



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



In the matter of:)	
)	
)	ISCR Case No. 25-00589
)	
Applicant for Security Clearance)	

Appearances

For Government: Andrew H. Henderson, Esq., Department Counsel
For Applicant: *Pro se*

03/05/2026

Decision

GLENDON, John Bayard, Administrative Judge:

Applicant did not mitigate the financial considerations security concerns. Eligibility for access to classified information is denied.

Statement of the Case

On June 12, 2024, Applicant submitted a Questionnaire for National Security Positions (Questionnaire). On May 9, 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 DCSA acted under Executive Order (EO) 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) implemented by the DOD on June 8, 2017.

In Applicant's May 18, 2025 response to the SOR (Answer), she admitted, with explanations, 12 of the 22 allegations under the SOR and denied the remaining ten allegations, also with explanations. She also submitted a written statement with the

Answer, but she did not provide any documentary evidence. She requested a hearing before a Defense Office of Hearings and Appeals (DOHA) administrative judge.

On June 16, 2025, the Government was ready to proceed to a hearing. I was assigned this case on June 30, 2025. DOHA issued a notice on July 21, 2025, scheduling the hearing for September 3, 2025, by video teleconference. The hearing proceeded as scheduled. The Government proffered six evidentiary exhibits identified as Government Exhibits (GE) 1 through 6. GE 3 is a Report of Investigation summarizing Applicant's security background interview, which was conducted on July 15, 2024. Applicant provided corrections to the exhibit and did not object to its admissibility, as corrected. Applicant testified, but she did not offer any documentary evidence. At her request, I left the record open until October 1, 2025, to provide her an opportunity to supplement the evidentiary record. Applicant timely submitted two documents, which I have marked as Applicant Exhibit (AE) A and B. Both exhibits are admitted into the record without objection. DOHA received the hearing transcript (Tr.) on September 10, 2025. The record closed on October 1, 2025. (Tr. at 13-18, 68-69.)

Findings of Fact

Applicant is 55 years old. She married at an early age and had her first child about a year later. She did not finish high school at that time. She and her husband had four more children. They divorced in 2009 with Applicant having custody of the children. The children are now over 30 years old. She went back to school and received a high school diploma, and in 2014, she earned an associate degree. Starting in 2014, Applicant worked for the next ten years as a school bus driver. Her job was only parttime and her pay was low. She has had financial issues for many years. She did not work during the COVID-19 Pandemic because the schools were closed. Applicant's most serious financial problems continued until May 2024, when she was hired by a DoD contractor in a full-time position in the transportation field. Her employer is her sponsor for a security clearance. She testified that this position has given her the opportunity to work towards her financial goal of resolving her debts. She believes that her financial situation is presently stable. (Tr. at 19-22; GE 1 at 5, 9-10, 14; GE 2 at 14, 15.)

SOR Allegations

The SOR sets forth 21 allegations of delinquent debts and one allegation about a Chapter 13 bankruptcy discharge. In her Answer, Applicant admitted 12 of the allegations. My findings regarding the admitted allegations will be discussed first.

SOR ¶ 1.a. Auto Loan – Repossession with Balance Due of \$17,606. In 2017, Applicant co-signed a vehicle purchase note with one of her daughters. The daughter defaulted on the note in 2019, and Applicant could not continue the payments to avoid the repossession of the vehicle. As of the hearing date, neither Applicant nor her daughter have any plans to repay the balance due on the loan. The debt remains on Applicant's recent credit report (AE B). (Answer at 1; Tr. at 26-29; GE 4 at 8; GE 5 at 1; AE A at 1; AE B at 4.)

SOR ¶ 1.b. Auto Loan – Repossession with Balance Due of \$8,670. Applicant had signed a note to purchase a vehicle. Applicant testified that in 2017, she was injured and was not able to work. She attempted to renegotiate the monthly payments so that she could afford to keep the vehicle but was unsuccessful. She defaulted on the loan, and the vehicle was repossessed. Applicant disputed the amount of the debt alleged in the SOR because it was higher than she believed was owed. She has no plans to pay the balance due on this loan. In her post-hearing submission, she asserted that she disputed the debt due to inaccuracies with an unstated entity and noted that the debt was no longer on her recent credit report (AE B). The debt also does not appear on the Government's most recent credit report in the record, dated April 24, 2025 (GE 5), though it is listed on the Government's July 2, 2024 credit report in the record (GE 4). Applicant provided no evidence to support her claim that there was any inaccuracy in the Government's credit report. This debt is unresolved. (Answer at 1; Tr. at 29-30; GE 4 at 2; GE 5; AE A at 1; AE B.)

