DEFENSE LEGAL SERVICES AGENCY
DEFENSE OFFICE OF HEARINGS AND APPEALS

In the matter of:	)	
	)	
	)	ISCR Case No. 25-00377
	)	
Applicant for Security Clearance	)	

Appearances

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

08/21/2026

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Decision

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HOGAN, Erin C., Administrative Judge:

This case involves security concerns raised under Guideline F (Financial Considerations), Guideline J (Criminal Conduct), and Guideline E (Personal Conduct). Eligibility for access to classified information is denied.

Statement of the Case

Applicant submitted a security clearance application (SCA) on January 22, 2024. (GE 1) On June 12, 2025, the Defense Counterintelligence and Security Agency (DCSA) sent him a Statement of Reasons (SOR) alleging security concerns under Guidelines F, J, and E. The DCSA acted under Executive Order (EO) 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 July 3, 2025, Applicant answered the SOR and requested a hearing before an administrative judge. Department Counsel forwarded the case to the DOHA Hearing Office on January 30, 2026. The case was assigned to me on March 27, 2026. On April 10, 2026, a notice of hearing was issued scheduling the hearing on May 5, 2026, via video-teleconference. The hearing was held on that date. The Government offered 15 exhibits, which were admitted in evidence as Government Exhibits (GE) 1-15 without objection. Applicant offered 26 exhibits, which were marked as Applicant Exhibits (AE) A-Z and admitted without objection. The record was held open until May 19, 2026, to allow Applicant to submit additional exhibits. He timely submitted a 30-page exhibit, which was marked and admitted as AE AA without objection. I compiled the post-hearing e-mails, dated May 22, 2026, May 27, 2026, and June 5, 2026, together and marked them as AE BB; they total 12 pages and include Department Counsel's response to the Applicant's post-hearing exhibits dated May 27, 2026. The transcript (Tr.) was received on May 14, 2026.

Some details in the decision were excluded to protect Applicant's right to privacy. Specific information is available in the cited exhibits.

Findings of Fact

Applicant, age 69, has been an employee of a government contractor since February 2024 and is seeking a security clearance. He was previously granted a security clearance in 2008. He also has a small business that provides IT support to elderly clients. He has no military service. In 2000, he became a licensed minister. He has been married and divorced five times. He has two adult daughters and an eight-year-old son. His current girlfriend is the mother of his son. They do not live with Applicant, but he pays their rent. (Tr. 44-58; GE 1)

The SOR raised concerns under Financial Considerations, Criminal Conduct, and Personal Conduct. Financial Considerations concerns include two prior bankruptcies and 23 delinquent debts with an approximate total balance of $67,795. Criminal Conduct concerns allege that Applicant was arrested on 14 occasions between 1995 to 2024. Personal Conduct concerns allege that Applicant falsified material facts on his January 22, 2024, security clearance application in response to Section 22, when he responded, "No." to the question that asked if he had ever been arrested and charged with a felony offense; and when he failed to list his delinquent accounts in response to Section 26. The SOR allegations under each Guideline will be addressed in more detail under the relevant sections below.

Guideline F – Financial Considerations

The SOR allegations under Guideline F include the following:

SOR ¶ 1.a: a $16,630 delinquent account for a rental truck that was placed for collection. (GE 12 at 3; GE 13 at 2)

SOR ¶ 1.b: a delinquent $17,880 account. (GE 9 at 4; GE 12 at 3; GE 13 at 2; GE 14 at 2; GE 15 at 1-2; AE I-1 at 34; AE I-2 at 16)

SOR ¶ 1.c: a $4,395 delinquent loan. (GE 12 at 3; GE 13 at 3; GE 14 at 2; GE 15 at 2; AE I-1 at 34; AE 1-2 at 8)

SOR ¶ 1.d: $3,049 delinquent account that was placed for collection. (GE 12 at 4; GE 13 at 3; GE 14 at 9; GE 15 at 8: AE I-1 at 42; AE I-2 at 26; AE I-3 at 3)

SOR ¶ 1.e: a $2,634 delinquent cell phone account that was placed for collection. (GE 12 at 4; GE 13 at 3; GE 14 at 9; GE 15 at 8; AE I-1 at 40; AE I-2 at 24; AE I-3 at 3)

SOR ¶ 1.f: a $1,983 delinquent credit card account that was placed for collection. (GE 12 at 4; GE 13 at 3; GE 14 at 7; GE 15 at 7; AE I-1 at 41)

SOR ¶ 1.g: a $1,734 delinquent account that was charged off. (GE 12 at 4; GE 13 at 3; GE 14 at 9; GE 15 at 9; AE I-1 at 36; AE I-2 at 18; AE I-3 at 3)

SOR ¶ 1.h: a $1,739 delinquent credit card account that was placed for collection. (GE 12 at 5; GE 13 at 4; AE I-2 at 25)

SOR ¶ 1.i: a $1,447 delinquent account that was placed for collection. (GE 12 at 5; GE 15 at 7-8; AE I-1 at 45; AE I-2 at 15, 29)

SOR ¶ 1.j: a $952 delinquent account that was charged off. (GE 12 at 5; GE 13 at 4; GE 14 at 10; GE 15 at 10; AE I-1 at 26; AE I-2 at 10)

SOR ¶ 1.k: an $834 delinquent account that was charged off. (GE 12 at 5; GE 13 at 4: AE I-1 at 43)

SOR ¶ 1.l: a $739 delinquent account that was charged off. (GE 12 at 5; GE 13 at 4; GE 14 at 10; GE 15 at 9-10: AE I-1 at 43)

SOR ¶ 1.m: a $682 delinquent credit card account that was placed for collection. (GE 12 at 5; GE 13 at 4; GE 14 at 8; GE 15 at 8-9; AE I-1 at 29; AE I-2 at 27)

