



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



In the matter of:)
)
) ISCR Case No. 25-00606
)
Applicant for Security Clearance)

Appearances

For Government: Andre M. Gregorian, Esq., Department Counsel
For Applicant: *Pro se*

03/31/2026

Decision

HARVEY, Mark, Administrative Judge:

Guideline F (financial considerations) security concerns are mitigated. Eligibility for access to classified information is granted.

Statement of the Case

On January 26, 2024, Applicant completed an Electronics Questionnaires for Investigations Processing (e-QIP) or security clearance application (SCA). (Government Exhibit (GE) 1) On July 10, 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) 1)

The SOR detailed reasons why 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 said his case will be submitted to an Administrative Judge for

a determination as to whether to grant, deny, or revoke his security clearance. Specifically, the SOR set forth security concerns arising under Guideline F. (HE 1) On August 8, 2025, Applicant responded to the SOR. (HE 2) On September 29, 2025, Department Counsel was ready to proceed. 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 December 1, 2025, the case was assigned to me. On December 10, 2025, DOHA issued a notice scheduling the hearing for January 21, 2026. (HE 3) The hearing was held as scheduled, using the Microsoft Teams video teleconference system.

During the hearing, Department Counsel offered six exhibits; Applicant did not offer any exhibits; and all proffered exhibits were admitted into evidence without objection. (Tr. 11, 15-18; GE 1-GE 6)

On February 3, 2026, DOHA received a copy of the transcript. Applicant provided four post-hearing exhibits, which were admitted into evidence without objection. (Applicant Exhibit (AE) A-AE D) The record closed on March 18, 2026. (Tr. 44, 52)

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, 1.c, and 1.e, and he denied the allegations in SOR ¶¶ 1.b, 1.d, 1.f, and 1.g. (HE 2) He also provided extenuating and mitigating information. (HE 2) His admissions are accepted as findings of fact. (HE 2)

Applicant is a 31-year-old assistant account manager employed by a Department of War (DoW) contractor since November of 2023. (Tr. 6, 9, 20) In 2013, he graduated from high school. (Tr. 6, 20) In 2017, he received an associate degree in science for criminal justice technology. (Tr. 6) In 2025, he received a bachelor of science degree, and he majored in criminal justice administration. (Tr. 7, 20) Next year, he expects to receive a master's degree in criminal justice. (Tr. 7, 21) He has never served in the military. (Tr. 9, 20) He was married from 2017 to 2020, and he married his current spouse in 2022. (Tr. 8, 21) His daughter is eight years old. (Tr. 8) He shares custody with his daughter's mother, and he does not have any child-support responsibilities. (Tr. 8, 21)

Financial Considerations

Applicant's current spouse is a registered nurse, and his spouse's annual income is about \$65,000. (Tr. 25) In 2019, Applicant's now former spouse and Applicant moved to State A; he was unemployed for a month after he moved; and his income was substantially reduced in State A. (Tr. 26-28) After he moved, several debts became delinquent because he had insufficient income. (Tr. 26-28) From September of 2019 to August of 2021, his annual income was about \$32,000. (Tr. 28) From August of 2021 to December of 2022, his annual income was about \$30,000. (Tr. 29) From January of 2023

to November of 2023, his annual income was about \$26,000. (Tr. 30) From November of 2023 to present, his annual income has been about \$52,000. (Tr. 30)

Applicant has not had any financial counseling. (Tr. 42) He said he wanted to pay one debt at a time. (Tr. 38) Eventually, he believes he will pay all of his debts. (Tr. 41, 43) The SOR alleges seven delinquent debts totaling \$29,739. (HE 1)

SOR ¶ 1.a alleges Applicant has a charged-off repossessed vehicle debt for about \$12,709. (Tr. 31) His most recent payment was in April of 2020. (Tr. 31) He did not make any payments because he did not have sufficient income for payments. (Tr. 31)

SOR ¶ 1.b alleges Applicant has a charged-off bank debt for about \$8,194. He used this credit card for living expenses. (Tr. 33-34) His most recent payment was in October 2020. (GE 6 at 4) He has not recently contacted the creditor. (Tr. 34) On December 31, 2023, the creditor cancelled the debt and issued a Cancellation of Debt, IRS Form 1099-C, to Applicant. (Tr. 44; AE B) He believed that he put the debt cancellation amount on his federal income tax (FIT) return. (Tr. 45-46) He understands he is required to pay FIT on the amount shown on the IRS Form 1099-C.

