



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



In the matter of:)
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Applicant for Security Clearance)
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ISCR Case No. 24-02208

Appearances

For Government: Daniel O’Reilly, Esq., Department Counsel
For Applicant: *Pro se*

06/02/2026

Decision

MURPHY, Braden M., Administrative Judge:

This case involves alleged and admitted security concerns under Guideline E (personal conduct) and Guideline F (financial considerations). Though some personal conduct allegations are not established, Applicant did not provide sufficient evidence to mitigate established security concerns under either guideline. Applicant’s eligibility for access to classified information is denied.

Statement of the Case

Applicant submitted a security clearance application (SCA) on August 5, 2024. Following a background investigation, the Defense Counterintelligence and Security Agency (DCSA) issued a Statement of Reasons (SOR) to Applicant on February 12, 2025, detailing security concerns under Guidelines E and F. The DCSA issued the SOR under Executive Order (Exec. Or.) 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 Security Executive Agent Directive (SEAD) 4, *National Security Adjudicative Guidelines* (AG), effective June 8, 2017.

Applicant answered the SOR on February 21, 2025, and requested a hearing before an administrative judge from the Defense Office of Hearings and Appeals (DOHA). She provided no documents with her answer.

The case was initially assigned to Administrative Judge 1 on or about July 18, 2025, for scheduling of a hearing. The hearing was initially scheduled for October 8, 2025. However, that hearing was cancelled when all administrative judges were furloughed from October 1 through November 12, 2025, during a federal government shutdown due to a lapse in funding. After the federal government reopened, DOHA issued a notice on December 4, 2025, scheduling the hearing for December 22, 2025, before another DOHA administrative judge, Judge 2.

The December 22, 2025 hearing convened as scheduled. Department Counsel submitted Government's Exhibits (GE) 1 through 6, all of which were admitted without objection. Applicant testified but did not submit any documents as part of her case. At the end of the hearing, Judge 2 held the record open until January 23, 2026, to allow Applicant the opportunity to submit additional evidence. There is no indication in the file that Applicant submitted any evidence, either before the record closed on January 23, 2026, or at any time thereafter. DOHA received the hearing transcript (Tr.) on January 9, 2026.

In early April 2026, Judge 2 unexpectedly passed away. On April 7, 2026, the DOHA chief administrative judge assigned the case to me. On April 7, 2026, I emailed the parties to inform Applicant of Judge 2's death. Since a decision in her case remained pending, I offered Applicant the choice of requesting a new hearing before me, or a decision by me based on the transcript and admitted evidence in the December 2025 hearing before Judge 2. (Hearing Exhibit (HE) I)

On May 12, 2026, Applicant emailed to indicate that "I do not wish to proceed with a hearing in this matter and would like to waive my right to appear/request that the matter be resolved without a formal hearing, if permitted under applicable regulations." (HE I) I interpreted her response as a waiver of her right to a further hearing and emailed the parties the same day to indicate that I would review the record in the December 2025 hearing before Judge 2 and issue a written decision on Applicant's eligibility for a security clearance at a later date. The post-hearing emails are included in the record as HE I. The record otherwise remained closed.

Findings of Fact

Applicant admitted all the allegations in the SOR without comment. This included the Guideline E allegations at SOR ¶¶ 1.a-1.e, and the Guideline F allegations at SOR ¶¶ 2.a-2.h. SOR ¶ 2.a is a cross-allegation of a job termination alleged at SOR ¶ 1.a. Notwithstanding her "admissions" to the falsification allegations at SOR ¶¶ 1.b-1.e, I consider that she denied any intent to falsify or to mislead the Government by her

omissions on her SCA. Her admissions are incorporated into the Findings of Fact. Additional findings follow.

