



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



In the matter of:

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ISCR Case No. 24-02273

Applicant for Security Clearance

Appearances

For Government: Aubrey De Angelis, Esq., Department Counsel

For Applicant: *Pro se*

02/26/2026

Decision

HARVEY, Mark, Administrative Judge:

Guideline F (financial considerations) security concerns are not mitigated. Eligibility for access to classified information is denied.

Statement of the Case

On February 15, 2024, Applicant signed an Electronic Questionnaires for Investigations Processing. (Government Exhibit (GE) 1) On January 30, 2025, the Defense Counterintelligence and Security Agency (DCSA) issued a statement of reasons (SOR) to Applicant under Executive Order (Exec. Or.) 10865, *Safeguarding Classified Information within Industry* (February 20, 1960); Department of Defense (DOD) Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (Directive) (January 2, 1992), as amended; and Security Executive Agent Directive 4, establishing in Appendix A, the *National Security Adjudicative Guidelines for Determining Eligibility for Access to Classified Information or Eligibility to Hold a Sensitive Position* (AGs), effective June 8, 2017. (Hearing Exhibit (HE) 2)

The SOR detailed reasons why the DCSA did not find under the Directive that it is clearly consistent with the interests of national security to grant or continue a security clearance for Applicant and recommended referral to an administrative judge to determine whether a clearance should be granted, continued, denied, or revoked. Specifically, the

SOR set forth security concerns arising under Guideline F. (HE 2) On February 20, 2025, Applicant provided his response to the SOR. On April 29, 2025, the Defense Office of Hearings and Appeals issued an amended SOR changing the caption from an ADP case to an ISCR case. On April 30, 2025, Department Counsel was ready to proceed. On August 14, 2025, the case was assigned to me.

On August 29, 2025, the Defense Office of Hearings and Appeals (DOHA) issued a notice scheduling the hearing on October 3, 2025. (HE 1) This decision was delayed when all administrative judges were furloughed from October 1 through November 12, 2025, during a federal government shutdown due to a lapse in federal funding. On November 19, 2025, DOHA issued a notice scheduling the hearing on December 12, 2025. (HE 1) The hearing was held as rescheduled using the Microsoft Teams video teleconference system.

During the hearing, Department Counsel offered six exhibits into evidence, Applicant did not provide any exhibits; there were no objections; and all proffered exhibits were admitted into evidence without objection. (Tr. 18-19; GE 1-GE 6) On December 19, 2025, DOHA received a copy of the transcript. The record was held open after the hearing until February 10, 2026. (Tr. 51, 58) No post-hearing documents were received.

Some details were excluded to protect Applicant's right to privacy. Specific information is available in the cited exhibits and transcript.

Findings of Fact

In Applicant's SOR response, he admitted the allegations in SOR ¶¶ 1.a through 1.i. (HE 3) He also provided extenuating and mitigating information. (HE 3) His admissions are accepted as findings of fact.

Applicant is a 39-year-old flight-equipment technician, who specializes in aircraft and explosives, and he has worked for his current employer for about two years. (Tr. 6-10) His current salary is \$48 an hour. (Tr. 20) In 2006, he graduated from high school. (Tr. 6) He has about three years of college; however, he has not received a degree. (Tr. 7) He has certifications in welding, fiber optics, heating, air conditioning, and refrigeration (HVAC). (Tr. 7) He is working on his electrical-journeyman license. (Tr. 7)

Applicant served in the Marine Corps from 2006 to 2011; his Marine Corps specialty was flight-equipment technician; he received an honorable discharge; and he was promoted to sergeant when he was on terminal leave. (Tr. 10; GE 1) He was deployed to Korea, and he received a Naval Aviation Maintenance Award. (Tr. 51-52) For about three years, he has been receiving about \$4,300 monthly from the Department of Veterans Affairs (VA) for service-connected disability. (Tr. 21; 52) He was married from 2005 to 2011, and he married his current spouse in 2013. (Tr. 11) His children with his first wife are ages 17 and 21, and his child with his current wife is 10. (Tr. 11) He is current on his child-support responsibilities. (Tr. 12)