SOR ¶ 1.c alleges Applicant has a charged-off bank debt for about \$2,421. Applicant used this credit card to buy a watch and for living expenses. (Tr. 34) He most recently made a payment in August 2020. (Tr. 34-35; GE 6 at 4) He does not have a payment plan for this account. (Tr. 35)

SOR ¶ 1.d alleges Applicant has a bank debt placed for collection for about \$3,037. On December 14, 2024, the creditor listed Applicant's \$100 monthly payments from May of 2023 to November of 2024, and indicated the balance was \$2,038. (GE 2 at 11) At the time of his hearing the balance of the debt was \$737. (Tr. 19, 35; GE 6 at 4) He plans to continue with his \$100 monthly payment plan until the debt is paid. (Tr. 36) This debt is being resolved.

SOR ¶ 1.e alleges Applicant has a charged-off bank debt for about \$1,159. The last payment on this vehicle loan was in December of 2021. (Tr. 36; GE 6 at 1) Applicant said he contacted the creditor the week before his hearing to discuss a payment plan; however, he does not currently have a payment plan. (Tr. 36)

SOR ¶ 1.f alleges Applicant has a medical debt for about \$527. The debt is indicated on his April 23, 2025 credit bureau report (CBR) as delinquent. (GE 5 at 3) He said he was unaware of the debt; he had not been contacted by a medical creditor; and he did not know how to contact the creditor. (Tr. 36-37) The name of the creditor is not in the April 23, 2025 CBR. The debt is not listed on his January 6, 2026 CBR. (GE 6)

SOR ¶ 1.g alleges Applicant has a charged-off bank debt for about \$1,692. On December 14, 2024, the creditor indicated Applicant made \$50 monthly payments from May of 2023 to November of 2024, and the current balance was \$493. (GE 2 at 10) At his hearing, Applicant said the debt was paid. (Tr. 19, 37-38) The debt is currently reflected in his CBR as having a zero balance, but with a reported loss. (GE 6 at 5) His January 6,

2026 CBR indicates his most recent payment was in September 2020. (GE 6 at 5) A January 21, 2026 receipt from the creditor shows the account has a zero balance. (AE C) Applicant is credited with resolving this debt.

Applicant provided information from his January 21, 2026 FIT transcripts for tax years (TYs) 2020 to 2024. (AE A) His adjusted gross income is rounded to the nearest \$1,000 and taxes are rounded to the nearest \$100. He filed as single for TYs 2020, 2021, and 2023, and married filing joint in TYs 2022 and 2024. His TY 2024 FIT transcript shows a \$702 payment to an unspecified account. Applicant said his tax returns were timely filed, and he did not owe any tax debts. (Tr. 39)

Tax Year	Date Filed	Adjusted Gross Income	Taxes Owed (O) Taxes Refunded (R)	Exhibit
2020	Mar. 8, 2021	\$35,000	R-\$1,000	AE A1
2021	Feb. 28, 2022	\$31,000	R-\$8,200	AE A2
2022	Apr. 15, 2023	\$98,000	R-\$7,000	AE A3
2023	Mar. 18, 2024	\$50,000	R-\$2,500	AE A4
2024	Apr. 7, 2025	\$97,000	R-\$5,300	AE A5

Applicant's January 6, 2026 CBR lists 13 satisfactory accounts including eight paid accounts with zero balances. (GE 6) All of his SOR debts, except SOR ¶ 1.e (\$1,159) and 1.f (\$527), are shown on this CBR as delinquent accounts. (GE 6)

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 War or his designee to grant applicant 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, nothing in an unfavorable decision should be construed to suggest that it is based on any express or implied determination about an applicant’s allegiance, loyalty, or patriotism. An unfavorable decision is merely an indication the applicant has not met the strict guidelines the President, Secretary of War, 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.

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 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.

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."

"[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). Additional inquiry about the possible applicability of mitigating conditions is required. 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)).