Applicant is 33 years old. She has a high school diploma. She married in October 2025. She has an infant daughter, born in June 2025. Since April 2024, Applicant has worked as a painter for a defense contractor at a naval shipyard, a job for which she submitted an SCA in August 2024. She has never held a clearance before. (GE 1; Tr. 5, 9, 17-22)

Applicant testified that she was out of work for about four months, from late May to late September 2025. Her mother became very ill, so Applicant had to care for her, and Applicant also had her baby soon thereafter. (Tr. 20-21) She later said her mother passed away, leaving Applicant to care for three teenagers. (Tr. 58)

Applicant disclosed several jobs on her SCA. From June 2018 until May 2021, she worked as an assistant manager of a clothing store. From May 2021 until March 2022 or later, she worked as a store manager for another company. She reported on her SCA that she left the job by mutual agreement following an allegation of poor performance. (See discussion below) She stated that she had not been properly trained. She disclosed that her supervisor was Ms. K.A. From July 2022 to April 2024, Applicant worked as a teacher at a school or learning center for young children. She left the job by mutual agreement because she found that working with children was “not for everyone.” She began working at the shipyard soon thereafter. (GE 1 at 12-14; Tr. 6-7, 22-25)

Applicant’s background investigation revealed the three charged-off delinquent debts (SOR ¶¶ 2.b-2.d) and four outstanding judgments (SOR ¶¶ 2.e-2.h) alleged in the SOR. The SOR debts and judgments total about \$45,388. Applicant admitted each debt in the SOR. The debts are also established by credit reports from January 2025 and August 2024. (GE 5, GE 6) The judgments are established by court records. (GE 4)

When she submitted her SCA, Applicant did not disclose any other job terminations, and she did not disclose any delinquent debts, judgments, or civil cases against her. (GE 1) She discussed her job termination, her debts, and other matters in her October 2024 background interview that she authenticated and adopted as accurate in a January 2025 interrogatory response. (GE 3)

In her interview, Applicant attributed her debts to financial inexperience and said she did not have anyone to teach her how to balance her finances. She said her financial situation at the time was “poor” and “terrible,” though she said she was working on improving her finances by learning budgeting and how to balance her finances. Applicant also said that although she could not explain her omissions on her SCA, she did not intend to mislead the Government. (GE 3 at 6) The details she provided about her debts in her interview, if any, are addressed as necessary with each SOR debt, below.

Applicant initially said in her testimony that none of the debts had been paid and that she had made no efforts to pay or resolve them, though she said she intended to do so. (Tr. 32-38) She later said she thought some of the judgments had been resolved.

SOR ¶¶ 2.b (\$20,488) and 2.c (\$19,215) are charged-off debts related to car loans. (GE 5, GE 6) The amount alleged at SOR ¶ 2.c is what remains on the loan after Applicant's first car was totaled in an auto accident. She had auto insurance but only liability and not full coverage. The loan at SOR ¶ 2.b is the remaining balance on a car loan after Applicant's second car was repossessed. She said she had received a settlement offer on SOR ¶ 2.b but was unable to pay it. (GE 3 at 5-6; Tr. 32-42) These debts are not resolved.

SOR ¶ 2.d (\$2,413) is a charged-off loan account. Applicant explained in her interview that the account was a loan she took out to pay off other debts. She asserted that she paid \$100 each month towards the debt, and that it was current with a balance of \$613. (GE 3 at 6) Applicant's August 2024 credit report lists the account as having been charged off with a balance of \$1,913. (GE 6) Her January 2025 credit report lists the charged-off amount alleged (\$2,413) with the last payment made in November 2024. (GE 6 at 2) In her testimony, she said the debt had been paid. She did not provide documentary proof, either at or after the hearing. (Tr. 42-44, 58) This debt is not resolved.

SOR ¶ 2.e (\$367) is a judgment obtained from Applicant by plaintiff W in local general district court, allegedly in February 2019. Applicant admitted the debt, and it is established by GE 4 (although the suit was filed in October 2019, and a default judgment was issued against Applicant in November 2019, not February 2019, as alleged). She testified that this is an unresolved medical bill. It remains unpaid though she intends to resolve it. (Tr. 44-45)

SOR ¶ 2.f (\$520) is alleged as an unpaid judgment obtained against Applicant by collector H for apartment complex C in November 2019. Applicant admitted the debt in her Answer. However, the Government's evidence shows that the plaintiff collector sued two individuals for collection in local general district court – Applicant and another individual, Mr. H. The court records provided show that while plaintiff obtained a judgment against Mr. H for the amount alleged, the case against Applicant was "dismissed." (GE 4 at 3) Applicant said she called the court clerk in about June 2024 and was told the case was dismissed. (Tr. 45-47) Notwithstanding her admission, SOR ¶ 2.f is found for Applicant since the Government's evidence shows it was dismissed at least as to her.