Financial Considerations¹

Applicant said his delinquent debts in SOR ¶¶ 1.c through 1.i were due to his loss of employment in September of 2019, and the limited employment available during the COVID-19 pandemic. (HE 3) In 2019, he purchased a house, and it needed substantial repairs. (Tr. 38) Around September 2020, his spouse became very ill from complications from her Type 1 Diabetes diagnosis. She was in a coma for two weeks and suffered severe nerve damage. She was an inpatient for three months, and then she was in a recovery unit for about four months. (Tr. 25) She is totally disabled and unable to work outside their home. (Tr. 21-23) He pays about \$400 monthly for medical insurance, copays, and deductibles. (Tr. 24) He has taken some unpaid leave for his own medical issues. (Tr. 55) On February 12, 2025, a credit repair company wrote that they were assisting Applicant with most of the SOR debts. (HE 3) He is paying \$100 monthly to the credit repair company. (Tr. 48; SOR response) Credit repair companies provide credit counseling and budgeting information to their clients.

Applicant was unemployed from about September 2019 through February 2021, and reemployment was difficult during the COVID-19 pandemic. (Tr. 26-27, 31) He had some part-time employments during 2019 to 2021. (HE 3) His total annual income for his current employment and VA disability is about \$150,000. (Tr. 56)

Applicant's credit bureau reports (CBRs) state, and the SOR alleges he has a total of nine debts in collection or charged off, and they total \$56,880. (GE 3-5)

The SOR alleges seven of nine total debts were charged-off, and the seven charged-off debts total \$48,329 as follows:

1.a is a bank debt for about \$11,229. Applicant borrowed funds to purchase a truck. The truck needed repairs, and he left the truck with a mechanic for four months before he tried to obtain it. The mechanic said the truck was stolen. Applicant filed a police report about the theft; however, no one was prosecuted. (Tr. 29-30) He allowed his vehicle insurance to lapse while the truck was being repaired. He informed the creditor with a lien on his vehicle of the theft. (Tr. 30) His last payment was in September of 2018. (Tr. 27) He plans to sue the mechanic for negligence. (Tr. 27) He did not describe any payment plans or payments to address this debt.

1.b is a credit union debt for about \$9,174. Applicant was unable to afford the payments on his vehicle loan due to his unemployment in 2020 because of the COVID-19 pandemic. (Tr. 31) The creditor repossessed the vehicle in November 2020. (Tr. 31-32) The creditor wanted \$3,000, and payments to return the vehicle to Applicant. Applicant believed the creditor was unreasonable to be demanding such a large initial payment. He said the creditor would have to sue him if the creditor wanted to be paid. (Tr. 31-32) He did not describe any payment plans or payments to address this debt.

¹ Unless indicated otherwise, the information in this section is from Applicant's SOR response. (HE 3)

1.c is a bank debt for about \$8,021. Applicant used the account to purchase items for his residence. (Tr. 32) His last payment was in November 2020. (Tr. 32) He contacted the creditor about one year ago, and he believed he could settle the debt for about \$5,000. (Tr. 32) He did not describe any payment plans or payments to address this debt.

1.d is a credit card debt for about \$7,654. On February 12, 2025, the creditor offered to settle the debt for \$1,530 with monthly payments of \$255 from February 2025 to July of 2025. (HE 3) Applicant said he paid this debt. (Tr. 33-34, 49) He said he settled the debt because he wanted to improve his credit score. (Tr. 34) He is credited with mitigating this debt.

1.e is a bank debt for about \$5,682. Applicant's most recent payment was around July of 2019. (Tr. 35) He did not remember why he stopped making payments. (Tr. 35) He has discussed resolution of the debt with the creditor. (Tr. 35) He did not describe any payment plans or payments to address this debt.

1.g is a credit card debt for about \$3,535. On February 12, 2025, the creditor offered to settle the debt for \$707. (HE 3) Applicant said he paid this debt, and his CBR reflects that this debt is paid. (Tr. 34; GE 5 at 17-18) He is credited with mitigation of this debt.