SOR ¶ 1.n: a $292 delinquent account that was placed for collection. (GE 12 at 5; GE 13 at 5; GE 14 at 2; GE 15 at 2; AE I-1 at 14)

SOR ¶ 1.o: a $289 delinquent cell phone account that was placed for collection. (GE 12 at 7; GE 14 at 8; GE 15 at 7; AE I-1 at 46)

SOR ¶ 1.p: a $17 delinquent account that was placed for collection. (GE 12 at 7; AE I-1 at 13)

SOR ¶ 1.q: a $20 delinquent lending business account that was placed for collection. (GE 12 at 7; GE 14 at 10; GE 15 at 9; AE I-1 at 30; AE I-2 at 22)

SOR ¶ 1.r: a $4,991 delinquent account that was charged off. (GE 12 at 8; GE 13 at 6; GE 14 at 11; GE 15 at 10; AE I-1 at 38; AE I-2 at 22)

SOR ¶ 1.s: a $4,189 delinquent loan that was placed for collection. (GE 13 at 3; GE 14 at 8; GE 15 at 8; AE I-1 at 47)

SOR ¶ 1.t: an $834 delinquent credit card account that was placed for collection. (GE 14 at 8; GE 15 at 8; AE I-2 at 28; AE I-3 at 34)

SOR ¶ 1.u: a $125 delinquent account that was charged off. (GE 12 at 10; GE 14 at 10)

SOR ¶ 1.v: a $1,036 delinquent account that was charged off. (GE 13 at 6; GE 14 at 11; GE 15 at 10; AE I-1 at 27)

SOR ¶ 1.w: a $1,306 delinquent lending club account that was charged off. (GE 13 at 6; GE 14 at 3; GE 15 at 3; AE I-2 at 15)

SOR ¶ 1.x: Applicant filed for Chapter 13 bankruptcy on July 6, 2016. It was converted to a Chapter 7 bankruptcy on March 12, 2018. Applicant's debts were discharged on June 18, 2018. (GE 3 at 9; GE 9 at 1; GE 11; GE 12 at 2; GE 13 at 2; GE 14 at 1; AE J)

SOR ¶ 1.y: On October 14, 2005, Applicant filed for Chapter 7 bankruptcy. His debts were discharged on October 31, 2007. (GE 3 at 9; GE 9; GE 10)

Applicant admits all of the debts alleged in the SOR. He testified that the debts arose during a difficult period of financial hardship and instability. He endured periods of unemployment and had to make difficult choices. He prioritized paying his mortgage and utilities. He realizes that it is his responsibility to address his obligations. In February 2024, he was hired by his current employer. He realized that he should have started to address his delinquent debts sooner. (Tr. 16-17)

Applicant filed for bankruptcy in 2006 because he wanted to keep his house. His financial problems at the time were caused by the sporadic nature of working as a contractor. He had periods of unemployment in between contracts, which caused financial issues. He also unsuccessfully attempted to start his own business. (Tr. 72-73)

In 2016, Applicant initially filed for bankruptcy under Chapter 13. His financial problems arose because of the sporadic nature of contract work. He converted the Chapter 13 bankruptcy to a Chapter 7 bankruptcy because he did not meet the payment schedule under the Chapter 13 bankruptcy. (Tr. 73-74)

Applicant testified that he is now more financially stable because he is in a more permanent job. He initially entered into a consolidation agreement with Debt Relief Firm Number One. He agreed to pay $403 over a four-year period. He did not go through with the plan because he was concerned that he was not going to get a security clearance. He can only make payments towards his debts if he receives a security clearance. (Tr. 75-80; AE H)

On May 4, 2026, Applicant entered into an agreement with a law group who helps clients resolve or dispute their delinquent debts. This agreement was signed the day before his security clearance hearing. Applicant agreed to pay $346 a month over a period of four years. On the date of the hearing, he had not made his first payment towards his agreement with the law group. Department Counsel pointed out that only $20,149 of the approximately $68,000 in debt is included in the plan. Ten of the debts alleged in the SOR are included in the plan, specifically, the debts alleged in SOR ¶¶ 1.c – 1.e, 1.g, 1.i, 1.l – 1.o, and 1.t. (Tr. 81-90; AE G at 3, 19)

Applicant claims the amount of delinquent debt has decreased to approximately $40,000. Of that amount, he disputes approximately $20,000 of the debt. He claims he paid off approximately $10,000 to $20,000 of the debt through garnishment. He could not specifically identify which delinquent debts were paid off through garnishment. The record was held open to allow Applicant to provide more documentary evidence about the garnishments. (Tr. 81-84) After the hearing, he provided copies of his paychecks which indicated that his gross income was $88,000 in 2024 and he had $475.52 in garnishments. In 2025, his gross income was $125,840 and he paid $2,736 in garnishments. As of May 20, 2026, his gross income was $62,951 and he paid $1,896 in garnishments. (AE AA at 1-3) With the exception of the debt alleged in SOR ¶ 1.h discussed below, the evidence is unclear as to which creditor(s) obtained a writ of garnishment and whether any debt was paid off through garnishment.

In his April 30, 2025, Response to Interrogatories, Applicant provided garnishment notices that $950 was deducted from his paychecks on March 26, 2025, and April 9, 2025, pursuant to a writ of garnishment. The notices identified the collection agency alleged in SOR ¶¶ 1.f and 1.h. (GE 3 at 22-23) The garnishment notices do not identify the specific account number of the debt and it is unclear whether the garnishment covered one or both of these debts alleged in the SOR. SOR ¶ 1.h is found for Applicant because the debt is not on his recent credit report, dated April 28, 2026. The record does not contain sufficient information to conclude the debt alleged in SOR ¶ 1.f is resolved.