SOR ¶¶ 2.g (\$1,182) and 2.h (\$1,203) are unpaid judgments obtained by apartment complex M against both Applicant and Mr. H (the same individual as in SOR ¶ 2.f), in November 2018 and October 2018, respectively, for unpaid rent. When she was asked about the debts in her background interview, she said she moved into the apartment with her fiancé in February 2018 and was evicted in September 2018. The unlawful detainer actions followed soon thereafter. She said in the interview that the collection agency told her the debts had been paid. However, she admitted the debts in her SOR response, and they are established by GE 4. (GE 2 at 5, GE 4)

These two judgments are discussed in Applicant's background interview, but it is not clear that she knew about them either at the time or when she prepared her SCA. (GE 3 at 5) She said she learned about these two judgments later when she applied for an apartment lease. She said there was no mention of a judgment to creditor C (SOR ¶ 2.f). It appears that Mr. H is now her husband. She said he told her the debts had been paid off, so she was surprised to learn of the judgments. She said when she called the apartment complex and the collection agency, both told her there was no record of a debt she owed. They referred her to the courthouse. She has been unable to get clarification on what if anything she owes. (Tr. 47-49)

At the time of the hearing, Applicant said she earned \$26.97 an hour. She has no other job. Her husband works for the same defense contractor employer as she does and earns a similar income. They live together and share household expenses. They live paycheck to paycheck with little-to-no safety net. She noted one other credit card that was past due, on which she owed about \$600 but she is paying it off. She is not involved in financial counseling and does not think she needs it. She tries to keep a household budget but acknowledged she does not keep a written budget. (Tr. 50-58)

In February 2022, Applicant was allegedly fired from her job as a manager at Store C for "embezzling or stealing merchandise, money, or store credit" in the amount of \$82. This was alleged under Guideline E (SOR ¶ 1.a) and cross-alleged under Guideline F (SOR ¶ 2.a)

The Government's evidence includes a "voluntary statement" signed by Applicant on February 21, 2022, explaining the circumstances. It says:

I found a [\$]67.84 merchandise card in the store. I had waited a while to see if anyone would come in the store to claim it. I did [purchase] some things in the store after it was claimed. I do not anything [sic] about the [\$]15.91 being added. Me [Applicant] as store manager should of [sic] had known better and I truly [apologize] for my mistakes. I have redeemed the [\$]82.24 a day later. I didn't know the [\$]15.91 was added to the card. I [Applicant] will pay back [\$]82.74. (GE 3 at 2)

The same exhibit also includes a "Payment Plan" in which Applicant acknowledged that, "You have confessed to theft in the amount of \$82.24." She also indicated that she would pay the debt in full in August 2022 by mailing a money order to the store's headquarters. (GE 3 at 3) It is not clear whether she did so, but the \$82 is not alleged in the SOR as an unpaid debt.

In SOR ¶ 1.b, the SOR alleges that when Applicant disclosed the circumstances of her departure from the job at Store C on her SCA, she deliberately failed to disclose that she was either fired or left following allegations of misconduct (theft) and instead said she left the job following notice of unsatisfactory performance.

Applicant admitted that she was terminated from her job as a store manager. (Answer; Tr. 7) (SOR ¶¶ 1.a, 2.a) As noted above, in listing this job on her SCA, she named her supervisor, Ms. K.A., but she did not list the name of the store (Store C). She said this was an oversight. She listed her departure from the job but said her performance issues related to a lack of training. She said she was embarrassed about disclosing that she was terminated, though she also feels she should have received more training as a store manager than the one week she got. Her supervisor, Ms. K.A., was based in another city. This was Applicant's first time running a store by herself and she said she was not ready for it. (Tr. 25-27)

Applicant said she found the merchandise card and used it herself to purchase some clothes. Under questioning, she acknowledged giving the card to a friend or family member, though she did not recall details. She was confronted about it and terminated when the store found out. No matter the details, she acknowledged that she was wrong to take the store's card for her personal use. (Tr. 27-31)

The remaining falsification allegations alleged under Guideline E relate to the financial information Applicant allegedly omitted from her SCA. In her SOR Response, Applicant admitted each allegation without further comment.

