



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



In the matter of:	)	
	)	
	)	ISCR Case No. 21-02181
	)	
Applicant for Security Clearance	)	

**Appearances**

For Government: John Lynch, Esq., Department Counsel  
For Applicant: Alexander M. Laughlin, Esq.

12/21/2023

**Decision**

HYAMS, Ross D., Administrative Judge:

Applicant did not mitigate the foreign influence security concerns arising from his foreign contacts and connections to Jordan and the United Arab Emirates (UAE). The security concerns regarding Iraq were mitigated. Eligibility for access to classified information is denied.

**Statement of the Case**

Applicant submitted a security clearance application (SCA) on April 25, 2020. On December 1, 2021, the Department of Defense (DoD) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guideline B, foreign influence. Applicant answered the SOR on January 19, 2022, and requested a hearing before an administrative judge. The case was reassigned to me on December 8, 2022.

The hearing convened on December 14, 2022. Department Counsel submitted Government Exhibits (GE) 1-3, which were admitted in evidence without objection. Applicant submitted Applicant's Exhibits (AE) A-DD, which were admitted in evidence without objection.

## **Amendment to the SOR**

At the end of the hearing, Department Counsel moved to amend the SOR to strike SOR allegations ¶¶ 1.a and 1.k. The amendment was granted without objection. (Tr. 153)

## **Request for Administrative Notice**

At Department Counsel's request, I took administrative notice of facts concerning Jordan, the United Arab Emirates (UAE), and Iraq. Department Counsel provided supporting documents that verify and provide context for those facts. They are detailed in the Government's administrative notice filings (AN) 1, 3, and 4 and are included in the findings of fact. Facts about another country were included in AN 2. Since the allegation concerning that country was struck in SOR ¶ 1.k, AN 2 no longer requires consideration.

## **Findings of Fact**

In his answer, Applicant admitted all of the SOR allegations (¶¶ 1.a-1.m) with explanation. His admissions are incorporated into the findings of fact. Based on my review of the pleadings, evidence submitted, and testimony, I make the following additional findings of fact:

Applicant is 32 years old. He was married in 2019, and has one minor child. He has worked for a government contractor since 2016, and has served in overseas assignments for almost the entire time of his employment. He was granted a security clearance shortly before he was married in 2019. (Tr. 17-22, 107-111, 139, 142; GE 1)

Applicant was born in the U.S. in State A in 1990. His parents are Jordanian citizens and were in the U.S. because his father was attending a university on a student visa. A few months after his birth, Applicant and his family moved to the UAE. He lived in the UAE until 2000, when his parents divorced. He then moved to Jordan and lived with his grandmother. After high school, he attended a Jordanian University, and graduated with a bachelor's degree in 2012. In 2013, he moved back to the U.S. to earn a master's degree at a university in State A. After graduating in June 2014, he worked for a construction company in State A. In March 2016, he started working for a government contractor in State B. His first assignment was in Jordan, and he lived and worked there from April 2016 to Sept 2019. In September 2019, he was temporarily assigned in State B and was accompanied by his wife. His next assignment was in Morocco. He and his wife moved there in February 2020. After a short period in Morocco, he temporarily returned to State B without his wife, and became stuck in the U.S. because of the Covid-19 pandemic. His wife gave birth while he was in the U.S. and he returned to Morocco in August 2020, as soon as travel into the country was permitted. He has lived and worked in Morocco since that time. (Tr. 17-22, 56, 107-111, 139, 142; GE 1)

Applicant owns investment properties in State A, but has no home in the U.S. His father rents a home in State C, and Applicant uses that location as his U.S. mailing

address. Applicant's wife is a Jordanian citizen. She became a U.S. permanent resident in December 2020, and a U.S. citizen in July 2022. She has only spent about six months total in the U.S. Since April 2016, Applicant has spent less than a year total in the U.S., and a significant portion of that time was because he was stuck here at the start of the Covid-19 pandemic. His most recent visits to Jordan were in May 2021 to visit family, and in July 2022 for his brother-in-law's wedding. (Tr. 17-22, 25-26, 56, 107-111, 139, 142; GE 1; AE L, M)

The SOR alleges the following foreign influence concerns:

SOR ¶ 1.b alleges that Applicant's mother is a citizen of Jordan and resident of the UAE. He admitted this allegation. She has been a U.S. permanent resident since December 2019. He sponsored her application, and claims that she visits friends in the U.S. every six months. He has monthly contact with her. (Tr. 40-42, 108; AE N; GE 1, 2, 3)

