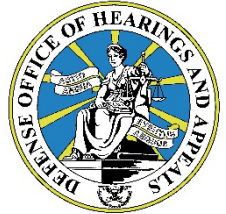




**DEFENSE LEGAL SERVICES AGENCY
DEFENSE OFFICE OF HEARINGS AND APPEALS**



In the matter of:)
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Applicant for Security Clearance)
_____)

ISCR Case No. 25-01391

Appearances

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

07/15/2026

Decision

GOLDSTEIN, J., Administrative Judge:

Applicant did not mitigate the security concerns under Guidelines H (Drug Involvement and Substance Misuse) and E (Personal Conduct). Eligibility for access to classified information is denied.

Statement of the Case

Applicant submitted a security clearance application (SCA) on May 23, 2025. On December 2, 2025, the Defense Counterintelligence and Security Agency (DCSA) sent him a Statement of Reasons (SOR) alleging security concerns under Guidelines H and E. This DCSA acted 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) implemented by the DOD on June 8, 2017.

On December 5, 2025, Applicant's counsel submitted their letter of representation along with Applicant's election to have his matter decided after a hearing before an administrative judge, signed on December 4, 2025. His counsel requested an extension and Applicant's answer to the SOR was submitted through counsel by February 20, 2026. Department Counsel prepared Government's discovery packet on March 27, 2026. On April 2, 2026, after receiving Government's discovery packet, Applicant's counsel withdrew their representation and indicated that Applicant now requests a decision on the written record, without a hearing. Department Counsel submitted the Government's written case on April 10, 2026. A complete copy of the file of relevant material (FORM) was sent to Applicant, who was given an opportunity to file objections and submit material to refute, extenuate, or mitigate the Government's evidence. He received the FORM on April 15, 2026, and did not respond. The case was assigned to me on June 29, 2026.

The Government's FORM consists of the SOR (Government Exhibit (GE) 1), Applicant's answer to the SOR which includes Applicant's Exhibit (AE) A-J (GE 2), and the documents in support of the allegations in the SOR (GE 3-6). GE 3 through 6 are admitted into evidence, without objection.

Applicant's exhibits included in GE 2 are as follows: AE A: a copy of the SOR; AE B: excerpt from the Directive, AG ¶ E; AE C: excerpt from the Directive, AG ¶ H; AE D: negative hair follicle drug test result, dated January 2026; AE E: Letter of Intent, signed by Applicant on December 5, 2025; AE F: school transcripts; AE G: Psychological Evaluation, dated December 18, 2025; AE H: Applicant's resume; AE I: three character letters; AE J: excerpt from the Directive, Appendix C. AE D through I will be considered as evidence. AE A is duplicative and has been previously marked as GE 1. AE B, C, and J are excerpts of the Directive, and not evidence.

Findings of Fact

The SOR alleges under Guideline H that Applicant used marijuana with varying frequency from September 2014 to January 2025, to include purchasing marijuana beginning in July 2017. (SOR ¶¶ 1.a-1.b) He also used mushrooms¹ from March 2023 to December 2024, purchasing it from March 2024 forward. (SOR ¶¶ 1.c-1.d) He admitted all the allegations under Guideline H. (GE 2)

The SOR alleges under Guideline E that Applicant intentionally falsified material facts on August 1, 2020, when he did not disclose the true extent of his marijuana use on his certified Questionnaire for Public Trust Positions (Standard Form (SF) 85P). (SOR ¶¶ 1.a-1.b) All the allegations alleged under Guideline H are also cross alleged under Guideline E. (SOR ¶ 2.c) Applicant admits the allegations in SOR ¶¶ 2.a-2.b. He neither admits nor denies the allegation in SOR ¶ 2.c, and instead references his answers under the Guideline H allegations and asserts that the admitted to underlying conduct is appropriately alleged under Guideline H, only. (GE 2)

¹ The SOR lists "mushrooms" as the controlled substance. Based on the evidence in the FORM, any reference to "mushrooms" is found to be a reference to psilocybin, a type of hallucinogenic mushroom that is a Schedule I controlled substance. *Controlled Substances Act*, 21 U.S.C. § 801 et seq. (1970).

