



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



In the matter of:

ISCR Case No. 25-00060

Applicant for Security Clearance

Appearances

For Government:
Alison P. O'Connell, Esq., Department Counsel

For Applicant:
Pro se

11/20/2025

Decision

CEFOLA, Richard A., Administrative Judge:

Applicant did not mitigate the security concerns raised under the Financial Considerations adjudicative guideline. National security eligibility for access to classified information is denied.

Statement of the Case

Applicant submitted a Questionnaire for National Security Positions on July 20, 2023 (Questionnaire). On February 26, 2025, the Defense Counterintelligence and Security Agency (DCSA) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guideline F (Financial Considerations). The action was taken under Executive Order 10865, *Safeguarding Classified Information Within Industry* (February 20, 1960), as amended; Department of Defense (DoD) Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the adjudicative guidelines (AG) effective within DoD after June 8, 2017.

On March 26, 2025 (as supplemented on May 1, 2025) Applicant responded to the SOR in writing (SOR Response or Item 2). She requested that this case be decided on the written record in lieu of a hearing. In her Answer, she admitted to 28 of the 34 debts alleged in the SOR. In addition, she included 23 pages of unlabeled documents that appear to represent the status of some of the alleged debts (to the extent discernable, these documents were labeled and matched to SOR allegations).

On June 2, 2025, Department Counsel submitted the Government's written case in a File of Relevant Material (FORM). A complete copy of the FORM, consisting of Items 1 to 10 and the Government's arguments in support of the SOR, was received by the Applicant on June 16, 2025. She was afforded an opportunity to file objections and submit material to refute, extenuate, or mitigate the security concerns, but did not respond within the period specified to do so. The case was assigned to me on September 29, 2025 (the Federal government was shut down from October 1 – November 12, 2025).

Findings of Fact

Applicant is a 45-year-old employee for a DoD contractor and submitted the Questionnaire in connection with her employment. She has a master's degree, has never married, and has no children. (Item 3 at 5, 11, 19-20)

SOR Paragraph 1, Guideline F (Financial Considerations)

The Government alleged that Applicant is ineligible for a security clearance because she had 34 delinquent and unresolved debts. I find the following facts regarding the history and status of the debts:

1.a. Collection Account, on-line personal loan (\$10,337). Applicant took out this loan in August 2015 to pay off other credit cards. It was charged off in May 2019, then later sold to a collection agency. She suggested having reached out to the creditor in April 2025 (after the February 2025 issuance of the SOR), but the debt remains unpaid, and she has not come to terms on resolution. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 4 at 3; Item 7 at 15; Item 9 at 3; Item 10 at 4)

1.b. Charged-Off Account, auto loan (\$4,243). Applicant took out a \$23,209 loan in October 2015 to purchase a vehicle, then turned the car back in when she could no longer afford the payments. The difference between the value of the vehicle and the loan – the debt – was charged off in January 2019 and remains unpaid. No additional mitigation was provided. Applicant disclosed the existence of this delinquent debt in the Questionnaire wherein she claimed the financial issue was resolved in June 2020, but later admitted to the debt in her Answer. (Item 3 at 52-53; Item 9 at 2)

1.c. Charged-Off Account, retail store credit card (\$3,590). Applicant took out the credit card in November 2013 to furnish her apartment and it was charged off in April 2019. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 9 at 2; Item 10 at 5)

1.d. Charged-Off Account, credit card (\$1,427). Applicant took out the credit card in February 2016 and it was later charged off in August 2018. Applicant subsequently entered into a settlement agreement with the creditor in October 2024 for a total of \$642, with six monthly payments of \$107 due from October 2024 through March 2025. Evidence of these payments does not appear in the administrative record and no additional mitigation was provided; however, the notation of settlement “for less than full balance” does appear on a recent credit report. The agreed-upon settlement amount therefore appears to have been paid. Applicant did not disclose the existence of this delinquent debt in the Questionnaire but admitted to it in her Answer. (Item 3 at 51-53; Item 4 at 4, 23; Item 6 at 2; Item 9 at 3)