SOR ¶ 1.c alleges that Applicant's father, stepmother, brother, two half-sisters, and two half-brothers are citizens and residents of Jordan. He admitted this allegation. His father has been a U.S. permanent resident since 2016, but did not move to live in the U.S. until September 2021. Applicant sponsored his father's application. His father lives with Applicant's stepmother, two half-brothers and half-sister in State C. He assists Applicant with his investment properties in State A, by talking on the phone with the property management company. Applicant has biweekly contact with him. (Tr. 39-45, 96, 116-123; AE O, P, Q; GE 1, 2, 3)

Applicant's stepmother is a Jordanian citizen. She has been in the U.S. since September 2021, however, it is not clear how she is legally here. He was unable to provide any immigration details or documentation for her. He provided a copy of a social security card. He has quarterly contact with her. (Tr. 39-45, 96, 116-123; AE O, S; GE 1, 2, 3)

Applicant's brother is a citizen and resident of Jordan. In 2017 Applicant sponsored him for an immigrant visa. but it has not been approved. The State Department documentation asserts that the wait would take many years. His brother has a wife and two minor children in Jordan. (Tr. 48-50, 121-122; AE T; GE 1, 2, 3)

Applicant's two half-brothers and two half-sisters are Jordanian citizens. They became U.S. permanent residents in September 2021. Three of them live with their parents in State C. His older half-sister has returned to live in Jordan and is attending university there. He has quarterly contact with his stepsiblings. (Tr. 50-54; AE U-X; GE 1, 2, 3)

SOR ¶ 1.d alleges that Applicant's father served as director of a division of a Jordanian Government Ministry. He admitted this allegation. His father retired in 2019 and receives a pension from the Jordanian government. He does not know if his father is in touch with his former colleagues. (Tr. 39-45, 96, 116-123; AE Q; GE 1, 2, 3)

SOR ¶ 1.e alleges that Applicant's stepmother served in a medical component of the Jordanian Army. He admitted this allegation. She retired in 2019, and receives a pension from the Jordanian government. He does not know if she is in touch with her former colleagues. (Tr. 45-48, 119-121; AE R; GE 1, 2, 3)

SOR ¶ 1.f alleges that Applicant's uncles and aunts are citizens and residents of Jordan. He admitted this allegation. At the hearing, six uncles and three aunts were discussed. All are Jordanian citizens and all but one resides in Jordan. One uncle resides in a European country. His contact with these family members varies from quarterly, to semi-annual, to annually. He contacts them by phone, Facetime, and Facebook Messenger. He is unsure if any of these persons or their immediate family members have connections to the Jordanian government. (Tr. 71-79, 125; GE 1, 2, 3)

SOR ¶ 1.g alleges that one of Applicant's uncles served in a Jordanian Government Ministry. He admitted this allegation. His uncle retired in 2020, and receives a pension from the Jordanian government. He last saw him in July 2022. (Tr. 71-72, 124; AE Y; GE 1, 2, 3)

SOR ¶ 1.h alleges that another one of Applicant's uncles served in a Jordanian Government Ministry. He admitted this allegation. His uncle retired in 2010, and receives a pension from the Jordanian government. He last saw him in July 2022. (Tr. 72-73, 124; GE 1, 2, 3)

SOR ¶ 1.i alleges that Applicant's mother-in-law, father-in-law, and his wife's brothers, sisters, and aunt are citizens and residents of Jordan. He admitted this allegation. He reported that one sister-in-law now lives in the UAE. He saw his in-laws when visiting Jordan. His wife primarily communicates with them, but sometimes he speaks with them when she is on an audio or video call. (Tr. 99, 126-130; GE 1, 2, 3)

SOR ¶ 1.j alleges that Applicant and his wife have multiple friends who are citizens and/or residents of Jordan. He admitted this allegation. He reported that he has a close group of about 12 friends in Jordan that he maintains contact with, and has other friends and acquaintances that he maintains some contact with. His wife also maintains contact with her friends in Jordan. (Tr.58-71, 82-102, 130-138; GE 1, 2, 3)

SOR ¶ 1.l alleges that Applicant's friend is a resident of the UAE. He admitted this allegation. He testified about two friends who live in the UAE. (Tr. 58-71; GE 1, 2, 3)

SOR ¶ 1.m alleges that Applicant has friends that are residents of Iraq. He admitted this allegation. He testified about a friend whom he met at a previous work assignment who is now living in Iraq. He maintains quarterly contact with him. He testified about two other individuals that are now also in Iraq, however he does not classify them as close friends. (Tr. 58-71, 83-91; GE 1, 2, 3)

