

KEYWORD: Foreign Influence

DIGEST: Applicant is a 44-year-old senior systems integrator with a federal contractor. His mother-in-law, brother-in-law, and sister-in-law are citizens and residents of Iran. A sister-in-law's spouse was the former mayor of his township in Iran. Applicant presented credible evidence successfully mitigating the security concerns about Guideline B (foreign influence). Clearance is granted.

CASENO: 06-09873.h1

DATE: 06/14/2007

DATE: June 14, 2007

In re:)	
)	
-----)	
SSN: -----)	ISCR Case No. 06-09873
)	
Applicant for Security Clearance)	
)	

**DECISION OF ADMINISTRATIVE JUDGE
CHRISTOPHER GRAHAM**

APPEARANCES

FOR GOVERNMENT

Daniel F. Crowley, Esq., Department Counsel

FOR APPLICANT

Pro Se

SYNOPSIS

Applicant is a 44-year-old senior systems integrator with a federal contractor. His mother-in-law, brother-in-law, and sister-in-law are citizens and residents of Iran. A sister-in-law's spouse was

the former mayor of his township in Iran. Applicant presented credible evidence successfully mitigating the security concerns about Guideline B (foreign influence). Clearance is granted.

STATEMENT OF THE CASE

On November 13, 2003, Applicant submitted a Security Clearance Application (SF 86).¹ The Defense Office of Hearings and Appeals (DOHA) declined to grant or continue a security clearance for Applicant. As required by Executive Order 10865, *Safeguarding Classified Information Within Industry*, dated February 20, 1960, as amended and modified, and Department of Defense (DoD) Directive 5220.6 ¶ E3.1.2 *Defense Industrial Personnel Security Clearance Review Program* (Directive), dated January 2, 1992, as amended, modified, and revised, DOHA issued a Statement of Reasons (SOR) on July 31, 2006, detailing the basis for its decision – security concerns raised under Guideline B (Foreign Influence) of the Directive. The President issued revised adjudicative guidelines (RAG) on December 30, 2005. DoD implemented them effective September 1, 2006. Pending official amendment/reissue of DoD Directive 5220.6, the RAG are to be used in all cases when the SOR is issued on or after September 1, 2006. Because the SOR was issued prior to September 1, 2006, DOHA policy requires that this case proceed under the old guidelines. Applicant answered the SOR in writing on August 9, 2006, and elected to have a hearing before an administrative judge. The case was assigned to me on January 23, 2007. The Notice of Hearing was issued on January 31, 2007. I convened a hearing on February 6, 2007, to consider whether it is clearly consistent with the national interest to grant or continue a security clearance for Applicant. The government offered eleven exhibits, marked as exhibits 1-11. Applicant offered no exhibits. DOHA received the hearing transcript (Tr.) on February 14, 2007.

PROCEDURAL RULING

At the hearing, Department Counsel asked me to take administrative notice of the contents of the following U.S. Department of State documents: Iran Bureau of Near Eastern Affairs Report, dated October 2006 (Exhibit 3); Iran Bureau of Consular Affairs Report, dated October 11, 2006 (Exhibit 4); Country Reports on Human Rights Practices – 2005: Iran, Bureau of Democracy, Human Rights, and Labor Report, dated October 12, 2006 (Exhibit 5); Country Reports on Terrorism, Chapter 6, “State Sponsors of Terror, Overview,” Office of the Coordinator for Counterterrorism, dated April 28, 2006 (Exhibit 6); Testimony of Director, Central Intelligence, before the Senate Select Committee on Intelligence (*Global Intelligence Challenges 2005*, dated February 16, 2005 (Exhibit 7); “Iran: U.S. Concerns and Policy Responses, Congressional Research Service Report, dated June 2, 2006 (Exhibit 8); Country Reports on Human Rights Practices – 2005: Turkey, Bureau of Democracy, Human Rights, and Labor Report, dated March 8, 2006 (Exhibit 9); Turkey Bureau of Consular Affairs Report, dated October 10, 2006 (Exhibit 10); and Background Note: Turkey, Bureau of European and Eurasian Affairs, dated October 2006 (Exhibit 11).