1.e. Charged-Off Account, credit card (\$970). Applicant took out a second credit card with this bank in April 2021 for groceries and daily expenses (see ¶1.p. below for the first credit card). It was then charged off in September 2023. Attached to her Answer, Applicant provided an unlabeled webpage printout which references the creditor and the original account balance of \$970. It also indicates \$300 paid to date, with the last payment having been made in September 2021, and the remaining balance as \$670. In addition, a recent credit report indicates a recent payment bringing the balance to \$595. The remainder of the debt, however, remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 8; Item 3 at 51-53; Item 7 at 7; Item 10 at 6)

1.f. Collection Account, credit card (\$939). Applicant took out the credit card in 2020 to pay medical bills. It was charged off in September 2021, then later sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 6 at 3; Item 10 at 6)

1.g. Collection Account, clothing store credit card (\$937). Applicant took out the credit card in June 2018. The debt was later placed into collection and sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer (Item 3 at 51-53; Item 8 at 4; Item 10 at 6)

1.h. Collection Account, credit card (\$825). Applicant took out the credit card in June 2022. The debt went into default and was sold to a collection agency. Attached to her Answer, wherein she referenced having entered into a payment arrangement, Applicant provided an unlabeled webpage printout which references the original creditor, and an account number that matches one of the credit reports. The printout notes undated payments totaling \$206, with a remaining balance of \$619. The remainder of the debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 9-10; Item 3 at 51-53; Item 6 at 3; Item 7 at 21)

1.i. Collection Account, credit card (\$750). Applicant took out the credit card in November 2019 to pay living expenses. The debt went into default and was sold to a collection agency. Attached to her Answer, wherein she referenced having entered into a payment arrangement, Applicant provided an unlabeled webpage printout which references the original creditor, and an account number that matches one of the credit reports. The printout notes undated payments totaling \$100, with a remaining balance of \$650. The remainder of the debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 11-12; Item 3 at 51-53; Item 8 at 9; Item 10 at 7)

1.j. Collection Account, credit card (\$747). Applicant took out the credit card in November 2023. The debt went into default and was sold to a collection agency. Attached to her Answer, wherein she referenced having entered into a payment arrangement, Applicant provided an unlabeled webpage printout that references the same bank, but lists a debt amount that corresponds instead with the amount alleged in SOR ¶1.r. Applicant likewise included an unlabeled webpage printout in her responses to interrogatories that corresponds with the SOR ¶1.r. allegation. Both webpage printouts bear the same account number, which, when cross-referenced with supplied credit reports, bear a unique 16-digit credit card account number (ending in 8522) which aligns with the SOR ¶1.r. allegation. The debt alleged in this allegation, when cross-referenced with supplied credit reports, bears a unique 16-digit credit card account number (ending in 6217) which corresponds to the amount alleged here. There is therefore no evidence of a payment arrangement for this specific debt; and as such, the debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 13-14; Item 3 at 51-53; Item 4 at 30-31; Item 6 at 4)

1.k. Collection Account, credit card (\$602). Applicant took out the credit card in June 2022. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 6 at 4)

1.l. Collection Account, gas credit card (\$571). Applicant took out the credit card in December 2023. The debt went into default and was sold to a collection agency. Attached to her Answer, wherein she referenced having entered into a payment arrangement set to start in May 2025, Applicant provided an unlabeled webpage printout which references the original creditor and an account number that matches one of the credit reports. The printout notes an original balance of \$571 and a settlement offer of \$285, along with a proposed payment schedule, but no proof of payment was provided. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 25-26; Item 3 at 51-53; Item 6 at 4; Item 10 at 9)

1.m. Collection Account, credit card (\$548). Applicant took out the credit card in April 2022. The debt went into default and was sold to a collection agency. Per a recent credit report, the debt was paid in full for less-than-full balance in December 2024. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 5 at 2; Item 6 at 4)