In his November 9, 2024, Response to Interrogatories, Applicant provided a copy of a money order in the amount of $20 to the creditor alleged in SOR ¶ 1.q. The balance on the debt was $20. (GE 2 at 24) There is sufficient evidence to conclude the debt alleged in SOR ¶ 1.q is resolved.

The April 28, 2026, credit report indicates that the $292 debt alleged in SOR ¶ 1.n was paid for less than the full balance. (GE 15 at 2; AE I-1 at 14) SOR ¶ 1.n is found for Applicant.

The remaining debts alleged in the SOR are unresolved. Three of the debts, SOR ¶¶ 1.a, 1.h and 1.u are no longer listed on Applicant's recent credit report. I cannot conclude that the debts alleged in SOR ¶¶ 1.a and 1.u were paid by Applicant or if they were removed from the credit report after seven years, as required by the Fair Credit Reporting Act. As mentioned above, there is sufficient evidence to conclude the debt alleged in SOR ¶ 1.h was paid by garnishment.

A credit report, in and of itself, may not be sufficient to meet an applicant's burden of persuasion as to mitigation, insofar as it provides little evidence regarding the underlying circumstances of the debt. The fact that a debt no longer appears on a credit report does not establish any meaningful, independent evidence as to the disposition of the debt.

The Fair Credit Reporting Act requires removal of most negative financial items from a credit report seven years from the first date of delinquency or of the debt becoming collection barred because of a state statute of limitations, whichever is longer. *See* Title 15 U.S.C. § 1681c. Debts may be dropped from a credit report upon dispute when a creditor believes the debt is not going to be paid, a creditor fails to timely respond to a credit bureau's request for information, or when the debt has been charged off. There may be other reasons a disputed debt may be dropped from a credit report that do not show meaningful mitigation.

After the hearing, Applicant sent an e-mail on June 5, 2026, titled Final Mitigation Package. His attorney from the law group informed him that the debts alleged in SOR ¶¶ 1.a, 1.c, 1.d, 1.f and 1.l are uncollectable because the five-year statute of limitations has passed in the state where he resides and because Applicant last made a payment towards these accounts in 2021. (AE BB at 7) This still does not mitigate Applicant's conduct of neglecting these debts until the statute of limitations passed. It does not show a good-faith effort to resolve one's debts.

As a result of the debts being removed from his repayment plan, Applicant's payment agreement contains five delinquent accounts, SOR ¶¶ 1.e ($2,634), 1.m ($682), 1.o ($289), 1.s ($4,189) and 1.t ($834), with a total approximate balance of $8,628. Applicant also indicated that he is not ignoring the $17,880 debt alleged in SOR ¶ 1.b. He claims that the balance on the account was originally $4,000 and increased to $20,000. He is disputing this account through the Fair Credit Reporting Act because he believes the balance is excessive and requires verification. He also believes that this account may also raise statute of limitations concerns under state law. He asserts that the debt alleged in SOR ¶ 1.h was paid through garnishment, which shows compliance rather than avoidance. His debt repayment program has been reduced to 24 months, which shows a realistic and meaningful path to resolution. He made his first payment to the law group on June 5, 2026. The payments have been reduced to $346. He also indicated after the hearing that his paycheck was garnished in the amount of $1,332 by the creditor alleged in SOR ¶ 1.e, with a balance on the debt of $2,634. (AE BB at 8-9)

In his agreement with the law group, Applicant provided the following information regarding his financial status: his monthly household income was approximately $10,000; his monthly expenses were approximately $3,109; his monthly program deposit was $349; and his monthly remainder was approximately $6,545. (GE G at 20)

During the hearing, Applicant testified that he had approximately $5,000 in the bank. He anticipates that he will receive a $20,000 bonus in February 2027. He has about $2,000 in savings and $4,000 in another account. He has approximately $4,000 in another fund and approximately $17,000 in his 401(k) – retirement savings account. He is also collecting social security. He admits most of the delinquent debts are unresolved. He intends to pay them at some time in the future. He is waiting until he gets a security clearance. If he does not get a security clearance, he will lose his job and will not be able to pay his debts. He attended financial counseling as required in conjunction with his two bankruptcies. He has timely filed his federal and state income tax returns and does not owe any delinquent taxes. (Tr. 90-95)

Applicant owes his sister approximately $4,800. She loaned him the money so he could buy his home. She is not on speaking terms with him because he has not paid her back. He claims he will begin to pay her when he gets a security clearance. (Tr. 93-94; GE 3 at 4) This debt is not alleged in the SOR. It will not be considered for disqualification purposes but will be considered under matters of extenuation and mitigation. Conduct not alleged in the SOR may be considered to assess Applicant's credibility; to decide whether a particular adjudicative guideline is applicable; to evaluate evidence of extenuation, mitigation, or changed circumstances; to consider whether Applicant has demonstrated successful rehabilitation; or as part of a whole-person analysis. *See* ISCR Case No. 03-20327 at 4 (App. Bd. Oct. 26, 2006)

Guideline J – Criminal Conduct

Between May 1995 and December 19, 2024, Applicant was arrested for criminal conduct or cited for traffic offenses on multiple occasions.

