



**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 6, 2025

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In the matter of: )  
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ISCR Case No. 24-02174

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

**APPEARANCES**

**FOR GOVERNMENT**

Andrea M. Corrales, Esq., Deputy Chief Department Counsel

**FOR APPLICANT**

*Pro se*

The Department of Defense (DoD) declined to grant Applicant a security clearance. On January 3, 2025, 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 June 9, 2025, Defense Office of Hearings and Appeals Administrative Judge Darlene D. Lokey Anderson denied Applicant national security eligibility. Applicant appealed pursuant to Directive ¶¶ E3.1.28 and E3.1.30.

The SOR alleged nine delinquent debts that totaled approximately \$39,800. In his answer to the SOR, Applicant admitted all allegations, and the Judge found adversely on all nine. On appeal, Applicant argues that the Judge’s findings “do not accurately reflect the mitigating conditions” in his case and cites to the circumstances that gave rise to his financial difficulties and to his efforts to resolve his debts. Appeal Brief at 1. Fundamentally, Applicant disagrees with how the Judge weighed the evidence in his case, but none of Applicant’s arguments are sufficient to establish the Judge weighed the evidence in a manner that was arbitrary, capricious, or contrary to

law. Directive ¶ E3.1.32.3. Applicant requests reconsideration of his case, but the Appeal Board does not review cases *de novo*.

Applicant has not established that the Judge committed harmful error. Our review of the record reflects that the Judge examined the relevant evidence and articulated a satisfactory explanation for the decision, which is sustainable on this record. “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. 24-02174 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