1.n. Collection Account, credit card (\$546). Applicant took out the credit card in April 2023. The debt went into default and was sold to a collection agency. In her Answer, Applicant referenced a payment arrangement to settle the debt for \$219 that would be satisfied as of May 2025 – a copy of which was attached to her Answer. No proof of payment was provided, however, nor was any additional mitigation. The debt remains unpaid. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 19-20; Item 3 at 51-53; Item 5 at 2; Item 6 at 4)

1.o. Collection Account, credit card (\$511). Applicant took out the credit card in October 2023. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 5 at 2; Item 6 at 4-5)

1.p. Collection Account, credit card (\$468). Applicant took out the first credit card with this bank in March 2020 to pay off medical debt. It was then charged off in October 2021. Attached to her Answer, Applicant provided an unlabeled webpage printout which references the creditor and the original account balance of \$468. It also indicates \$318 paid to date, with the last payment having been made in September 2021 and the remaining balance as \$150. In addition, a recent credit report reflects a payment bringing the balance to \$44. The remainder of the debt, however, remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 7; Item 3 at 51-53; Item 6 at 5; Item 10 at 7)

1.q. Collection Account, credit card (\$452). Applicant took out the credit card in March 2022. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 6 at 5)

1.r. Collection Account, credit card (\$385). Applicant took out the credit card in June 2022. The debt went into default and was sold to a collection agency. Applicant denied this debt in her Answer, suggesting it was “a duplicate of one of the above.” While there are in fact three separate debts to this bank listed in the SOR (¶¶1.j, 1.q, and 1.r) all three are for different amounts. In addition, a cross-reference review of supplied credit reports shows three different accounts with three unique account numbers. Attached to her Answer, Applicant provided an unlabeled webpage printout which references the original creditor and an account number that matches one of the credit reports. The printout notes undated payments totaling \$192, with a remaining balance of \$192. Applicant also provided unlabeled webpage printouts in her responses to interrogatories showing previous payments in 2023 that brought the amount owed to \$385 from the original \$770 (listed in the supplied credit reports). The remainder of the debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire. (Answer at 13-14; Item 3 at 51-53; Item 4 at 30-31; Item 6 at 5; Item 7 at 11)

1.s. Collection Account, credit card (\$117). Applicant took out the credit card in October 2023. The debt went into default and was sold to a collection agency. Applicant denied this debt in her Answer, suggesting it was “a duplicate of one of the above.” While there are in fact three separate debts to banks in the same state listed in the SOR (¶¶1.i, 1.o, and 1.s) all three are for different amounts. In addition, a cross-reference review of supplied credit reports shows three different accounts with three unique account numbers. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire. (Answer at 11-12; Item 3 at 51-53; Item 6 at 3-5; Item 7 at 9)

1.t. Collection Account, medical debt (\$10). This debt arose in the course of Applicant’s receipt of physical therapy in 2022. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 6 at 5; Item 10 at 8)

1.u. Charged-Off Account, credit card (\$11,096). Applicant took out the credit card in September 2015 for everyday living expenses and, after becoming delinquent in 2018, was charged off in September 2023. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 3; Item 10 at 4)

1.v. Charged-Off Account, credit card (\$5,784). Applicant took out the credit card in September 2015 to pay bills. The debt went into default and was ultimately charged off. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 4; Item 10 at 4).

1.w. Charged-Off Account, credit card (\$4,137). Applicant took out the credit card in March 2016. The debt went into default and was ultimately charged off. Applicant denied this debt in her Answer, asserting she only had one credit card from this particular bank. While there are in fact two separate debts to this same bank (SOR ¶¶1.v. and 1.w) both are for different amounts. In addition, a cross-reference review of supplied credit reports shows two different accounts with two unique account numbers. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire. (Item 3 at 51-53; Item 7 at 4)

1.x. Collection Account, credit card (\$3,174). Applicant took out the credit card in November 2022 to pay off other credit cards. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 5; Item 10 at 5)

1.y. Charged-Off Account, credit card (\$2,549). Applicant took out the credit card in July 2012. The debt went into default and was ultimately charged off. Attached to her Answer, Applicant provided an unlabeled webpage printout referencing the creditor and the charged-off amount of \$2,549. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Answer at 6; Item 3 at 51-53; Item 7 at 5)