Applicant is 29 years old, has never married, and has no children. He graduated from a university and earned a bachelor's degree in May 2018. He was unemployed upon graduation and sought employment for nearly a year before starting his first job with a Government contractor in April 2019. He submitted an SF85P on August 1, 2020, seeking to occupy a position of trust with the same employer. It is not clear from the record whether he occupied that position of trust after submitting the application. However, his resume reflects that between May 2021 and January 2023, he worked on two government contracts. He was laid off in October 2023 due to funding issues. He was unemployed from October 2023 until he was hired by his current employer in May 2025. He seeks a security clearance in connection with his current employment. (GE 2 at AE H; GE 3)

In Applicant's SF85P, certified by him on August 1, 2020, he disclosed a one-time use of marijuana in January 2018 during his last semester in college. (GE 4 at 21) He explained that "[i]t was his last semester as a senior in college and [he] had never tried it before." (GE 4 at 21) He stated that he did not intend to use marijuana in the future "because of the mental effects it can have on me when trying to be productive, now that I have graduated school and I am in the work force." (GE 4 at 22)

In his 2025 SCA, Applicant disclosed a lengthy history of illegal drug use, which predated his 2020 SF85P certification. In his answer to the SOR, he admitted that he falsified his 2020 SF85P because it "was [his] first job after college [which] took [him] a year to get, and [he] lied out of fear." (GE 2) In his SCA, he revealed that he first used marijuana during his first semester in college (Fall 2014) and again at the end of his sophomore year (May 2016). He increased his marijuana use to about once or twice every other week during his junior year in college (2016-2017). In his senior year (2017-2018), he lived with roommates who were regular marijuana users and began smoking marijuana approximately every other day until graduation. (GE 3 at 27-28; GE 2 at AE G) While attending an event in Washington, D.C. sometime in early 2018, he learned that marijuana use remained federally illegal. (GE 5 at 17) His use decreased after graduation (2019-2022). In 2022, he relocated into his own apartment and his use once again increased to daily or every other day until January 2025. (GE 3 at 27-28; GE 5 at 15) He would purchase marijuana from a friend in college, and after the summer of 2019, he began purchasing it from a dispensary. During the period of his near daily use, he would typically purchase about "3.5 grams" of marijuana and that would last him about two weeks. (GE 3 at 29; GE 5 at 15)

As he had in his 2020 SF85P, Applicant again attested in his 2025 SCA that he had no intent to use marijuana in the future, stating:

I do not intend to use THC in the future to continue a new chapter of maturity and healthy habits. It was an immature habit that started in college with friends for fun that eventually lost its purpose as I got older. My priorities changed from just hanging out with friends to maximizing opportunities, careerwise and in other aspects of my life. Also, I will be thirty years old next year and want to start the new decade of my life in the best physical and mental shape as possible.

(GE 3 at 28)

Applicant used psilocybin (hallucinogenic mushrooms) on at least five occasions from May 2022² to December 2024. (GE 2 at AE G; GE 3 and 5) He obtained the drug from a friend on the first two occasions of his use and purchased it approximately three more times between March and December 2024. (GE 2 at AE G) He stated in his SCA, “I do not intend to use psilocybin mushrooms or any hallucinogenic in the future to continue to develop healthy habits and maximize opportunities in my life. My use of psilocybin was experimental and there is nothing more for me to gain from it.” (GE 3 at 28)

Applicant asserts that he “has been abstinent from all illegal substances since early 2025, and he has not purchased any illegal substances since January 2025.” (GE 2 at AE D) He provided a signed letter of intent to abstain from all illegal substances and acknowledged the security consequences if he were to use any illegal substances while possessing a security clearance. (GE 2 at AE E) He underwent a voluntary psychological evaluation in December 2025 (GE 2 at AE G), and the duly qualified mental health professional (MHP) opined, “[Applicant] does not... meet the diagnostic criteria for Substance Use Disorder [sic] or any other clinical diagnosis. His frequency and pattern of consumption, as described by [Applicant], does not rise to a level of clinical significance that would merit conferring a diagnosis.”³ (GE 2 at AE G, 37) The MHP added,

In addition to ... not meeting the diagnostic criteria for a Substance Use Disorder [sic], he appears to possess numerous protective factors that would mitigate concerns about future substance-related abuse or dependence. He has a well-defined career path that includes thoughtfulness and seriousness about what is required to maintain a security clearance, should one be granted. Second, he has a longstanding pattern of maintaining and improving his physical health and well-being, and he engages in various health-related activities that are aligned with robust and positive coping skills—including, and especially, refraining from substance use over the past year. Finally, he is socially and emotionally connected to people (family, friends) who support him in his ongoing health-promotion efforts—again, including refraining from substance use. Specifically, he is well-regarded by family, friends, and colleagues, several of whom have vouched for his character in writing.

