



State of Washington
PUBLIC DISCLOSURE COMMISSION

711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcca.gov

Memorandum

To: Public Disclosure Commission

From: Jennifer Hansen, Compliance Officer

Date: August 15, 2024

Subject: Request for Reconsideration from Dorothy Gasque, Reporting Modification

Matter on Review:

On June 27, 2024, the Washington State Public Disclosure Commission (the Commission) considered the request for partial modification of the filing requirements described in RCW 42.17A.710 of Dorothy Gasque, a 2024 candidate for Clark County Council.

On July 25, 2024, the Commission issued an Order denying Ms. Gasque's request which she now requests to be reviewed by the Commission.

Background:

- Dorothy Gasque declared her candidacy for Clark County Council on May 10, 2024, and was required to submit a Personal Financial Affairs Statement (F-1 report) within two weeks of becoming a candidate. The F-1 report was submitted on May 18, 2024.
- On May 18, 2024, Ms. Gasque submitted a partial modification request that would exempt her from disclosing the business customers of Stardust Materials LLC (doing business as Stardust Secured) of which her spouse is the Chief Operations Officers and has a ten percent or more ownership interest.
- The Commission considered Dorothy Gasque's partial modification request at the June 27, 2024, Regular Commission Meeting.
- Compliance Coordinator, Colin Peeples presented the matter to the Commission and Ms. Gasque waived her right for appearance at the hearing.

- The Commission denied Dorothy Gasque’s request and issued an Order on July 25, 2024, via electronic mail. **[Exhibit A]**

Request for Reconsideration:

- Dorothy Gasque sent an email to PDC staff on August 2, 2024, requesting an appeal of the Commission’s July 25, 2024, Order denying her partial reporting modification. **[Exhibit B]**
- Staff replied to Ms. Gasque’s email on August 6, 2024, to confirm that her request for an appeal had been received and on August 9, 2024, staff requested that she send additional written information as to the reason for her appeal pursuant to [WAC 390-37-150](#). No additional information has been provided in writing.
- On August 12, 2024, PDC staff served Dorothy Gasque by email with a hearing notice for a Reconsideration Proceeding to be held on August 22, 2024, concerning her Request for a Reconsideration of the Order entered on July 25, 2024. **[Exhibit C]**

Exhibit List:

- **Exhibit A** – Dorothy Gasque Final Order denying request; entered July 25, 2024
- **Exhibit B** – Written Request for Reconsideration of Order, Dated Aug. 2, 2024
- **Exhibit C** – Reconsideration Hearing Notice, Dated Aug. 12, 2024

EXHIBIT A

BEFORE THE PUBLIC DISCLOSURE COMMISSION
OF THE STATE OF WASHINGTON

IN RE DOROTHY GASQUE

APPLICATION FOR MODIFICATION
OF THE DISCLOSURE REQUIREMENTS
OF RCW 42.17A.710

FINDINGS, CONCLUSIONS
AND ORDER

This matter came before the Washington State Public Disclosure Commission (the Commission) upon application by Dorothy Gasque. Proceedings were held on June 27, 2024, remotely in Olympia, Washington, by live audio and online transmission. Consideration of the request was made pursuant to RCW 42.17A.120 and chapter 390-28 WAC. The applicant waived appearance at the hearing.

The applicant requests exemption from disclosing her spouse's business customers who paid \$12,000 or more during the reporting period, as identified in the attached Modification Request Cover Sheet.

FINDINGS OF FACT

Based upon the Modification Application, the Commission makes the following Findings of Fact.

1. The applicant is subject to the disclosure requirements of RCW 42.17A.710.
2. The applicant has not previously been granted the requested reporting modification.
3. The applicant attests that the facts contained in the application are true and correct.
4. The applicant does not meet the qualifications for a reporting modification established by the Commission in WAC 390-28-100(1)(iv).

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1 CONCLUSIONS OF LAW

2 Having made these Findings of Fact, the Commission makes the following Conclusions
3 of Law:

- 4 1. Literal compliance with all provisions of RCW 42.17A.710 would not work a
5 manifestly unreasonable hardship on the applicant.
6 2. Limited suspension or modification of the reporting requirements as specified in
7 the Order would frustrate the purposes of the Act in this particular case.