SOR ¶ 1.d. Student Loan - \$3,384. Applicant testified that she has contacted the company servicing this student loan. She noted in her post-hearing submission (AE A) that this contact was in March 2025, which was prior to the issuance of the SOR. She testified that she believed the loan was in deferment. The service company responded and asked for documentation. Applicant has not received any final information as to whether the loan is in deferment or pay status. She intends to begin paying this loan if advised that the loan is no longer in deferment. She expects to receive a payment plan if that is the case. The student loan is listed in GE 4 with a note that the loan is past due. However, that information is dated, and the loan is not listed in the Government's most recent credit report in the record (GE 5). The loan is listed on Applicant's credit report, AE B, with a note that the loan was paid. The Government did not establish that the Applicant is presently delinquent on this debt. (Answer at 1; Tr. at 33-34; GE 4 at 9; GE 5; AE A at 1; AE B at 10.)

SOR ¶ 1.e. Charged-Off, Credit-Card Account - \$3,377. At the hearing, Applicant claimed that she sent a letter to the creditor in June 2025 disputing the amount of the debt and seeking a resolution of it. Her son has some experience with this process and has advised her how to dispute a debt. She has not heard further from the creditor. The debt is not listed on the Government's most recent credit report, dated April 24, 2025, (GE 5), which preceded Applicant's dispute letter. Her more recent credit report in the record does not list this debt either. Applicant has not established that this debt has been fully resolved through a dispute, especially since her dispute was limited to a disagreement regarding the amount of the debt, not its validity. This debt is unresolved. (Answer at 1-2; Tr. at 34-36; GE 3 at 3; GE 4 at 9; GE 5; AE A at 1; AE B.)

SOR ¶ 1.h. Charged-Off, Credit-Card Account - \$1,656. Applicant defaulted on the payments of this credit-card account during the COVID-19 Pandemic when she was not working. This debt is unresolved. (Answer at 2; Tr. at 40-41; GE 2 at 5; GE 3 at 3; GE 4 at 3; GE 5 at 9; AE A at 1; AE B at 8-9.)

SOR ¶ 1.m. Student Loan - \$1,106. Applicant admits this allegation about a student loan debt but denies that it is in default. She believes that it is in deferment. She has contacted the service company and is seeking a payment plan. The student loan is not listed on the Government's most recent credit report (GE 5) or Applicant's more recent credit report, AE B. As with SOR ¶ 1.d, the Government did not establish that the Applicant is presently delinquent on this debt. (Answer at 3; Tr. at 44; GE 2 at 7; GE 3 at 4; GE 4 at 4; GE 5; AE A at 2; AE B.)

SOR ¶ 1.n. Charged-Off, Credit-Card Account - \$1,051. Applicant defaulted on this debt during the COVID-19 Pandemic. She has disputed the amount of the debt and is awaiting a response from the creditor. Applicant has no current plan to pay this debt. This debt is unresolved. (Answer at 3; Tr. at 44; GE 3 at 4; GE 4 at 5; GE 5 at 9-10; AE A 2; AE B at 6.)

SOR ¶ 1.o. Charged-Off, Store Credit-Card Account - \$987. Applicant has disputed the amount of the debt and is awaiting a response from the creditor. Applicant has no current plan to pay this debt. This debt is unresolved. (Answer at 3; Tr. at 44-45; GE 2 at 7; GE 3 at 4; GE 4 at 5; AE A at 2; AE B at 4.)

SOR ¶ 1.r. Charged-Off, Credit-Card Account - \$639. In her Answer, Applicant explained that this debt arose during a difficult time in her life following the death of her mother in 2017. She took a leave of absence from her job and the resulting loss of income adversely affected her finances, which included defaulting on this credit card. At the hearing, she explained that she incurred this debt to buy new tires for her vehicle. She claimed that she had sent the creditor a letter disputing this debt but had not heard back. She did not explain whether she disputed the validity of the debt or the amount of the debt. The debt does not appear on either the Government's most recent credit report or Applicant's more recent report. This debt is unresolved. (Answer at 4; Tr. at 49-50; GE 2 at 8; GE 3 at 4; GE 4 at 6; GE 5; AE A at 2-3; AE B.)

