



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



In the matter of:)	
)	
)	ISCR Case No. 24-02148
)	
Applicant for Security Clearance)	

Appearances

For Government: Aubrey De Angelis, Esq., Department Counsel
For Applicant: *Pro se*

02/04/2026

Decision

DORSEY, Benjamin R., Administrative Judge:

Applicant mitigated the foreign influence security concerns. Eligibility for access to classified information is granted.

Statement of the Case

On February 3, 2025, the Department of Defense (DOD) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guideline B (foreign influence). Applicant responded to the SOR on February 11, 2025 (Answer) and requested a hearing before an administrative judge. The case was assigned to me on August 5, 2025, and was originally scheduled for hearing on October 6, 2025. The original hearing was cancelled and held in abeyance because of a federal government shutdown due to a lapse in federal funding from October 1, 2025 to November 12, 2025. After the shutdown ended, DOHA rescheduled the hearing on December 15, 2025.

The hearing was convened as rescheduled over the Microsoft Teams online network. Government Exhibits (GE) 1 through 3 were admitted in evidence without objection. On the Government’s motion, and, without objection, I took administrative notice of certain facts about the Kingdom of Jordan as of April 23, 2025, as contained in official U.S. Government documents (AN I). I marked the Government’s Exhibit List as Hearing Exhibit (HE) 1.

Applicant testified and provided documents that I entered in evidence as Applicant Exhibit (AE) A through AE C, without objection. At Applicant's request, I left the record open until January 7, 2026, for either party to provide post-hearing documentation. Applicant timely provided documents that I marked as AE D through AE F, and admitted in evidence, without objection.

Findings of Fact

Applicant is a 30-year-old naturalized U.S. Citizen who was born in Jordan. He has worked for a U.S. contractor since March 2023. He first resided in the United States in 2012. He went back to Jordan from 2012 until 2015, when he returned to reside in the U.S. He has not returned to Jordan since. That same year, he earned a high school diploma from a U.S. high school. In December 2022, he earned a bachelor's degree from a U.S. college. He has never married and has no children. He became a naturalized U.S. citizen in June 2019. At the time of the hearing, he held both U.S. and Jordanian citizenships. However, he provided a post-hearing document showing that he has at least attempted to renounce his Jordanian citizenship through the Jordanian Embassy. In this document, he swore, under oath, that he has made all relevant filings with Jordanian authorities and that his renunciation complied with all Jordanian laws. (Tr. 31-39, 44-47, 57-59; GE 1-3; AE A-D, F)

In the SOR, the Government alleged the following: Applicant's father is a citizen and resident of Jordan (SOR ¶ 1.a); his brother-in-law is a citizen of Jordan (SOR ¶ 1.b); his mother, brother, and sister, are citizens of the United States and Jordan (SOR ¶ 1.c); and he expects to inherit a portion of his father's Jordanian estate that is worth at least \$900,000 (SOR ¶ 1.d). In his Answer, Applicant admitted the SOR allegations with additional comments. His admissions are incorporated in my finds of fact. (Tr. 32-34 Answer; GE 1-3)

Applicant's father is a Jordanian citizen residing in Jordan. Along with the rest of his family, Applicant is estranged from his father and has not had contact with him since July 2022. He claimed that he wants nothing to do with his father or with his father's money because of his father's poor treatment of his mother. He claimed that his father stopped speaking to his mother in 2017, and he does not care for the way his father treated her. Applicant's father owns real property in Jordan, including a home valued at about \$900,000, and business properties with an unknown value. He is a professor at a university in Jordan, although Applicant believes he may be retired now. While his father has resided in the U.S. in the past, he is not a U.S. citizen. The last time he was in the U.S. was in 2016, when he came here for medical treatment after suffering a heart attack. Applicant claimed that he does not know what the terms of his father's will are with respect to inheritance, but he does not need or want his father's money. His understanding is that none of his family has contact with their father. While Applicant has sought financial assistance from his father before he became gainfully employed, his father has not provided him with any financial support since he moved to the U.S. (Tr. 32-37, 49-59, 77, 81, 84; Answer; GE 1-3; AE A, B, C)

Applicant's brother-in-law is a citizen of Jordan residing in the U.S. He is a doctor at a prestigious hospital in the U.S. Since 2014, he has been married to one of Applicant's sisters (Ms. H) who is a U.S. citizen residing in the U.S. She earned a master's degree from a U.S. university and worked in a pharmacy until she had children, when she became a homemaker. Applicant's brother-in-law has a green card and has resided in the U.S. since 2011. He will obtain his U.S. citizenship in 2026. He owns his home with Ms. H in the U.S. and their three children are U.S. citizens. (Tr. 59-68, 80; Answer; GE 1-3)

