



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



In the matter of:)
)
) ISCR Case No. 19-03261
)
Applicant for Security Clearance)

Appearances

For Government: John Lynch, Esq., Department Counsel
For Applicant: Alan V. Edmunds, Esq.

07/14/2021

Decision

MURPHY, Braden M., Administrative Judge:

Applicant did not provide sufficient evidence to mitigate financial security concerns arising from his delinquent debts and personal conduct security concerns arising from his failure to disclose any delinquencies on his security clearance application. Applicant's eligibility for access to classified information is denied.

Statement of the Case

Applicant submitted a security clearance application (SCA) on February 13, 2018. On January 3, 2020, the Department of Defense (DOD) issued Applicant a Statement of Reasons (SOR) detailing security concerns under Guideline F, Financial Considerations and Guideline E, Personal Conduct. The DOD took the action under Executive Order 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 (AG) effective within the DOD on June 8, 2017.

Through counsel, Applicant answered the SOR on or about January 4, 2021 (Tr. 23-26) and requested a hearing before an administrative judge from the Defense Office of Hearings and Appeals (DOHA). The case was assigned to me on May 7, 2021. Applicant requested an expedited hearing by video teleconference. (Tr. 9) On May 12, 2021, DOHA issued a notice scheduling the video-teleconference hearing through the Defense Collaboration Services (DCS), to occur on May 20, 2021.

The hearing convened as scheduled. Department Counsel submitted Government's Exhibits (GE) 1-6, which were admitted without objection. Applicant testified and submitted Applicant's Exhibits (AE) A – H, of which AE A – AE E were provided with the SOR response. AE A – AE F, and AE H were admitted without objection.

AE G is a policy memorandum from President Biden, dated February 4, 2021. As Department Counsel noted, it is more properly considered for administrative notice (AN) purposes, and not as a substantive exhibit, so it was relabeled as AN G. A ruling on Department Counsel's relevance objection was deferred. (Tr. 19-21) AN G is described further in the "Administrative Notice" section, below, and addressed in the Analysis section as appropriate.

I left the record open until June 1, 2021, to allow Applicant the opportunity to submit additional information. On May 25, 2021, he provided four additional exhibits, which are marked as AE I – AE L and admitted without objection. DOHA received the transcript (Tr.) on June 2, 2021. Issuance of the decision was unexpectedly delayed because I was out of the office due to an extended family emergency in June 2021. I advised the parties of that fact by e-mail on June 16, 2021.

Findings of Fact

Applicant admitted SOR ¶¶ 1.a through 1.p with explanations. I construe his answers to SOR ¶¶ 2.a and 2.b as denials of intent to falsify his SCA. His admissions incorporated into the findings of fact. After a thorough and careful review of the pleadings and exhibits submitted, I make the following findings of fact.

Applicant is 35 years old. He was married from 2006 to 2011, though he and his wife were separated during some of that period. That relationship produced no children. Applicant and his second wife have been married for four years, and cohabitated for several years before that. They are now separated, and Applicant filed for divorce in December 2019. The divorce remains pending. (Tr. 22-23, 93) They have one daughter, age 13. She lives with her mother in another state. Applicant is current on his \$800 monthly child support. (Tr. 68-69) Applicant's wife also has two children of her own (ages 21 and 19) from a prior relationship. He has helped them financially. (Tr. 68-70, 99-100)

After graduating from high school in 2005, Applicant served in the U.S. Navy on active duty for four years, until June 2009. (Tr. 70-71; AE I) He reported on his SCA that from June 2009 to June 2014, he was largely unemployed. (GE 1 at 18; Tr. 40, 71-72) He

then attended college for about two years, but did not earn a degree. (Tr. 23, 60-61, 72-73)

From about September 2012 to June 2013 and from August 2013 to January 2014, Applicant held some temporary, part-time positions. He also had a later job, from June 2014 to an undefined period, as a construction worker. (Tr. 44-45) In June 2014, Applicant enlisted in the Army National Guard (ANG). (GE 1 at 15-21; Tr. 27) He deployed to the Middle East with his unit for several months in 2017 and 2018. (AE I) He continues to serve in the ANG, in an active reserve capacity. His reserve unit is in a different state many hours from where he now lives, so he arranges to do his reserve time all at once. (GE 2 at 2; Tr. 45-46, 83-85) The home where Applicant's wife lives is a rental. His home in the locale where he works is paid for by his employer. (Tr. 90)

Since February 2018, Applicant has worked for a defense contractor as a shipboard engineer or mechanic on a maritime prepositioning ship. (Tr. 84-85; GE 1) From July 2019 to December 2020, he was deployed overseas with the ship. (Tr. 83) He said he does not need a security clearance for his current job, but has applied for one so he can be promoted to supervisor. (GE 1 at 15-21; Tr. 11, 21-22, 81) He also said he was placed on paid administrative leave the week before the hearing. (Tr. 81-82, 94) He was earning \$27.62 an hour. (Tr. 85)

The Guideline F allegations in the SOR concern multiple federal debts, mostly student loans, some cell-phone debts, medical debts, and a charged-off debt relating to a car. The debts are listed on credit reports from March 2018 and August 2019. (GE 3, GE 4) GE 5, a 2021 credit report, reflects that Applicant's credit file has been frozen.