SOR ¶ 2.a: On or about December 19, 2024, he was arrested for: (1) Improper or Fictitious Registration/Title/Plate; (2) Expired Registration; (3) Failure to Have Vehicle Inspected; (4) Illegal Inspection Sticker; (5) Safety Belt Violation; and (6) Child Restraint – Seven and Under. On February 5, 2025, Applicant failed to appear in court as ordered. (GE 3 at 18; GE 6 at 1-14)

SOR ¶ 2.b: On or about November 23, 2022; he was arrested and charged with a misdemeanor: assault and battery of a family member. Prosecution was deferred through May 2025 to allow him to attend anger management classes. Charges were dismissed after completion of the anger management class. (GE 3 at 4-6, 18, 25; GE 4 at 15; GE 5 at 5; GE 6 at 15-18; GE 7 at 1, 9-12)

SOR ¶ 2.c: On or about April 9, 2022, he was cited for: (1) Operating an Uninspected Vehicle and (2) Child Restraint - Seven and Under. On May 5, 2022, he was found guilty (in absentia). (GE 3 at 7, 19; GE 5 at 8; GE 8 at 3)

SOR ¶ 2.d: On or about February 17, 2022, he was cited for speeding 10-14 miles over the speed limit. On April 21, 2022, he was found guilty (in absentia). (GE 3 at 8; GE 5 at 8; GE 8 at 3)

SOR ¶ 2.e: On or about December 6, 2019, he was cited for reckless driving and speeding 20 mph over the speed limit. On August 19, 2020, he was found guilty (in absentia). (GE 5 at 8; GE 8 at 3)

SOR ¶ 2.f: On or about July 30, 2019, he was cited for speeding over 20 mph or more over the speed limit. On August 3, 2019, his license was suspended and on September 5, 2019, he was found guilty (in absentia). (GE 5 at 9; GE 8 at 19)

SOR ¶ 2.g: On or about January 27, 2018, he was cited for driving with a revoked or suspended license. On May 17, 2018, he was found guilty and his license was suspended on August 17, 2018. (GE 3 at 8; GE 5 at 9; GE 8 at 4)

SOR ¶ 2.h: On or about September 13, 2017, he was cited for speeding over 20 mph or more over the speed limit. On October 17, 2017, he was found guilty (in absentia), and his license was suspended on December 14, 2017. (GE 3 at 8; GE 5 at 9; GE 8 at 4)

SOR ¶ 2.i: On or about December 5, 2016, he was cited for speeding 20 mph or more over the speed limit. On March 2, 2017, he was found guilty. (GE 3 at 8; GE 5 at 8; GE 8 at 4)

SOR ¶ 2.j: On or about November 23, 2002, he was arrested and charged with obstruction of justice, a misdemeanor. In accordance with a plea agreement, he was convicted of this offense on August 21, 2003. (GE 3 at 7; GE 4 at 14; GE 5 at 4)

SOR ¶ 2.k: On or about June 7, 2001, he was arrested and charged with the following felonies: eight counts of issuing bad checks in excess of $200. In accordance with a plea agreement, he pled guilty to two misdemeanor counts of issuing bad checks. He was sentenced to 12 months of confinement (suspended) and unsupervised probation. (GE 3 at 5-6; GE 4 at 11-13; GE 5 at 2-4)

SOR ¶ 2.l: On or about December 2, 1999, he was arrested and charged with failure to appear on a misdemeanor charge, a misdemeanor. (GE 4 at 11; GE 5 at 2)

SOR ¶ 2.m: On or about August 8, 1999; he was arrested and charged with assault and battery of a family member, a misdemeanor. In accordance with a plea agreement, on or about July 6, 2000, the District Attorney entered a nolle prosequi in exchange for his guilty plea to the failure to appear charge referenced in SOR ¶ 2.l. (GE 3 at 5; GE 4 at 10; GE 5 at 2; GE 7 at 1, 6)

SOR ¶ 2.n: On or about May 26, 1995; he was arrested and charged with a felony for larceny. In accordance with a plea agreement, on September 11, 1995, he pled guilty to misdemeanor larceny. (GE 3 at 5; GE 4 at 9; GE 5 at 2)

The allegations in SOR ¶¶ 2.a, and 2.c -2.i are traffic offenses and do not fall under a criminal statute. As a result, I find these allegations for Applicant under the Guideline J - Criminal Conduct concern. The government cross-alleged everything in Guideline J under the Guideline E - Personal Conduct concern. The above traffic offenses alleged in SOR ¶¶ 2.c -2.i are more appropriately considered under Personal Conduct because they are not criminal offenses.

The remaining allegations under Guideline J, SOR ¶¶ 2.a, 2.b, and 2.j – 2.n, consist of seven allegations of criminal conduct beginning in May 1995 to December 2024. They will be discussed from the most recent to the oldest.

On December 19, 2024, Applicant was arrested for (1) Improper or Fictitious Registration/Title/Plate, (2) Expired Registration, (3) Failure to Have a Vehicle Inspected, (4) Illegal Inspection Sticker, (5) Safety Belt Violation, and (6) Child Restraint – Seven and Under. Most of the above offenses were traffic citations. However, Applicant was arrested because he was listed as a fugitive as of result of his failure to appear in court on or about February 2025. (GE 6) He was arrested in December 2025 because there was a warrant out for his arrest for failure to appear. He spent 20 days in jail. The case was dismissed by the judge because he was not properly notified. (SOR ¶ 2.a: Tr. 114-117; AE AA at 8-30)

On November 23, 2022, Applicant was arrested for assault and battery of a family member, a misdemeanor. In accordance with a plea agreement, the prosecution was deferred through May 2025 to allow him to attend anger management classes. Upon his completion of the anger management classes, the charges were dismissed. (SOR ¶ 2.b) On the evening of the incident which led to his arrest, Applicant's girlfriend came over to pick up their four-year-old son and some of her belongings. He and his girlfriend got into an argument, which turned physical. Applicant punched her in the face. The police officer noticed a visible injury and blood between her eyes. Her sweatshirt was also torn. She told the police officers that her son was hugging her legs when Applicant pushed both of them down the stairs. He had been drinking and was angry. She took their son and got in her car and drove away. Applicant owned a handgun. As she was driving away, Applicant fired several shots at her car. Neighbors confirmed that they heard gun shots. When the police interviewed Applicant, his right eye was swollen and his cheek was bleeding from a cut. He denied firing his gun. (GE 7 at 9-12)

