



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



In the matter of:)	
)	
)	ISCR Case No. 23-00133
)	
Applicant for Security Clearance)	

Appearances

For Government: Carroll Connelley, Esq., Department Counsel
For Applicant: Marshall Griffin, Esq.

07/24/2024

Decision

DORSEY, Benjamin R., Administrative Judge:

Applicant mitigated the alcohol consumption security concerns. He did not mitigate the personal conduct security concerns. Eligibility for access to classified information is denied.

Statement of the Case

On March 1, 2023, the Department of Defense (DOD) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guideline G (alcohol consumption) and Guideline E (personal conduct). Applicant, through counsel, responded to the SOR on June 6, 2023 (Answer) and requested a hearing before an administrative judge. The case was assigned to me on April 17, 2024.

After conferring with the parties, I scheduled the matter for hearing on June 25, 2024. The hearing was convened as scheduled. I admitted Government Exhibits (GE) 1 through 10 and Applicant Exhibits (AE) A through D in evidence without objection. I received a transcript (Tr.) of the hearing on July 2, 2024.

Findings of Fact

Applicant is a 40-year-old employee of a defense contractor. He has worked for his current employer since about August 2020. He earned a high school diploma in 2002 and a bachelor's degree in 2008. He was married from 2010 until a divorce in 2012. He is currently single. He has no children. (Tr. 20-21; Answer; GE 1, 2, 8-10)

In about March 2003, Applicant was arrested and charged with driving under the influence of alcohol (DUI) in State A. He was 19 years old and under the legal age limit to consume alcohol. State A had a "zero-tolerance" law that made it illegal for underage drivers to have any alcohol in their system while driving. Applicant had alcohol in his system when he was pulled over by police while driving. He was convicted of DUI. The court suspended his driver's license for about 45 days, ordered him to attend alcohol counseling, pay fines, and perform community service. He complied with the requirements of this sentence. He claimed the punishment had a lasting impact on him and his alcohol use. He reported this arrest on his 2021 Electronic Questionnaires for Investigations Processing (2021 SF 86) and on his 2011 Electronic Questionnaires for Investigations Processing (2011 SF 86). He did not list this arrest on his 2020 Electronic Questionnaires for Investigations Processing (2020 SF 86) or his 2015 Electronic Questionnaires for Investigations Processing (2015 SF 86). He had to be confronted with this DUI by a DOD investigator during his 2016 personal subject interview (2016 PSI), but he openly discussed this DUI with a DOD investigator during personal subject interviews in 2011 (2011 PSI), 2020 (2020 PSI), and 2021 (2021 PSI). He authenticated and adopted the summaries of all these PSIs. (Tr. 21-23, 38, 51, 53; Answer; GE 1, 2, 6, 8-10)

In about October 2015, Applicant's then employer, another government contractor, gave him a written reprimand for confrontational behavior. At the time, he travelled a significant distance from State B, where he lived and worked, to a U.S. territory to repair communication equipment on a U.S. Naval vessel. He was in a high stress environment because there was a time deadline to complete his work on the Naval vessel before a typhoon came through the Territory. He and his supervisor had an argument over the timeliness of his efforts early one morning at about 2:00 or 3:00 a.m. His supervisor thought Applicant should have completed his work earlier, but Applicant claimed he could not because of a customs issue. He ultimately completed his work and heard nothing about fallout from the argument until a few months later when he incorrectly filled out a timecard. As a result of the earlier argument, he was counseled, told to be more careful with his language, and received a written reprimand. While it was not listed in the SOR, he also received written discipline for the timecard issue. He did not list either of the 2015 employment disciplinary actions in the 2021 SF 86, but he listed both actions in the 2015 SF 86. (Tr. 23-26; Answer; GE 1, 2, 8, 9)