(GE 2 at 37; AE G)

² In GE 3, Applicant lists date of first psilocybin use as March 2023. In GE 5, he lists his date of first use as May 2022 and confirms in GE 2 that the date he listed in GE 3 was an oversight. In GE 2 at AE G, he reported the date of first psilocybin use as May 2022.

³ “Based on clinical observations and the internal consistency and validity scales of the [Minnesota Multiphasic Personality Inventory] MMPI and [Substance Abuse Subtle Screening Inventory] SASSI-4 (all of which were within normative ranges), the following assessment results are considered valid and reliable.” GE 2 at 36.

Three individuals provided character letters attesting to Applicant's positive character traits, one of whom is both his current and past supervisor. He stated that he found Applicant to be "an honest and trustworthy person... [who] has proven to be a valuable team member." Another individual whom Applicant worked with described him as "reliable, honest, and conscientious." The third character letter was written by Applicant's uncle who impressed that Applicant is "very resilient and has overcome several hardships" to become the "hardworking and selfless young man" he is today. (GE 2 at AE I)

Policies

"[N]o 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 applicants eligibility for access to classified information "only upon a finding that it is clearly consistent with the national interest to do so." Exec. Or. 10865 § 2.

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, an administrative judge applies these guidelines 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 and 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 that 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 made "in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned." Exec. Or. 10865 § 7. Thus, a decision to deny a security clearance is merely an indication the applicant has not met the strict guidelines the President and the Secretary of War 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. 15-01253 at 3 (App. Bd. Apr. 20, 2016).

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 burden of proving a mitigating condition, and the burden of disproving it never shifts to the Government. See ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005).

An applicant "has the ultimate burden of demonstrating that it is clearly consistent with the national interest to grant or continue his security clearance." ISCR Case No. 01-20700 at 3 (App. Bd. Dec. 19, 2002). "[S]ecurity clearance determinations should err, if they must, on the side of denials." *Egan*, 484 U.S. at 531.

Analysis

Guideline H, Drug Involvement and Substance Misuse

The concern under this guideline is set out in AG ¶ 24:

The illegal use of controlled substances, to include the misuse of prescription and non-prescription drugs, and the use of other substances that cause physical or mental impairment or are used in a manner inconsistent with their intended purpose can raise questions about an individual's reliability and trustworthiness, both because such behavior may lead to physical or psychological impairment and because it raises questions about a person's ability or willingness to comply with laws, rules, and regulations. *Controlled substance* means any "controlled substance" as defined in 21 U.S.C. 802. *Substance misuse* is the generic term adopted in this guideline to describe any of the behaviors listed above.

Applicant's admissions and the record evidence establish the following disqualifying conditions under this guideline:

AG ¶ 25(a): any substance misuse (see above definition); and

AG ¶ 25(c): illegal possession of a controlled substance, including cultivation, processing, manufacture, purchase, sale, or distribution; or possession of drug paraphernalia.

Applicant used marijuana with varying frequency from September 2014 to January 2025 and purchased marijuana from July 2017 to January 2025. In early 2018, he learned that marijuana use was illegal under federal law but continued to possess and purchase it. From 2022 to January 2025, Applicant was smoking marijuana daily or every other day.

Applicant also used psilocybin from May 2022 to December 2024. He purchased it three times between March to December 2024 online and it was mailed to him. He estimated he spent \$180 on the psilocybin.

The following mitigating conditions are potentially applicable:

AG ¶ 26(a): the behavior happened so long ago, was so infrequent, or happened under such circumstances that it is unlikely to recur or does not cast doubt on the individual's current reliability, trustworthiness, or good judgment; and

AG ¶ 26(b): the individual acknowledges his or her drug involvement and substance misuse, provides evidence of actions taken to overcome this problem, and has established a pattern of abstinence, including, but not limited to:

- (1) disassociation from drug-using associates and contacts;
- (2) changing or avoiding the environment where drugs were used; and
- (3) providing a signed statement of intent to abstain from all drug involvement and substance misuse, acknowledging that any future involvement or misuse is grounds for revocation of national security eligibility.