Applicant testified that his five-year period of unemployment or underemployment (2009-2014) began after his wife gave birth to their first child. She, too, was unemployed at the time. (Tr. 40, 94) Applicant testified that he was pursuing an education full time during these years. He testified that he supported himself through the 9/11 GI Bill. (Tr. 72-73, 94; AE L) He testified that his unemployment impacted his ability to pay his debts. (Tr. 29-30) GE 6, a 2014 credit report, reflects numerous delinquent accounts, including federal student loans, debts to the VA, and other debts from that time period.

SOR ¶ 1.a (\$11,999) is a charged-off account relating to an automobile. Applicant said his wife purchased a car when he was working or serving overseas. (Tr. 26, 50-58) Recent documentation shows that the amount currently owed is \$9,376. (Tr. 58-59; AE F at 11) It remains delinquent. Applicant attributed this to being absent from home, either on deployment or living separately from his wife and returning home only for military drills. (Tr. 57) He acknowledged financial responsibility for the car, even though it was his wife's. (Tr. 101) This debt is unresolved. Applicant acknowledged that two prior cars he purchased, in 2000 and 2008, were also voluntarily repossessed. (Tr. 59-60)

SOR ¶¶ 1.b (\$10,361), 1.c (\$3,918), 1.d (\$3,021), 1.h (\$4,498), 1.i (\$3,788), 1.j (\$3,367), 1.k (\$2,863), and 1.l (\$1,361) are eight delinquent federal student loans. (GE 3, GE 4, GE 6) Applicant testified that the student loans became delinquent because he was

not working and because “my wife was put in charge of taking care of it, but she never did.” (Tr. 27-28) He believed that the student loans could be used for many purposes, not only books and supplies, but also personal and living expenses. (Tr. 91)

Applicant, through his wife, retained a law firm to manage his student loans. He said that during the period of his deployment to the Middle East in 2017, he paid the law firm about \$250 per paycheck for about eight months, but the debts were not resolved. (Tr. 29, 63-65) AE J reflects one payment to the law firm in November 2017, for about \$120.

In December 2020, Applicant consolidated his federal student loans together in an organized payment plan. (Tr. 31; Answer; AE D) Six of the eight student loan accounts are listed on AE D, a letter to Applicant from a collection agency concerning a rehabilitation plan. Under the plan, Applicant was to make nine monthly payments of about \$401, beginning in mid-December 2020. (AE D; Tr. 31) He has missed payments, which he said was because he had to pay to retain legal counsel (for this hearing). He said he is in contact with the collection agency and intends to make future payments. (Tr. 61-62) Applicant believes that all of his federal student loans are consolidated together, as detailed in AE D. (Tr. 77) The student loans remain unresolved.

SOR ¶¶ 1.e (\$2,108) and 1.g (\$6,308) are accounts placed for collection by the VA. The origin of these debts is rather unclear. Applicant stated in his Answer that this was an “overpayment” of housing payments taken from his drill checks that were stopped when he went on deployment and then placed for collection. (Answer; Tr. 30-31) He later said they were overpayments of BAH (Basic Allowance for Housing) payments that he received under the 9/11 GI Bill. (Tr. 47-48)

Applicant asserted that he received BAH during his years of unemployment (2009-2014), years in which he was neither on active duty (2005-2009) or active in the ANG, either in reserve drill status or deployed on active duty (2014 to present). He also asserted that his BAH allotment during this period was not enough to pay his bills, which is why he fell behind. (Tr. 73-76) He also testified that a 2017 deployment to a remote location in the Middle East made it difficult to monitor his finances. His wife was in charge of the household bills. (Tr. 62-64)

Applicant stated that his wife initially retained a law firm to resolve these debts, but they took no action. He said he has entered into a payment plan, and that the debts were being resolved through withholdings from his military drill checks. (Answer; Tr. 30, 48-49, 91) This is undocumented. He said his tax returns have been filed, but he did not know if any federal tax refunds had been withheld to address his federal debts. (Tr. 67-68) He also acknowledged knowing about the VA debts for a long time. (Tr. 50)

AE H is an internet printout from the VA website. It references an application for a financial status report (Form 5655) and an application for disability compensation (Form 21-526EZ). Both forms are indicated to be “in progress.” (AE H) Applicant believes that Form 5655 is an “application to waive the accounts” due to financial hardship. (Tr. 36-37,

48-50, 78-80) The VA forms that Applicant said he prepared are not in evidence. SOR ¶¶ 1.e and 1.g are not resolved.