In about October 2015, Applicant was charged by police with DUI. He claimed that earlier that night, he had one whisky while playing pool with friends at a bar. However, during the 2020 PSI, he told a DOD investigator that he had about four beers over four or five hours. During the 2016 PSI, he told the DOD investigator that when he was driving home from the bar, one of his tires blew out and he struck a bridge. During

direct examination, he testified that he struck a bridge because of a “mechanical failure.” On cross-examination, he testified that he may have struck the bridge because he was arguing with his passenger, she may have grabbed the steering wheel and jerked it to the side, but he could not remember specifically. He also provided this version of the reason for the accident to the DOD investigator during the 2020 PSI. He left his disabled vehicle, got a ride home from a friend and had a drink of whisky. He claimed that he drank the whisky to calm his nerves. During the 2020 PSI, he told a DOD investigator that he drank a beer at the friend’s house who picked him up. He testified that the inconsistencies in his various reporting of the incident were not a result of his being dishonest; instead, they resulted from the time that has elapsed since the incident occurred. (Tr. 26-29, 38, 56-59, 68-70; Answer; GE 1, 2, 3, 6, 7, 9; AE A)

Applicant then went back to his truck to have it towed. Police were on the scene and asked him to take a field sobriety test and a breathalyzer test. He refused. He claimed that he refused these tests because they would be inaccurate because of the glass of whisky (or beer) he allegedly drank at home after the accident. He was arrested and taken to jail. He hired a lawyer and entered into a plea agreement reducing his charge from DUI to reckless driving. The court required him to pay fines and costs totaling about \$1,095. It also required him to attend three hours of family counseling, 50 hours of community service, take a two-day aggressive driving course, and it suspended his driver’s license for three months. He has completed the terms of his sentence. (Tr. 26-29, 38, 56-59, 68-70; Answer; GE 1, 2, 3, 6, 7, 9; AE A)

Applicant reported his 2015 DUI arrest on his 2015 SF 86 and his 2021 SF 86. Despite being required to do so, he did not report his 2015 DUI arrest on his 2020 SF 86. During the 2020 PSI, he did not disclose his 2015 DUI arrest until he was confronted about it by a DOD investigator. He told the DOD investigator that he did not disclose this DUI on the 2020 SF 86 or admit it until confronted because he was worried that it would negatively impact his ability to obtain a security clearance. He claimed that he informed his facility security officer (FSO) directly after his arrest. (Tr. 29, 38, 51, 53-; Answer; GE 1-6; AE A)

In May 2020, Applicant’s employer, a government contractor (Contractor A), terminated Applicant’s employment. His supervisor, with whom he had been having ongoing disagreements, accused Applicant of being at work while intoxicated. Applicant denied that he was intoxicated at work. He claimed that he had two drinks the night before work, but he did not become intoxicated, and he stopped drinking at about 9:00 p.m. the night before. However, minutes before he testified that he had two drinks, he testified that he did not consume any alcohol. He claimed that his supervisor held a grudge against him because he decided to stay with the subcontractor for whom he worked instead of accepting an offer with the general contractor for whom the supervisor worked. He also claimed that he and his supervisor had the altercation because Applicant was not appropriately dressed. Initially, Applicant was terminated for being intoxicated at work. He received a termination letter to that effect. After he contested the reason for his termination, Contractor A sent him a letter (Termination Letter) containing the subject matter line, “[t]ermination of [e]mployment,” informing him that his services were no longer required. The letter made no reference to Applicant’s

alleged intoxication. A May 2020 e-mail from the contractor to him calls the Termination Letter a “term letter.” This e-mail indicates that another termination letter had been removed from its files. (Tr. 29-34, 38, 40-43, 60-63; Answer; GE 1, 2, 4-6, 8)

In the 2020 SF 86, Applicant wrote that he left his employment with Contractor A because of stress, health problems, the death of his grandfather, and his father’s health problems. He also claimed he left because Contractor A was not allowing him to practice safe COVID-19 practices while he was living with his parents, who were particularly vulnerable to it. He claimed he left by mutual agreement with the contractor for unsatisfactory performance. He did not disclose that the contractor terminated his employment and made no mention that he had been accused of being intoxicated at work. During the 2020 PSI, he twice told the DOD investigator that the information he listed in the 2020 SF 86 about the end of his employment with Contractor A was accurate. The second time the DOD investigator asked him, he expounded a little more and said that he did not like working for the overarching general contractor. (Tr. 38, 42-45; Answer; GE 2, 4, 5, 6, 8)