Applicant submitted four professional character letters which state that he is a valued employee, reliable, trustworthy, and fit to hold a security clearance. A work

colleague testified that Applicant is a good hard-working employee and is an asset to the company. He stated that their employer has invested a lot in Applicant and given him significant responsibility. (Tr. 147-154; AE Z-CC)

## **Jordan**

In AN 1, dated December 8, 2022, the Government included recent information from the U.S. Department of State about the United States' relations with Jordan and the current conditions in that country. I take administrative notice of the following facts:

The U.S. Department of State overall travel advisory for Jordan is Level 2: "Exercise increased caution in Jordan due to terrorism". The threat of terrorism remains high in Jordan. Transnational and indigenous terrorist groups have demonstrated the capability to plan and implement attacks in Jordan. The U.S. Department of State has assessed Jordan's capital city, Amman, as being a high-threat location for terrorism directed at or affecting official U.S. government interests. As of the date of this decision, parts of Jordan are listed with Level 4 warnings: "Do not travel". These areas include border areas, refugee camps, Zarqa, Rusayfah and the Baqa'a neighborhood of Ayn Basha. A Level 3 warning: "Reconsider travel" is in effect for Ma'an city, and areas of Ma'an Governorate.

Violent extremist groups in Syria and Iraq, including the Islamic State of Iraq and ash-Sham (ISIS) and al-Qa'ida, directly or indirectly, have conducted or supported attacks in Jordan and continue to plot against local security forces, U.S. and Western interests and "soft" targets such as high-profile public events, hotels, places of worship, restaurants, schools, and malls. Jordan's prominent role in the Global Coalition to Defeat ISIS and its shared borders with Iraq and Syria increase the potential for future terrorist incidents.

Due largely to its proximity to regional conflicts in Iraq and Syria, the presence of major terrorist organizations in both of those countries, and the Israeli-Palestinian conflict, the highest priorities of Jordan's military and security services in 2022 included securing its borders and the potential for domestic terrorist attacks. The terrorist group Hezbollah and Iranian-backed militia forces were operating in southwestern Syria near Jordan's border while fighters from the ISIS terrorist group continued operating in both Iraq and Syria; ISIS fighters included Jordanian nationals, some of whom have returned to Jordan; meanwhile, individuals and groups sympathetic to Palestine have planned and conducted terrorist attacks in Jordan.

Regional issues can inflame anti-U.S./anti-Western sentiment. U.S. involvement in Iraq and Syria as well as U.S. government policies on Israel have fueled anti-U.S. sentiment. Certain segments of the Jordanian population view U.S. policy and military operations in the region unfavorably. Recent surveys of Jordanians show that more than 80% of the population holds an unfavorable view of the U.S. government. According to surveys, this sentiment does not generally extend to unfavorable views of

U.S. citizens or U.S. culture, though U.S. citizens should always maintain a high level of vigilance.

There have been significant human rights issues in Jordan, including credible reports of torture or cruel, inhuman, and degrading treatment or punishment in government facilities, and arbitrary arrest and detention.

## **Iraq**

In AN 3, dated December 8, 2022, the Government included recent information from the U.S. Department of State about the United States' relations with Iraq and the current conditions in that country. I take administrative notice of the following facts:

The U.S. Department of State travel advisory for Iraq is Level 4: "Do not travel to Iraq" due to terrorism, kidnapping, armed conflict, civil unrest, and Mission Iraq's limited capacity to provide support to U.S. citizens. U.S. citizens in Iraq are at high risk for violence and kidnapping. Terrorist and insurgent groups regularly attack both Iraqi security forces and civilians. Anti-U.S. sectarian militias threaten U.S. citizens and Western companies throughout Iraq. Attacks using improvised explosive devices (IEDs) occur in many areas of the country, including Baghdad. Demonstrations, protests, and strikes occur frequently. These events can develop quickly without prior notification, often interrupting traffic, transportation, and other services; such events have the potential to turn violent. The "Do not travel" warning remains in effect as of the date of this decision.

Terrorist groups and those inspired by such organizations are intent on attacking U.S. citizens abroad. Primary terrorist threats within Iraq included Islamic State in Iraq and Syria (ISIS) and Iran-aligned militia groups. ISIS is a designated terrorist organization, which is active in Syria and near the Iraq border. ISIS and its associated terrorist groups indiscriminately commit attacks and violent atrocities in Iraq despite improved Iraqi government control. ISIS, militia groups, and criminal gangs target U.S. citizens for attacks and hostage-taking.

