



**DEPARTMENT OF WAR  
DEFENSE LEGAL SERVICES AGENCY  
DEFENSE OFFICE OF HEARINGS AND APPEALS  
APPEAL BOARD**



Date: March 18, 2026

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In the matter of: )  
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Applicant for Security Clearance )  
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ISCR Case No. 25-00082

**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 April 4, 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 29, 2025, Defense Office of Hearings and Appeals Administrative Judge Benjamin R. Dorsey denied Applicant national security eligibility. Applicant appealed pursuant to Directive ¶¶ E3.1.28 and E3.1.30.

**Discussion**

The SOR alleged that Applicant failed to timely file her federal and state income tax returns for tax years 2021 through 2023; that she carried approximately \$20,000 in other delinquent consumer debt; and that she discharged about \$60,000 in debt through Chapter 7 bankruptcy in 2019. The Judge found adversely on all of the allegations. In the Judge’s analysis of the mitigating conditions, he noted that Applicant did not show financial responsibility and that her financial issues were ongoing and not under control. The Judge concluded that none of the mitigating conditions were fully established.

On appeal, Applicant reiterates that her debts were due to circumstances beyond her control and provides details of her hardships. She also asserts that she made a good-faith effort to resolve her debts. There is no presumption of error below and the appealing party has the burden of raising claims of error with specificity. Directive ¶ E3.1.30. Applicant makes no assertion of error but rather requests “these extenuating circumstances and my good-faith efforts to resolve the debts be considered as mitigating factors.” Appeal Brief at 2. In summary, Applicant’s arguments on appeal amount to disagreements with the Judge’s weighing of the evidence, which is not sufficient to show that the Judge weighed the evidence in a manner that was arbitrary, capricious, or contrary to law. *See* ISCR Case No. 04-08975, 2006 WL 2725032 at \*1 (App. Bd. Aug. 4, 2006) (citation omitted).

### **Conclusion**

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.’” *Dep’t 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. 25-00082 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