SOR ¶ 1.t. Charged-Off, Credit-Card Account - \$518. Applicant admitted this debt. In her Answer, she explained that she defaulted on this debt when she was unemployed during the COVID-19 Pandemic. She did not provide any information about a plan to pay this debt. It appears on Applicant's most recent credit report, AE B, as unpaid. This debt is unresolved. (Answer at 4; Tr. at 51-52; GE 3 at 4; GE 4 at 6; AE A at 3; AE B at 5-6.)

SOR ¶ 1.u. Collection Account - \$281. In her Answer, Applicant explained that she defaulted on this credit-card account during her unemployment due to the COVID-19 Pandemic. She has written to the creditor but has not explained what further steps she has taken to resolve this delinquent account. In her post-hearing submission, she claimed that this account was now "in good standing." Her most recent credit report does not list this debt. This debt is unresolved. (Answer at 5; Tr. at 53; GE 2 at 9; GE 4 at 6; AE A at 3; AE B at X.)

SOR ¶ 1.v. Chapter 13 Bankruptcy Proceeding – Filed February 12, 1998, Discharged September 24, 2001. Applicant explained in her Answer that she filed this bankruptcy petition with her then-husband before they divorced. She was 28 years old at the time of the filing. She and her husband experienced financial hardship because she was laid off from her job and was unable to find adequate day care for her children. She wrote that since this experience, she has worked diligently to rebuild her financial position. She commented further that she understands “the importance of sound financial management in connection with holding a security clearance.” She maintains that her financial problems in 1998 were “the result of an extraordinary period of hardship” and that she has “taken deliberate steps to address the issue and move forward with integrity.”

Under the terms of their Chapter 13 bankruptcy plan, they resolved their debts with monthly payments over about three years and the bankruptcy proceeding concluded in 2001. The bankruptcy resolved all of Applicant and her former husband’s debts at that time. This allegation is resolved favorably. (Answer at 5; Tr. at 53-54; GE 6 at 1-2.)

In her Answer, Applicant denied ten delinquent-debt SOR allegations. My findings regarding the denied allegations are as follows:

SOR ¶ 1.c. Medical Debt in Collection - \$4,388. Applicant’s delinquent medical account was referred to a collection agency. She disputes this debt claiming that she never received the medical services in question. At the hearing, she testified that she is not familiar with that medical debt. She said that she filed a formal dispute in May 2025, but has not heard anything further. She comments that the debt did not appear on her September 2025 credit report, however, the debt also does not appear on the Government’s April 2025 report, which predated her dispute letter. This suggests that the debt dropped off her credit report for reasons other than her dispute letter, such as the age of the debt. This debt is unresolved. (Answer at 1; Tr. at 30-32; GE 3 at 2; GE 4 at 2; GE 5; AE A at 1; AE B.)

SOR ¶ 1.f. Collection Account - \$2,146. Applicant’s delinquent account was referred to a collection agency. At the hearing, she disputed this debt claiming that she never had an account with this collection agency. In her post-hearing submission, she asserted she sent “letters” to the collection agency, and the debt no longer appears on her recent credit report. Applicant provided no information about the basis for her dispute of this debt and provided no documentation to support her claims. This debt is unresolved. (Answer at 2; Tr. at 36-39; GE 5 at 8; AE A at 1; AE B.)

SOR ¶ 1.g. Collection Account - \$1,931. Applicant’s delinquent account was referred to a collection agency. At the hearing, she disputed this debt claiming that she never had an account with this collection agency. She made no similar claim with respect to the original creditor, a lending institution. She testified that she wrote a letter seeking a payment plan, but she has not received a response. After the hearing, she noted that the debt did not appear on her recent credit report. She offered no additional information regarding a payment plan. This debt is unresolved. (Answer at 2; Tr. at 39-40; GE 5 at 7; AE A at 1; AE B.)

SOR ¶ 1.i. Collection Account - \$1,323. Applicant's delinquent account was referred to a collection agency. At the hearing, she disputed this debt claiming that she never had an account with this collection agency. She made no similar claim with respect to the original creditor, a woman's clothing store's financing bank. She sent a dispute letter to the collection agency but has not heard further. This debt is unresolved. (Answer at 2; Tr. at 41-42; GE 4 at 3; GE 5 at 8; AE A at 2; AE B at 3.)

SOR ¶ 1.j. Collection Account - \$1,200. Applicant's delinquent account was referred to a collection agency. At the hearing, she disputed this debt claiming that she never had an account with this collection agency. She made no similar claim with respect to the original creditor, a bank. She sent a dispute letter to the collection agency. She asserts that the matter is "pending investigation." This debt is unresolved. (Answer at 2; Tr. at 42-43; GE 4 at 4; GE 5 at 8; AE A at 2; AE B at 3.)