When the DOD investigator asked him a third time, Applicant admitted that Contractor A had terminated him, and he had been accused of being intoxicated at work. He also disclosed that his supervisor with Contractor A had accused him of being intoxicated at work on several occasions. Applicant told the investigator that he was never intoxicated at work, but that he hobbled around because of an injury he suffered in a car accident. He also claimed that he was on an allergy medication that caused his pupils to dilate. He initially claimed that what he wrote in the 2020 SF 86 about his reason for leaving Contractor A was his “interpretation” of what information the 2020 SF 86 required. He eventually admitted that he intentionally omitted the termination from Contractor A and the reasons surrounding it because he feared for his security clearance and his employment chances. He acknowledged that this intentional omission showed poor judgment. He testified that he did not try to mislead the DOD investigator, and because of stress and “chaos,” he thought all three explanations were true. He further testified that he thought the question about why he would lie on a security clearance application was a hypothetical that requested why a person who lied on a security clearance application might do so. He did not make this point when he adopted his 2020 PSI. Despite instructions in bold font informing Applicant that he could make corrections to the summaries of his PSIs, he claimed he did not know he could do so. He also testified that he was tired and worn down from travel, wanted the 2020 PSI to be over, and just agreed with what the investigator said. (Tr. 38, 42-47, 53-55; Answer; GE 2, 4, 5, 6, 8)

In the 2021 SF 86, Applicant wrote that he left employment with Contractor A by mutual agreement following notice of unsatisfactory performance. He elaborated that he had personal issues with the management team and that he was let go by the project manager because he left the site during the COVID pandemic. He also claimed that his performance was unsatisfactory because he was tired and because of mismanagement by the general contractor. He did not reference having been accused of being intoxicated at work and he did not reference that he had been terminated. During the 2021 PSI, Applicant confirmed to the DOD investigator that he left this employment by

mutual agreement. He reiterated that he left because Contractor A was not following safe COVID protocols, and he refused to go to work until it used safer protocols. He claimed that he had no other performance issues with Contractor A. He did not tell the DOD investigator that he had been terminated, nor did he tell the investigator that he had been accused of being intoxicated at work. (Tr. 38, 47-48; Answer; GE 1, 2, 4, 5, 6, 8)

On August 30, 2022, at DOD's request, Applicant underwent a virtual assessment by a licensed clinical psychologist and board-certified neuropsychologist (Psychologist) utilizing the Zoom application. The psychologist issued a report based upon that assessment dated September 12, 2022. As part of the assessment, the Psychologist interviewed him and had him complete a standardized psychology inventory called the Personality Assessment Inventory (PAI). In her report, the Psychologist noted that Applicant was not forthcoming about the circumstances surrounding his employment with Contractor A and his termination. Applicant also made no reference to the fact that he had been accused of being intoxicated at work. She found Applicant to be evasive and not fully forthcoming with regards to his legal history. She wrote that she is not confident that the information Applicant provided during the interview was accurate. She noted that his PAI score with respect to alcohol related difficulties was incongruent with what an honest responder might score given his history of alcohol-related incidents at work and in his social life. She wrote that he "appears to lack insight into his past difficulties in the work place [sic], as well as in legal realms, due to alcohol use." (Tr. 34-35, 59; Answer; GE 6)

Based upon Applicant's alcohol-related legal issues, the accusation against him that he was intoxicated at work, his lack of candor about his alcohol related difficulties, and his continued consumption of alcohol, the Psychologist diagnosed him with alcohol use disorder, mild, at a minimum. Given these issues, his lack of candor, and the inconsistencies between the records she reviewed and what he relayed during their interview, she had significant concerns regarding his judgment, reliability, and trustworthiness. She reported that his prognosis is poor. Applicant testified that the interview lasted 30 to 45 minutes, that the atmosphere was adversarial, and he was uncomfortable with the whole process. He claimed that the Psychologist lacked objectivity, and he thought that she had already formed an opinion about him before the interview. He has not had another assessment but testified that he would do so if required. (Tr. 34-35, 59-60; Answer; GE 6)

Applicant testified that he modified his drinking after his 2015 DUI arrest. He claimed that he did not drink at all for a couple of years. However, he also testified that he reduced his alcohol consumption to a "negligible amount" during this time. He started to drink again (or more) in 2018, but only an occasional beer after mowing the lawn. He claimed he has not driven after consuming alcohol since 2015. He performs well at his current job and provided several character-reference letters from friends and colleagues. In those letters, his friends and colleagues note that he is honest, forthright, hardworking, loyal, dedicated, and he loves his country. He has also volunteered his time helping hurricane victims recover from a devastating hurricane. (Tr. 63-68; Answer GE 2; AE C)

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 G, Alcohol Consumption

The security concern for alcohol consumption is set out in AG ¶ 21:

Excessive alcohol consumption often leads to the exercise of questionable judgment or the failure to control impulses, and can raise questions about an individual’s reliability and trustworthiness.