Applicant's mother is a dual U.S. and Jordanian citizen residing in the U.S. She first resided in the U.S. in the 1970's and had three children (two boys and a girl) in the U.S. with Applicant's father. Applicant's, mother, father and their three children returned to Jordan in the late 1980s. As their three children were born in the U.S., they were automatically granted U.S. citizenship. His mother became a U.S. citizen in 2008, and then sponsored her three Jordanian born children (including Applicant) to come to the U.S. Applicant's mother resides with Applicant's sister and his brother-in-law referenced in SOR ¶ 1.b. After living in both the U.S. and Jordan between 2008 and 2015, she has resided only in the U.S. since then. She owns no Jordanian property or assets. She has no contact with Applicant's father. (Tr. 35-38, 61-62, 64-66, 78; Answer; GE 1-3)

Applicant's brother (Mr. M) is a dual U.S. and Jordanian citizen residing in the U.S. Applicant has not spoken to Mr. M since August of this year. Mr. M has resided in the U.S. since 2013. He has a job in the U.S. He is not married and has no children. (Tr. 69-71; Answer; GE 1-3)

Applicant's brother (Mr. A) was born in the U.S., lived here until the late 1980s, when he moved back to Jordan with his parents, and then came back to reside in the U.S. in 2006. He is a doctor in the U.S. Applicant is estranged from Mr. A, and has not had contact with him since 2014. Applicant testified that Mr. A stopped talking to him, but he is not sure why. He believes that it may have something to do with their father. Applicant does not know much about Mr. A, but does know that he was married to a woman from Jordan, and they have at least one child who is a U.S. citizen. He believes that Mr. A resides with his family in the U.S. (Tr. 38, 71-73, 80; Answer; GE 1-3)

Applicant's sister (Ms. R) was born in the U.S., lived here until the late 1980s, when she moved back to Jordan with her parents, and then came back to reside in the U.S. in 2010 or 2011. She has lived in the U.S. since then. Applicant believes that Ms. R is a dentist or a pharmacist and works in the U.S. He is estranged from Ms. R and has not had contact with her since 2019. He said the estrangement arose from "personal problems." (Tr. 73-74; Answer; GE 1-3)

Applicant's brother (Mr. MO) was born in the U.S., lived here until the late 1980s, when he moved back to Jordan with his parents, and then came back to reside in the U.S. in 2007. As far as Applicant knows, Mr. MO has lived in the U.S. since then. He is married to a dual citizen of the U.S. and Jordan. Applicant thinks that Mr. MO worked at a hospital, but he is not sure because he has been estranged from him since 2018. Applicant testified that Mr. MO "stopped talking to him for no reason." (Tr. 75-77; Answer; GE 1-3)

Applicant does not know if his siblings travel to Jordan as they do not tell him whether or when they travel. He does not believe that his siblings own any Jordanian assets, but he is not certain of that because of his lack of contact with them. (Tr. 78-79)

Applicant's mother and father have extended family in Jordan, but he does not know them and has no contact with them. His grandparents have passed away. As a Jordanian male citizen, he could have been subject to mandatory military service, even while also holding U.S. citizenship. He could have applied for an exemption from this military service that he claimed is easy to obtain, but he did not do so because he lived in the U.S. and had no plan to go back to Jordan. None of his family have been a part of the Jordanian military. (Tr. 38-41, 47-49, 71; AN I)

Applicant has complied with his U.S. tax filing and tax payment obligations. He provided documentary evidence to this effect. He holds a valid U.S. passport that he obtained in 2019. He does not hold a valid Jordanian passport. He last obtained a Jordanian passport in 2015. He does not own any property in Jordan. He has a U.S.-based individual retirement account (IRA) with a balance of about \$27,000 that he opened when he started with his current employer in 2023. He holds a U.S. savings account with a balance of about \$28,000, and a U.S. checking account with a balance of about \$21,000. He earns a salary of about \$84,000 annually from his job in the U.S. He also owns a car in the U.S. He has never received any Jordanian benefits and has not exercised any right as a Jordanian citizen since moving to the U.S. (Tr. 32-34, 44, 79; GE; AE A, B)

Applicant provided character-reference letters from work colleagues. The authors write that he is trustworthy, hardworking, dependable, intelligent, compassionate, and adheres to security requirements. To the extent they opine, they believe that he should be granted security clearance eligibility, although it is unclear whether they are aware of the security concerns raised in the SOR. (AE A, C, E)

In AN 1, the Government included information from the U.S. Department of State and other Government Agencies about the United States' relations with the Kingdom of Jordan and the conditions in that country. I take administrative notice of the information included in those documents including, but not limited to:

The U.S. Department of State has issued travel advisories for Jordan, designating border areas with Syria and Iraq as "Do Not Travel" zones. It has designated the rest of Jordan as a Level 2: exercise increased caution due to terrorism.

