



**DEFENSE LEGAL SERVICES AGENCY
DEFENSE OFFICE OF HEARINGS AND APPEALS**



In the matter of:)
)
) ISCR Case No. 24-01552
)
)
Applicant for Security Clearance)

Appearances

For Government:
John Renehan, Esq, Department Counsel

For Applicant:
Pro se

05/19/2026

Decision

CEFOLA, Richard A., Administrative Judge:

Applicant mitigated the security concerns raised under the Criminal Conduct guideline. Applicant did not mitigate the security concerns raised under the Sexual Behavior or Personal Conduct guidelines. National security eligibility for access to classified information is denied.

Statement of the Case

Applicant submitted an Electronic Questionnaire for Investigations Processing on June 28, 2023 (Questionnaire). On August 22, 2025, the Defense Counterintelligence and Security Agency (DCSA) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guidelines D (Sexual Behavior), E (Personal Conduct), and J (Criminal Conduct). The action was taken under Executive Order 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) effective within DoD after June 8, 2017.

On December 10, 2025, Applicant responded to the SOR in writing (Answer) and requested that the case be decided on the written record in lieu of a hearing. In his Answer, Applicant admitted to all of the allegations in SOR ¶¶ 1 and 2. He also admitted to SOR ¶¶ 3.a and 3.b, but qualified his responses to SOR ¶¶ 3.c, 3.d, and 3.e by neither expressly admitting nor denying the allegations. Instead, he denied an intent to deceive. These responses are viewed as denials.

On January 30, 2026, Department Counsel submitted the Government's written case in a File of Relevant Material (FORM). A complete copy of the FORM, consisting of Government Exhibits (GE) 1 to 12 and the Government's arguments in support of the SOR, was received by the Applicant on March 9, 2026. He was afforded an opportunity to file objections and submit material to refute, extenuate, or mitigate the security concerns. Applicant responded (Response) via a series of emails exchanged with Department Counsel spanning from March 17, 2026, through April 6, 2026. Therein, Applicant did not submit matters in refutation, extenuation, or mitigation, but rather modified his response to the SOR so as to remove his admission to SOR ¶ 3.b. His modified response is viewed as a denial as well. The case was assigned to me on May 11, 2026, and GE 1 to 11 were admitted without objection. GE 12 is a newspaper article quoting the victim and, while not objected to by Applicant, constitutes two-level hearsay that has no probative value. GE 12 was not admitted or considered.

Findings of Fact

Applicant is 62 years old and is presently employed as a pipefitter for a DoD contractor where he has worked since July 2023. He submitted the Questionnaire in conjunction with his employment. He received a bachelor's degree in 1993, a master's degree in 1999, and another master's degree in 2007. He was married from 2003 – 2020 and has no children. (GE 3 at 5, 13-14; GE 4 at 7; GE 6 at 16-18)

SOR Paragraph 1, Guideline D (Sexual Behavior)

The Government alleged that Applicant is ineligible for a security clearance because he has engaged in sexual behavior that involves a criminal offense, reflects a lack of judgment or discretion, or may subject the Applicant to undue influence or coercion, exploitation, or duress. I find the following facts regarding this allegation:

1.a. Sexual Assault of a student: In September 2014, while an adjunct college professor, Applicant met with a female student in an adjunct on-campus office he was using. At the conclusion of the meeting, when the student got up to leave, Applicant asked for a hug. During the hug, Applicant held her tight and told her "I feel your breasts" – and then tried to kiss her on the lips. When the student turned her head to avoid the kiss, Applicant put his tongue in her ear then groped her breasts and crotch through her clothes. As the student struggled to get away, Applicant became more aggressive and "had his hands everywhere," stating, "let me see your tits." The student said, "No," several times.

The student managed to get free and bent over to get her backpack on the way out, only to have the Applicant grab her from behind and grind his pelvis into her buttocks while asking about her favorite sexual position. He then unbuckled his pants and exposed himself, asking the student to touch him. The student refused and told him to get himself together. Applicant gestured to his exposed genitals and said, "What am I going to do with this?" The student stated, "I don't care what you do with that." The Applicant then backed off and began to get dressed, at which point the student fled the office. She related these events to the police on September 29, 2014, but at that point indicated she did not wish to press charges.

