



**DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF HEARINGS AND APPEALS**



In the matter of:)
)
) ISCR Case No. 17-03895
)
Applicant for Security Clearance)

Appearances

For Government: Benjamin R. Dorsey, Esq., Department Counsel
For Applicant: *Pro se*

12/26/2018

Decision

MATCHINSKI, Elizabeth M., Administrative Judge:

Applicant defaulted on approximately \$22,379 in Federal student loans, \$13,163 in state university debts, and a \$116 medical debt. The medical debt and state university debts have been fully satisfied. He made \$200 monthly payments toward his Federal student loans for over a year before formally entering a loan-rehabilitation program in July 2018. A conditional security clearance is granted.

Statement of the Case

On February 15, 2018, the Department of Defense Consolidated Adjudications Facility (DOD CAF) issued a Statement of Reasons (SOR) to Applicant, detailing a security concern under Guideline F, financial considerations. The SOR explained why the DOD CAF was unable to find it clearly consistent with the national interest to grant or continue security clearance eligibility for him. The DOD CAF took the action under Executive Order (EO) 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; DOD Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the *National Security Adjudicative*

Guidelines for Determining Eligibility for Access to Classified Information or Eligibility to Hold a Sensitive Position (AG) effective within the DOD on June 8, 2017.

On April 19, 2018, Applicant responded to the SOR allegations and requested a decision based on the written record by an administrative judge from the Defense Office of Hearings and Appeals (DOHA). On May 24, 2018, the Government submitted a File of Relevant Material (FORM), consisting of seven exhibits (Items 1-7). DOHA forwarded a copy of the FORM to Applicant on June 7, 2018, and instructed him to respond within 45 days of receipt. Applicant received the FORM on June 19, 2018, and he submitted a timely response that was accepted without any objections by the Government on August 29, 2018. On October 11, 2018, the case was assigned to me to determine whether it is clearly consistent with national security to grant or continue a security clearance for Applicant. I received the case assignment on October 15, 2018, and accepted Applicant's FORM response in the record as Applicant Exhibit (AE) A.

Evidentiary Ruling

Department Counsel submitted as Item 4 a summary report of subject interviews of Applicant conducted on March 2, 2017, February 28, 2017, and May 9, 2017. The summary report was part of the DOD Report of Investigation (ROI) in Applicant's case. Under ¶ E3.1.20 of the Directive, a DOD personnel background report of investigation may be received in evidence and considered with an authenticating witness, provided it is otherwise admissible under the Federal Rules of Evidence. The summary report did not bear the authentication required for admissibility under ¶ E3.1.20.

In ISCR Case No. 16-03126 decided on January 24, 2018, the Appeal Board held that it was not error for an administrative judge to admit and consider a summary of personal subject interview where the applicant was placed on notice of her opportunity to object to consideration of the summary; the applicant filed no objection to it; and there is no indication that the summary contained inaccurate information. In this case, Applicant was provided a copy of the FORM and advised of his opportunity to submit objections or material that he wanted the administrative judge to consider. In a footnote, the FORM advised Applicant of the following:

IMPORTANT NOTICE TO APPLICANT: The attached summary of your Personal Subject Interview (PSI) (Item 4) [sic] is being provided to the Administrative Judge for consideration as part of the record evidence in this case. In your response to this File of Relevant Material (FORM), you can comment on whether the PSI summary accurately reflects the information you provided to the authorized OPM investigator(s) and you can make any corrections, additions, deletions, and updates necessary to make the summary clear and accurate. Alternatively, you can object on the ground that the report is unauthenticated by a Government witness and the document may not be considered as evidence. If no objections are raised in your response to the FORM, or if you do not respond to the FORM, the Administrative Judge may determine that you have waived any objections to

the admissibility of the summary and may consider the summary as evidence in your case.