The threat of terrorism from groups like ISIS and al-Qa'ida remains high, with these groups continuing to plot attacks against Western and local targets. Despite Jordan's status as a committed partner in counterterrorism, its geographic location and role in the Global Coalition to Defeat ISIS heighten its risk profile. Furthermore, U.S. citizens who also hold Jordanian citizenship may be subject to local laws, including compulsory military service. (AN 1)

There are significant human rights issues in Jordan. These include credible reports of torture, arbitrary arrest, and detention by government authorities. There are serious restrictions on freedoms of expression, media, and the internet, involving censorship and the prosecution of journalists. Other human rights issues involve substantial interference with the freedoms of assembly and association, the inability of citizens to change their government through free and fair elections, and widespread impunity for officials who commit human rights abuses. (AN 1)

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

The security concern for foreign influence is set out in AG ¶ 6:

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.

The guideline notes several conditions that could raise security concerns under AG ¶ 7. The following are potentially applicable 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;

(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; and

(f) substantial business, financial, or property interests in a foreign country, or in any foreign owned or foreign-operated business that could subject the individual to a heightened risk of foreign influence or exploitation or personal conflict of interest.

The nature of a nation's government, including its level of control, 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 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). The administratively noticed country conditions in Jordan, such as terrorism, and its poor human-rights record, raise the security concerns to the level of a heightened risk.

Applicant's father is a citizen and resident of Jordan. His mother and five siblings, and his brother-in-law are also citizens of Jordan. While he does not own Jordanian property, he has a prospective inheritance interest in Jordanian property that is worth at least \$900,000. Applicant's connection to his Jordanian family members presents a heightened risk of foreign exploitation and a potential conflict of interest. As a matter of common sense and human experience there is a rebuttable presumption that a person has ties of affection for, or obligation to, their immediate family members and longstanding friends. Application of the AG is not a comment on an applicant's patriotism but merely an acknowledgment that people may act in unpredictable ways when faced with choices that could be important to a loved one, such as a family member. (ISCR Case No. 08-10025 at 4 (App. Bd. Nov. 3, 2009). AG ¶¶ 7(a), 7(b), and 7(f) apply.

Conditions that could mitigate foreign influence security concerns are provided under AG ¶ 8. The following are potentially applicable:

(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 United States;

(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;

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

(f) the value or routine nature of the foreign business, financial, or property interests is such that they are unlikely to result in a conflict and could not be used effectively to influence, manipulate, or pressure the individual.

Applicant has made a life for himself in the U.S. He moved here in 2015 and has not been back to Jordan. He was educated here, works here, and has significantly stocked bank accounts and an IRA here. He became a U.S. citizen. While it is unclear whether he has officially renounced his Jordanian citizenship, the evidence shows that he has evinced his desire to do so to the Jordanian Government, and he believes he has complied with all renunciation requirements. This renunciation ends the possibility that he would be required to serve in the Jordanian military; an event already unlikely as he has not traveled to Jordan in over ten years and does not plan to do so. It also evidences his commitment and loyalty to the U.S. and positively impacts his mitigative evidence among all the aforementioned mitigating conditions.

Except for Applicant's father, his family members are either U.S. citizens residing in the U.S. or, in the case of his brother-in-law, a green card holder residing in the U.S. Their U.S. citizenship and residency, along with Jordan's status as a counterterrorism partner and ally in the Middle East, diminish the likelihood that he will be placed in the position of having to choose between the interests of a foreign individual, group, organization, or government and the interests of the United States.

Applicant has not had contact with his father for about three and one-half years. While it is unclear exactly what the cause of the rift is, it appears to have hardened, spread among the family, and broken the filial bond. Given Applicant's ties to the U.S. and the infrequent (actually, nonexistent) contact with his father, there is little likelihood that this relationship could create a risk for foreign influence or exploitation, and Applicant can be expected to resolve any conflict of interest in favor of the U.S. interest.

Applicant owns no foreign property. He only holds property in the U.S. He has a prospective inheritance interest in his father's estate upon his passing, but, given the fractious relationship between him, his father, and the rest of his family, his realization of this interest is far from certain. Moreover, as we are dealing in hypotheticals, if he is a beneficiary of his father's estate, the most likely scenario is that he will have a one-seventh stake (among his mother and his siblings) in about \$900,000, that we know about. While not insignificant, this amount approximates the value of his property (bank accounts and IRA) in the U.S. Given these considerations, I find that his father's Jordanian property is unlikely to result in a conflict and could not be used effectively to influence, manipulate, or pressure Applicant. All of the aforementioned mitigating factors apply.

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for a security clearance by considering the totality of the applicant's conduct and all 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 Guideline B in my whole-person analysis. I have considered his positive character references. I conclude that Applicant mitigated the foreign influence security concerns.

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:	FOR APPLICANT
Subparagraphs 1.a-1.d:	For Applicant

Conclusion

It is clearly consistent with the national interest to grant Applicant eligibility for a security clearance. Eligibility for access to classified information is granted.

Benjamin R. Dorsey
Administrative Judge