Later that same day, Applicant was interviewed by the police. He initially acknowledged hugging the student but denied anything other than conversation. The police continued to ask questions and even promised the Applicant that under no circumstances would he be arrested – he just needed to tell the truth. Approximately 40 minutes into the interview, Applicant acknowledged everything that had happened and explained that he "basically lost control." Later, Applicant attributed his conduct to getting poor sleep and drinking too many "Red Bull" energy drinks, rendering him "not in the right head space." He signed a sworn statement attesting to everything the student had alleged. Applicant admitted this allegation in both his Answer and his Response. (Answer; Response; GE 4 at 11-12; GE 7 at 1-7)

1.b. Arrest for Sexual Assault: On August 14, 2015, the student returned to the police department and indicated that she had changed her mind about pressing charges. She indicated she was still suffering emotional trauma and had also recently learned the college allowed Applicant to resign from his position rather than be fired. The police obtained a warrant for Applicant's arrest and on September 2, 2015, Applicant turned himself in. He was booked and charged with felony sexual assault, along with misdemeanor unlawful restraint and disorderly conduct. Applicant posted a \$10,000 bond.

Given the promises the police used to obtain Applicant's statement, his confession was ultimately ruled inadmissible in his criminal case. Applicant subsequently entered into a plea agreement wherein he pled guilty to three misdemeanors: Unlawful Restraint, Reckless Endangerment, and Coercion. He was sentenced to one year of confinement (suspended) and two years of probation, which he satisfactorily completed on January 30, 2019. Applicant admitted this allegation in both his Answer and his Response. (Answer; Response; GE 4 at 11-12, 15; GE 7 at 9-10; GE 8; GE 10; GE 11)

1.c. Civil Suit for Sexual Assault:

In a civil suit stemming from the facts discussed above regarding SOR ¶¶ 1.a and 1.b, the student brought a civil suit against Applicant. Applicant settled the case on July 3, 2018, with \$45,000 going to the student and another \$5,000 given to a local charity. Applicant admitted to this allegation in both his Answer and his Response. (Answer; Response; GE 3 at 28; GE 4 at 13, 16-18)

SOR Paragraph 2, Guideline J (Criminal Conduct)

The Government alleged that Applicant is ineligible for a security clearance because he has engaged in criminal conduct that calls into question his ability or willingness to comply with laws, rules, and regulations. I find the following facts regarding this allegation:

2.a. Cross-allegations with paragraph 1 in its entirety. See discussion above. Two of Applicant's friends are aware of the admitted misconduct as well as the criminal and civil cases. On August 11, 2023, Applicant signed an authorization for the state Board of Pardons and Paroles to conduct a background investigation in his application for a pardon. A pardon was granted on December 10, 2024. (GE 4 at 13; GE 5 at 4; GE 6 at 21)

SOR Paragraph 3, Guideline E (Personal Conduct)

The Government alleged that Applicant is ineligible for a security clearance because he had engaged in conduct that involved questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations. I find the following facts regarding this allegation:

3.a. Cross-allegations with paragraph 1 in its entirety. See discussion above. Applicant admitted to this allegation in both his Answer and Response.

3.b. False Statement ONE to a DoD Investigator: On December 1, 2023, an authorized agent for the DoD conducted a subject interview with the Applicant that included a discussion of the incident alleged in SOR ¶¶ 1 and 2. Applicant stated he had left his employment with the college in June 2014 "on good terms" and he was "eligible for rehire." In his Questionnaire, Applicant acknowledged having been reprimanded for the arrest by the Department Dean, after which time he resigned his position. In both his Answer and Response, Applicant stated that given his resignation, he believed he could state that he had parted ways with the college "because of differences." (Answer; Response; GE 3 at 9; GE 4 at 10)

3.c. False Statement TWO to a DoD Investigator: On December 1, 2023, an authorized agent for the DoD conducted a subject interview with the Applicant that included a discussion of the incident alleged in SOR ¶¶ 1 and 2. Applicant denied having been on probation or parole in the last seven years. When confronted with the fact that he had been on probation from January 31, 2017, to January 30, 2019, he attributed the omission to "oversight." In both his Answer and Response, he denied an intent to deceive and attributed this omission to having been nervous and "(doing) the math wrong." (Answer; Response; GE 4 at 11-12; GE 6 at 23)

3.d. False Statement ONE in Questionnaire: On June 28, 2023, Applicant submitted his Questionnaire wherein he answered, “No,” to the question, “In the last seven years, have you been or are you currently on probation or parole?” As stated, however, Applicant was on probation from January 31, 2017, to January 30, 2019. In both his Answer and Response, he denied an intent to deceive and attributed this omission to “(doing) the math wrong.” (Answer; Response; GE 3 at 23; GE 11)