The guideline notes several conditions that could raise security concerns under AG ¶ 22. The following are potentially applicable in this case:

- (a) alcohol-related incidents away from work, such as driving while under the influence, fighting, child or spouse abuse, disturbing the peace, or other incidents of concern, regardless of the frequency of the individual's alcohol use or whether the individual has been diagnosed with alcohol use disorder;
- (b) alcohol related incidents at work, such as reporting for work or duty in an intoxicated or impaired condition, drinking on the job, or jeopardizing the welfare and safety of others regardless of whether the individual is diagnosed with alcohol use disorder;
- (c) habitual or binge consumption of alcohol to the point of impaired judgment, regardless of whether the individual is diagnosed with alcohol use disorder; and
- (d) diagnosis by a duly qualified medical or mental health professional (e.g., physician, clinical psychologist, psychiatrist, or licensed clinical social worker) of alcohol use disorder.

Applicant was charged with DUI and convicted of that offense in 2003 after consuming alcohol while underage and then driving. In 2015, he was arrested for DUI after drinking and driving, getting into a single-car accident, and then refusing field sobriety and breathalyzer tests. While the accident may have been caused by something other than his alcohol consumption, he told a DOD investigator that he had four beers that night prior to driving. This is sufficient evidence for me to find that the Government has met its burden of providing substantial evidence that Applicant was driving his vehicle while impaired by alcohol. His refusal to submit to field sobriety and breathalyzer tests provides additional context to inform this finding. Finally, a licensed

clinical psychologist diagnosed him with alcohol use disorder, mild. AG ¶¶ 22(a), 22(c), and 22(d) are established.

AG ¶ 22(b) is not established. I find there is insufficient evidence to establish that Applicant was intoxicated at work. While he was accused by a supervisor of being intoxicated while working, he denied it, and Contractor A did not ultimately terminate him for being intoxicated. Therefore, I find for Applicant with respect to SOR ¶ 1.c, as it indicates that he was terminated for being intoxicated at work.

Conditions that could mitigate alcohol consumption security concerns are provided under AG ¶ 23. The following are potentially applicable:

(a) so much time has passed, or the behavior was so infrequent, or it happened under such unusual circumstances that it is unlikely to recur or does not cast doubt on the individual's current reliability, trustworthiness, or judgment; and

(b) the individual acknowledges his or her pattern of maladaptive alcohol use, provides evidence of actions taken to overcome this problem, and has demonstrated a clear and established pattern of modified consumption or abstinence in accordance with treatment recommendations.

It has been about nine years since Applicant has had an established alcohol-related incident. Available evidence provides that he modified his alcohol consumption after being arrested for DUI in 2015, and he continues to do so. I find that so much time has passed that his alcohol-related incidents are unlikely to recur. I also find that he has acknowledged his pattern of maladaptive alcohol misuse and has demonstrated a clear and established pattern of modified consumption. AG ¶¶ 23(a) and 23(b) fully apply.

Guideline E, Personal Conduct

The security concern for personal conduct is set out in AG ¶ 15:

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.

The guideline notes several conditions that could raise security concerns under AG ¶ 16. The following are potentially applicable in this case:

(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 employment

qualifications, award benefits or status, determine security clearance eligibility or trustworthiness, or award fiduciary responsibilities;

(b) deliberately providing false or misleading information; or concealing or omitting information, concerning relevant facts to an employer, investigator, security official, competent medical or mental health professional involved in making a recommendation relevant to a national security eligibility determination, or other government official; and

(d) credible adverse information that is not explicitly covered under any other guideline and may not be sufficient by itself for an adverse determination, but which, when combined with all available information, supports a whole-person assessment of questionable judgment, untrustworthiness, unreliability, lack of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the individual may not properly safeguard classified or sensitive information.

This includes, but is not limited to, consideration of:

- (1) untrustworthy or unreliable behavior to include breach of client confidentiality, release of proprietary information, unauthorized release of sensitive corporate or government protected information;
- (2) any disruptive, violent, or other inappropriate behavior;
- (3) a pattern of dishonesty or rule violations.