SOR ¶ 1.k. Collection Account - \$1,190. Applicant's delinquent account was referred to a collection agency. At the hearing, she disputed this debt claiming that she never had an account with this collection agency. She made no similar claim with respect to the original creditor, a bank. She sent a dispute letter to the collection agency but has not heard further. This debt is unresolved. (Answer at 3; Tr. at 42-43; GE 5 at 7; AE A at 2; AE B at 9.)

SOR ¶ 1.l. Charged-Off Loan Account - \$1,190. Applicant's delinquent account was charged off by the lender. She disputes this debt claiming that she never had an account with this creditor. She stated that she sent a dispute letter to the creditor. However, she provided no additional information including any information regarding the nature of her dispute. This debt is unresolved. (Answer at 3; Tr. at 43-44; GE 4 at 4; GE 5 at 7; AE A at 2; AE B at 7.)

SOR ¶ 1.p. Collection Account - \$735. Applicant's delinquent credit card account was referred to a collection agency. She disputes this debt claiming that she never had an account with this creditor. At the hearing, Applicant admitted this debt. She said that she has disputed the amount of the debt and is awaiting a response from the creditor. Applicant has no current plan to pay this debt. This debt is unresolved. (Answer at 4; Tr. at 45-46; GE 4 at 5; AE A at 2; AE B at 7.)

SOR ¶ 1.q. Collection Account - \$731. Applicant's delinquent account was referred to a collection agency. She disputes this debt claiming that she never had an account with this creditor. She sent a dispute letter to the collection agency and is waiting for a response. She has no current plan to repay this debt. This debt is unresolved. (Answer at 4; Tr. at 46-49; GE 4 at 6; AE A at 2; AE B.)

SOR ¶ 1.s. Collection Account - \$533. Applicant's delinquent car insurance account was referred to a collection agency. She obtained new car insurance and then canceled her old insurance believing that she did not owe the insurer any money. She stated she believes she may have been mistaken. She disputes that she owes the creditor

anything. She sent the collection agency a dispute letter and is waiting for a response. She does not intend to pay this debt. This debt is unresolved. (Answer at 4; Tr. at 50-51; GE 5 at 8-9; AE A at 3; AE B at 3.)

Mitigation and Whole-Person Evidence

Applicant explained at the hearing that when she began working for her current employer, she was unsure if her employment would continue after six months. She knew that she had to receive a security clearance to continue. After a period, she learned how to dispute debts that she believed were not hers and to dispute debts that were listed for amounts she felt were inaccurate. She wrote letters to her creditors in an effort to begin to resolve the debts that were not hers or were for inaccurate amounts, and to enter into payment plans on the debts she believed she owed. As of the date of the hearing and the close of the record, she had not heard further from most of the creditors. (Tr. at 57-58.)

Applicant has two private student loans (SOR ¶¶ 1.d and 1.m), and several others being managed by the U.S. Government. At the time of the hearing, she was making monthly payments on all of her student loans through automatic withdrawals from her bank account. (Tr. at 56-57.)

Applicant testified that with her new and better-paying employment, she has up to \$1,000 extra each month to pay her debts. She has caught up on her ongoing bills and those accounts are current. She has extra money every month to pay any unusual expenses. She has owned her home, a mobile home, since 1987, when she was 17 (she married at age 15) and raised her five children in that home. She was awarded the home in her 2009 divorce. The land and the home are fully paid. (Tr at 26, 59-61; GE 1 at 5, 7, 14.)

At the hearing, Applicant also provided some history of her financial problems and subsequent years. She said that she started to experience financial difficulties in 2009, apart from her 1998 Chapter 13 Bankruptcy. She lost a factory job in 2009, after the company relocated to Mexico. Applicant then earned her high school diploma and an associate degree. She has taken courses towards a bachelor's degree but stopped in 2018, short of earning that degree. She worked for years in a low-paying job. In her current job, she is paid more money than she has ever earned in the past. Applicant now wants to pay off her older, unpaid debts. Her daughters have told her they will provide her with funds to help her resolve her debts. She commented at the hearing that it is hard to know how to start to improve her credit history. (Tr. at 61-62, 66.)

The debts alleged in the SOR total more than \$50,000. Applicant has not sought financial counseling. Also, she has not prepared a current budget for submission into the record or provided a plan regarding what steps she was going to take to resolve the debts she agrees she owes. (Tr. at 26.)