3.e. False Statement TWO in Questionnaire: On June 28, 2023, Applicant submitted his Questionnaire wherein he answered, “No,” to the question, “Have you EVER been charged with a felony offense?” On September 9, 2014, however, Applicant was charged with the Class D felony Sexual Assault for which he posted a \$10,000 bond. In both his Answer and Response, Applicant asserted ignorance, explaining that the felony charge had been reduced or dropped, leaving the three misdemeanor charges to which he pled guilty. Applicant mentioned having been arrested and charged with three misdemeanors elsewhere in the Questionnaire when discussing his reprimand from the college. (Answer; Response; GE 3 at 9, 23-24; GE 7 at 10)

Whole Person Evidence

Applicant provided his Certificate of Pardon dated December 10, 2024. He also included supporting documentation from the package that was presented to the state Board of Pardons and Paroles in 2023. Therein he included his resumé along with many teaching credentials and awards. Also in the package were four letters of support. Two of the four expressed knowledge of the incident and one in particular noted Applicant’s deep shame and regret.

Applicant additionally submitted a letter from a therapist who worked with the Applicant weekly from August 10 to October 30, 2023. He mentioned the incident and characterized the Applicant as “a person of integrity” who had “enormous regret, and deep remorse about the incident.” The therapist did not speak to the specifics of Applicant’s behavior, nor did he proffer a diagnosis, but he opined that Applicant was “not a danger to himself or others in the community, and he is not a sexual predator.” In his Response, Applicant elaborated that he was “in no way susceptible to committing such an out-of-character, egregious, horrendous, lifetime of pain and trauma-inducing act for the victim and many others in (his) immediate family – particularly (his) ex-wife – as well as (himself).” (Response; GE 5 at 4-6; GE 6 at 8, 10-15, 17-20; 23-30)

Policies

When evaluating an applicant’s suitability for national security eligibility, the administrative judge must consider the adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines (AG) list potentially disqualifying conditions and mitigating conditions, which are to be used in evaluating an applicant’s national security eligibility.

These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in AG ¶ 2 describing the adjudicative process. The administrative judge's overarching adjudicative goal is a fair, impartial, and commonsense decision. The entire process is a conscientious scrutiny of applicable guidelines in the context 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 national security is the paramount consideration. AG ¶ 2(b) requires, "Any doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security." In reaching this decision, I have drawn only those conclusions that are reasonable, logical, and based on the evidence contained in the record. I have not drawn inferences based on mere speculation or conjecture.

Directive ¶ E3.1.14, requires the Government to 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, and has the ultimate burden of persuasion as to obtaining a favorable clearance decision."

A person who seeks access to classified information enters into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours. The Government reposes a high degree of trust and confidence in individuals to whom it grants national security eligibility. Decisions include, by necessity, consideration of the possible risk the applicant may deliberately or inadvertently fail to protect or safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified or sensitive information.

Finally, as emphasized in Section 7 of Executive Order 10865, "Any determination under this order adverse to an applicant shall be a determination in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned." See *a/so* Executive Order 12968, Section 3.1(b) (listing multiple prerequisites for access to classified or sensitive information.)

Analysis

SOR Paragraph 1, Guideline D (Sexual Behavior)

The security concern for sexual behavior is set out in AG ¶ 12:

Sexual behavior that involves a criminal offense; reflects a lack of judgment or discretion; or may subject the individual to undue influence of coercion, exploitation, or duress. These issues, together or individually, may raise

questions about an individual's judgment, reliability, trustworthiness, and ability to protect classified or sensitive information. Sexual behavior includes conduct occurring in person or via audio, visual, electronic, or written transmission. No adverse inference concerning the standards in this Guideline may be raised solely on the basis of the sexual orientation of the individual.

The facts of this case establish the following potentially disqualifying conditions set forth in AG ¶ 13 to the allegations under Guideline D:

- (a) sexual behavior of a criminal nature, whether or not the individual has been prosecuted;
- (c) sexual behavior that causes an individual to be vulnerable to coercion, exploitation, or duress; and
- (d) sexual behavior of a public nature or that reflects lack of discretion or judgement.

The burden therefore shifts to Applicant to mitigate security concerns under Guideline D. The guideline includes the following conditions in AG ¶ 14 that could potentially mitigate security concerns arising from Applicant's sexual behavior:

- (b) the sexual behavior happened so long ago, so infrequently, or under such unusual circumstances, that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or judgment;
- (c) the behavior no longer serves as a basis for coercion, exploitation, or duress; and
- (e) the individual has successfully completed an appropriate program of treatment, or is currently enrolled in one, has demonstrated ongoing and consistent compliance with the treatment plan, and/or has received a favorable prognosis from a qualified mental health professional indicating the behavior is readily controllable with treatment.