There have been significant human rights issues in Iraq, including: credible reports of unlawful or arbitrary killings; extrajudicial killings and forced disappearances by the government; torture and cruel, inhumane, and degrading treatment by the government; and arbitrary arrest and detention.

## **UAE**

In AN 4, dated December 8, 2022, the Government included recent information from the U.S. Department of State about the United States' relations with the UAE and the current conditions in that country. I take administrative notice of the following facts:

The U.S. Department of State has issued a Level 3 travel advisory for the UAE, encouraging U.S. nationals to reconsider travel to the UAE due to the threat of missile or drone attacks. The possibility of attacks affecting U.S. citizens and interests in the Gulf

and Arabian Peninsula remains an ongoing serious concern. Rebel groups operating in Yemen have stated an intent to attack neighboring countries, including the UAE, using missiles and drones. Recent missile and drone attacks targeted populated areas and civilian infrastructure. As of the date of this decision, the travel warning is Level 2: "Exercise increased caution" due to the threat of missile or drone attacks and terrorism. The possibility of attacks affecting U.S. citizens and interests in the Gulf and Arabian Peninsula remains an ongoing, serious concern

The UAE advanced counterterrorism efforts in 2020, particularly in the field of countering terrorist financing. U.S.-UAE security agencies continue to finalize a new information sharing memorandum of cooperation to make travel safer. The UAE seeks to be a leader in countering violent extremist narratives on a global level, supporting countering violent extremism and participating in and hosting international fora to promote tolerance and coexistence.

The U.S. Department of State has assessed Abu Dhabi and Dubai as being medium-threat locations for terrorism directed at or affecting official U.S. government interests. The Department of State remains concerned about the global threat of terrorism, including the continuing possibility of terrorist attacks against U.S. citizens and interests in the UAE given its proximity to hostile and unstable countries, importance as a major transit hub for regional travel and commerce, strong bilateral relationship with the U.S., and large expatriate population. The UAE's participation in the anti-ISIS coalition and ongoing Yemen civil war in addition to normalizing relations with Israel has raised the overall likelihood of terrorist attacks against UAE and Western interests. Despite the robust security apparatus, terrorist groups have threatened to target the UAE. Continued threats from terrorist groups directed against U.S. interests worldwide require that U.S. citizens remain alert, maintain a low profile, and incorporate good security practices into their daily activities.

There have been significant human rights issues in the UAE, including credible reports of torture in detention; arbitrary arrest and detention, including incommunicado detention, by government agents; and political prisoners.

## **Policies**

This case is adjudicated 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 adjudicative guidelines (AG), which became effective on June 8, 2017.

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 to be used 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, 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(c), 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."

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 the 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 the applicant may deliberately or inadvertently fail to safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation of potential, rather than actual, risk of compromise of classified information.

Section 7 of EO 10865 provides that adverse 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 B, Foreign Influence**

AG ¶ 6 details the security concern about "foreign contacts and interests" as follows:

Foreign contacts and interests, including, but not limited to, business, financial, and property interests, are a national security concern if they result in divided allegiance. They may also be a national security concern if they create circumstances in which the individual may be manipulated or induced to help a foreign person, group, organization, or government in a way inconsistent with U.S. interests or otherwise made vulnerable to pressure or coercion by any foreign interest. Assessment of foreign contacts and interests should consider the country in which the foreign contact or interest



is located, including, but not limited to, considerations such as whether it is known to target U.S. citizens to obtain classified or sensitive information or is associated with a risk of terrorism.

AG ¶ 7 indicates conditions that could raise a security concern and may be disqualifying in this case:

(a) contact, regardless of method, with a foreign family member, business or professional associate, friend, or other person who is a citizen of or resident in a foreign country if that contact creates a heightened risk of foreign exploitation, inducement, manipulation, pressure, or coercion; and

(b) connections to a foreign person, group, government, or country that create a potential conflict of interest between the individual's obligation to protect classified or sensitive information or technology and the individual's desire to help a foreign person, group, or country by providing that information or technology.

The nature of a nation's government, its relationship with the United States, and its human-rights record are relevant in assessing the likelihood that an applicant's family members and foreign contacts are vulnerable to government coercion or inducement. The risk of coercion, persuasion, or duress is significantly greater if the foreign country has an authoritarian government, a family member or friend is associated with or dependent upon the government, the country is known to conduct intelligence collection operations against the United States, or the foreign country is associated with a risk of terrorism.