Administrative or official notice is the appropriate type of notice used for administrative proceedings.² The most common basis for administrative notice at ISCR proceedings is to notice

¹Government Exhibit 1, Standard Form (SF) 86, Security Clearance Application, dated November 13, 2003.

²See ISCR Case No. 02-24875 at 2 (App. Bd. Oct. 12, 2006) (citing ISCR Case No. 02-18668 at 3 (App. Bd. Feb. 10, 2004)); *McLeod v. Immigration and Naturalization Service*, 802 F.2d 89, 93 n.4 (3d Cir. 1986)).

facts that are either well known or from government reports.³ Applicant did not object to my consideration of Exhibits 3-11, and I took administrative notice of them.⁴

FINDINGS OF FACT

Applicant is a 44-year-old senior systems integrator with a federal contractor.⁵ He is married for a second time, has two children, and earned a bachelor's degree.⁶ He has no prior military service and has held a top-secret security clearance since 1990.⁷

Applicant's current mother-in-law, brother-in-law, and sister-in-law are citizens and residents of Iran. A sister-in-law's spouse had been the mayor of his township in Iran. Applicant's wife came to this country when she was 16 years old, sent here to marry her first cousin, who was 31 years old. They married, had two children, and divorced in 1995.⁸

Applicant met his current wife in 1997, and they married in 1998. Since coming to the U.S., his wife had not seen her mother in 16 years, and had constantly been concerned about her health since her mother had suffered two heart attacks and a stroke.⁹ Since his mother-in-law was a citizen and resident of Iran, and because he held a security clearance, Applicant did not feel it was appropriate for him to travel to Iran, so he traveled to Turkey. He said:

She initially came to the United States in 2000, when I no longer had access to SCI information. I notified my facility security officer (FSO) of my intent to travel to Turkey, filled out paperwork, and upon returning from Turkey, contacted my security officer and filled out post-travel information. I went to Ankara initially with my wife, who had an entry/exit passport, or a white passport, since she was, at the time, an Iranian citizen. We brought her mother back to the United States, and we had no issue getting through customs or security. And I'd like to think it's because I went along.¹⁰

³See Stein, ADMINISTRATIVE LAW, Section 25.01 (Bender & Co. 2006) (listing fifteen types of facts for administrative notice).

⁴Tr. at 15.

⁵*Id.* at 29, 32.

⁶*Id.* at 29.

⁷*Id.*

⁸*Id.* at 33.

⁹*Id.*

¹⁰*Id.* at 34.

In 2001, 2002, 2005, and 2006, he again traveled to Turkey to assist his mother-in-law in obtaining a United States visa in Ankara, Turkey, and to accompany her on a trip to the U.S.¹¹ “The embassy folks knew me quite well and I was not interested in obtaining a green card for her because I did not know when I would go back to work with special clearances, and I did not want her to have documentation which may allow her to come whenever she wanted to come.”¹² It was cheaper to bring his mother-in-law to the U.S. than it was to take his family to Turkey.¹³ Since her last visit to the U.S. in 2006, she suffered another heart attack, had quadruple heart bypass surgery, and has a leg wound from her ankle to her groin, from the artery graft. Her doctor told her she cannot travel by air, so she cannot travel to the U.S. again, and Applicant no longer needs to travel to Turkey.¹⁴

Applicant’s brother-in-law, a teacher, had served as the mayor of a small town in southwestern Iran, in the desert near the Persian Gulf. The people living in that area of the country have contempt for the Iranian government.¹⁵ Applicant’s wife has one brother who is unemployed and one who is a commercial construction worker. Neither of their wives is employed. None of his wife’s family have served in the Iranian military. During the 1979 Iranian revolution, the Iranian government confiscated four homes and several ranches belonging to his wife’s family.¹⁶ His wife has been a U.S. citizen for 18 months and surrendered her Iranian passport.¹⁷ Applicant does not communicate with his in-laws. At his instruction, his wife’s family contacts her on her cell phone and not at home. They do not speak English and he does not speak Farsi. He has no intention of traveling to Iran.¹⁸ His wife has never been to his workplace. She only knows how to reach him by telephone.

