



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



In the matter of: )  
)  
) ISCR Case No. 25-01069  
)  
Applicant for Security Clearance )

**Appearances**

For Government: Rhett E. Petcher, Esq., Department Counsel  
For Applicant: *Pro se*

03/10/2026

**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 September 6, 2024, Applicant signed an Electronic Questionnaires for Investigations Processing (e-QIP). (Government Exhibit (GE) 1) On August 28, 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 August 28, 2025, Applicant provided her response to the SOR. On December 8, 2025, Department Counsel was ready to proceed. On January 3, 2026, the case was assigned to me.

On January 8, 2026, the Defense Office of Hearings and Appeals (DOHA) issued a notice scheduling the hearing on February 11, 2026. (HE 1) The hearing was held as scheduled using the Microsoft Teams video teleconference system.

During the hearing, Department Counsel offered five exhibits into evidence; Applicant did not provide any exhibits; there were no objections; and all proffered exhibits were admitted into evidence without objection. (Tr. 11-16; GE 1-GE 5) On February 21, 2026, DOHA received a copy of the transcript. The record was not held open after the hearing. (Tr. 59)

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, she admitted the allegations in SOR ¶¶ 1.a through 1.p. (HE 3) She also provided extenuating and mitigating information. Her admissions are accepted as findings of fact.

Applicant is a 30-year-old truck driver. (Tr. 6, 9) She has been hauling hazardous and military freight for one year; however, without a security clearance, she will be unable to continue transporting such materials. (Tr. 9) Her current employer has employed her for 15 months. (Tr. 23) In 2013, she graduated from high school. (Tr. 6-7) She completed two years of college; however, she does not have a degree. (Tr. 7) In July of 2023, she received her commercial driver's license (CDL). (Tr. 29) She has not served in the military. (Tr. 7)

In 2023, Applicant married, and she has been separated from her husband for two years. (Tr. 7-8, 20) Her husband is a chef. (Tr. 21) He did not provide financial support to her because "he had a very bad alcohol problem." (Tr. 22) They are going through a divorce. (Tr. 7) Her four children are ages three, six, nine, and 13. (Tr. 8, 21-22) Her four children reside with Applicant. (Tr. 8, 22) She does not receive any child support payments from the fathers of her children. (Tr. 22) Her sister helps with her children when she is away from home driving a truck. (Tr. 22)

### **Financial Considerations**

From 2017 to May of 2023, Applicant was a surveillance agent at a racetrack, and her monthly pay was about \$1,600. (Tr. 28-29) From July to September of 2023, Applicant was unemployed. (Tr. 28) From September of 2023 to September of 2024, Applicant's monthly pay was about \$2,400 to \$4,800. (Tr. 27) Her pay in her current position ranged from about \$8,000 to \$9,200 per month. (Tr. 23-24) In the Spring of 2025, her monthly pay was increased to \$10,000, and then after she lost her security clearance, her monthly

pay was reduced to \$8,000. (Tr. 25-26) Around 2022, Applicant's youngest child received several surgeries, and she missed several months of work taking care of her. (Tr. 31-33) She had Medicaid, which paid her daughter's medical bills. (Tr. 45)

Applicant's credit bureau reports (CBRs) and response to DOHA interrogatories state, and her SOR alleges she has a total of 16 debts in collection or charged off, and they total \$24,962. (GE 3-5) Additional financial information follows.

The following information applies to all 16 SOR debts. Around June of 2025, a credit consultant advised Applicant that for the debt in SOR ¶ 1.a, she "should just let it ride because it's getting ready to fall off [of her CBR]. And basically, if [she should] reopen it, it's just going to restart the process on [her] credit report, and it'll be on there for another seven years." (Tr. 35, 37) Applicant believed the credit consultant was supposed to dispute her debts and help her "fix everything." (Tr. 36) On June 9, 2025, the credit counseling service wrote their company was diligently working on her CBRs, which included disputing balances on accounts where appropriate. (GE 3) They will also monitor the information on her CBRs and keep her informed of significant developments. (GE 3) She said she disputed the presence of the negative accounts on her CBRs and attempted to "get the payments down." (Tr. 37) She does not have any payment agreements with the SOR creditors, and she has not made any payments to SOR accounts. (Tr. 38) Some creditors contacted her, and she advised them that she would make payments when she is able to do so. (Tr. 38) She did not provide any documentation about the debt disputes for specific debts or correspondence from or to creditors.