In SOR ¶ 1.c, the SOR alleges that Applicant deliberately failed to disclose the four judgments (SOR ¶¶ 2.e-2.h) in answer to a financial question on her SCA regarding "Delinquencies Involving Enforcement." (GE 1)

In SOR ¶ 1.d, the SOR alleges that Applicant deliberately failed to disclose any of her delinquent debts (SOR ¶¶ 2.b-2.d) or the four judgments (SOR ¶¶ 2.e-2.h) in answer to a financial question on her SCA regarding "Delinquencies Involving Routine Accounts." (GE 1)

In SOR ¶ 1.e, the SOR alleges that Applicant deliberately failed to disclose both the four judgments alleged (SOR ¶¶ 2.e-2.h) as well as four unlawful detainer civil cases brought against her between October 2017 and February 2018 by creditor GWB, in answer to a financial question on her SCA regarding "Non-Criminal Court Actions." (GE 1)

The repossessions are established by their listings on credit reports in the record. (GE 5, GE 6) The judgments and the four unlawful detainer suits are established by court records. (GE 4) The unlawful detainer suits led to writs of eviction but it is not clear what happened after that. (GE 4) They are also not alleged in the SOR.

Applicant testified that when she filled out her SCA, she knew about the repossessions. She said she was "really not sure" why she did not disclose them. She said she did not know about the judgments. (Tr. 16, 31-32) The four unlawful detainer suits were not discussed specifically in the record. Applicant discussed the repossessions in her background interview. It is not clear that she volunteered information about them before she was confronted. (GE 2 at 5-6)

Applicant concluded her testimony by acknowledging that she had been irresponsible. She did not understand the importance of a clearance until she filled out the SCA. She said she “tried [her] best” with filling out the form but said she can get distracted. She is trying to be more responsible and improve her life for herself and her family. (Tr. 53-54, 56, 62)

Policies

It is well established that no one has a right to a security clearance. As the Supreme Court has held, “the clearly consistent standard indicates that security determinations should err, if they must, on the side of denials.” *Department of Navy v. Egan*, 484 U.S. 518, 531 (1988).

When evaluating an applicant’s suitability for a security clearance, the administrative judge must consider the adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines list potentially disqualifying conditions and mitigating conditions, which are used in evaluating an applicant’s eligibility for access to classified information.

These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in the adjudicative process. The administrative judge’s overarching adjudicative goal is a fair, impartial, and commonsense decision. According to AG ¶ 2(a), the entire process is a conscientious scrutiny of several variables known as the “whole-person concept.” The administrative judge must consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a decision.

The protection of the national security is the paramount consideration. AG ¶ 2(b) requires that “[a]ny doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security.” In reaching this decision, I have drawn only those conclusions that are reasonable, logical, and based on the evidence contained in the record. Likewise, I have not drawn inferences grounded on mere speculation or conjecture.

Under Directive ¶ E3.1.14, the Government must present evidence to establish controverted facts alleged in the SOR. Under Directive ¶ E3.1.15, an “applicant is responsible for presenting witnesses and other evidence to rebut, explain, extenuate, or mitigate facts admitted by applicant or proven by Department Counsel and has the ultimate burden of persuasion to obtain a favorable security 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 access to classified information. 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 of potential, rather than actual, risk of compromise of classified information.

Analysis

Guideline F, Financial Considerations

The security concern relating to the guideline for financial considerations is set out in AG ¶ 18:

Failure to live within one's means, satisfy debts, and meet financial obligations may indicate poor self-control, lack of judgment, or unwillingness to abide by rules and regulations, all of which can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information. . . .

This concern is broader than the possibility that an individual might knowingly compromise classified information in order to raise money. It encompasses concerns about an individual's self-control, judgment, and other qualities essential to protecting classified information. An individual who is financially irresponsible may also be irresponsible, unconcerned, or negligent in handling and safeguarding classified information. See ISCR Case No. 11-05365 at 3 (App. Bd. May 1, 2012).