A security clearance adjudication is not a debt-collection procedure. It is designed to evaluate an applicant's judgment, reliability, and trustworthiness. See ISCR Case No. 09-02160 (App. Bd. Jun. 21, 2010). 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).

Applicant was underemployed for several years as indicated in his IRS tax transcripts and statement at his hearing. In 2019, he moved to a State A, and he was unemployed for one month. In 2020, he was divorced. His unemployment, underemployment, divorce, and move to State A are circumstances largely beyond his control, which adversely affected his finances. 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).

Applicant's history of non-payment of several debts has important security implications. See ISCR Case No. 20-01004 at 3 (App. Bd. June 28, 2021) ("Resolution of a delinquent debt does not preclude further inquiry or examination regarding it. Even if an alleged debt has been paid or canceled, a Judge may still consider the circumstances underlying the debt as well as any previous actions or lapses to resolve the debt for what they reveal about the applicant's worthiness for a clearance") (citing ISCR Case No. 15-02957 at 3 (App. Bd. Feb. 17, 2017)).

Two Appeal Board decisions illustrate the analysis for applying AG ¶¶ 20(a) and 20(b) in cases where there are limited financial resources and circumstances beyond an applicant's control adversely affecting his or her finances. In ISCR Case No. 09-08533 (App. Bd. Oct. 6, 2010), the applicant had \$41,871 in delinquent credit-card debt and defaulted on a home loan generating a \$162,000 delinquent debt. *Id.* at 2. That applicant filed for bankruptcy the same month the Administrative Judge issued her decision. *Id.* at 1-2. The applicant in ISCR Case No. 09-08533 was recently divorced, had been unemployed for 10 months, and had childcare responsibilities. Her former husband was inconsistent in his child support payments to her. The Appeal Board determined that AG ¶ 20(a) was "clearly applicable (debt occurred under such circumstances that it is unlikely to recur and [the debt] does not cast doubt on the individual's current reliability, trustworthiness, or good judgment)" even though that applicant's debts were unresolved at the time the Administrative Judge's decision was issued. *Id.* at 3. The Appeal Board also decided that the record evidence raised the applicability of AG ¶ 20(b) because of the absence of evidence of irresponsible behavior, poor judgment, unreliability, or lack of trustworthiness. *Id.* at 4. I note that Applicant has the burden of proving the applicability of any mitigating conditions, and the burden to disprove a mitigating condition never shifts to the Government.

Similarly, in ISCR Case No. 08-06567 (App. Bd. Oct. 29, 2009) the Appeal Board addressed a situation where an applicant was sporadically unemployed and lacked the ability to pay his creditors. The Appeal Board noted "it will be a long time at best before he has paid" all of his creditors. *Id.* at 3. The applicant was living on unemployment compensation at the time of his hearing. The Appeal Board explained that such a circumstance was not necessarily a bar to having access to classified information stating:

However, the Board has previously noted that an applicant is not required to be debt-free nor to develop a plan for paying off all debts immediately or simultaneously. 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. 08-06567 at 3 (App. Bd. Oct. 29, 2009) (citing ISCR Case No. 07-06482 at 3 (App. Bd. May 21, 2008)). The applicant in ISCR Case No. 08-06567 used his limited resources to (1) resolve some of his debts; (2) had a repayment plan for the remaining debts; and (3) took "reasonable actions to effectuate that plan." *Id.* The Appeal Board remanded the Administrative Judge's decision because it did not "articulate a satisfactory explanation for his conclusions," emphasizing the Administrative Judge did "not explain[]

what he believes that applicant could or should have done under the circumstances that he has not already done to rectify his poor financial condition, or why the approach taken by applicant was not 'responsible' in light of his limited circumstances." *Id.*

Applicant's SOR alleges he has seven delinquent debts totaling \$29,739. Three delinquent debts are resolved or are being resolving: the debt in SOR ¶ 1.b (\$8,194) was cancelled by the creditor; the debt in SOR ¶ 1.d (\$3,037) has been in a \$100 monthly payment plan for about two years, and the balance is \$737; and the debt in SOR ¶ 1.g (\$1,692) is paid.