The Security Executive Agent (SecEA) promulgated clarifying guidance concerning marijuana-related issues in security clearance adjudications as follows:

[Federal] agencies are instructed that prior recreational marijuana use by an individual may be relevant to adjudications but not determinative. The SecEA has provided direction in [the adjudicative guidelines] to agencies that requires them to use a "whole-person concept." This requires adjudicators to carefully weigh a few variables in an individual's life to determine whether that individual's behavior raises a security concern, if at all, and whether that concern has been mitigated such that the individual may now receive a favorable adjudicative determination. Relevant mitigations include, but are not limited to, frequency of use and whether the individual can demonstrate that future use is unlikely to recur, including by signing an attestation or other such appropriate mitigation. Additionally, in light of the long-standing federal law and policy prohibiting illegal drug use while occupying a sensitive position or holding a security clearance, agencies are encouraged to advise prospective national security workforce employees that they should refrain from any future marijuana use upon initiation of the national security vetting process, which commences once the individual signs the certification contained in the Standard Form 86 (SF-86), Questionnaire for National Security Positions.

Additionally, the DOHA Appeal Board cited the importance of consideration of "the changing landscape of marijuana law and ... of the Director of National Intelligence's Clarifying Guidance Concerning Marijuana." ISCR Case No. 23-02402 at 4 (App. Bd. Feb. 19, 2025). See also ISCR Case No. 24-00914 at 3 (App. Bd. Apr. 9, 2025) (noting the "evolving landscape of marijuana law and policy," "the resulting increasing prevalence of marijuana use," and in some instances "recreational marijuana use deserves less, or even no negative inference on judgment.")

Applicant is credited with disclosure of his marijuana and psilocybin use on his 2025 SCA. His use was not discovered through a polygraph test, investigative efforts, or a urinalysis test. He promised not to use illegal drugs in the future. A psychologist concluded he did not have a drug use disorder and did not recommend drug treatment. He received a good prognosis, and his hair follicle test was negative.

Applicant signed a statement of intent to abstain from all drug involvement and substance misuse and to avoid associations with known drug users and environments where illegal drugs are used. He acknowledged that any future involvement or misuse of drugs is grounds for automatic revocation of national security eligibility. He satisfied the requirements of AG ¶ 26(b)(3), except he has not established a credible or sufficient "pattern of abstinence of drug use." See generally, ISCR Case No. 24-00914 at 6 (App. Bd. Apr. 9, 2025). His decisions to use marijuana after promising in his public trust applicant to stop is an indication he lacks the qualities expected of those with access to national secrets. Further, he admitted he knew since 2018 that marijuana use was federally illegal. The time between Applicant's involvement with marijuana and the SCA, where he asserted abstinence, was just four months. He reaffirmed his commitment to abstinence in his Answer, but only one year had passed between his last reported use and his Answer. One year is insufficient when compared to his length of habitual marijuana use. His recent involvement with marijuana continues to cast doubt on his current reliability, trustworthiness, and judgment.

Applicant last used psilocybin in December 2024. Although his psilocybin use was less frequent, he began using it after completing an SF85P and while working on Government contracts. He did not claim that his use of psilocybin happened under circumstances that make future use unlikely. His choice to use this psychedelic drug does not reflect well on his reliability, trustworthiness, or good judgment. AG ¶ 26(a) does not provide full mitigation.

Guideline E, Personal Conduct

The concern under this guideline is set out in AG ¶ 15:

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 information. Of special interest is any failure to provide truthful and candid answers during the security clearance process or any other failure to cooperate with the security clearance process.

The following disqualifying conditions are potentially applicable under this guideline:

AG ¶ 16(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;

AG ¶ 16(c): credible adverse information in several adjudicative issue areas that is not sufficient for an adverse determination under any other single guideline, but which, when considered as a whole, 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; and

AG ¶ 16(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. This includes, but is not limited to, consideration of:

- (1) untrustworthy or unreliable behavior to include breach of client confidentiality, release of proprietary information, unauthorized release of sensitive corporate or government protected information;
- (2) any disruptive, violent, or other inappropriate behavior;
- (3) pattern of dishonesty or rule violations; and
- (4) evidence of significant misuse of Government or other employer's time or resources.