1.i is a bank debt for about \$3,034. Applicant did not describe any payment plans or payments to address this debt.

The SOR alleges two of the nine total accounts were placed for collection, and they total \$8,551 as follows: 1.f. is a bank debt for about \$5,495; and 1.h. is a bank debt for about \$3,056. Applicant did not remember contacting the creditors in SOR ¶¶ 1.f. and 1.h. (Tr. 36-37) He did not describe any payment plans or payments to address these two debts. (Tr. 36-37)

Applicant communicated with several creditors to discuss settlements or payment plans. (HE 3) The creditor in SOR ¶¶ 1.a (\$11,229), 1.e (\$5,682), and 1.i (\$3,034) is the same bank. Applicant has a checking account with this bank. (Tr. 35, 37-38) The next debts he plans to pay are those owed to this bank. He plans to sell a vehicle to raise money to pay debts. (Tr. 46)

Applicant has a non-SOR debt in collections for \$19,852, which is owed to a credit union and a non-SOR delinquent medical debt for \$1,569. (Tr. 38-39) He believes the VA will pay the medical debt, which was for emergency medical treatment. (Tr. 39) He did not describe any payment plans or payments to address the \$19,852 debt.

In July of 2025, Applicant obtained a new mortgage loan for \$208,000, which he used to pay or resolve the following debts: a mortgage on the same property of about \$50,000; a \$40,000 vehicle loan; remodeling of a bathroom in his residence, and some debts owed to family and friends. (Tr. 40-47) He owes his father-in-law an unspecified amount, and he is making payments on this debt. (Tr. 47) His monthly mortgage payment increased from \$597 to \$1,849 because of the \$208,000 debt. (Tr. 43)

Policies

The U.S. Supreme Court has recognized the substantial discretion of the Executive Branch in regulating access to information pertaining to national security emphasizing, “no one has a ‘right’ to a security clearance.” *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). As Commander in Chief, the President has the authority “to control access to information bearing on national security and to determine whether an individual is sufficiently trustworthy” to have access to such information. *Id.* at 527. The President has authorized the Secretary of Defense or his designee to grant applicants eligibility for access to classified information “only upon a finding that it is clearly consistent with the national interest to do so.” Exec. Or. 10865, *Safeguarding Classified Information within Industry* § 2 (Feb. 20, 1960), as amended.

Eligibility for a security clearance is predicated upon the applicant meeting the criteria contained in the adjudicative guidelines. These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with an evaluation of the whole person. An administrative judge’s overarching adjudicative goal is a fair, impartial, and commonsense decision. An administrative judge must consider all available, reliable information about the person, past and present, favorable, and unfavorable.

The Government reposes a high degree of trust and confidence in persons with access to classified information. This relationship transcends normal duty hours and endures throughout off-duty hours. 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 about potential, rather than actual, risk of compromise of classified information. Clearance decisions must be “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” See Exec. Or. 10865 § 7. Thus, this decision should not be construed to suggest that it is based on any express or implied determination about applicant’s allegiance, loyalty, or patriotism. It is merely an indication the applicant has not met the strict guidelines the President, Secretary of Defense, and Director of National Intelligence have established for issuing a clearance.

Initially, the Government must establish, by substantial evidence, conditions in the personal or professional history of the applicant that may disqualify the applicant from being eligible for access to classified information. The Government has the burden of establishing controverted facts alleged in the SOR. See *Egan*, 484 U.S. at 531. “Substantial evidence” is “more than a scintilla but less than a preponderance.” See *v. Washington Metro. Area Transit Auth.*, 36 F.3d 375, 380 (4th Cir. 1994). The guidelines presume a nexus or rational connection between proven conduct under any of the criteria listed therein and an applicant’s security suitability. See ISCR Case No. 95-0611 at 2 (App. Bd. May 2, 1996).

Once the Government establishes a disqualifying condition by substantial evidence, the burden shifts to the applicant to rebut, explain, extenuate, or mitigate the facts. Directive ¶ E3.1.15. An applicant “has the ultimate burden of demonstrating that it

is clearly consistent with the national interest to grant or continue his [or her] security clearance.” ISCR Case No. 01-20700 at 3 (App. Bd. Dec. 19, 2002). The burden of disproving a mitigating condition never shifts to the Government. See ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005). “[S]ecurity clearance determinations should err, if they must, on the side of denials.” *Egan*, 484 U.S. at 531; see AG ¶ 2(b).