Four SOR debts totaling \$16,816 are not resolved and are not being resolved: 1.a (\$12,709); 1.c (\$2,421); 1.e (\$1,159); and 1.f (\$527). Applicant denied responsibility for the medical debt in SOR ¶ 1.f (\$527), and it has been dropped from his 2026 CBR. Applicant failed to contact the CBR listing the medical debt and ask for information about the source of the debt, which would have enabled him to contact the creditor and learn more about the debt. He did not provide documentation showing the basis of the dispute of the medical debt, and he does not receive full mitigating credit under AG ¶ 20(e) for resolution of that debt.

Applicant's January 6, 2026 CBR lists 13 satisfactory accounts including eight paid accounts with zero balances. His tax returns were timely filed, and he does not have a delinquent tax debt.

Applicant established mitigation under AG ¶¶ 20(b) and 20(d). He showed good faith in his overall handling of his finances. I found his statement at his hearing to be candid and credible. His income has been gradually increasing, and he indicated he will pay his debts and establish his financial responsibility. Future or new delinquent debts are unlikely to recur, and there are clear indications his financial problems are in the process of being resolved. His history of handling his finances does not cast doubt on his current reliability, trustworthiness, and judgment. Financial considerations security concerns are 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 commonsense 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 31-year-old assistant account manager employed by a DoW contractor since November of 2023. In 2017, he received an associate degree in science for criminal justice technology. In 2025, he received a bachelor of science degree, and he majored in criminal justice administration. Next year, he expects to receive a master’s degree in criminal justice.

Applicant has a history of delinquent debt. His SOR alleges he has seven delinquent debts totaling \$29,739. Four debts totaling \$16,816 are not resolved and are not being resolved. Underemployment, unemployment, divorce, and a move to State A harmed his finances. He acted responsibly under the circumstances within his limited means. Applicant’s January 6, 2026 CBR lists 13 satisfactory accounts including eight paid accounts with zero balances. He is making payments on one SOR debt, and promised to pay all SOR debts and establish his financial responsibility. The evidence supporting grant of a security clearance is further detailed in the financial considerations analysis section, *supra*, and this evidence is more substantial than the evidence against mitigation.

The Appeal Board has addressed a key element in the whole-person analysis in financial cases stating:

. . . the concept of meaningful track record necessarily includes evidence of actual debt reduction through payment of debts. However, an applicant is not required, as a matter of law, to establish that he has paid off each and every debt listed in the SOR. All that is required is that an applicant demonstrate that he has . . . established a plan to resolve his financial problems and taken significant actions to implement that plan. The Judge can reasonably consider the entirety of an applicant’s financial situation and his actions in evaluating the extent to which that applicant’s plan for the reduction of his outstanding indebtedness is credible and realistic. See Directive ¶ E2.2(a) (Available, reliable information about the person, past and present, favorable and unfavorable, should be considered in reaching a determination.) There is no requirement that a plan provide for payments on all outstanding debts simultaneously. Rather, a reasonable plan (and concomitant conduct) may provide for the payment of such debts one at a time. Likewise, there is no requirement that the first debts actually paid in furtherance of a reasonable debt plan be the ones listed in the SOR.

ISCR Case No. 07-06482 at 2-3 (App. Bd. May 21, 2008) (internal citations and quotation marks omitted). Applicant has demonstrated a meaningful financial track record of repayment of overdue creditors and otherwise established his financial responsibility.

It is well settled that once a concern arises regarding an applicant's security clearance eligibility, there is a strong presumption against granting a security clearance. See *Dorfmont*, 913 F. 2d at 1401. "[A] favorable clearance decision means that the record discloses no basis for doubt about an applicant's eligibility for access to classified information." ISCR Case No. 18-02085 at 7 (App. Bd. Jan. 3, 2020) (citing ISCR Case No.12-00270 at 3 (App. Bd. Jan. 17, 2014)).

I have carefully applied the law, as set forth in *Egan*, *Dorfmont*, 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 mitigated 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: FOR APPLICANT

Subparagraphs 1.a through 1.g: For Applicant

Conclusion

I conclude that it is clearly consistent with the interests of national security of the United States to grant or continue Applicant's national security eligibility for access to classified information. Eligibility for access to classified information is granted.

Mark Harvey
Administrative Judge