Concerning whether Applicant understood the meaning of authentication or the legal consequences of waiver, Applicant's *pro se* status does not confer any due process rights or protections beyond those afforded him if he was represented by legal counsel. He was advised in ¶ E3.1.4 of the Directive that he may request a hearing. In ¶ E3.1.15, he was advised that he is responsible for presenting evidence to rebut, explain, or mitigate facts admitted by him or proven by Department Counsel and that he has the ultimate burden of persuasion as to obtaining a favorable clearance decision. While the Directive does not specifically provide for a waiver of the authentication requirement, Applicant was placed on sufficient notice of his opportunity to object to the admissibility of the interview summary report, to comment on the interview summary, and to make any corrections, deletions, or updates to the information in the report. He did not file any objections in his rebuttal (AE A) to the FORM. In the absence of any objections or indication that the interview summary report contains inaccurate information, I accepted Item 4 in evidence, subject to issues of relevance and materiality in light of the entire record.

Findings of Fact

The SOR alleges under Guideline F that, as of February 15, 2018, Applicant owed \$24,594 in defaulted Federal student-loan debt (SOR ¶¶ 1.a-1.j), a \$116 medical collection debt (SOR ¶ 1.k), and state education debts in collection for \$2,978 (SOR ¶ 1.l) and \$10,185 (SOR ¶ 1.m). In his Answer to the SOR (Item 2), Applicant admitted the debts, but he also provided payment receipts to show that the amount of his indebtedness was incorrect. After considering the FORM, which includes Applicant's Answer to the SOR (Item 2), and AE A, I make the following findings of fact.

Applicant is 27 years old and married. He graduated from high school in June 2009 and pursued university studies between August 2009 and May 2014 with a break from September 2010 to January 2012.¹ He has yet to earn a degree. Applicant has been a member of the National Guard since November 2010. He has worked part time or full time for several companies as a security guard since March 2013, at times holding more than one job. As of May 2016, Applicant was being sponsored for security clearance eligibility for part-time work as a security guard on a military base.² (Item 3.)

¹ Applicant indicated on his SF 86 that he attended college from August 2009 to September 2010 and resumed his studies at a different university from August 2012 to May 2014. (Item 3.) He discrepantly advised an Office of Personnel Management (OPM) investigator in March 2017 that he had withdrawn from the first university in September 2011. (Item 4.) Available credit reports show no Federal student loans obtained after the spring semester of 2010 until the spring semester of 2012. His tuition debt to the first university was in collection for \$10,185 as of October 2011.

² At my request, Department Counsel confirmed in October 2018 that Applicant was still being sponsored for security clearance eligibility by the employer listed first in response to the employment activities inquiry on his May 2016 security clearance application (SF 86). I marked his email noting the sponsorship as a file exhibit for the administrative record. Applicant told an Office of Personnel Management (OPM) investigator that he left the company in June 2016 after less than one month for a full-time position with another Federal contractor.

Applicant obtained ten Federal student loans for college totaling \$22,379 between October 2009 and January 2014 (SOR ¶¶ 1.a-1.j). He incurred another \$10,185 in educational debt to the university that he attended from August 2009 to September 2010. (Item 3.) Applicant withdrew from the university only two or three days into the semester when his mother became ill, but it was too late to negate his tuition obligation. He could not afford to make the initial payment, which was 20% of the balance owed. As of October 2011, his account was in collection for \$10,185 (SOR ¶ 1.m). (Items 3-4.)

Applicant was unemployed until November 2010, when he joined the National Guard. He had no other income apart from his part-time Guard duties until October 2012, when he began working as a bouncer at a bar on the weekends. He resumed his college studies at another state university in 2012, and his Federal student loans were deferred. In March 2013, he began working full time as a night-shift supervisor for a company that provides mall security while continuing to take college classes and work as a bouncer. In March 2015, he took on a part-time job as a security guard with a security company. Five months later, he was offered a full-time position with the security company, and he left his job in mall security. In January 2016, he began working for company X as a part-time "Federal armed security officer" while also working for the security company. In May 2016, he took on another part-time job, as a security officer on a military base for his current employer. (Item 3.)