Applicant’s father worked for the U. S. Air Force for 22 years and maintained a top-secret clearance for another 25 years with a defense contractor. His brother has worked for a defense contractor in a foreign country for the past five years. He also has a top-secret clearance. His sister has worked for a defense contractor for 25 years and also carries a top-secret clearance.¹⁹

¹¹*Id.* at 32, 34.

¹²*Id.* at 35.

¹³*Id.*

¹⁴*Id.* at 36.

¹⁵*Id.* at 48.

¹⁶*Id.* at 36-41.

¹⁷*Id.* at 44, 49.

¹⁸*Id.* at 42.

¹⁹*Id.* at 45-47.

Iran is an authoritarian, constitutional, theocratic republic, dominated by the Shi'a Muslim clergy.²⁰ Islamic law is the basis of the state's authority. Human rights violations continue, particularly against journalists who speak out against Iran's current government, minority religions, and political activists, who oppose the current ruling regime.²¹ Serious mistreatment of prisoners occurs. Human rights problems such as summary execution, torture, arbitrary arrest, prolonged solitary confinement, and official corruption have been reported. Although human rights violations are prohibited by law, the Iranian government does not enforce the law.

Iran has been the most active state sponsor of terrorism. It is increasingly involved in supplying lethal assistance to Iraqi militant groups in support of terrorist activity against the U.S. forces in Iraq. Iran supported the June 25, 1996, truck bombing of the Khobar Towers in Saudi Arabia, a terrorist act that killed 19 U.S. military personnel and wounded 500.²² The current Iranian government supports and actively sponsors terrorism by providing resources, guidance and a safe haven to terrorists.²³ Iran continues to be unwilling to bring to justice senior al-Qaida members, and has resisted numerous requests to transfer custody of its al-Qaida detainees to their countries of origin or to third countries for interrogation and/or trial. Iran presents a particular concern, given its active sponsorship of terrorism and its continued development of a nuclear program. Iran is also capable of producing biological and chemical agents or weapons. Iran could support terrorist organizations seeking to acquire weapons of mass destruction (WMD).²⁴

In response to a question about threats to his wife's family members by the Iranian government, in an effort to force Applicant to disclose classified information, he responded:

A. My wife makes no bones about her disdain for the country of Iran. And she would alert me immediately if someone approached her, family member or not. She talks very unfavorably about her brother, who is jobless, and I believe has drug issues. She cannot tolerate the things that go on in that country. My wife swore allegiance to the United States. She's a U.S. citizen. She loves this country. And she loves what it's done for her. She is not approachable.²⁵

²⁰Government Exhibit 4 (U.S. Department of State, Consular Information Sheet, Iran, October 11, 2006) at 1; Government Exhibit 3 (Iran Bureau of Near Eastern Affairs Report, dated October 2006) at 1; and Government Exhibit 5 (Country Reports on Human Rights Practices – 2005: Iran Bureau of Democracy, Human Rights, and Labor Report, dated October 12, 2006) at 1 are the sources for this sentence and the next sentence.

²¹Government Exhibit 5, *supra* n. 17 at 1-28 is the source for this sentence and the next four sentences.

²²Government Exhibit 8 (“Iran: U.S. Concerns and Policy Responses,” Congressional Research Service Report, dated June 2, 2006) at 20-21.

²³Government Exhibit 3, *supra* n. 21, at 8; Exhibit 6 (Country Reports on Terrorism, Chapter 6 – State Sponsors of Terror, Overview, Office of the Coordinator for Counterterrorism, dated April 28, 2006) at 1.

²⁴Government Exhibit 6 (Country Reports on Terrorism, Chapter 6, “*State Sponsors of Terror, Overview*,” Office of the Coordinator for Counterterrorism, dated April 28, 2006) at 173.

²⁵*Id.* at 43-44.