1.a is a charged-off debt for about \$11,826. Around 2018, Applicant's car was totaled in an accident, and she did not have gap insurance on it. (Tr. 34) The insurance company paid to the policy limit, and the remainder of the loan was charged off. (Tr. 34)

1.b is a charged-off debt for about \$2,592. Applicant borrowed the funds from the creditor to help her afford school. (Tr. 39)

1.c and 1.m are charged off debts for about \$2,347 and \$1,095. Applicant may have rented or purchased furniture from the creditors resulting in these two debts. (Tr. 39-40, 44-45)

1.d is an account placed for collection for about \$1,516. Applicant borrowed the funds from the creditor because "a hurricane hit, and I needed some money to evacuate my children, and I had to get that loan. And we ended up being out for a whole month." (Tr. 41)

1.e and 1.o are accounts placed for collection for about \$960 and \$681, respectively. SOR ¶ 1.e is for Applicant's telephone account, and SOR ¶ 1.o is for her utility account. (Tr. 41, 46) She said the two debts were too expensive for her to pay. (Tr. 41, 46)

1.f, 1.g, 1.i, 1.k, 1.n, and 1.p are charged-off debts for about \$709, \$660, \$391, \$155, \$774, and \$275, respectively. Applicant had credit cards or lines of credit accounts

resulting from paying living expenses for her family, and she was unable to pay the debts because of insufficient income and other expenses. (Tr. 41-46)

1.h, 1.j, and 1.l are charged-off debts for about \$622, \$229, and \$130, respectively. Applicant did not believe these were her debts because she did not recognize the name of the creditor or have a credit card or line of credit from the entity in the SOR. (Tr. 42-43) She did not provide documentation disputing her responsibility for these debts. (Tr. 43-44)

On December 3, 2024, an Office of Personnel Management investigator interviewed Applicant about her finances. (GE 2) Most of the SOR debts were discussed with her. (GE 2) She repeatedly indicated she would investigate the debt the investigator cited to her and attempt to resolve it. (GE 2)

Applicant's July 17, 2025 CBR lists the 12 accounts in SOR ¶¶ 1.a through 1.l as charged off or in collections. (GE 4) The four debts in SOR ¶¶ 1.m through 1.p are not listed in this CBR. (GE 4)

Applicant did not believe she had any non-SOR delinquent debts. (Tr. 46) She currently has about \$200 in her savings and \$50 in her checking accounts. (Tr. 47) She is earning enough money to pay her current expenses. She said she had a monthly remainder of about \$200 to \$1,000, and she was bringing debts to current status or paying them. (Tr. 53) Applicant's student loans total about \$30,000, and her July 17, 2025 CBR shows that those student loans are in deferment status. (GE 4) In the near future, she will have to start making payments of about \$250 monthly on her student loans. (Tr. 52, 58) She does not believe she has had an available remainder to address delinquent SOR debts. (Tr. 48) She has filed and paid her federal and state income taxes. (Tr. 50) She uses her federal income tax refunds to pay her debts. (Tr. 58) She takes responsibility for her delinquent debts, and she intends to resolve them in the future. (Tr. 49, 54)

## 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).

Applicant’s CBRs and responses to DOHA interrogatories state, and her SOR alleges she has a total of 16 debts in collection or charged off status, and they total \$24,962. “[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.* The record establishes the disqualifying conditions in AG ¶¶ 19(a) and 19(c), requiring an inquiry about the possible applicability of mitigating conditions. Additional 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 her finances. She was underemployed or unemployed before obtaining her current employment as a commercial truck driver. Her daughter had medical issues in 2020. In

2023, she married, and she has been separated from her husband for two years. She and her husband are pending a divorce. Her four children reside with Applicant, and she does not receive any child support payments from the fathers of her children. 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)). AG ¶ 20(b) partially applies. It does not fully apply because she did not establish that she acted responsibly towards her SOR debts after obtaining her current employment, which pays substantially more than her previous employments.