Applicant's sole incident of misconduct, while certainly serious, occurred nearly 12 years ago under circumstances in academia that are unlikely to recur, given his current vocation as a pipefitter. And while his judgment at the time was clearly poor, his future prognosis, as delineated by his therapist, speaks well of his current reliability, trustworthiness, and judgment. AG ¶ 14(b) therefore applies to SOR ¶ 1. Likewise, Applicant's therapist confirmed both a program of treatment and plans for ongoing counselling in the future. Consequently AG ¶ 14(e) applies as well to SOR ¶ 1.

AG ¶ 14(c) however, is more problematic. The record evidence provides no indication that anyone from the DoD contractor is aware of Applicant's sexual conduct.

Applicant has worked there for nearly three years, but the record contains no input from any coworkers, supervisors, or even the security manager that might allay concerns about his susceptibility to coercion, exploitation, or duress. Because of this issue, questions remain about Applicant's judgment, reliability, trustworthiness, and ability to protect classified or sensitive information. Guideline D is found against Applicant.

SOR Paragraph 2, Guideline J (Criminal Conduct)

The security concern for criminal conduct is set out in AG ¶ 30:

Criminal activity creates doubt about an Applicant's judgment, reliability, and trustworthiness. By its very nature, it calls into question a person's ability or willingness to comply with laws, rules and regulations.

The facts of this case establish the following potentially disqualifying condition set forth in AG ¶ 31 to the allegation under Guideline J:

(b) evidence (including, but not limited to, a credible allegation, an admission, and matters of official record) of criminal conduct, regardless of whether the individual was formally charged, prosecuted, or convicted.

The burden therefore shifts to Applicant to mitigate security concerns under Guideline J. The guideline includes the following conditions in AG ¶ 32 that could potentially mitigate security concerns arising from Applicant's criminal conduct:

(a) so much time has elapsed since the criminal behavior happened, or it happened under such unusual circumstances, that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment; and

(d) there is evidence of successful rehabilitation; including, but not limited to, the passage of time without recurrence of criminal activity, restitution, compliance with the terms of parole or probation, job training or higher education, good employment record, or constructive community involvement.

As discussed above, Applicant's sole incident of misconduct, while certainly serious, occurred nearly 12 years ago under circumstances in academia that are unlikely to recur, given his current vocation as a pipefitter. And while his judgment at the time was clearly poor, his future prognosis, as delineated by his therapist, speaks highly of his current reliability, trustworthiness, and judgment.

Moreover, Applicant successfully completed his probation term and ultimately received a Certificate of Pardon which expressed a full, complete, absolute, and unconditional pardon for his criminal misconduct. This pardon is not binding on the DoD in conducting a security clearance evaluation, but it does speak to the present

assessment of Applicant's reliability, trustworthiness, and good judgment. AG ¶¶ 32(a) and (d) apply and Guideline J is found for Applicant.

SOR Paragraph 3 (Guideline E, Personal Conduct)

The security concerns relating to the guideline for personal conduct are set out in AG ¶ 15, which states:

Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual's reliability, trustworthiness and ability to protect classified or sensitive information. Of special interest is any failure to cooperate or provide truthful and candid answers during national security investigative or adjudicative processes.

The following potentially disqualifying conditions set forth in AG ¶ 16 may pertain to the allegations levied in this case under Guideline E:

(a) deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar form used to conduct investigations, determine employment qualifications, award benefits or status, determine national security eligibility or trustworthiness, or award fiduciary responsibilities;

(b) deliberately providing false or misleading information; or concealing or omitting information, concerning relevant facts to an employer, investigator, security official, competent medical or mental health professional involved in making a recommendation relevant to a national security eligibility determination, or other official government representative; and

(e) personal conduct, or concealment of information about one's conduct, that creates a vulnerability to exploitation, manipulation, or duress by a foreign intelligence entity or other individual or group. Such conduct includes:

(1) engaging in activities which, if known, could affect the person's personal, professional, or community standing;

(2) while in another country, engaging in any activity that is illegal in that country;

(3) while in another country, engaging in any activity that, while legal there, is illegal in the United States.

Upon review, the evidentiary record does not contain facts sufficient to support the allegation levied in SOR ¶ 3.b that Applicant deliberately provided false or misleading

information. As written, the allegation posits that because Applicant resigned his position after committing misconduct, *res ipsa loquitur* he was not on good terms with the college and was ineligible for rehire. While this premise is certainly plausible, it is without evidentiary support. Applicant asserts that given the student's declination to press charges (at that time), he believed his resignation was characterized as the result of "differences" between the parties. The Applicant has not admitted to this allegation and the Government has provided no evidence to the contrary. SOR ¶ 3.b is found for Applicant.