An operations engineer who worked with Applicant between 1995 and 1998, and again between 2003 and 2005, stated that he never had any cause for questioning Applicant's ability to safeguard classified information. He said that Applicant worked well with some very tough customers, very demanding customers, and he worked well with them getting technical assistance for their systems and coordinating enhancements. He described Applicant as patriotic, that he trusted him completely, and he that had no reservations about Applicant having the highest level security clearance.²⁶

POLICIES

In an evaluation of an applicant's security suitability, an administrative judge must consider Enclosure 2 of the Directive, which sets forth adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines are divided into Disqualifying Conditions (DC) and Mitigating Conditions (MC), which are used to determine an applicant's eligibility for access to classified information.

These adjudicative guidelines are not inflexible ironclad rules of law. Instead, recognizing the complexities of human behavior, an administrative judge should apply these guidelines in conjunction with the factors listed below. An administrative judge's overarching adjudicative goal is a fair, impartial and common sense decision.

Because the entire process is a conscientious scrutiny of a number of variables known as the "whole person concept," an administrative judge should consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a meaningful decision.

Specifically, an administrative judge should consider the nine adjudicative process factors listed at Directive ¶ E2.2.1: (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 voluntariness of participation; (6) the presence or absence of rehabilitation and other pertinent 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.

Since the protection of the national security is the paramount consideration, the final decision in each case is arrived at by applying the standard that the issuance of the clearance is "clearly consistent with the interests of 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 avoided drawing inferences grounded on mere speculation or conjecture.

In the decision-making process, facts must be established by "substantial evidence. The government initially has the burden of producing evidence to establish a potentially disqualifying condition under the Directive. Once the government has produced substantial evidence of a disqualifying condition, the burden shifts to the applicant to produce evidence and prove a mitigating

²⁶*Id.* at 16-23.

condition.²⁷ Directive ¶ E3.1.15 provides, “The 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 [applicant] has the ultimate burden of persuasion as to obtaining a favorable clearance decision.” The burden of disproving a mitigating condition never shifts to the government.²⁸

A person who seeks access to classified information enters into a fiduciary relationship with the government predicated upon trust and confidence. It is a relationship that transcends normal duty hours and endures throughout off-duty hours as well. It is because of this special relationship the government must be able to repose a high degree of trust and confidence in those individuals to whom it grants access to classified information. Decisions under this Directive include, by necessity, consideration of the possible risk an applicant may deliberately or inadvertently fail to protect or safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified information.

The scope of an administrative judge’s decision is limited. Applicant’s allegiance, loyalty, and patriotism are not at issue in these proceedings. Section 7 of Executive Order 10865 specifically provides industrial security clearance decisions shall be “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” Security clearance decisions cover many characteristics of an applicant other than allegiance, loyalty, and patriotism. Nothing in this Decision should be construed to suggest that I have based this decision, in whole or in part, on any express or implied determination as to Applicant’s allegiance, loyalty, or patriotism

CONCLUSIONS

The government has established its case under Guideline B. Applicant’s mother-in-law, brother-in-law, and sister-in-law are citizens and residents of Iran. A sister-in-law’s spouse was the mayor of his township in Iran. Foreign Influence Disqualifying Conditions (FIDC) E2.A2.1.2.1. (*An immediate family member, or a person to whom the individual has close ties of affection or obligation, is a citizen of, or resident or present in, a foreign country*) and E2.A2.1.2.1. (*Sharing living quarters with a person or persons, regardless of their citizenship status, if the potential for adverse foreign influence or duress exists*) are applicable.

However, FIDC E2.A2.1.2.3. (*Relatives, cohabitants, or associates who are connected with any foreign government*) does not apply because Applicant’s brother-in-law no longer is mayor. The

²⁷“Substantial evidence [is] such relevant evidence as a reasonable mind might accept as adequate to support a conclusion in light of all the contrary evidence in the record.” ISCR Case No. 04-11463 at 2 (App. Bd. Aug. 4, 2006) (citing Directive ¶ E3.1.32.1). “This is something less than the weight of the evidence, and the possibility of drawing two inconsistent conclusions from the evidence does not prevent [a Judge’s] finding from being supported by substantial evidence.” *Consolo v. Federal Maritime Comm’n*, 383 U.S. 607, 620 (1966). “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).