Needing a clearance for his job on the military base, Applicant completed and certified to the accuracy of a Questionnaire for National Security Positions (SF 86) on May 11, 2016. He listed his civilian employments and also his Guard duty. He indicated that he had been investigated for a security clearance for his duties with company X, but he had not been granted a clearance. He listed a Secret clearance granted to him in 2011, presumably for his Guard duties. In response to the financial record inquiries, Applicant disclosed that he owed approximately \$26,000 in delinquent Federal student loans and explained:

A payment plan exists it was set up in 2014, no payments have been made as of yet because the loan[s] were deferred up until February (est) of this year. Payment should still be defed [sic] as I am enrolled in the [military] Student Loan repayment. I am 87 Days Delinquent.

Applicant added that he would establish a payment plan as soon as he returned to a full-time position. Applicant also indicated that he owed \$9,997 (SOR ¶ 1.m) to the university he first attended because he had withdrawn from classes. He added that the state withheld his income tax refund for tax year 2015, but that the debt was not fully resolved. Applicant disclosed another \$3,500 debt (SOR ¶ 1.l) for his college studies in 2014. Under the additional comment section, Applicant explained that his educational debts to the state were in the process of being placed on a repayment plan. (Item 3.)

As of August 2016, Applicant's Federal student-loan debt had accrued to \$25,610. He was in default since May 2016, when his loans came out of deferment. His student

(Item 4.)

debts with the state were in collection for \$10,185 and \$2,978. Applicant was making timely payments of \$279 per month on an \$11,205 five-year auto loan obtained in July 2015. He had three open credit card accounts that were rated as current. (Item 5.)

In January 2017, Applicant left his employment with company X because of a military deployment with his Guard unit. He was on a military installation preparing for deployment when, on March 2, 2017, he was interviewed by an authorized investigator for the Office of Personnel Management (OPM). He provided the OPM investigator with a letter from the U.S. Department of Education notifying him that his loans were in default and that he had 60 days to make repayment arrangements before his default status would be reported to the credit bureaus. The balance of his loans was then \$27,054 (\$25,690 in principal and \$1,364 in interest). (Item 7.) He could not afford the \$275 monthly payments initially required in repayment because of a lack of full-time work. Applicant acknowledged that the loans had been 87 days delinquent as of May 2016, but he was enrolled in a military student-loan repayment program. He expressed his intention to immediately arrange for repayment and to pay at least \$500 per month toward the loans during his impending deployment from April 2017 to April 2018.³ About his state education debts, Applicant explained that he became delinquent on the account in SOR ¶ 1.m one year after he withdrew from the university, and he could not afford the required first payment of 20% of the balance. The other debt (SOR ¶ 1.l) became delinquent in August 2015. He provided evidence of a \$200 payment in February 2017, which was allocated between his two state debts (SOR ¶¶ 1.l and 1.m), and added that the state took his \$600 income tax refund in partial repayment. He expressed an intention to continue to make \$200 payments. Applicant described his financial situation as good in that he was meeting his financial obligations on time. (Item 4.)

On February 28, 2017, Applicant was re-interviewed by the OPM investigator about his college debts. He provided documentation showing that the state withheld his income tax refund of \$607, and that he made payments of \$200 on January 23, 2017, and again on March 5, 2017, which were split between his two accounts. Applicant was re-contacted about the debts on May 9, 2017, but was unable to provide any additional information. (Item 4.)

As of late October 2017, Equifax was reporting that Applicant owed past-due Federal student loan balances totaling \$26,416. A \$116 medical debt from December 2016 had been placed for collection in May 2017 (SOR ¶ 1.k). Applicant had not been late on his car loan or credit-card payments. (Item 6.)

On February 15, 2018, the DOD CAF issued a SOR to Applicant because of his college debts and the \$116 medical collection debt. (Item 1.) Applicant asserted in April 2018 that his Federal student loans were now current. He explained that, in the process of moving, he was not aware that his Federal student loans had become 180 days overdue. He provided documentation showing that he made \$200 monthly payments from March 14,

³ Applicant had apparently not been deployed as of May 9, 2017, when he was interviewed in person by an OPM investigator. The investigator subsequently had no success in contacting Applicant because he was deployed until January 2018. (Item 4.)