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 indicated several of her SOR debts were or would soon be dropped from her credit report. “[T]hat some debts have dropped off his [or her] credit report is not meaningful evidence of debt resolution.” ISCR Case No. 14-05803 at 3 (App. Bd. July 7, 2016) (citing ISCR Case No. 14-03612 at 3 (App. Bd. Aug. 25, 2015)). The Fair Credit Reporting Act requires removal of most negative financial items from a credit report seven years from the first date of delinquency or the debt becoming collection barred because of a state statute of limitations, whichever is longer. See Title 15 U.S.C. § 1681c. See Federal Trade Commission website, Consumer Advice, Debt Collection FAQs, <https://consumer.ftc.gov/articles/debt-collection-faqs>. Debts may be dropped from a credit report upon dispute when creditors believe the debt is not going to be paid, a creditor fails to timely respond to a credit reporting company’s request for information, or when the debt has been charged off.

Once Applicant stopped making payments, the creditor had to file suit within the statute of limitations to maintain the collectability of their debt. There is no evidence that the creditors in SOR ¶¶ 1.a through 1.p took judicial action to pursue collection of these 16 debts. Assuming but not deciding that many of these SOR debts are collection barred, they are still relevant to financial considerations security concerns:

Applicant’s argument concerning the unenforceability of the largest debt due to the running of the statute of limitations fails to demonstrate the Judge erred. First, security clearance decisions are not controlled or limited by statutes of limitations. Second, absent an explicit act of Congress to the

contrary, the Federal Government is not bound by state law in carrying out its functions and responsibilities. Applicant does not cite to any Federal statute that requires the Federal Government to be bound by state law in making security clearance decisions. Third, a security clearance adjudication is not a proceeding aimed at collecting an applicant's personal debts. Rather, it is a proceeding aimed at evaluating an applicant's judgment, reliability, and trustworthiness. Accordingly, even if a delinquent debt is legally unenforceable under state law, has been discharged in a bankruptcy, or is paid, the Federal Government is entitled to consider the facts and circumstances surrounding an applicant's conduct in incurring and failing to satisfy the debt in a timely manner. *See, e.g.*, ISCR Case No. 01-09691 at 3 (App. Bd. Mar. 27, 2003). In this case, the Judge's consideration of the unenforceable debt in making her security clearance eligibility determination was not arbitrary, capricious, or contrary to law.

ISCR Case No. 15-02326 at 3 (App. Bd. Oct. 14, 2014). The Appeal Board has "held that reliance on a state's statute of limitations does not constitute a good-faith effort to resolve financial difficulties and is of limited mitigative value." ISCR Case No. 15-01208 at 3 (App. Bd. Aug. 26, 2016) (citing ADP Case No. 06-18900 at 5 (App. Bd. Jun. 6, 2008); ISCR Case No. 03-04779 at 4 (App. Bd. Jul. 20, 2005); ISCR Case No. 01-09691 at 2-3 (App. Bd. Mar. 27, 2003)). *See, e.g.*, ISCR Case No. 08-01122 (App. Bd. Feb. 9, 2009) (reversing grant of security clearance); ADP Case No. 06-14616 (App. Bd. Oct. 18, 2007) (reversing grant of security clearance and stating, "reliance upon legal defenses such as the statute of limitations does not necessarily demonstrate prudence, honesty, and reliability; therefore, such reliance is of diminished probative value in resolving trustworthiness concerns arising out of financial problems" (citing ISCR Case No. 03-20327 at 4 (App. Bd. Oct. 26, 2006))).

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 her 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 she paid or made any payments to the SOR creditors; (2) correspondence to creditors or CBRs showing credible debt disputes indicating she did not believe she was responsible for the debts and why she held such a belief; or (3) evidence of attempts to negotiate payment plans, such as settlement offers or agreements to show that she was attempting to resolve her delinquent debts. Applicant failed to establish mitigation under AG ¶ 20(e) because she did not provide documented proof to substantiate the existence, basis, or the result of any debt disputes. AG ¶ 30(d) does not apply.

Applicant has not demonstrated a sufficient track record of debt payments after she became employed by her current employer. She did not prove that she was unable to pay or settle at least some of the smaller debts listed on her SOR. Based on her overall history of financial irresponsibility, I am not confident that she will establish payment

plans, pay, or otherwise resolve her 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 30-year-old truck driver. She has been hauling hazardous and military freight for one year; however, without a security clearance, she will be unable to continue transporting such materials. Her current employer has employed her for 15 months. In 2013, she graduated from high school. She completed two years of college; however, she does not have a degree. In July of 2023, she received her CDL.

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.

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.

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 continued efforts to resolve her SOR debts and establish her financial responsibility, she may well be able to demonstrate persuasive evidence of her security clearance worthiness.

## **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.p:	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.

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Mark Harvey  
Administrative Judge