



**DEPARTMENT OF DEFENSE  
DEFENSE LEGAL SERVICES AGENCY  
DEFENSE OFFICE OF HEARINGS AND APPEALS  
APPEAL BOARD  
POST OFFICE BOX 3656  
ARLINGTON, VIRGINIA 22203  
(703) 696-4759**

Date: August 12, 2025

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In the matter of: )  
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ISCR Case No. 24-01563

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Applicant for Security Clearance )  
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**APPEAL BOARD DECISION**

**APPEARANCES**

**FOR GOVERNMENT**

Julie R. Mendez, Chief Department Counsel

**FOR APPLICANT**

*Pro se*

The Department of Defense (DoD) declined to grant Applicant a security clearance. On November 5, 2024, DoD issued a Statement of Reasons (SOR) advising Applicant of the basis of that decision – security concerns raised under Guideline F (Financial Considerations) of the National Security Adjudicative Guidelines (AG) in Appendix A of Security Executive Agent Directive 4 (effective June 8, 2017) and DoD Directive 5220.6 (Jan. 2, 1992, as amended) (Directive). On July 1, 2025, Defense Office of Hearings and Appeals Administrative Judge Roger C. Wesley denied Applicant national security eligibility. Applicant appealed pursuant to Directive ¶¶ E3.1.28 and E3.1.30.

**Discussion**

The SOR alleged that Applicant carried four delinquent debts totaling approximately \$36,000. In response to the SOR, Applicant admitted all allegations with explanation and requested that his case be decided based on the written record. On February 14, 2025, he received a complete copy of the Government's File of Relevant Material and was notified of his ability to respond with

any objections or additional information for the Judge to consider. Applicant did not respond to the FORM and the Judge found adversely on all allegations.

On appeal, Applicant requests reconsideration of the decision and argues that the “entire person wasn’t taken into consideration,” with examples of his military service and the absence of concerning conduct beyond his finances as information that was neglected in the analysis. Appeal Brief at 1. Applicant’s argument, which we interpret as a challenge to the Judge’s analysis under the Whole-Person Concept, is unpersuasive. The Judge found that Applicant’s credit reports reflect a “pattern of accruing multiple delinquent debts and acquiescing in their falling off his credit reports without addressing them,” and that his expressed commitments to address the delinquencies were supported by neither evidence of repayment efforts nor changes in financial practices. Decision at 3. Moreover, Applicant’s financial statement reflected a monthly net remainder of approximately \$5,000 after all other expenses were paid, but the SOR debts were not being addressed and Applicant provided no information about how the funds were being used. The Judge opined that “Applicant [was] entitled to credit for his work in the defense industry” but concluded that “his efforts are not enough at this time to overcome his repeated failures or inability to address his delinquent debts.” Decision at 6. The Judge’s analysis reflects that he weighed the record evidence and reached a reasonable conclusion, including in consideration of the Whole-Person Concept.

Applicant has not established that the Judge’s conclusions were arbitrary, capricious, or contrary to law. Rather, the Judge examined and weighed the disqualifying and mitigating evidence and articulated a satisfactory explanation for the decision. The record is sufficient to support that the Judge’s findings and conclusions are sustainable. “The general standard is that a clearance may be granted only when ‘clearly consistent with the interests of the national security.’” *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). “Any doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security.” AG ¶ 2(b).

## **Order**

The decision in ISCR Case No. 24-01563 is **AFFIRMED**.

Signed: Moira Modzelewski

Moira Modzelewski  
Administrative Judge  
Chair, Appeal Board

Signed: Jennifer I. Goldstein

Jennifer I. Goldstein  
Administrative Judge  
Member, Appeal Board

Signed: Allison Marie

Allison Marie  
Administrative Judge  
Member, Appeal Board