Regarding the remainder of the allegations, the facts of this case establish the above-referenced potentially disqualifying conditions set forth in AG ¶ 16. The burden therefore shifts to Applicant to mitigate security concerns under Guideline E. The guideline includes the following conditions in AG ¶ 17 that could potentially mitigate security concerns arising from Applicant's personal conduct:

(c) the offense is so minor, or so much time has passed, or the behavior is so infrequent, or it happened under such unique circumstances that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment;

(d) the individual has acknowledged the behavior and obtained counseling to change the behavior or taken other positive steps to alleviate the stressors, circumstances, or factors that contributed to untrustworthy, unreliable, or other inappropriate behavior, and such behavior is unlikely to recur; and

(e) the individual has taken positive steps to reduce or eliminate vulnerability to exploitation, manipulation, or duress.

The Applicant admitted to SOR ¶ 3.a, which incorporates all of the allegations in SOR ¶ 1. For the same reasons discussed in the SOR ¶ 1 analysis above, AG ¶¶ 17(c) and (d) apply, but 17(e) cannot. Applicant has not provided sufficient evidence of having taken positive steps to reduce or eliminate vulnerability to exploitation, manipulation, or stress. The pardon is certainly a step in that direction, but without any evidence of knowledge by anyone at the DoD contractor, SOR ¶ 3.a must be found against Applicant.

SOR ¶¶ 3.c and 3.d both involve Applicant's denial to the DoD of his having been on probation within the last seven years. In each instance, Applicant said, "No," but denied having any intent to deceive claiming he simply "did the math wrong" on two separate occasions. Applicant, however, is a highly-educated professor with two master's degrees. The math problem in question was 2023 minus 2019.

He failed to disclose two years of probation on his Questionnaire in June 2023, then did so again six months later when specifically asked the question by a DoD investigator in December 2023. The denial to the DoD investigator, however, occurred

soon after Applicant applied for a pardon from the Board of Pardons and Paroles in August 2023. But only after being confronted did he acknowledge his sentence.

As the Appeal Board has noted, “a person holding a security clearance has a duty to fully disclose conduct of security concern.” [ISCR 24-00278 at 3 (App. Bd. Jan. 14, 2026)]. Moreover, multiple omissions undercut any argument that applicant’s failure to disclose required information was the result of mistake, oversight, or lack of recall. [ISCR 21-02729 at 3 (App. Bd. Feb. 15, 2023)]. Having examined the omissions in light of the record as a whole, AG ¶¶ 17(c), (d), and (e) do not apply. SOR ¶¶ 3.c and 3.d are found against Applicant.

Finally, regarding SOR ¶ 3.e, Applicant essentially pled ignorance, noting he only believed there to be three misdemeanors in his case, rather than a felony. The record evidence clearly shows that Applicant was in fact initially charged with felony sexual assault. The question is not, however, was the Applicant wrong in his belief, but whether his omission was deliberate. In this case, Applicant’s misunderstanding of whether his case over ten years ago initially included a felony charge is certainly plausible. But more importantly, the Government has not met its burden to produce the substantial evidence required to show his omission was deliberate. [ISCR 07-16511 at 3 (App. Bd. Dec. 4, 2009)] AG ¶¶ 17(c), (d), and (e) therefore apply and SOR ¶ 3.e is found for Applicant.

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant’s eligibility for national security eligibility 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 national security 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 above whole-person factors and the potentially disqualifying and mitigating conditions in light of all pertinent facts and circumstances surrounding this case.

I have given the appropriate weight to Applicant’s Answer, Response, and interrogatory responses (which include the referenced Pardon Board package materials). As discussed above, Guideline J is found for Applicant. But ultimately the sexual behavior

and personal conduct issues cannot be resolved in his favor and 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 ¶ E3.1.25 of Enclosure 3 of the Directive, are:

Paragraph 1, Guideline D:	AGAINST APPLICANT
Subparagraphs 1.a – 1c:	Against Applicant
Paragraph 2, Guideline J:	FOR APPLICANT
Subparagraph 2.a:	For Applicant
Paragraph 3, Guideline E:	AGAINST APPLICANT
Subparagraph 3.a:	Against Applicant
Subparagraph 3.b:	For Applicant
Subparagraphs 3.c – 3.d:	Against Applicant
Subparagraph 3.e:	For Applicant

Conclusion

In light of all of the circumstances presented by the record in this case, I conclude that it is not clearly consistent with the interests of national security to grant Applicant's eligibility for a security clearance. Eligibility for access to classified information is denied.

RICHARD A. CEFOLA
Administrative Judge