Analysis

Financial Considerations

AG ¶ 18 articulates the security concern for financial problems:

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.

AG ¶ 19 includes disqualifying conditions that could raise a security concern and may be disqualifying in this case: “(a) inability to satisfy debts” and “(c) a history of not meeting financial obligations.”

The Appeal Board explained the scope and rationale for the financial considerations security concern in ISCR Case No. 11-05365 at 3 (App. Bd. May 1, 2012) (citation omitted) as follows:

This concern is broader than the possibility that an applicant might knowingly compromise classified information in order to raise money in satisfaction of his or her debts. Rather, it requires a Judge to examine the totality of an applicant’s financial history and circumstances. The Judge must consider pertinent evidence regarding the applicant’s self-control, judgment, and other qualities essential to protecting the national secrets as well as the vulnerabilities inherent in the circumstances. The Directive presumes a nexus between proven conduct under any of the Guidelines and an applicant’s security eligibility.

In ISCR Case No. 08-12184 at 7 (App. Bd. Jan. 7, 2010), the Appeal Board explained the role of CBRs in financial considerations analysis:

It is well-settled that adverse information from a credit report can normally meet the substantial evidence standard and the government’s obligations under [Directive] ¶ E3.1.14 for pertinent allegations. At that point, the burden

shifts to applicant to establish either that [he or] she is not responsible for the debt or that matters in mitigation apply.

(internal citation omitted).

The record establishes the disqualifying conditions in AG ¶¶ 19(a) and 19(c), requiring additional inquiry about the possible applicability of mitigating conditions. Discussion of the disqualifying conditions is contained in the mitigation section, *infra*. The financial considerations mitigating conditions under AG ¶ 20 which may be applicable in this case are as follows:

(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 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.

The Appeal Board in ISCR Case No. 10-04641 at 4 (App. Bd. Sept. 24, 2013) explained Applicant's responsibility for proving the applicability of mitigating conditions as follows:

Once a concern arises regarding an Applicant's security clearance eligibility, there is a strong presumption against the grant or maintenance of a security clearance. See *Dorfmont v. Brown*, 913 F. 2d 1399, 1401 (9th Cir. 1990), *cert. denied*, 499 U.S. 905 (1991). After the Government presents evidence raising security concerns, the burden shifts to the applicant to rebut or mitigate those concerns. See Directive ¶ E3.1.15. The standard applicable in security clearance decisions is that articulated in *Egan, supra*. "Any doubt concerning personnel being considered for access

to classified information will be resolved in favor of the national security.”
Directive, Enclosure 2 ¶ 2(b).

AG ¶ 20(a) does not apply to the SOR debts. “It is also well established that an applicant’s ongoing, unpaid debts demonstrate a continuing course of conduct and can be viewed as recent for purposes of the Guideline F mitigating conditions.” ISCR 22-02226 at 2 (App. Bd. Oct. 27, 2023) (citing ISCR Case No. 15-06532 at 3 (App. Bd. Feb. 16, 2017)).

Some circumstances partially or fully beyond Applicant’s control adversely affected his finances. He experienced unemployment and underemployment. He made necessary home repairs, and had his own medical issues, and his spouse’s medical issues. However, “[e]ven if [an applicant’s] financial difficulties initially arose, in whole or in part, due to circumstances outside his [or her] control, the [administrative judge] could still consider whether [the applicant] has since acted in a reasonable manner when dealing with those financial difficulties.” ISCR Case No. 05-11366 at 4 n.9 (App. Bd. Jan. 12, 2007) (citing ISCR Case No. 03-13096 at 4 (App. Bd. Nov. 29, 2005); ISCR Case No. 99-0462 at 4 (App. Bd. May 25, 2000); ISCR Case No. 99-0012 at 4 (App. Bd. Dec. 1, 1999)). Applicant established that he acted responsibly under the circumstances with respect to the debts in SOR ¶¶ 1.d for about \$7,654 and 1.g for about \$3,535 because he paid these two debts in 2025. AG ¶ 20(b) partially applies. It does not fully apply because he accumulated additional delinquent debt after the SOR was issued, and he did not establish that he could not have made more progress resolving his delinquent SOR debts considering his annual income of about \$150,000 for the last two years.