²⁸*See* ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005). “The Administrative Judge [considers] the record evidence as a whole, both favorable and unfavorable, [evaluates] Applicant’s past and current circumstances in light of pertinent provisions of the Directive, and [decides] whether Applicant [has] met his burden of persuasion under Directive ¶ E3.1.15.” ISCR Case No. 04-10340 at 2 (App. Bd. July 6, 2006).

residents in that small town in the southwesterly-most part of the country have contempt for the Iranian government. There are no family ties to the Iranian government.

Under the Directive, potentially disqualifying conditions may be mitigated through the application of the “whole person” concept and/or specific mitigating conditions. When the government produces evidence raising potentially disqualifying conditions, an Applicant has the burden to produce evidence to rebut, explain, extenuate, or mitigate the conditions.²⁹ The government never has the burden of disproving a mitigating condition.³⁰

A security risk may exist when an applicant’s immediate family, or other persons to whom he may be bound by affection, influence, or obligation, are not citizens of the U.S., or may be subject to duress. These situations could create the potential for foreign influence that could result in the compromise of classified information.

Foreign Influence Mitigating Condition (FI MC) E2.A2.1.3.1. (*A determination that the immediate family member(s), (spouse, father, mother, sons, daughters, brothers, sisters), cohabitant, or associate(s) in question are not agents of a foreign power or in a position to be exploited by a foreign power in a way that could force the individual to choose between loyalty to the person(s) involved and the United States*) does not apply.

To determine whether Applicant was “in a position to be exploited by a foreign power,” I normally weigh Applicant’s connection to his family against his strong ties to the United States. I note that Applicant’s wife is a naturalized citizen of the U.S., and therefore entitled to the liberties and protection afforded U.S. citizens. Her family residing in Iran present a somewhat greater vulnerability; although they have no connection to or dependence upon a foreign power, they are still under the physical control of the Iranian government. Applicant’s record of successful employment, the fact that Iran and the U.S. have a poor relationship, and that the Iranian government has an abominable human rights record, make it likely that his wife’s family members would be vulnerable to improper influence.

The issue of casual contact is more problematic because of Applicant’s five trips to Turkey to accompany his mother-in-law to the United States for a visit. But her recent physical deterioration prevents her from coming to the U.S. again, which reduces the concern. Applicant detailed his knowledge of security procedures. He notified his employer when making these trips, and filed follow-up reports when he returned. He has insulated himself from his wife’s family, and his wife doesn’t know the physical location of his work-place. Her family calls her cell phone so he doesn’t have to interact with them. He doesn’t speak Farsi and has no intention of learning the language. Any contact, though infrequent, is nothing more than a “hello.” I find that FI MC E2.A2.1.3.3. (*Contact and correspondence with foreign citizens are casual and infrequent*) to be applicable.

Whole Person

²⁹Directive, ¶ E3.1.15.

³⁰ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005).

In assessing whether an applicant is a security risk because of his or her relatives or associates in a foreign country, it is necessary to consider all relevant factors. As noted above, ¶¶ E2.2.1, E2.2.2, and E2.2.3 of the Directive specifically require each administrative judge to consider all the facts and circumstances, including the “whole person” concept, when evaluating each individual case. To ignore such evidence would establish a virtual per se rule against granting clearances to any person with ties to persons in a foreign country, contrary to the clear terms of the Directive. “Although the position of an applicant’s foreign family members is significant and may preclude the favorable application of Foreign Influence Mitigating Conditions E2.A2.1.3.1., the totality of an applicant’s conduct and circumstances (including the realistic potential for exploitation) may still warrant a favorable application of the relevant general factors.”³¹

Because Applicant’s mother-in-law can no longer travel, he has no need to travel to Turkey so concerns about foreign influence no longer exist with that country. On the other hand, Iran, where his in-laws live, presents a more serious concern.

