



DEPARTMENT OF DEFENSE
DEFENSE LEGAL SERVICES AGENCY
DEFENSE OFFICE OF HEARINGS AND APPEALS
APPEAL BOARD
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Date: January 12, 2026

In the matter of:

Applicant for Security Clearance

ISCR Case No. 24-02473

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 February 13, 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 December 4, 2025, Defense Office of Hearings and Appeals Administrative Judge Richard A. Cefola denied Applicant national security eligibility. Applicant appealed pursuant to Directive ¶¶ E3.1.28 and E3.1.30.

Discussion

The SOR alleged that Applicant filed Chapter 7 bankruptcy in 2020 and discharged her debt in November 2020 in SOR ¶ 1.a. Additionally, it alleged 13 delinquent debts (several of the debts were duplicated on the SOR). SOR ¶ 1.r was withdrawn by the Government at hearing. Transcript (Tr.) at 50-51. In her response to the SOR, Applicant admitted all of the debts and

provided explanations and documents. The Judge found against her on SOR ¶¶ 1.b, 1.c, 1.e, 1.s, and 1.t, which represent four unique debts totaling over \$10,000 that appear to remain delinquent.¹

On appeal, Applicant contends that, “Due to an apparent scanning or transmission error, proof of these payments was not properly submitted.” Appeal Brief at 1. She further noted that she was resubmitting all relevant documentation with her appeal. *Id.* She attached a one-page document to her brief relating to the debt identified in SOR ¶ 1.b (and duplicated in SOR ¶ 1.t), which she contends was lost in transmission. *Id.* at 3. However, the Judge reviewed the document she contends was lost. The one-page document attached to her brief document was also attached to Applicant’s Answer to the SOR. He noted this when discussing this debt:

1.b. and 1.t. are one and the same past-due debt. Applicant admits that she was indebted to Creditor A in the amount of about \$5,276. She has *submitted a letter from the successor creditor of this debt*, showing that said creditor has agreed to accept half payment in March of 2025, and monthly payments of \$233, thereafter. Applicant avers that she made the half payment, and “like [about] seven” monthly payments pursuant to the agreement. However, despite having more than a month to do so, Applicant has submitted nothing further in this regard. (TR at page 33 line 12 to page 41 line 13, and *Answer at attachment 1.*) These allegations are found against Applicant.

Decision at 2 (emphasis added). It is clear that the Judge reviewed the document in question and found that it failed to establish that Applicant had made any payments. Based on our review of the record, we find no error in the Judge’s finding that Applicant did not provide documentary evidence to corroborate her claim that the delinquent debt discussed above was resolved.

We find that the Judge reasonably concluded that Applicant had not established a sufficient record of payments and responsible financial conduct with respect to this debt. Applicant’s “disagreement with the Judge’s weighing of the evidence, or an ability to argue for a different interpretation of the evidence, is not sufficient to demonstrate that the Judge weighed the evidence or reached conclusions in a manner that is arbitrary, capricious, or contrary to law.” ISCR Case No. 06-17409, 2007 WL 4105312 at *2 (App. Bd. Oct. 12, 2007). Moreover, Applicant’s argument fails to rebut the presumption that the Judge considered all of the record evidence. The Judge’s conclusion that Applicant failed to mitigate the financial security concerns is sustainable.

The Judge examined the relevant evidence and articulated a satisfactory explanation for the decision. The decision 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).

¹ The Judge’s failure to find for Applicant on one of the debts alleged in duplicate (SOR ¶ 1.b and SOR ¶ 1.t) is harmless error, as he explicitly recognized the duplication.

Order

The decision in ISCR Case No. 24-02473 is **AFFIRMED**.

Signed: Moira Modzelewski

Moira Modzelewski
Administrative Judge
Chair, Appeal Board

Signed: Allison Marie

Allison Marie
Administrative Judge
Member, Appeal Board

Signed: Jennifer I. Goldstein

Jennifer I. Goldstein
Administrative Judge
Member, Appeal Board