Applicant’s CBRs show, and the SOR alleges he has a total of nine debts in collection or charged off, and they total \$56,880. He is credited with resolution of the debts in SOR ¶¶ 1.d and 1.g. He has seven unresolved SOR debts totaling \$45,691. “[A] single debt can be sufficient to raise Guideline F security concerns.” ISCR Case No. 19-02667 at 3 (App. Bd. Nov. 3, 2021) (citing ISCR Case No. 14-05366 at 3 (App. Bd. Feb. 5, 2016)). “Additionally, a single debt that remains unpaid over a period of years can properly be characterized as a history of not meeting financial obligations.” *Id.*

Applicants are not required “to be debt-free in order to qualify for a security clearance. Rather, all that is required is that an applicant act responsibly given his or her 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) (denial of security clearance remanded) (citing ISCR Case No.13-00987 at 3, n. 5 (App. Bd. Aug. 14, 2014)). There is no requirement that an applicant make payments on all delinquent debts simultaneously, nor is there a requirement that the debts alleged in the SOR be paid first. See ISCR Case No. 07-06482 at 2-3 (App. Bd. May 21, 2008). See *also* ISCR Case No. 23-01434 at 2-3 (App. Bd. May 7, 2024).

Applicant is credited with receiving some financial counseling from the credit repair company he is employing. However, he has not shown that he applied the information he

received to pay more of his delinquent SOR debts or establish payment plans with them. There are not clear indications that he is resolving his SOR debts.

The Appeal Board has stated that it is reasonable for a Judge to expect an applicant to present documentation corroborating actions taken to resolve debts. ISCR Case No. 19-03757 at 3 (App. Bd. Aug. 18, 2021) (citing ISCR Case No. 19-01599 at 3 (App. Bd. Jan. 15, 2020)). For his unresolved SOR debts, Applicant did not provide documentation showing: (1) proof of payments, such as checking account statements, photocopies of checks, or a letter from the creditor proving that he paid or made any payments to these four creditors; (2) correspondence to creditors or CBRs showing credible debt disputes indicating he did not believe he was responsible for the debts and why he held such a belief; or (3) evidence of attempts to negotiate payment plans, such as settlement offers or agreements to show that he was attempting to resolve his delinquent debts. Applicant failed to establish mitigation under AG ¶ 20(e) because he did not provide documented proof to substantiate the existence, basis, or the result of any debt disputes.

In July of 2025, Applicant obtained a new mortgage loan for \$208,000, which he used to pay or resolve the following debts: a mortgage on the same property of about \$50,000; a \$40,000 vehicle loan; remodeling of a bathroom in his residence; and some debts owed to family and friends. The refinancing of his mortgage occurred after the SOR was issued on January 30, 2025. In ISCR Case No. 24-01994 at 2 (App. Bd. Aug. 12, 2025), the Appeal Board stated:

It is well-settled that the timing of debt resolution efforts is an important factor in evaluating mitigation “because an applicant who begins to resolve financial problems only after being placed on notice that his clearance was in jeopardy may lack the judgment and self-discipline to follow rules and regulations over time or when there is no immediate threat to his own interests.” ISCR Case No. 15-06440 at 4 (App. Bd. Dec. 26, 2017). Moreover, until an applicant has a “meaningful financial track record,” it cannot be said “that he has initiated a good-faith effort to repay overdue creditors or otherwise resolve debts.” ISCR Case No. 01-21386 at 2 (App. Bd. Jun. 11, 2003).

