HQ0007-27-01_Interim_PCA_Review_Report.pdf
[12] MCL 168.765a(9), (13), https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-168-765a; MCL 168.720j(14), https://www.legislature.mi.gov/Laws/MCL?objectName=mcl-168-720j; MCL 168.795(2), https://legislature.mi.gov/documents/mcl/pdf/MCL-168-795.pdf
[13] CISA, 2026 Election Infrastructure Security Plan (Sept. 2026). https://www.cisa.gov/sites/default/files/2026-09/2026-CISA-Election-Security-Plan-FINAL-508c.pdf
[14] 6 U.S.C. § 659(c)(6), (f). https://uscode.house.gov/view.xhtml?req=(title:6%20section:659%20edition:prelim)
[15] CISA, CISA Election Report. https://www.cisa.gov/resources-tools/resources/cisa-election-report
[16] CISA, Election Security Services. https://www.cisa.gov/topics/election-security/election-security-services
[17] EAC, Testing and Certification Program Manual, Version 3.0, §§ 8.5–8.6. https://www.eac.gov/sites/default/files/TestingCertification/Testing_and_Certification_Program_Manual_Version_3_020421.pdf

Exhibits



Exhibit A — Certified test unit label: FAL18480532, "Made in USA." Source: TÜV SÜD Canada EMC/EMI Test Report 7169006118E-000 for Pro V&V, Figure 3 (June 17, 2019).



Exhibit B — ICP2 label reported fielded in Saugatuck, Allegan County: VAL24280001-005, "Made in Taiwan." Reproduced from the October 6, 2026 DOJ referral, Exhibit 3