During the hearing, Applicant claimed his girlfriend punched him first. He admits that he hit her one time, and that she fell down the steps. He admits that his son was holding onto his mother's leg when he hit her, and that his son also fell down the stairs. He admits that he fired several gun shots in the air when his girlfriend drove away but denied firing the gun at the car. He attended 18 Anger Management classes. He paid $500 for the course. He believed that upon completion of the course, the case was completed. He later learned that a Failure to Appear warrant was issued against him on August 26, 2025, and October 29, 2025. He claims he never received notice of the court dates. A final status hearing was held on March 11, 2026. On May 5, 2026, he paid all of his outstanding fines. The court disposition states, "Complied with Law." (Tr. 110-114; AE J; AE K: AE N; AE AA at 8-30)

On November 3, 2002, Applicant was arrested and charged with obstructing justice: a misdemeanor. Applicant testified that he was pulled over and tried to retrieve his laptop from the back seat before he got out of his car. The arresting police officer claimed that he was resisting arrest. Applicant said he was pulled out of the car and that eight or nine cops held him down on the ground. He was afraid that he was going to be killed. (SOR ¶ 2.j: Tr. 107-110)

On June 7, 2001, Applicant was arrested and charged with eight counts of issuing bad checks in excess of $200, a felony. On November 4, 2001, he pled guilty to a misdemeanor of two counts of issuing bad checks. He was sentenced to 12 months confinement, suspended, and unsupervised probation. Applicant initially said that his brother stole his identification and committed the crime. He now accepts responsibility for these offenses. He claims he did not pay attention to the balances on his accounts before writing the checks. He is ashamed of it. (SOR ¶ 2.k: Tr. 96-107)

On August 8, 1999, Applicant was arrested for assault and battery of a family member. The victim was his then wife. (SOR ¶ 2.m: Tr. 98; GE 7 at 1, 6) On December 2, 1999, Applicant was arrested for a misdemeanor of "failure to appear on a misdemeanor charge." (SOR ¶ 2.l) It is not clear whether this arrest was related to his August 1999 arrest for assault and battery of a family member. It is likely they are related because the plea agreement involved both arrests and charges. On July 6, 2000, Applicant pled guilty to the charge of failure to appear on a misdemeanor charge and the District Attorney entered a nolle prosequi in exchange for his guilty plea. (Tr. 101)

Applicant's first arrest in May 1995 involved felony larceny. The details of the offense are unknown other than he pled guilty to misdemeanor larceny on September 11, 1995. (SOR ¶ 2.n)

Guideline E – Personal Conduct

The SOR allegations under Guideline E include the following.

SOR ¶ 3.a: Applicant falsified material facts on his January 22, 2024, security clearance application in response to "Section 22 - Police Record: Other than those offenses already listed, have you EVER had the following happen to you? Have you EVER been charged with a felony offense?" He answered, "no," and deliberately failed to disclose that he was charged with a felony offense as alleged in SOR ¶¶ 2.k and 2.n. (GE 1 at 24; GE 3 at 5-6; GE 4 at 9, 11-13; GE 5 at 2-4)

SOR ¶ 3.b: Applicant falsified material facts on his January 22, 2024, security clearance application in response to "Section 26 – Financial Record-Delinquency Involving Routine Accounts: Other than previously listed, have any of the following happened? In the past seven (7) years, you had bills or debts turned over for a collection agency? [and] In the past seven (7) years you had any account suspended, charged off, or cancelled for failing to pay as agreed? (Include financial obligations for which you were the sole debtor, as well as those for which you were a co-signer or guarantor)." He answered, "no" and deliberately failed to disclose his delinquent debts alleged in SOR ¶¶ 1.a – 1.w. (GE 1 at 28; GE 3 – GE 8)

SOR ¶ 3.c: All of the allegations under Guideline J, Criminal Conduct, were cross-alleged under the Personal Conduct concern.

Applicant denied that he intentionally falsified his answers to questions on his January 22, 2024, security clearance application. He misunderstood the questions. It was never his intent to deceive the government. Regarding SOR ¶ 3.a, he did not think he needed to list his arrests because he pled to misdemeanor offenses. He acknowledges that he was initially charged with a felony but pled to a misdemeanor. (Tr. 18, 95-101)

Applicant testified that he made a mistake when he answered "no" to the questions in Section 26 on his January 2024 security clearance application pertaining to his delinquent debts. (SOR ¶ 3.b) On March 20, 2024, he disclosed all of his delinquent debts with the investigator who conducted his background investigation interview. He did not intend to falsify his security clearance application. He did not have access to his credit reports when he completed his SCA. (Tr. 63-71; GE 3 at 2-15)

The cross-allegations under Personal Conduct of SOR ¶¶ 2.a through 2.n (SOR ¶ 3.c) are listed under the Guideline J, Criminal Conduct, section.

Whole-Person Evidence

Applicant's girlfriend, and the mother of his 8-year-old son wrote a letter on his behalf. She describes him as a "caring father, a hardworking provider, and a man who takes his responsibilities seriously." She admits he has faced challenges in the past, but he has matured and become more focused. He is serious about his job, his role as a father, and his future. He wants to be a positive example for their child. He is not the same person today and is committed to doing what is right. (AE P)

A pastor for over 13 years wrote that Applicant joined his church about two years ago. He says that Applicant has overcome some things in his life. He has been inspirational in teaching Sunday School. He ministers on the 4th Sunday and works with the praise and worship team. He is also the church's sound and technical support person. He is reliable and completes any tasks assigned to him. He is supportive of the church and their ministry. (AE Q)

Applicant's coworker over the past two years described Applicant as a person of morals and integrity. He is known to be helpful and charitable and is much loved by all. (AE R)