Applicant borrowed \$208,000 when he refinanced his mortgage, and he had \$158,000 after he paid his existing mortgage of about \$50,000. He did not apply any of the \$158,000 to address his delinquent SOR debts; however, he did resolve some of his financial obligations. “In effect, he substituted one form of indebtedness (several debts) for another form (a larger mortgage loan) or, looking at it in a different way, he converted old debt into new debt.” See ISCR Case No. 20-01510 at 3-4 (App. Bd. July 14, 2021) (reversing grant of security clearance).

Applicant’s total debt increased in the last year because he had an additional non-SOR debt in collections for \$19,852, which is owed to a credit union. In ISCR Case No. 03-20327 at 4 (App. Bd. Oct. 26, 2006), the Appeal Board listed five circumstances in which conduct not alleged in an SOR may be considered stating:

(a) to assess an applicant's credibility; (b) to evaluate an applicant's evidence of extenuation, mitigation, or changed circumstances; (c) to consider whether an applicant has demonstrated successful rehabilitation; (d) to decide whether a particular provision of the Adjudicative Guidelines is applicable; or (e) to provide evidence for whole person analysis under Directive Section 6.3.

Id. (citing ISCR Case No. 02-07218 at 3 (App. Bd. Mar. 15, 2004); ISCR Case No. 00-0633 at 3 (App. Bd. Oct. 24, 2003)). See also ISCR Case No. 12-09719 at 3 (App. Bd. Apr. 6, 2016) (citing ISCR Case No. 14-00151 at 3, n. 1 (App. Bd. Sept. 12, 2014); ISCR Case No. 03-20327 at 4 (App. Bd. Oct. 26, 2006)). This non-SOR allegation (non-SOR debt in collections for \$19,852) will be considered in the credibility assessment, analysis of mitigation, and under the whole-person concept. It will not be considered for disqualification purposes.

Applicant has not demonstrated a sufficient track record of debt payments after he became employed by his current employer, and his annual income has been about \$150,000. Based on his overall history of financial irresponsibility, I am not confident that he will establish payment plans, pay, or otherwise resolve his remaining SOR and non-SOR debts. Financial considerations security concerns are not mitigated.

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 the 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), "[t]he ultimate determination" of whether to grant a security clearance "must be an overall common-sense judgment based upon careful consideration" of the guidelines and the whole-person concept. My comments under Guideline F are incorporated in my whole-person analysis. Some of the factors in AG ¶ 2(d) were addressed under that guideline but some warrant additional comment.

Applicant is a 39-year-old flight-equipment technician, who specializes in aircraft and explosives, and he has worked for his current employer for about two years. His current salary is \$48 an hour. He has about three years of college. He has certifications in welding, fiber optics, and HVAC. He is working on his electrical-journeyman license.

Applicant served in the Marine Corps from 2006 to 2011; his Marine Corps specialty was flight-equipment technician; he received an honorable discharge; and he was promoted to sergeant when he was on terminal leave. He was deployed to Korea, and he received a Naval Aviation Maintenance Award. For about three years, he has been receiving about \$4,300 monthly from the VA for 100 percent service-connected disability.

The evidence against grant of a security clearance is detailed in the financial considerations section, *supra*, and this evidence is more substantial than the evidence of mitigation.

This decision should not be construed as a determination that Applicant cannot or will not attain the state of reform necessary for award of a security clearance in the future. With additional effort towards payment of his debts and establishment of his financial responsibility, he may well be able to demonstrate persuasive evidence of his security clearance worthiness.

I have carefully applied the law, as set forth in *Egan*, Exec. Or. 10865, the Directive, the AGs, and the Appeal Board's jurisprudence, to the facts and circumstances in the context of the whole person. Applicant failed to sufficiently mitigate financial considerations 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 F:	AGAINST APPLICANT
Subparagraphs 1.a through 1.c:	Against Applicant
Subparagraph 1.d:	For Applicant
Subparagraphs 1.e and 1.f:	Against Applicant
Subparagraph 1.g:	For Applicant
Subparagraphs 1.h and 1.i:	Against Applicant

Conclusion

I conclude that it is not clearly consistent with the interests of national security to grant or continue Applicant's national security eligibility for access to classified information. Eligibility for access to classified information is denied.

Mark Harvey
Administrative Judge