Department Counsel agreed that SOR ¶ 1.p (\$2,108) is a duplicate of SOR ¶ 1.e (also for \$2,108), as it was taken from a different credit report. It will be resolved for Applicant on that basis. (Tr. 33, 122-123)

SOR ¶ 1.f (\$108) is a past-due medical account. It has been paid in full. (AE C; Tr. 30, 32) SOR ¶ 1.n (\$375) is also a past-due medical account that Applicant says has been paid. (Answer; Tr. 32, 80)

SOR ¶ 1.m (\$666) is a debt placed for collection by a phone company. Applicant noted in his Answer that the account is old, and the debt relates to a cancellation fee that he was unaware of. While noting that the debt no longer appears on his credit report, he said he is paying it. (Answer) At hearing, he testified that this was a joint phone plan he previously held with his wife. He said he currently has an account with the same phone company, and is in good standing. (Tr. 31-32, 81)

SOR ¶ 1.o (\$375) is a debt placed for collection by a cable TV company for unreturned equipment. The debt is no longer on Applicant's credit report, but he said he would pay it when he is able. (Answer) He testified that the debt remains delinquent, but he intends to pay it, though he later said he was not aware of it. (Tr. 33, 80)

Applicant said he has not had any formal credit counseling, but he is now more "self-aware" of his credit status. He said he had no other delinquent debts beyond what is alleged in the SOR. (Tr. 86-88) He showed evidence of payments on other debts, not alleged, and provided evidence of improved finances (excerpts from a May 2021 credit report. (AE E, AE F)

In March 2020, due to the COVID-19 pandemic, the Department of Education began providing temporary relief on federal student loans, including suspension of loan payments and collections on defaulted student loans. On January 20, 2021, President Biden extended that COVID-19 emergency relief to at least September 30, 2021. (AE K at 2; Tr. 105-106)

When Applicant submitted his SCA, in February 2018, he was asked if "You are currently delinquent on any Federal debt." (GE 1 at 36) He was also asked to disclose any delinquencies involving "Routine Accounts" in the past seven years, including any debts turned over to a collection agency or "any account or credit card suspended, charged off, or cancelled for failing to pay as agreed." (GE 1 at 37)

Under Guideline E, the SOR alleged that Applicant allegedly falsified his SCA in failing to disclose either his federal debts, to the Department of Education and to the VA (SOR ¶ 2.a) or his various other charged-off debts and debts in collection (SOR ¶ 2.b), as required. He answered "No" to all the financial questions on the SCA, though he did

indicate that he was “working with [a] credit repair company to fix old issues.” (GE 1 at 37)

In answering the SOR, Applicant denied any intent to falsify his SCA. At his hearing, he testified that he had retained a law firm to file claims on his behalf with credit bureaus, and, as a result, items would be deleted from his credit report. He believed this to mean that “there was nothing on my credit report that showed I owed anything.” (Tr. 34; Tr. 88-89) He said he checked his credit report in December 2017, before preparing his SCA in February 2018. (Tr. 96) Applicant also denied having any “current” debts. (Tr. 34) He testified that at the time, he believed all his debts were take care of, either by the law firm or by his wife. (Tr. 62) He acknowledged being confronted about his delinquent debts during his background interview, and being “completely taken aback” as he thought it all “was taken care of.” (Tr. 89; GE 2)

Two supervisors provided recommendation letters for Applicant. They attest that he is reliable, flexible, and a self-starter requiring little supervision. He is very mission-oriented, has excellent leadership skills, and works well with his peers. He is trusted and respected. (AE A)

Policies

It is well established that no one has a right to a security clearance. As the Supreme Court has held, “the clearly consistent standard indicates that security determinations should err, if they must, on the side of denials.” *Department of the Navy v. Egan*, 484 U.S. 518, 531 (1988).

The adjudicative guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, administrative judges apply the guidelines in conjunction with the factors listed in the adjudicative process. The administrative judge’s overarching 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 access to classified information 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. Likewise, I have avoided drawing inferences grounded on mere speculation or conjecture.