2017, through March 8, 2018, toward his Federal loans, of which almost \$1,895 went to pay interest on the loans in 2017. Applicant maintained that he had paid the \$116 medical collection debt, although he provided no proof. He provided documentation of credit-card payments totaling \$3,003 between January 23, 2017, and December 8, 2017, to resolve the college debt in SOR ¶ 1.l, and of three credit-card payments of \$100 each between January 2017 and May 2017 toward his debt in SOR ¶ 1.m. (Item 2.) In rebuttal to the FORM, Applicant provided a payment receipt showing that the debt in SOR ¶ 1.m was fully satisfied as of December 11, 2017, with \$2,977.95 collected by the state at that time. (AE A.)

On July 23, 2018, Applicant entered into a formal loan rehabilitation program for his Federal student loans then totaling \$25,609, inclusive of interest. Applicant agreed to make at least nine monthly payments of \$228 beginning on July 28, 2018. Because he was rehabilitating Direct Loans (Item 7), he was required to complete the initial payment and at least eight of the other required monthly payments within a ten month period starting in July 2018. On rehabilitation of the loans, the loan servicer will set a new monthly payment amount and due date. (AE A.)

Policies

The U.S. Supreme Court has recognized the substantial discretion the Executive Branch has in regulating access to information pertaining to national security, emphasizing that “no one has a ‘right’ to a security clearance.” *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). When evaluating an applicant’s suitability for a security clearance, the administrative judge must consider the adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines list potentially disqualifying conditions and mitigating conditions, which are required to be considered in evaluating an applicant’s eligibility for access to classified information. These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in the adjudicative process. The administrative judge’s overall adjudicative goal is a fair, impartial, and commonsense decision. According to AG ¶ 2(a), the entire process is a conscientious scrutiny of a number of variables known as the “whole-person concept.” The administrative judge must consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a decision.

The protection of the national security is the paramount consideration. AG ¶ 2(b) requires that “[a]ny doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security.” In reaching this decision, I have drawn only those conclusions that are reasonable, logical, and based on the evidence contained in the record. Under Directive ¶ E3.1.14, the Government must present evidence to establish controverted facts alleged in the SOR. Under Directive ¶ E3.1.15, the applicant is responsible for presenting “witnesses and other evidence to rebut, explain, extenuate, or mitigate facts admitted by applicant or proven by Department Counsel. . . .” The applicant has the ultimate burden of persuasion to obtain a favorable security decision.

A person who seeks access to classified information enters into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours. The Government reposes a high degree of trust and confidence in individuals to whom it grants access to classified information. Decisions include, by necessity, consideration of the possible risk that the applicant may deliberately or inadvertently fail to safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation about potential, rather than actual, risk of compromise of classified information. Section 7 of EO 10865 provides that decisions shall be “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” See *also* EO 12968, Section 3.1(b) (listing multiple prerequisites for access to classified or sensitive information).

Analysis

Guideline F: Financial Considerations

The security concerns about financial considerations are articulated in AG ¶ 18:

Failure to live within one’s means, satisfy debts, and meet financial obligations may indicate poor self-control, lack of judgment, or unwillingness to abide by rules and regulations, all of which can raise questions about an individual’s reliability, trustworthiness, and ability to protect classified or sensitive information. Financial distress can also be caused or exacerbated by, and thus can be a possible indicator of, other issues of personnel security concern such as excessive gambling, mental health conditions, substance misuse, or alcohol abuse or dependence. An individual who is financially overextended is at greater risk of having to engage in illegal or otherwise questionable acts to generate funds. . . .

An applicant is not required to be debt free, but is required to manage his finances in a way as to exhibit sound judgment and responsibility. The concern under Guideline F is broader than the possibility that an individual might knowingly compromise classified information in order to raise money. It encompasses concerns about an individual’s self-control, judgment, and other qualities essential to protecting classified information.

Applicant defaulted on his Federal student loans initially totaling \$22,379, and on \$13,163 in state-university debts. A \$116 medical debt was referred for collection after he failed to pay it before his recent military deployment. Disqualifying conditions AG ¶ 19(a), “inability to satisfy debts,” and AG ¶ 19(c), “a history of not meeting financial obligations,” are established.