8 ORDER

9 Having made these Findings of Fact and Conclusions of Law, the Commission issues the
10 following order:

11 For the Statement of Financial Affairs covering the period specified in the attached
12 Modification Request Cover Sheet required to be filed with the Commission:

- 13 1. The request for modification is denied.
14 2. The applicant shall comply in full with the requirements of RCW 42.17A.710.
15 3. In all other matters required to be reported, the applicant shall comply in full with
16 the disclosure requirements of RCW 42.17A.

17 Dated this 25th day of July 2024.

18 For the Commission

19
20
21 Electronically Signed by Peter Frey Lavalley
22 Peter Frey Lavalley
23 Executive Director
24
25
26
27
28

1 INFORMATION ABOUT APPEALS AND ENFORCEMENT OF FINAL
2 ORDERS

3 RECONSIDERATION OF ORDER - BY THE COMMISSION

4 Pursuant to the provisions of RCW 34.05.470 and WAC 390-37-150, you may file a petition for
5 reconsideration with the PDC within ten (10) days from the date this order is served upon you.
6 Any petition for reconsideration must state the specific grounds for the relief requested and be
7 limited to those set forth in WAC 390-37-150. Petitions must be submitted electronically to
8 pdc@pdc.wa.gov.

9
10 FURTHER APPEAL RIGHTS – SUPERIOR COURT

11 You have the right to appeal this order to Superior Court, pursuant to the Petition for Judicial
12 Review provisions of RCW 34.05.514 *et seq.* Any Petition for Judicial Review of this order must
13 be filed with the court as provided by RCW 34.05.514, and also served upon the Commission,
14 the Office of the Attorney General, and all parties of record within thirty (30) days after this order
15 is served upon you. *See* RCW 42.17A.542.

16
17 CITIZEN APPEAL RIGHTS – SUPERIOR COURT

18 Pursuant to the provisions of RCW 42.17A.120(5), any citizen may bring an action in Thurston
19 County Superior Court to contest any order entered under RCW 42.17A.120 within one year from
20 the date the order is entered.

MODIFICATION REQUEST COVER SHEET (Corrected)

Name of Filer	Dorothy Gasque
Reporting Period	<input checked="" type="checkbox"/> Candidate F-1 report (Filed May 18, 2024 - Covering May 10, 2023 through May 9, 2024) <input type="checkbox"/> Annual F-1 Report
Type of Request	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	County Council, Clark County Candidate in the 2024 Election Cycle
Application Rule(s)	<input type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(1)(b) <input type="checkbox"/> Personal Residence: WAC 390-28-100(d) <input type="checkbox"/> Attorney: WAC 390-28-100(1)(e)(i) <input type="checkbox"/> Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii) <input checked="" type="checkbox"/> Spousal: WAC 390-28-100(1)(e)(iv) <input type="checkbox"/> Other: WAC 390-28-100(1)(a)(c)
Explanation of Rule(s)	<p>(iv) Applicants whose spouse or registered domestic partner creates a reporting obligation for the applicant. When an applicant is required to report the activities of an entity solely because the applicant's spouse or registered domestic partner held an office, directorship, general partnership or ownership interest in the entity and the applicant does not have direct knowledge of the information that must be reported, the applicant may be allowed to satisfy the disclosure requirements of RCW 42.17A.710 (1)(g)(ii) by disclosing reportable customers from whom compensation in excess of the disclosure threshold established under RCW 42.17A.710 (1)(g)(ii) has been received as follows:</p> <p>(A) All payments made by the agency or jurisdiction in which the applicant seeks or holds office to the entity;</p> <p>(B) The business and other governmental customers or clients of the applicant's spouse/domestic partner of which the applicant is aware; and</p> <p>(C) Any other business and other governmental customers or clients of the entity whose identities are known to the applicant and whose interests are significantly affected by the agency or jurisdiction in which the applicant seeks or holds office. The commission may apply (e)(i) through (iii) of this subsection when the applicant's spouse/domestic partner is a lawyer, judge, or motor vehicle dealer.</p>
Supporting Documents (attached)	<input checked="" type="checkbox"/> Modification Application <input checked="" type="checkbox"/> Current F-1 report (filed May 18, 2024 covering May 10, 2023 through May 9, 2024)

Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none">• Dorothy Gasque is requesting a partial reporting modification that would exempt her from disclosing the business customers of Stardust Materials LLC, (doing business as Stardust Secured) in which her spouse is the Chief Operations Officer and has a 10 percent or more ownership interest.• According to its website, Stardust Secured specializes in the research, development, and scaled manufacturing of technology for supply chain traceability, document security, and brand protection.• Ms. Gasque states that Stardust Secured has 15 to 30 employees, handles \$6 million dollars in annual sales with about 50 customers, all of which would be subject to the reporting thresholds. In addition, the customers are not listed publicly and the company maintains confidentiality agreements with all their clients.• Ms. Gasque states her husband cannot legally provide her with a list of clients as it would violate the confidential agreements they have with their clients, and it would adversely affect their competitive position.
Other Issues	<ul style="list-style-type: none">• Ms. Gasque has agreed to recuse herself if a matter came before her involving a conflict of interest between her husband's company and her official duties, if elected.• Ms. Gasque has confirmed that Stardust Materials LLC has not received any payments from Clark County.

EXHIBIT B

[Dorothy Gasque](#) replied

Fri, 2 Aug 2024 at 1:52 PM

To:"PDC Support" <pdcc@pdcc.wa.gov>

External Email

I am asking for a reconsideration of the modification request. Please contact Jose Gasque, COO of Stardust Materials, at jose@stardustus.com or 360.831.7298. He is willing to speak to the commission and is better suited to discuss the company's security and the need for client confidentiality.

Best Regards,
Dorothy Gasque

EXHIBIT C



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

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August 12, 2024

Delivered electronically to Dorothy Gasque at “dorothe4county@gmail.com”

RECONSIDERATION REQUEST HEARING NOTICE

Date and time: Thursday, August 22, 2024 at 9:55 a.m.
Place: 711 Capitol Way S, Suite 206, Olympia, WA 98501
Also via Teams, Live Audio and Online Transmission
Presiding Officer: Allen Hayward, Chair, Public Disclosure Commission
Authority: RCW 42.17A and WAC 390

On the above date, the Public Disclosure Commission will hold a hearing pursuant to RCW 42.17A.120 and Chapter 390-28 WAC, to consider your Request for Reconsideration of the Commission’s July 25, 2024 Order denying your request for a partial reporting modification.



Your participation in the hearing is not required, but the PDC recommends participation whenever possible. This will provide you the opportunity to answer any questions the Commission may have regarding your request that were not included in your written materials.

PARTICIPATING VIA MICROSOFT TEAMS

The Enforcement Hearing will be audio and video recorded. Some Commission members and staff will be in-person at the PDC office in Olympia and some will join the meeting remotely.

PLEASE READ THE ENTIRE INSTRUCTION Prior to joining the meeting

How to participate remotely in the Washington State Public Disclosure Commission Meeting on August 22, 2024:

Please note you may be prompted to download MS TEAMS App or use a supported browser: Microsoft Edge  or Chrome  for best performance.

Participation Remote via MS Teams

On the date of the meeting and at the designated agenda time you will Join:

Microsoft Teams meeting info for August 22, 2024

Join on your computer or mobile app [CLICK HERE TO JOIN THE MEETING](#)

Please remember to **Mute** yourself and turn your **camera off** when you are not talking.

If you experience technical difficulties with the MS Teams participation after the meeting has started and before your hearing at 9:55 a.m., call the PDC's main number 1-360-753-1111 and staff will try to assist you. Please join the meeting by 9:45 a.m. to be ready and to make sure you do not have any technical issues.

If you have any questions about the hearing process prior to the hearing date, please contact Jennifer Hansen by email at pdcc@pdcc.wa.gov.

Sincerely,

Jennifer Hansen
PDC Compliance Officer