Policies

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(a), the entire process is a conscientious scrutiny of a number of variables known as the "whole-person concept." The administrative judge must consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a decision.

The protection of the national security is the paramount consideration. AG ¶ 2(b) requires that "[a]ny doubt concerning personnel being considered for 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 sensitive 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 sensitive information. Decisions include, by necessity, consideration of the possible risk the applicant may deliberately or inadvertently fail to safeguard sensitive information. Such decisions entail a certain degree of legally permissible extrapolation of potential, rather than actual, risk of compromise of sensitive 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 F: Financial Considerations

The security concern for financial considerations is set out in AG ¶ 18:

Failure to live within one's means, satisfy debts, and meet financial obligations may indicate poor self-control, lack of judgment, or unwillingness to abide by rules and regulations, all of which can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information. 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 guideline notes several conditions that could raise security concerns under AG ¶ 19. The following are potentially applicable in this case:

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

The Government established both of the above potentially disqualifying conditions. As a result, the burden shifts to Applicant to provide evidence in mitigation of the security concerns raised by the record evidence. Conditions that could mitigate the financial considerations security concerns are provided under AG ¶ 20. The following are potentially applicable in this case:

- (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, a death, divorce, or separation, clear victimization by predatory lending practices, or identity theft), and the individual acted responsibly under the circumstances;
- (c) the individual has received or is receiving financial counseling for the problem from a legitimate and credible source, such as a non-profit credit counseling service, and there are clear indications that the problem is being resolved or is under control;
- (d) the individual has initiated and is adhering to a good-faith effort to repay overdue creditors or otherwise resolve debts; and
- (e) the individual has a reasonable basis to dispute the legitimacy of the past-due debt which is the cause of the problem and provides documented proof to substantiate the basis of the dispute or provides evidence of actions to resolve the issue.

Applicant bears the burdens of production and persuasion in mitigation. An applicant is not held to a standard of perfection in his debt-resolution efforts or required to be debt-free. “Rather, all that is required is that an applicant act responsibly given his circumstances and develop a reasonable plan for repayment, accompanied by ‘concomitant conduct,’ that is, actions which evidence a serious intent to effectuate the plan.” ISCR Case No. 15-02903 at 3 (App. Bd. Mar. 9, 2017). See *also* ISCR Case No. 13-00987 at 3, n. 5 (App. Bd. Aug. 14, 2014).

Applicant credibly testified that she experienced financial hardships due to periods of unemployment and underemployment. However, her evidence in mitigation failed to establish any of the above mitigating conditions. Her debts are current and have been incurred frequently over a number of years. Her history of financial difficulties and delinquencies cast doubt on her current reliability, trustworthiness, and good judgment. Even if Applicant clearly established that most of her delinquent debts were incurred due to circumstances beyond her control, she failed to act responsibly by taking steps to address and resolve her debts other than to write letters disputing debts. Applicant has not sought financial counseling resulting in indications that her financial problems are being resolved. There is no evidence that she is adhering to a good-faith effort to repay overdue creditors or otherwise resolve her debts.

Lastly, Applicant has disputed a number of the debts alleged in the SOR. However, she has not shown that she has a reasonable basis to dispute those debts, and she has not provided documented proof to establish the basis of her disputes or evidence of actions taken to resolve the disputes. More generally, it is well established that an applicant’s reliance on credit report disputes and the removal of debts from a report is not meaningful evidence of dispute resolution. See, *e.g.*, ISCR Case No. 22-00056 at 2 (App. Bd. Jun. 15, 2023).

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant’s eligibility for a position of trust 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 have incorporated my comments under Guideline F and the factors in AG ¶ 2(d) in this whole-person analysis.

I am impressed by Applicant's recovery and hard work from many adverse circumstances in her life, starting with her marriage and pregnancy as a minor. She has also faced the loss of her mother, low paying jobs, and unemployment. Despite all of that, she finished her high school education, earned an associate degree, and completed courses towards a bachelor's degree. She owns her home without a mortgage. However, her difficult employment history and periods of unemployment, most recently during the COVID-19 Pandemic, has hurt her financial record. She has not yet recovered from that period of unemployment. She has been unable to provide sufficient evidence to mitigate the security concerns raised by her extremely large number of debts and the substantial total amount of her indebtedness. Overall, the record evidence leaves 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 section 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.u:	Against Applicant
Subparagraph 1.v:	For 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.

JOHN BAYARD GLENDON
Administrative Judge