The burden is on Applicant to mitigate the negative implications for his financial judgment raised by his delinquent debts. Application of the aforesaid disqualifying conditions triggers consideration of the potentially mitigating conditions under AG ¶ 20. Four of the seven mitigating conditions warrant some consideration and could potentially apply in whole or in part. They are:

(a) the behavior happened so long ago, was so infrequent, or occurred under such circumstances that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;

(b) the conditions that resulted in the financial problem were largely beyond the person's control (e.g., loss of employment, a business downturn, unexpected medical emergency, a death, divorce or separation, clear victimization by predatory lending practices, or identity theft), and the individual acted responsibly under the circumstances;

(c) the person has received or is receiving counseling for the problem from a legitimate and credible source, such as a non-profit credit counseling service, and there are clear indications that the problem is being resolved or is under control; and

(d) the individual initiated and is adhering to a good-faith effort to repay overdue creditors or otherwise resolve debts.

The medical collection debt from 2016 is minor and was likely just overlooked as Applicant prepared for deployment with the Guard. His defaults of his Federal student loans and of his obligations to the state for his education raise security concerns that are not mitigated under AG ¶ 20(a). His Federal student loans became 180 days past due after his latest deferment ended in May 2016. His state debt in SOR ¶ 1.l became delinquent in August 2015. His state debt in SOR ¶ 1.m was placed for collection in 2011, but a debt that became delinquent several years ago is still considered recent because "an applicant's ongoing, unpaid debts evidence a continuing course of conduct and, therefore, can be viewed as recent for purposes of the Guideline F mitigating conditions." ISCR Case No. 15-06532 at 3 (App. Bd. Feb. 16, 2017) (citing ISCR Case No. 15-01690 at 2 (App. Bd. Sept. 13, 2016)).

AG ¶ 20(b) has some applicability in that Applicant's mother's illness led him to withdraw from school only a few days after the semester started in 2010. He could not pay the tuition debt in SOR ¶ 1.m because he had no income apart from his part-time duties with the Guard. Regarding his more recent education debt, Applicant did not offer an explanation for why he did not continue to pursue a degree after 2014. He was working as a security guard when the debt in SOR ¶ 1.l came due. The file contains no specifics about his income or expenses, although it is noted that his debt repayment commenced during his deployment with the Guard, when he would have had extra income to make those payments.

Applicant received documentation in February 2017 advising him that his Federal student loans were in default and that he had 60 days to make repayment arrangements before his loans would be reported in default status to the credit bureaus. Applicant indicated during his subject interview in early March 2017 that he would immediately make repayment arrangements. Available payment records show that he began making \$200

monthly payments on March 14, 2017. He continued to make the payments through at least March 2018. In its FORM, the Government expressed concern that Applicant had not provided documentation to show that he had a repayment arrangement. Applicant thereafter entered into a formal loan rehabilitation program in late July 2018. The file contains no evidence about whether he has complied with the terms of the rehabilitation program. However, his \$200 monthly Federal student-loan payments made between March 2017 and March 2018, 12 of which predate the issuance of the SOR, constitute a good-faith effort to address his delinquent student loans under AG ¶ 20(d). Regarding the state debt in SOR ¶ 1.m, he submitted a letter in response to the FORM showing that the debt was fully satisfied as of December 2017. Applicant documented his payments totaling \$3,003 in 2017 toward the debt in SOR ¶ 1.l, so that debt was apparently satisfied as well. I accept Applicant's assertion that he paid the \$116 medical debt, given his track record of payments on his education debts. AG ¶¶ 20(c) and ¶ 20(d) fully apply in mitigation of the debts in SOR ¶¶ 1.k-1.m.

After at least 13 months of payments toward his Federal student loans (SOR ¶¶ 1.a-1.j), Applicant's balance was a substantial \$25,609 as of late July 2018. An applicant is not required, as a matter of law, to establish that he has paid off every debt in the SOR. He is required to demonstrate that he has established a plan to resolve his financial problems and taken significant actions to implement the plan. See ISCR Case No. 07-06482 at 2-3 (App. Bd. May 21, 2008) (internal citations and quotation marks omitted). Applicant's track record of payments on his Federal loans before he entered the loan-rehabilitation program inspire confidence that he will make the nine monthly payments of \$228 each to fully rehabilitate them. While it would be premature to apply AG ¶ 20(c) in mitigation of his Federal student-loan delinquencies without some evidence of compliance with the loan-rehabilitation program, student loans are an investment in one's future and do not carry the same judgment concerns as would excessive credit card debt. Applicant has no record of irresponsible spending or overreliance on consumer credit card debt. He has a record of timely payments on his credit cards and car loan. In that regard, he has shown that he can manage his expenses responsibly, provided he has the income to do so.