Applicant's uncle wrote a letter of support. Applicant has faced hardships in his life, but he has continued to press forward rather than give up. He has worked to improve himself, provide for his family, and maintain steady employment. He is aware the government must evaluate a person's judgment, reliability, honesty, and trustworthiness and believes Applicant possesses those qualities. He believes Applicant's past difficulties do not define who he is today. His life shows growth, correction, and a sincere desire to do what is right. He is a responsible person who has learned from life's challenges and continues to move forward in a positive direction. (AE S)

Applicant's adult daughters wrote letters on his behalf. One daughter wrote that her father has been a consistent and influential presence in her life. He has always demonstrated “responsibility, stability, and care for his family.” He takes pride in his work ethic and professionalism. She deeply respects him as a parent and a person of strong character. (AE T) Another daughter, a minister, wrote that Applicant has offered guidance, encouragement, and reliability to the family. He is intelligent and knowledgeable and has a strong sense of purpose. He serves as a Reverend and is actively engaged in his church. He is a mentor, leader, and provides spiritual support to his congregation. He volunteers in the community, supporting individuals struggling with substance abuse. He is dependable, supportive, and willing to assist others when needed. Her father is a person of integrity who strives to do what is right. (AE U)

Applicant is well-trained and knowledgeable in his career field. He completed numerous training courses and is certified in many areas of his career field. He is well regarded by his coworkers. (AE V, AE W and AE X)

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.” (*Egan* at 527). The President has authorized the Secretary of Defense or his designee to grant applicants eligibility for access to classified information “only upon a finding that it is clearly consistent with the national interest to do so.” (EO 10865 § 2)

Eligibility for a security clearance is predicated upon the applicant meeting the criteria contained in the AG. 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.” (EO 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 Defense 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. (*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. (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. (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; AG ¶ 2(b))

Analysis

Guideline F: Financial Considerations

The concern under this guideline is set out in AG ¶ 19:

> Failure to live within one's means, satisfy debts, and meet financial obligations may indicate poor self-control, lack of judgment, or unwillingness to abide by rules and regulations, all of which can raise questions about an individual's reliability, trustworthiness, and ability to protect classified or sensitive information. Financial distress can also be caused or exacerbated by, and thus can be a possible indicator of, other issues of personnel security concern such as excessive gambling, mental health conditions, substance misuse, alcohol abuse or dependence. An individual who is financially overextended is at greater risk of having to engage in illegal or otherwise questionable acts to generate funds.

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

AG ¶ 19 notes several disqualifying conditions that could raise security concerns. The disqualifying conditions that are relevant to Applicant's case are:

> (a) inability to satisfy debts; and
>
> (c) a history of not meeting financial obligations.

AG ¶ 19(a) and ¶ 19(c) apply with regard to Applicant's two bankruptcies (SOR ¶¶ 1.x – 1.y). The first bankruptcy was filed under Chapter 7 in 2005 with his debts being discharged in October 2007. The second bankruptcy occurred in July 2016. It was initially a Chapter 13 bankruptcy but was converted to a Chapter 7 bankruptcy in March 2018. His debts were discharged in June 2018. His two bankruptcies showed that Applicant has an inability to satisfy debts and a history of not meeting financial obligations. After his most recent bankruptcy in June 2018, Applicant continued to incur delinquent debts. The SOR alleged 23 delinquent debts, which totaled approximately $68,000. AG ¶¶ 19(a) and 19(c) apply to Applicant's delinquent debts alleged in SOR ¶¶ 1.a – 1.w.

AG ¶ 20 describes conditions that could mitigate security concerns. The following are potentially applicable in this case:

> (a) the behavior happened so long ago, was so infrequent, or occurred under such circumstances that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;
>
> (b) the conditions that resulted in the financial problem were largely beyond the person's control (e.g., loss of employment, a business downturn, unexpected medical emergency, a death, divorce, or separation, clear victimization by predatory lending practices, or identity theft), and the individual acted responsibly under the circumstances;
>
> (c) the individual has received or is receiving financial counseling for the problem from a legitimate and credible source, such as a non-profit credit counseling service , and there are clear indications that the problem is being resolved or under control;
>
> (d) the individual initiated and is adhering to a good-faith effort to repay overdue creditors or otherwise resolve debts; and
>
> (e) the individual has a reasonable basis to dispute the legitimacy of the past-due debt which is the cause of the problem and provides documented proof to substantiate the basis of the dispute or provides evidence of actions to resolve the issue.

AG ¶ 20(a) does not apply because Applicant's financial problems are ongoing. The SOR alleged 23 delinquent accounts, which totaled approximately $68,000. While Applicant entered a payment plan the day before his hearing in May 2026, the payment agreement only included five of the 23 debts alleged in the SOR, a total of $8,628. Applicant did not make his first payment until after the date of the hearing. It is too soon to conclude that Applicant will continue to meet the terms of his payment plan. Additional delinquent debts remain unresolved. "It is also well established that an applicant's ongoing, unpaid debts demonstrate a continuing course of conduct and can be viewed as recent for purposes of the Guideline F mitigating conditions." ISCR 22-02226 at 2 (App. Bd. Oct. 27, 2023) (citing ISCR Case No. 15-06532 at 3 (App. Bd. Feb. 16, 2017))

AG ¶ 20(b) partially applies because Applicant's multiple divorces likely had an adverse impact on his financial situation. In addition, he has had several periods of unemployment as result of the sporadic nature of being a contract worker. These are circumstances beyond his control. However, this mitigating condition is given less weight because I cannot conclude he acted responsibly under the circumstances. He continued to incur delinquent debt after two bankruptcies. He has been working full-time since February 2024. His delinquent debts were discussed during his personal subject interview on March 30, 2024. This should have put him on notice that he should start taking action to resolve his delinquent debts. He ignored most of his delinquent debts until he entered into a repayment agreement with the legal group the day before his hearing. He was not proactive in attempting to develop a plan to resolve his delinquent accounts.