Applicant deliberately falsified the circumstances surrounding his termination from Contractor A on the 2020 SF 86. He claimed that he left by mutual agreement and provided information implying that he left his employment there because he was displeased with Contractor A. He did not divulge that Contractor A terminated him.

Applicant did not deliberately fail to disclose his DUI arrests on the 2020 SF 86. While he did not divulge them on the 2020 SF 86, he divulged the 2003 arrest on the 2011 SF 86 and the 2015 arrest on the 2015 SF 86. He also openly discussed the 2003 arrest during the 2011 PSI and both DUI arrests during the 2016 PSI and 2020 PSI. I find for Applicant with respect to SOR ¶ 2.d.

Applicant deliberately falsified the circumstances surrounding his termination from Contractor A on the 2021 SF 86. Despite a DOD investigator making it clear to him in the 2020 PSI that he failed to properly report his termination in the 2020 SF 86, he repeated his false claim in the 2021 SF 86 that he left Contractor A by mutual consent and again failed to disclose that he had been terminated. AG ¶ 16(a) applies.

Applicant deliberately falsified material facts to a DOD investigator during the 2021 PSI. During the interview, he told the investigator that he left employment with Contractor A by mutual agreement. He did not tell the investigator that he had been

terminated, despite having been previously confronted by another investigator with this fact. AG ¶ 16(b) applies.

Applicant's alcohol-related conduct alleged under Guideline G that has been cross-referenced under Guideline E is explicitly covered under Guideline G. AG ¶ 16(d) is not established by that cross-alleged conduct. Therefore, I find for Applicant with respect to SOR ¶ 2.a.

AG ¶ 17 provides conditions that could mitigate personal conduct security concerns. The following mitigating conditions potentially apply in Applicant's case:

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

(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; and

(d) the individual has acknowledged the behavior and obtained counseling to change the behavior or taken other positive steps to alleviate the stressors, circumstances or factors that contributed to untrustworthy, unreliable, or other inappropriate behavior, and such behavior is unlikely to recur.

Applicant did not correct his falsification of the circumstances surrounding his termination from Contractor A. Instead, during the 2020 PSI, the DOD investigator had to confront him before Applicant finally admitted he was terminated. He then repeated the falsification in a subsequent SF 86 and during a subsequent PSI. AG ¶ 17(a) does not apply.

Deliberately falsifying required information and lying to DOD investigators is not minor. Instead, these actions strike at the heart of the security clearance process, which relies on candid and honest reporting. Applicant engaged in this deceitful and misleading activity multiple times and admitted that he did so to protect his security clearance and employment. Therefore, he has not shown that his behavior was infrequent, happened under unique circumstances, or is unlikely to recur. AG ¶ 17(c) does not apply.

Applicant has not acknowledged his dishonest behavior. During the hearing, he claimed that he told the truth on the security questionnaires and during the PSIs. However, he could not reasonably explain why he admitted that he lied to protect his security clearance during his 2020 PSI. He has provided inconsistent reports of his conduct throughout the security clearance process. For the reasons I provided in my analysis of AG ¶ 17(c), I do not find his dishonest behavior is unlikely to recur. AG ¶ 17(d) does not apply.

Applicant's 2015 verbal reprimand for confrontational behavior may seem minor, however he had multiple instances of problem behavior with his employers. I do not find that this type of behavior is infrequent or unlikely to recur. Moreover, he has not acknowledged his role in his problems with his past employers. AG ¶¶ 17(c) and 17(d) do not apply to Applicant's verbal reprimand.

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 have incorporated my comments under Guidelines G and E in my whole-person analysis. I have also considered Applicant's good employment record. However, I find that the totality of the evidence, especially his dishonest behavior, leaves me with questions and doubts about his eligibility and suitability for a security clearance. I find the Guideline G security concerns were either not established or mitigated but the Guideline E security concerns were not mitigated.

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 G:	FOR APPLICANT
Subparagraphs 1.a-1.d:	For Applicant
Paragraph 2, Guideline E:	AGAINST APPLICANT
Subparagraph 2.a:	For Applicant
Subparagraphs 2.b-2.c:	Against Applicant

Subparagraph 2.d:

For Applicant

Subparagraphs 2.e-2.f:

Against Applicant

Conclusion

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

Benjamin R. Dorsey
Administrative Judge