Whole-Person Concept

In assessing the whole person, the administrative judge must consider the totality of an applicant's conduct and all relevant circumstances in light of the nine adjudicative process factors in AG ¶ 2(d). The analysis under Guideline F is incorporated in my whole-person analysis. Some of the factors in AG ¶ 2(d) were addressed under that guideline, but some warrant additional comment.

Applicant's situation is not unlike that of many students of his generation who take out loans for their college education expecting to land a job at some future date at an income sufficient to repay them, but then find themselves underemployed when the loans come due. It is all the more difficult to find a well-paying job when an applicant has yet to earn a degree. Because Applicant requested a decision on the written record without a hearing, much remains unknown about his circumstances, his income, and his expenses. Applicant has worked more than one job at a time for the income needed to meet his living

expenses. His service in the Guard weighs in his favor under the whole-person concept, and he began and continued making monthly payments toward his educational loans when he was deployed. Applicant's candor about his delinquencies reflects positively on his security clearance suitability.

The security clearance adjudication involves an evaluation of an applicant's judgment, reliability, and trustworthiness in light of the security guidelines in the Directive. See ISCR Case No. 09-02160 (App. Bd. Jun. 21, 2010). It is not intended as a debt collection process or designed to punish applicants for past mistakes or shortcomings. At the same time, Applicant owes a considerable debt to the Federal government. In exceptional cases, an administrative judge may grant initial or continued eligibility for a security clearance, despite the presence of an issue(s) that can be partially but not completely mitigated.⁴ Applicant's record of debt repayment starting in January 2017 favors granting a conditional clearance in this case. In exercising this discretionary authority, I have carefully considered and weighed the financial considerations security concerns and decided Applicant earned an opportunity to show that he can be counted on to rehabilitate and continue to repay his Federal student loans. Applicant's eligibility for a security clearance is conditioned on him providing documentation to his facility security officer of his Federal student loan balance; of his loan-rehabilitation plan and compliance payments; and of payments for an additional six months after his loans are current to demonstrate that he has the ability and willingness to make the payments set by the loan servicer after the loans are rehabilitated.⁵

Formal Findings

Formal findings for or against Applicant on the allegations set forth in the SOR, as required by section E3.1.25 of Enclosure 3 of the Directive, are:

Paragraph 1, Guideline F:	FOR APPLICANT
Subparagraphs 1.a-1.m:	For Applicant

⁴ Appendix C of Security Executive Agent Directive (SEAD) 4 grants DOHA administrative judges the discretionary authority to grant initial or continued eligibility for a security clearance *despite the presence of an issue(s) that can be partially but not completely mitigated* with the provision of additional security measures. See also Memorandum, Director for Defense Intelligence (Intelligence and Security), dated January 12, 2018 ("Appendix C identifies authorized exceptions that are to be utilized when making adjudicative decisions to grant initial or continued eligibility for access to classified information or to hold a sensitive position . . . Effective immediately, authority to grant clearance eligibility with one of the exceptions enumerated in Appendix C is granted to any adjudicative, hearing, or appeal official or entity now authorized to grant clearance eligibility when they have jurisdiction to render the eligibility determination.")

⁵ The above conditions are easily verifiable and place the reporting requirement on the Applicant. Currently, DOHA administrative judges do not have the authority to compel a third party, such as an employer, to monitor a person's compliance with conditions. However, a facility security officer has an independent obligation to report to the Government any information raising a security concern, including a cleared employee's failure to make his student loan payments.

Conclusion

In light of all of the circumstances, it is clearly consistent with the national interest to grant or continue Applicant's eligibility for a security clearance subject to the aforesaid conditions.

Elizabeth M. Matchinski
Administrative Judge