1.z. Collection Account, online lender (\$2,510). Applicant took out this online loan in February 2018 to pay medical debt. The debt went into default and was ultimately charged off. In her Answer Applicant avers that “payments are being made,” but there is no such evidence in the administrative record. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 6 at 6; Item 7 at 6; Item 10 at 5)

1.aa. Collection Account, credit card (\$2,310). Applicant denied this allegation and avers that she only had one credit card from this particular bank, reflected in SOR ¶1.y. Applicant previously admitted to a different debt with this bank (SOR ¶1.u). In addition, a review of the provided credit reports reveals that she received additional cards from this bank in 2011, 2012, 2014, and 2015 – all of which were charged off in 2018. The debt alleged in SOR ¶1.aa is a credit card issued by the same bank in 2018. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire. (Item 3 at 51-53; Item 7 at 6; Item 9 at 2; Item 10 at 5)

1.bb. Collection Account, credit card (\$2,130). Applicant took out this credit card in November 2018 to help pay off debt. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 6; Item 10 at 5)

1.cc. Collection Account, credit card (\$2,071). Applicant took out this credit card in December 2017. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 6)

1.dd. Collection Account, medical debt (\$2,025). This debt was assigned in January 2022, during the timeframe Applicant was receiving medical care. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose this delinquent debt in the Questionnaire and denied it in her Answer. (Answer at 4; Item 3 at 51-53; Item 7 at 7)

1.ee. Collection Account, student loan (\$1,919). Applicant took out this student loan for her master's degree in 2004/2005. The debt went into default and was sold to a collection agency. She asserted that she made payments toward the debt, but there is no supporting evidence in the administrative record. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 7; Item 9 at 3; Item 10 at 6)

1.ff. Collection Account, credit card (\$803). Applicant took out the credit card in April 2014. The debt was charged off in June 2018 and sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 8)

1.gg. Collection Account, mobile phone (\$793). Applicant had a cell phone from this provider from about 2017 to 2019. The debt went into default and was sold to a collection agency. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire, but admitted to it in her Answer. (Item 3 at 51-53; Item 7 at 8; Item 10 at 6)

1.hh. Collection Account, credit card (\$786). Applicant took out the credit card in March 2018. The debt went into default and was sold to a collection agency. Applicant denied this debt in her Answer, asserting it to be duplicative of the debt listed in SOR ¶1.x. The two alleged debts are for different amounts, however, and a cross-reference review of supplied credit reports shows two different accounts with two unique account numbers. The debt remains unpaid. No additional mitigation was provided. Applicant did not disclose the existence of this delinquent debt in the Questionnaire. (Item 3 at 51-53; Item 7 at 5 & 9)

Whole Person Evidence

Applicant notes having previously been granted an undated secret clearance sponsored by the Navy Bureau of Medicine and Surgery (BUMED). She worked for the last ten years as a part-time mental health therapist for military members. She blames her financial difficulties over the last ten years on periods of unemployment, exacerbated by health problems. No other matters in mitigation were provided. (Answer at 4; Item 3 at 37)

Policies

When evaluating an applicant's suitability for national security eligibility, the administrative judge must consider the adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines (AG) list potentially disqualifying conditions and mitigating conditions, which are to be used in evaluating an applicant's national security eligibility.

These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in AG ¶ 2 describing the adjudicative process. The administrative judge's overarching adjudicative goal is a fair, impartial, and commonsense decision. The entire process is a conscientious scrutiny of applicable guidelines in the context 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, "Any doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security." In reaching this decision, I have drawn only those conclusions that are reasonable, logical, and based on the evidence contained in the record. I have not drawn inferences based on mere speculation or conjecture.

Directive ¶ E3.1.14, requires the Government to 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, and has the ultimate burden of persuasion as to obtaining a favorable clearance 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 national security eligibility. Decisions include, by necessity, consideration of the possible risk the applicant may deliberately or inadvertently fail to protect or safeguard classified information.

Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified or sensitive information. Finally, as emphasized in Section 7 of Executive Order 10865, “Any determination under this order adverse to an applicant shall be a determination in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” See *also* Executive Order 12968, Section 3.1(b) (listing multiple prerequisites for access to classified or sensitive information.)

Analysis

SOR Paragraph 1, Guideline F (Financial Considerations)

The security concerns relating to the guideline for financial considerations are set out in AG ¶ 18, which reads in pertinent part:

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

The facts of this case establish the following potentially disqualifying conditions set forth in AG ¶ 19:

- (a) inability to satisfy debts;
- (b) unwillingness to satisfy debts regardless of the ability to do so;
- (c) a history of not meeting financial obligations; and
- (d) consistent spending beyond one's means or frivolous or irresponsible spending, which may be indicated by excessive indebtedness, significant negative cash flow, a history of late payments or of non-payment, or tother negative financial indicators.

The burden therefore shifts to Applicant to mitigate security concerns under Guideline F. The guideline includes the following three conditions in AG ¶ 20 that can mitigate security concerns arising from Applicant's financial history:

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

The record evidence fails to establish AG ¶ 20(a) or (b). The five credit reports in the administrative record show a decade of using credit cards and loans to pay for other credit cards and loans. One credit report alone showed 51 accounts in collection as recently as 2023. Of equal or greater concern, however, is the number of credit accounts for what strongly appear to be non-essentials, such as retail stores, department stores, clothing stores, and online shopping accounts. Assuming Applicant's assertions – without evidentiary support – that starting in 2016 she was using credit to pay for everyday expenses, these numerous, additional credit lines belie that narrative. Indeed, Applicant took out a \$10,000 loan back in 2015 to pay off other credit cards, so her history of spending beyond her means dates back earlier than 2016. These financial anomalies have not been long ago or infrequent and therefore cast doubt on the Applicant's current reliability, trustworthiness, and good judgment.

Applicant avers, without evidentiary support, that medical expenses in 2020 negatively affected her ability to service her debts. Assuming this to be true, a review of her credit reports also reveals a \$32,331 auto loan taken out in August of 2020, which again challenges the notion that she acted responsibly under the circumstances.

The record evidence does establish AG ¶ 20(d) as it pertains to SOR ¶¶ 1.d, 1.m., and 1.p as there is evidence of both the initiation of – and adherence to – good-faith efforts to repay overdue creditors. Applicant has made assertions of other good-faith initiations to repay certain other creditors, but there is insufficient evidence of these payments in the administrative record. (Item 5 at 3; Item 6 at 2, 6, 11-14; Item 7 at 14-18, 24-28; Item 9 at 3; Item 10 at 3)

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for national security eligibility 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 national security 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 above whole-person factors and the potentially disqualifying and mitigating conditions in light of all pertinent facts and circumstances surrounding this case. I have given the appropriate weight to Applicant's statement attached to her Answer, as well as the website printouts she provided showing some payment progress toward several of the alleged debts. Therefore, overall, the majority of the Guideline F issues in the record evidence leave me with questions and doubts as to Applicant's suitability for national security eligibility and a security clearance.

Formal Findings

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

Paragraph 1, Guideline F:	AGAINST APPLICANT
Subparagraphs 1.a through 1.c:	Against Applicant
Subparagraph 1.d:	For Applicant
Subparagraphs 1.e through 1.l:	Against Applicant
Subparagraph 1.m:	For Applicant
Subparagraphs 1.n through 1.o:	Against Applicant
Subparagraphs 1.p:	For Applicant
Subparagraphs 1.q through 1.cc:	Against Applicant
Subparagraph 1.dd:	For Applicant
Subparagraphs 1.ee. through 1. hh:	Against Applicant

Conclusion

In light of all of the circumstances presented by the record in this case, it is not clearly consistent with the national interest to grant Applicant national security eligibility. Eligibility for access to classified information is denied.

RICHARD A. CEFOLA
Administrative Judge