Under Directive ¶ E3.1.14, the Government must present evidence to establish controverted facts alleged in the SOR. Under Directive ¶ E3.1.15, an “applicant is responsible for presenting witnesses and other evidence to rebut, explain, extenuate, or mitigate facts admitted by applicant or proven by Department Counsel, and has the ultimate burden of persuasion as to obtaining 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 an applicant may deliberately or inadvertently fail to safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified information.

Analysis

On February 4, 2021, President Biden issued a “Memorandum on Revitalizing America’s Foreign Policy and National Security Workforce, Institutions, and Partnerships.” (Presidential Memorandum) I took administrative of the document, as requested, and considered the argument made by Applicant’s counsel as to its relevance to this case. (AN G; Tr. 18-21, 120-122) Having reviewed and considered AN G, I conclude that there is nothing in the Presidential Memorandum that supersedes SEAD 4 or DOD Directive 5220.6, both of which remain in force.

Guideline F, Financial Considerations

The security concern relating to the guideline for financial considerations is set out, in relevant part, 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. . . .

This concern 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. An individual who is financially irresponsible may also be irresponsible, unconcerned, or negligent in handling and safeguarding classified information. ISCR Case No. 11-05365 at 3 (App. Bd. May 1, 2012).

The guideline notes several conditions that could raise security concerns under AG ¶ 19. The following are potentially applicable in this case:

- (a) inability to satisfy debts; and
- (c) a history of not meeting financial obligations.

The Guideline F allegations in the SOR concern multiple federal debts, mostly student loans, some cell-phone debts, medical debts, and a charged-off debt relating to a car. The SOR debts are listed on credit reports in the record, including from March 2018 and August 2019. AG ¶¶ 19(a) and 19(c) apply. As noted, SOR ¶ 1.p is a duplicate and is found for Applicant on that basis.

The guideline also includes conditions that could mitigate security concerns arising from financial difficulties. The following mitigating conditions under AG ¶ 20 are potentially applicable:

(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, or a death, divorce or separation, clear victimization by predatory lending practices, or identity theft), and the individual acted responsibly under the circumstances;

(c) the individual has received or is receiving financial 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;

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

(e) the individual has a reasonable basis to dispute the legitimacy of the past-due debt which is the cause of the problem and provides documented proof to substantiate the basis of the dispute or provides evidence of actions to resolve the issue.

Applicant's financial issues began a number of years ago, after he left the Navy in 2009. For most of the next five years, he was largely unemployed. He was attempting to further his education during this period, and used federal student loans to do so. He and his wife were also raising a young child during this time. It is not clear from the record how he and his wife supported themselves during that period, as neither of them were working. He may have lived off of his student loans, though this is not clear. GE 6, a 2014 credit report, reflects numerous delinquent accounts, including federal student loans, debts to the VA, and other debts.

Applicant was gainfully employed in his current position from February 2018 until the hearing, or shortly thereafter. He also has additional employment through the ANG. Some of his debts were incurred during deployments, either with the ANG or through his contractor position, and some of them, such as the auto repossession at SOR ¶ 1.a, were

incurred by his wife, during this period. Applicant has numerous delinquent accounts that remain ongoing and unresolved. Most of them are debts to the federal government, as they are either federal student loans, or debts owed to the VA. He has made little effort until recently, however, to begin to address his debts.

Payment of Applicant's federal student loans are likely suspended due to President Biden's Executive Order. However, this does not excuse or eliminate the fact that they have been delinquent for years. Applicant has a rehabilitation plan in place as of December 2020, but he did not make any payments on it. His student loans, like his debts to the VA, remain ongoing and unresolved. AG ¶ 20(a) does not apply.

Applicant has not demonstrated that AG ¶ 20(b) should fully apply. He was unemployed, or underemployed, for several years after leaving the Navy. However, that was many years ago, and Applicant was employed both as a contractor from February 2018 until the hearing and has been in the ANG since 2014. He is long divorced from his first wife, and he has not demonstrated that his separation from his second wife is a financial hardship, since his rent is covered by his employer. Applicant has not established that AG ¶ 20(b) applies.

Applicant has not pursued credit counseling. His testimony that he is now more "self-aware" of his finances is not sufficient. Applicant has also not established that there are clear indications that his financial issues are being resolved or are under control. AG ¶ 20(c) does not apply.