While circumstances beyond his control adversely affected his financial situation, however, "[e]ven if [an applicant's] financial difficulties initially arose, in whole or in part, due to circumstances outside his [or her] control, the [administrative judge] could still consider whether [the applicant] has since acted in a reasonable manner when dealing with those financial difficulties." ISCR Case No. 05-11366 at 4 n.9 (App. Bd. Jan. 12, 2007) (citing ISCR Case No. 03-13096 at 4 (App. Bd. Nov. 29, 2005); ISCR Case No. 99-0462 at 4 (App. Bd. May 25, 2000); ISCR Case No. 99-0012 at 4 (App. Bd. Dec. 1, 1999)) He did not present sufficient evidence that he acted responsibly under the circumstances with respect to the financial issues in the SOR because it is likely he could have developed and started a plan to repay his creditors earlier. AG ¶ 20(b) is partially established.

AG ¶ 20(c) does not fully apply. Although Applicant took financial counseling in conjunction with his bankruptcies, he continued to incur delinquent debts after the bankruptcies. While he began to take steps shortly before the hearing to resolve his delinquent debts, his financial problems are not under control.

AG ¶ 20(d) applies regarding the $292 alleged in SOR ¶ 1.n and the $20 debt alleged in SOR ¶ 1.q. There is sufficient evidence in the file to conclude these debts were resolved. While there is circumstantial evidence that the $1,739 debt alleged in SOR ¶ 1.h was paid, it cannot be considered a good-faith effort to resolve the debt because it was paid by involuntary garnishment. Although he initially entered into a debt repayment agreement involving ten of the remaining delinquent debts just before his hearing, it is too soon to conclude that he will successfully complete the payment plan. In ISCR Case No. 24-01994 at 2 (App. Bd. Aug. 12, 2025), the Appeal Board stated:

> It is well-settled that the timing of debt resolution efforts is an important factor in evaluating mitigation "because an applicant who begins to resolve financial problems only after being placed on notice that his clearance was in jeopardy may lack the judgment and self-discipline to follow rules and

> regulations over time or when there is no immediate threat to his own interests." ISCR Case No. 15-06440 at 4 (App. Bd. Dec. 26, 2017). Moreover, until an applicant has a "meaningful financial track record," it cannot be said "that he has initiated a good-faith effort to repay overdue creditors or otherwise resolve debts." ISCR Case No. 01-21386 at 2 (App. Bd. Jun. 11, 2003)

While Applicant has made some progress towards his delinquent debts, significant unresolved delinquent accounts remain.

After the hearing, Applicant indicated that the law group advised him that the debts alleged in SOR ¶¶ 1.a, 1.c, 1.d, 1.f, and 1.l are uncollectable because the law of the state where he resides has a five-year statute of limitations and Applicant's last payment toward each of these accounts occurred in 2021. This raises possible application of AG ¶ 20(e) – the individual has a reasonable basis to dispute the debt.

The Fair Credit Reporting Act requires removal of most negative financial items from a credit report seven years from the first date of delinquency or the debt becoming collection-barred because of a state statute of limitations, whichever is longer. *See* Title 15 U.S.C. § 1681c. In Applicant's case, the debts are not more than seven years old and will not be removed from his credit report under the Act. Even if one concludes that Applicant's debt is uncollectable in accordance with a statute of limitations under state law, the DOHA Appeal Board has long held:

> First, security clearance decisions are not controlled or limited by any statute of limitation. Second, absent an explicit Act of Congress to the contrary, the federal government is not bound by state law in carrying out it's functions and responsibilities . . . Third, a security clearance adjudication is not a proceeding aimed at collecting an applicant's personal debts. Rather, a security clearance adjudication is a proceeding aimed at evaluating an applicant's judgment, reliability, and trustworthiness to make a decision about the applicant's security eligibility. Accordingly, even if a delinquent debt is legally unenforceable under state law, the federal government is entitled to consider the facts and circumstances surrounding an applicant's conduct in incurring and failing to satisfy the debt in a timely manner. ISCR Case No. 01-09691at 2 (App. Bd. Mar, 27, 2003)

Applicant does not deny that the debts alleged in SOR ¶¶ 1.a, 1.c, 1.d, 1.f, and 1.l were his legitimate debts. He made no attempt to resolve the debts for over five years. Passively waiting for the statute of limitations to run on one's debts does not show responsibility and raises questions about a person's judgment, trustworthiness and reliability. The mitigating condition under AG ¶ 20(e) does not apply.

Based on Applicant's overall history of financial irresponsibility, I am not confident that he will establish payment plans, pay, or otherwise resolve his remaining SOR debts. Financial Considerations security concerns are not mitigated.

Guideline J, Criminal Conduct

The security concern for Guideline J, Criminal Conduct, is set out in AG & 30:

> Criminal activity creates doubt about a person'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.

AG ¶ 31 lists disqualifying conditions that could raise a security concern. The following apply to Applicant's case:

> AG ¶ 31(a) a pattern of minor offenses, any one of which on its own would be unlikely to affect a national security eligibility decision, but which in combination cast doubt on the individual's judgment, reliability, or trustworthiness; and
>
> AG ¶ 31(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.

AG ¶ 31(a) and AG ¶ 31(b) apply to Applicant's seven arrests and convictions as noted in SOR ¶¶ 2.a, 2.b, and 2.j – 2.m.

AG ¶ 32 lists the conditions that could mitigate security concerns under criminal conduct. The following mitigating conditions apply to Applicant's case:

> AG ¶ 32(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
>
> AG ¶ 32(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.