The guideline notes several conditions that could raise security concerns under AG ¶ 19. The following are potentially applicable in this case:

- (a) inability to satisfy debts;
- (c) a history of not meeting financial obligations; and
- (d) deceptive or illegal financial practices such as embezzlement, employee theft, . . . and other intentional financial breaches of trust.

The debts alleged in the SOR total just over \$45,000. They are largely established by Applicant's admissions and the documentation of the delinquent debts and judgments in the record. AG ¶¶ 19(a) and (c) apply. The judgment debt at SOR ¶ 2.f is not established as an active debt owed by Applicant, since the Government's evidence shows the judgment was dismissed as to her.

As to SOR ¶ 2.a, Applicant acknowledged that in February 2022, she engaged in theft when she found a store merchandise card with about \$82 on it and without authorization either used it herself or gave it to a family member to use. She was terminated from her job as a store manager as a result. Her actions constituted "employee theft" and AG ¶ 19(d) applies.

The financial considerations guideline also includes conditions that could mitigate security concerns arising from financial difficulties. The following mitigating conditions under AG ¶ 20 are potentially applicable:

(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; and

(d) the individual initiated and is adhering to good-faith effort to repay overdue creditors or otherwise resolve debts.

Applicant's theft of an \$82 merchandise card from her employer was a serious incident, an exercise in poor judgment, and a breach of financial trust in her role as a store manager. It was also an isolated incident for which Applicant paid a heavy price when she was terminated. She admitted what she did, both to her employer and in the security clearance process. She disclosed aspects of her departure from the job on her SCA (more on that below), admitted the allegation in the SOR, acknowledged wrongdoing in her testimony, and expressed remorse and said she had matured. AG ¶ 20(a) applies to SOR ¶ 2.a.

With respect to her debts and the unresolved judgments, Applicant did not provide sufficient evidence to apply mitigating conditions. She admitted the delinquent debts and judgments but offered no explanations or documentation about their current status to show that any of the debts are being paid, disputed, or resolved. She did not provide sufficient evidence from which to conclude that her financial issues are unlikely to recur and do not cast doubt on her current reliability, trustworthiness, and good judgment. AG ¶ 20(a) does not apply.

Applicant acknowledged that her debts were due to her own financial inexperience. She did not establish that her debts occurred due to conditions beyond her control. Moreover, even if she had, she did not establish that she undertook reasonable efforts under the circumstances to resolve her debts. AG ¶ 20(b) therefore does not apply. Similarly, she did not establish that she undertook sufficient good-faith efforts to pay or otherwise resolve her debts. She did not establish that AG ¶ 20(d) should apply.

Applicant needs to establish a track record of financial stability and good-faith efforts towards her creditors in order to mitigate financial security concerns arising from her debts and to show that she will not become financially overextended in the future. She has not done so.

Guideline E, Personal Conduct

AG ¶ 15 details the security concern for personal conduct:

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. . . .

AG ¶ 16 describes conditions that could raise a security concern and may be disqualifying. The following disqualifying conditions are potentially applicable:

(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; and

(d) credible adverse information that is not explicitly covered under any other guideline and may not be sufficient by itself for an adverse determination, but which, when combined with all available information, supports a whole-person assessment of questionable judgment, untrustworthiness, unreliability, lack of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the individual may not properly safeguard classified or sensitive information. . . .

The allegation at SOR ¶ 1.a concerns Applicant's theft from her employer, cross-alleged in SOR ¶ 2.a under Guideline F. As discussed above, I found that a disqualifying condition applied but also mitigated the conduct under AG ¶ 20(a) as an isolated incident unlikely to recur. Therefore, AG ¶ 16(d) can and does apply to the theft as cross-alleged under Guideline E, even if the conduct might be mitigated on similar grounds. This is addressed below.

SOR ¶ 1.b alleges that when Applicant disclosed the circumstances of her departure from Store C on her August 2024 SCA, she deliberately failed to disclose that she was either fired or left by mutual agreement following an allegation of misconduct (the theft), since she wrote instead that she left by mutual agreement following notice of unsatisfactory performance. Applicant did not list the name of the store, but listed the name of her off-site supervisor, Ms. K.A.