Guideline B is not limited to countries hostile to the United States. "The United States has a compelling interest in protecting and safeguarding classified information from any person, organization, or country that is not authorized to have access to it, regardless of whether that person, organization, or country has interests inimical to those of the United States." ISCR Case No. 02-11570 at 5 (App. Bd. May 19, 2004).

A heightened security risk in Jordan, the UAE, and Iraq is established by the administratively noticed facts in the record. The security risks include the risk of terrorism and the human-rights records of these countries.

Applicant and his wife have a large group of family members and friends who are citizens and/or residents of Jordan, with whom they maintain close and continuing contact. Applicant and his wife have family members and friends who are residents of the UAE. Applicant and his wife's longstanding connection to Jordan presents a potential conflict of interest. Applicant has friends who are currently in Iraq, which presents some of the most serious security concerns in the region. AG ¶¶ 7(a) and 7(b) apply.

AG ¶ 8 lists conditions that could mitigate foreign influence security concerns, including:

(a) the nature of the relationships with foreign persons, the country in which these persons are located, or the positions or activities of those persons in that country are such that it is unlikely the individual will be placed in a position of having to choose between the interests of a foreign individual, group, organization, or government and the interests of the U.S.;

(b) there is no conflict of interest, either because the individual's sense of loyalty or obligation to the foreign person, or allegiance to the group, government, or country is so minimal, or the individual has such deep and longstanding relationships and loyalties in the United States, that the individual can be expected to resolve any conflict of interest in favor of the U.S. interest; and

(c) contact or communication with foreign citizens is so casual or infrequent that there is little likelihood that it could create a risk for foreign influence or exploitation.

AG ¶ 8(a) does not apply to SOR ¶¶ 1.b-1.j, and 1.l. Applicant failed to provide sufficient evidence to find that he and his wife's relationships with family members and friends in Jordan and the UAE make it unlikely that he will be placed in a position of having to choose between these interests and the interests of the U.S. He and his wife have a large number of family members and friends in Jordan. His wife's close relationships and bonds of affection with her family and friends are imputed to him. Some of these persons have long standing connections to the Jordanian government, and there may be other connections to the Jordanian government that he is not currently aware of. His father and stepmother are former employees of the Jordanian government and receive pensions. These relationships, the risk of terrorism, and the human rights concerns create a heightened risk of foreign exploitation, inducement, manipulation, pressure, and coercion. Applicant and his wife have family and friends who reside in the UAE. These connections also create a heightened risk of foreign exploitation, inducement, manipulation, pressure, and coercion due to terrorism and human rights concerns in the UAE.

AG ¶ 8(a) applies to SOR ¶ 1.m. Applicant's friend and acquaintances in Iraq are not the same as his close and continuing relationships and connections in Jordan and the UAE. While the ongoing security concerns and circumstances in Iraq are serious, the concerns about his friend and acquaintances in Iraq are mitigated.

AG ¶ 8(b) does not apply. Applicant failed to provide sufficient evidence to find that there is no conflict of interest between his sense of loyalty or obligation to his foreign contacts, his allegiance and connection to Jordan or the UAE is minimal, or that he has such deep and longstanding relationships and loyalties in the U.S. that he can be expected to resolve any conflict of interest in favor of the U.S. interest. Applicant has not established a deep and longstanding relationship to the U.S. He grew up in the UAE and Jordan, and attended primary school through University in Jordan. At about 22 years old, he came to the U.S. for higher education for about a year and a half, and then had less than two years of work experience before returning to live and work overseas. It's clear

from his specific field of work, that he and his wife will likely continue to live and work overseas. The majority of their family and friends are in Jordan, and some are also in the UAE.

AG ¶ 8(c) does not apply. Applicant failed to provide sufficient evidence to find that his contact or communication with foreign citizens is so casual or infrequent that there is little likelihood that it could create a risk for foreign influence or exploitation. He and his wife maintain regular contact with family and friends in Jordan and the UAE, and they continue to have a close bond of affection and obligation for them.

### **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 relevant 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(c), 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 considered his character letters and character witness testimony. I have incorporated my comments under Guideline B in my whole-person analysis.

Overall, the record evidence leaves me with questions and doubts about Applicant's eligibility for a security clearance. He did not provide sufficient evidence to mitigate the security concerns under Guideline B arising from his foreign contacts and connections to Jordan and the UAE.

### **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 B:	AGAINST APPLICANT
Subparagraphs 1.b-1.j, and 1.l:	Against Applicant

Subparagraph 1.m:

For Applicant

**Conclusion**

It is not clearly consistent with the national interest to grant Applicant a security clearance. Eligibility for access to classified information is denied.

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Ross D. Hyams  
Administrative Judge