AG ¶ 32(a) applies. Applicant's most recent criminal arrest occurred in December 2024. On the day of the arrest, he was initially stopped for traffic offenses. He was arrested because he was listed as a fugitive for failing to appear at a court date. While serious, he provided proof that he was not properly notified of the court date. The more serious incident occurred in November 2022, when he was arrested for assault and battery of a family member. Applicant completed anger management classes, as required by the court. The charges were dismissed and he paid all fines. He has not had a domestic incident in over three and half years. Applicant's previous five arrests occurred between

May 1995 to November 2002. He served all of the sentences imposed by the court. Since that time, Applicant has matured and took responsibility for his behavior.

AG ¶ 32(d) applies because Applicant has demonstrated evidence of successful rehabilitation. He ultimately complied with the terms of the court. He is well regarded in his current position and is active in his community. He serves as a minister and counsels individuals dealing with substance abuse problems.

The Criminal Conduct concerns are mitigated.

Guideline E, Personal Conduct

The security concern relating to the guideline for Personal Conduct 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 or sensitive information. Of special interest is any failure to cooperate or provide truthful and candid answers during the national security or adjudicative processes. . . .

The following disqualifying conditions under AG ¶ 16 potentially apply to Applicant's case:

> AG ¶ 16(a) deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar used to conduct investigations, determine employment qualifications, award benefits or status, determine national security eligibility or trustworthiness, or award fiduciary responsibilities;
>
> 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:
>
> > (2) any disruptive, violent, or other inappropriate behavior; and
> >
> > (3) a pattern of dishonesty or rule violations.

AG ¶ 16(a) applies with regard to Applicant's failure to list that he was arrested and charged with felony offenses in 2001 for eight counts of issuing bad checks (SOR ¶ 1.k) and in May 1995 for a felony charge of larceny (SOR ¶ 1.n) in response to Section 22 of his January 2024 SCA. It also applies regarding his denial of having delinquent accounts in response to Section 26 of the same January 2024 SCA.

AG ¶ 16(d) applies with respect to Applicant's numerous traffic offenses from 2016 to 2024 (SOR ¶¶ 2.a, 2.c – 2.i) and his criminal offenses (SOR ¶¶ 2.a, 2.b, and 2.j -2.m) (All of the above SOR allegations were originally alleged under Criminal Conduct and cross-alleged under Personal Conduct) His extensive traffic citations include speeding, driving on a revoked license, operating an uninspected vehicle, improper or fictitious registration/title/plate, expired registration, failure to have vehicle inspected, illegal inspection sticker, safety belt violation, and child restraint – seven and under. His long history of criminal and traffic offenses reveal that Applicant has a history of not following rules, which raises concerns about his judgment, trustworthiness and reliability and his ability to properly safeguard classified or protected information.

Under Guideline E, the following mitigating conditions potentially apply in Applicant's case:

> AG ¶ 17(a) the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts; and
>
> 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 is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment.

AG ¶ 17(a) applies regarding Applicant's failure to list his delinquent debts on his January 2024 SCA. (SOR ¶ 3.b) While Applicant likely was aware that he had extensive debts, he fully disclosed and discussed his debts during his March 2024 personal subject interview.

AG ¶ 17(c) applies to the conduct alleged in SOR ¶ 3.a. Applicant did not list his felony arrests in response to section 22 of his January 2024 SCA. He did not think that he had to list them because he pled to a misdemeanor in each case. His explanation was credible. His first felony arrest occurred more than 31 years ago in 1995 (SOR ¶ 2.n), and his second and most recent felony arrest occurred more than 25 years ago in 2001 (SOR ¶ 2.k).

SOR ¶ 3.c is not mitigated. From 1995 to December 2024, Applicant has a history of committing misdemeanor criminal offenses and traffic offenses. His long history of rule violations raises concerns about his trustworthiness and reliability and raises the concern that he may not be able to follow the rules for protecting classified and sensitive information. His last offense occurred less than two years ago. Not enough time has passed to conclude the concern is mitigated. Personal Conduct security concerns are not mitigated.

Whole-Person Concept

Under AG ¶ 2(c), the ultimate determination of whether the granting or continuing of national security eligibility is clearly consistent with the interests of national security must be an overall commonsense judgment based upon careful consideration of the adjudicative guidelines, each of which is to be evaluated in the context of the whole person. 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 F, J and E, in my whole-person analysis, and I have considered the factors in AG ¶ 2(d). After weighing the disqualifying and mitigating conditions under each Guideline and evaluating all the evidence in the context of the whole person, I conclude that Applicant did not mitigate the security concerns raised under Financial Considerations and Personal Conduct. He mitigated the security concerns under Criminal Conduct because he completed the terms of his sentence and has demonstrated positive signs of rehabilitation.

This decision should not be construed as a determination that Applicant cannot or will not attain the state of reform necessary for award of a security clearance in the future. With continued effort to resolve his delinquent debts and to maintain a clean traffic and criminal record he may well be able to demonstrate persuasive evidence of his security clearance worthiness.

I have carefully applied the law, as set forth in *Egan*, Exec. Or. 10865, the Directive, the AGs, and the Appeal Board's jurisprudence, to the facts and circumstances in the context of the whole person. Applicant failed to sufficiently mitigate the security concerns under financial considerations and personal conduct.

Formal Findings

Formal findings on the allegations set forth in the SOR, as required by Section E3.1.25 of Enclosure 3 of the Directive, are:

Paragraph 1, Guideline F:	AGAINST APPLICANT
Subparagraphs 1.a-1.g, I.i-1.m, 1.o-1.p, 1.r-1.w:	Against Applicant

Subparagraphs 1.h, 1.n and 1.q:	For Applicant
Paragraph 2, Guideline J:	FOR APPLICANT
Subparagraphs 2.a-2.m:	For Applicant
Paragraph 3, Guideline E:	AGAINST APPLICANT
Subparagraphs 3.a-3.b:	For Applicant
Subparagraph 3.c:	Against Applicant

Conclusion

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

Erin C. Hogan
Administrative Judge