I conclude that while Applicant was less than fully candid about what she disclosed concerning her departure from Store C, the information she gave was also not deliberately false. Put another way, while she should have said she was fired, I cannot conclude that

she lied when she said that she left “by mutual agreement following notice of unsatisfactory performance.” AG ¶ 16(a) does not apply to SOR ¶ 1.b.

It is not established that Applicant knew about the two judgments to creditor M when she submitted her SCA. It has already been established that the judgment to creditor C was dismissed as to her. Therefore, it is not established that Applicant had a duty to disclose any of those judgments on her SCA, or that she deliberately failed to do so. AG ¶ 16(a) does not apply to SOR ¶ 1.c, notwithstanding her admission to the allegation on the SOR.

Similarly, it is not established that Applicant knew about the four unlawful detainer suits brought by GWB between October 2017 and February 2018, that she recognized that she had a duty to disclose them on her SCA, or that she deliberately failed to do so. AG ¶ 16(a) does not apply to SOR ¶ 1.e, notwithstanding her admission to the allegation on the SOR.

However, Applicant testified that she knew about the two repossession debts when she filled out her SCA. She had a duty to disclose routine delinquent debts such as those debts and did not do so. She also admitted SOR ¶ 1.d. AG ¶ 16(a) is established as to that allegation.

AG ¶ 17 sets forth potentially applicable mitigating conditions under Guideline E:

(a) the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts; and

(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.

Applicant’s theft of the \$82 merchandise card from her employer, as alleged in SOR ¶ 1.a, is mitigated as a personal conduct security concern under AG ¶ 17(c), just as it is mitigated as a financial considerations security concern under AG ¶ 20(a), above. However, it is not established that either AG ¶¶ 17(a) or 17(c) should apply to mitigate Applicant’s failure to disclose the debts at SOR ¶¶ 1.b-1.d on her SCA.

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 relevant circumstances. The administrative judge should consider the nine adjudicative process factors listed at AG ¶ 2(d):

(1) the nature, extent, and seriousness of the conduct; (2) the circumstances surrounding the conduct, to include knowledgeable participation; (3) the frequency and recency of the conduct; (4) the individual's age and maturity at the time of the conduct; (5) the extent to which participation is voluntary; (6) the presence or absence of rehabilitation and other permanent behavioral changes; (7) the motivation for the conduct; (8) the potential for pressure, coercion, exploitation, or duress; and (9) the likelihood of continuation or recurrence.

Under AG ¶ 2(c), the ultimate determination of whether to grant eligibility for a security clearance must be an overall commonsense judgment based upon careful consideration of the guidelines and the whole-person concept. I considered the potentially disqualifying and mitigating conditions given all the facts and circumstances surrounding this case. I have incorporated my comments under Guidelines E and F in my whole-person analysis.

Applicant's failure to disclose various debts on her SCA is not mitigated under Guideline E. However, the chief concern here is her overall financial situation. Applicant has taken few if any steps toward resolving her debts and improving her finances. She needs to establish a track record of payments towards her creditors and of increased financial stability. Time will tell if she is able to do this enough to warrant eligibility in the future. But at this time, she has not provided enough evidence of financial responsibility and stability to mitigate security concerns about her debts. Overall, the record evidence leaves me with questions and doubts as to Applicant's eligibility for access to classified information.

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 E:	AGAINST APPLICANT
Subparagraphs 1.a-1.c:	For Applicant
Subparagraph 1.d:	Against Applicant
Subparagraph 1.e:	For Applicant
Paragraph 2, Guideline F:	AGAINST APPLICANT
Subparagraph 2.a:	For Applicant
Subparagraphs 2.b-2.e:	Against Applicant
Subparagraph 2.f:	For Applicant
Subparagraphs 2.g-2.h:	Against Applicant

Conclusion

Considering all of the circumstances, it is not clearly consistent with the interests of national security to grant Applicant a security clearance. Eligibility for access to classified information is denied.

Braden M. Murphy
Administrative Judge