Applicant's drug involvement and substance misuse alleged in SOR ¶ 2.c is explicitly covered under Guideline H and is sufficient by itself for an adverse determination under Guideline H. Therefore, neither AG ¶¶ 16(c) or (d) is established for SOR ¶ 2.c.

Disqualifying condition AG ¶ 16(a) is established for Applicant's deliberate omission and concealment of the full extent of his drug use from his 2020 SF85P. (SOR ¶¶ 2.a-2.b)

The following mitigating conditions are potentially applicable:

AG ¶ 17(a): the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts;

AG ¶ 17 (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; and

AG ¶ 17 (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.

Mitigation under AG ¶ 17 is not established. In cases involving the deliberate omission, concealment, or falsification of material information, an applicant has a “heavy burden in demonstrating evidence of reform, rehabilitation, or changed circumstances sufficient to justify a conclusion that it is clearly consistent with the national interest to grant him access to classified information.” ISCR Case No. 23-01207 at 5 (Mar. 25, 2024). Applicant’s deliberate falsifications were motivated by fear and self-interest. He is credited for disclosing his drug use on his 2025 SCA, but that disclosure was not prompt. Further, he resumed and increased the very behavior he lied to conceal. Although he has acknowledged his deliberate falsification and taken the positive step of ceasing his drug use, an act of falsification has security significance independent of any significance of the underlying conduct. ISCR Case No. 01-19278 at 6 (App. Bd. Apr. 22, 2003).

Falsification of a security questionnaire constitutes misconduct that casts serious doubt on an applicant’s judgment, reliability, or trustworthiness. ISCR Case No. 22-00657 at 4 (App. Bd. Apr. 18, 2023). It is foreseeable that an applicant who fails to answer security clearance application questions according to their reasonable and accepted meanings may well fail to disclose other significant matters that should be brought to the attention of the Government, which is a requirement of those who have access to classified information. ISCR 15-08163 at 4 (App. Bd. Oct. 25, 2017) Here, the offense was not so minor or long ago that time alone will quell the concerns. Nor has Applicant demonstrated a change in behavior or circumstances sufficient to erase all doubts that the untrustworthy and unreliable behavior will not recur.

Whole-Person Concept

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. In applying the whole-person concept, an 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. An 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.

I have incorporated my comments under Guidelines H and E in my whole-person analysis and applied the adjudicative factors in AG ¶ 2(d). Because Applicant requested a determination on the record without a hearing, I had no opportunity to evaluate his credibility and sincerity based on demeanor. See ISCR Case No. 01-12350 at 3-4 (App. Bd. Jul. 23, 2003). While he presented character reference letters attesting to his trustworthiness, a favorable reputation for honesty and reliability must be discounted in the face of proven acts of falsification. See ISCR Case No. 94-1109 at 4 (App. Bd. Jan. 31, 1996). After weighing the disqualifying and mitigating conditions under Guidelines H and E and evaluating all the evidence in the context of the whole person, I conclude Applicant has not mitigated the security concerns raised under Guidelines H (Drug Involvement and Substance Misuse) and E (Personal Conduct).

The reasons for denial of Applicant's access to classified information are more persuasive at this time. This decision should not be construed as a determination that Applicant cannot or will not attain the state of true reform and rehabilitation necessary to be eligible for a security clearance. The determination of an individual's eligibility and suitability for a security clearance is not a once in a lifetime occurrence, but is based on applying the factors, both disqualifying and mitigating, to the evidence presented. Under his current circumstances, a clearance is not warranted. In the future, he may well demonstrate persuasive evidence of his security worthiness.

Formal Findings

I make the following 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:

Paragraph 1, Guideline H:	AGAINST APPLICANT
Subparagraphs 1.a-1.d:	Against Applicant
Paragraph 2, Guideline E:	AGAINST APPLICANT
Subparagraphs 2.a-2.b:	Against Applicant
Subparagraph 2.c:	For Applicant

Conclusion

I conclude that it is not clearly consistent with the national security interests of the United States to grant Applicant eligibility for access to classified information. Clearance is denied.

Jennifer Goldstein
Administrative Judge