Applicant's small medical debts (SOR ¶¶ 1.f and 1.n) are resolved. Otherwise, AG ¶ 20(d) has little application. Applicant has a rehabilitation plan in place as of December 2020 for his federal student loans, but he did not make any payments on it. The fact that Applicant says he intends to pay them is not sufficient evidence of good-faith efforts to do so. Applicant testified that his debts to the VA are being resolved through garnishment of his drill pay. This is not documented. Even if it were, that would be evidence of a garnishment, and repayment through garnishment "is not the same as, or similar to, a good-faith initiation of repayment by the debtor." ISCR Case No. 08-06058 at 6 (App. Bd. Sept. 21, 2009). AG ¶ 20(d) does not apply to mitigate Applicant's financial delinquencies.

Guideline E, Personal Conduct

AG ¶ 15 expresses the security concern for personal conduct:

Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information. Of special interest is any failure to cooperate or provide truthful and candid answers during national security investigative or adjudicative processes. . .

AG ¶ 16 describes conditions that could raise a security concern and may be disqualifying. The following disqualifying conditions are potentially applicable:

(a) deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar form used to conduct investigations . . . determine national security eligibility or trustworthiness, or award fiduciary responsibilities.

Under Guideline E, the SOR alleged that Applicant allegedly falsified his SCA in failing to disclose either his federal debts, to the Department of Education and to the VA (SOR ¶ 2.a) or his various other charged-off debts and debts in collection (SOR ¶ 2.b), as required. He answered “No” to all the financial questions on the SCA, and indicated only that he was “working with [a] credit repair company to fix old issues.” (GE 1 at 37) I have construed his answers to Guideline E as denials to the allegations of deliberate falsification.

The Government established that Applicant had numerous delinquents, including federal debts, in February 2018, when he prepared his SCA. Applicant testified that he had retained a law firm to resolve his debts and thought they were being addressed. However, his description on his SCA of his financial problems as “old issues” is telling, as it appears he did not want to acknowledge that he had current delinquencies. He also acknowledged that he knew about his VA debts for some time. He also had a long history of debts, both generally and federal debts in particular, going back to his years of underemployment and unemployment. I conclude that Applicant’s passing reference to credit counseling on his SCA was not a sufficient disclosure of his financial delinquencies. AG ¶ 16(a) applies.

AG ¶ 17 sets forth the applicable mitigating conditions under Guideline E:

(a) the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts; and

(c) the offense is so minor, or so much time has passed, or the behavior is so infrequent, or it happened under such unique circumstances that it is unlikely to recur and does not cast doubt on the individual’s reliability, trustworthiness, or good judgment.

Falsification of a security clearance application is a serious matter. It goes to the heart of an applicant’s eligibility for a clearance. Once disqualifying conditions are established, Applicant has the burden to establish mitigation. He has not done so. He did not disclose his debts until he was confronted about them in his interview. AG ¶¶ 17(a) and (c) do not apply.

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for a security clearance by considering the totality of the applicant's conduct and all the circumstances. The administrative judge should consider the nine adjudicative process factors listed at AG ¶ 2(d):

(1) the nature, extent, and seriousness of the conduct; (2) the circumstances surrounding the conduct, to include knowledgeable participation; (3) the frequency and recency of the conduct; (4) the individual's age and maturity at the time of the conduct; (5) the extent to which participation is voluntary; (6) the presence or absence of rehabilitation and other permanent behavioral changes; (7) the motivation for the conduct; (8) the potential for pressure, coercion, exploitation, or duress; and (9) the likelihood of continuation or recurrence.

Under AG ¶ 2(a), the ultimate determination of whether to grant eligibility for a security clearance must be an overall commonsense judgment based upon careful consideration of the guidelines and the whole-person concept.

I considered the potentially disqualifying and mitigating conditions in light of all the facts and circumstances surrounding this case. I have incorporated my comments under Guidelines F and E in my whole-person analysis.

Applicant has a long history of financial instability and poor judgment. Most of his debts are to the federal government. This a direct bearing on his eligibility to hold a federal security clearance. Applicant's debts will remain a security concern until he shows a documented track record of good-faith efforts to resolve them, and to be honest about them. The record evidence leaves me with questions and doubts as to Applicant's eligibility and suitability for a security clearance. For all these reasons, I conclude Applicant failed to mitigate the security concerns arising under Guideline F, financial considerations, and Guideline E, Personal Conduct.

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:	AGAINST APPLICANT
Subparagraphs 1.a-1.e, 1.g-1.m, 1.o:	Against Applicant
Subparagraphs 1.f, 1.n, 1.p:	For Applicant
Paragraph 2, Guideline E:	AGAINST APPLICANT
Subparagraphs 2.a-2.b:	Against Applicant

Conclusion

In light of all of the circumstances presented, it is not clearly consistent with the interests of national security to grant Applicant eligibility for access to classified information. Eligibility for access to classified information is denied.

Braden M. Murphy
Administrative Judge