One of the “whole person” factors which must be considered is “the potential for pressure, coercion, exploitation, or duress.”³² In that regard, an important factor for consideration is the character of any foreign power in question, including the government and entities controlled by the government, within the relevant foreign country. The relationship between a foreign government and the U.S. may be relevant in determining whether a foreign government or an entity it controls is likely to attempt to exploit a resident or citizen to against the U.S. through the applicant. The nature of the foreign government might also relate to the question of whether the foreign government or an entity it controls would risk jeopardizing its relationship with the U.S. by exploiting or threatening its private citizens in order to force a U.S. citizen to betray this country. A hostile relationship may make it more likely that Iran would attempt to exploit a U.S. citizen through his relatives or associates.³³

Iran is one of the least democratic countries in the Middle East. Iran and the United States have had poor relations for at least 27 years. I believe it is probable that Iran would attempt to exploit Applicant’s relatives to obtain classified information, and if it did, I believe Applicant would properly notify the authorities. His wife’s relatives are in a greater risk living in Iran, than other Middle East countries.

The “whole person” concept—not the potentially disqualifying or mitigating conditions—is the heart of the analysis of whether an applicant is eligible for a security clearance.³⁴ Indeed, the Appeal

³¹ISCR Case No. 03-17620 at 4 (App. Bd. Apr. 17, 2006) (footnotes omitted); *accord* ISCR Case No. 03-23259 at 3 (App. Bd. May 10, 2006).

³²Directive, ¶ E2.2.1.8.

³³ISCR Case No. 03-21423 at 7-10.

³⁴Directive, ¶ E2.2.3.

Board has repeatedly held that an administrative judge may find in favor of an applicant where no specific mitigating conditions apply.³⁵

Applicant is a mature individual with 17 years of successful employment while holding a security clearance without incident. Applicant has strong ties to the United States. Several family members have held or presently hold top secret security clearances. Because of Applicant's deep and long-standing relationships and loyalties in the U.S., he can be expected to resolve any conflict of interest in favor of the United States. I find the potential for pressure, coercion, exploitation, or duress does not constitute a security risk.³⁶

Of the adjudicative guidelines set out in Directive ¶ E2.2.1, *supra*, only E2.2.1.8. the potential for pressure, coercion, exploitation, or duress, appears to be on point. However, other matters, such as evidence of an applicant's personal loyalties, the nature and extent of an applicant's family ties to the U.S. relative to his ties to a foreign country; his or her social ties within the U.S., and many others raised by the facts of a given case can properly be factored in to a judge's evaluation of an applicant's worthiness of a security clearance.³⁷ I considered his age (44), his education which includes a college degree, his employment record, his reasons for travel to Turkey and that those reasons no longer exist, his financial stability, and his stable home environment as to whether he is a good candidate for a security clearance. He demonstrated that he understood and complied with the reporting requirements for contacts with foreign nationals.

I observed Applicant during the hearing, and especially during his testimony. I find his testimony to be believable and find him to be a sincere and credible witness, because he answered questions directly, completely, and honestly. He has not traveled to Turkey since 2006, and there are no longer reasons for him to contemplate such travel. He has no contact with his wife's siblings, and he has never discussed his work for his employer with any of her Iranian relatives.

Applicant takes his duties seriously, and has demonstrated the self-discipline generally required for academic and career achievement. He exercises sound judgment. I find he is capable of maintaining, over a long period of time, a stable, loyal relationship with the U.S. government. He has shown an ability to cooperate, accommodate, and be part of his employer's team.

A fair and commonsense assessment of the record before me as required by Directive Section E2.2.3. leads me to conclude that Applicant is not a security risk, has the ability to protect classified information, and will exercise the requisite good judgment and discretion expected of one in whom the government entrusts its interests. Therefore, notwithstanding that Foreign Influence Mitigating Condition (FI MC) E2.A2.1.3.1., *supra*, is inapplicable, under the "whole person concept", I conclude Guideline B for Applicant.

FORMAL FINDINGS

³⁵ISCR Case No. 03-11448 at 3-4 (App. Bd. Aug. 10, 2004); ISCR Case No. 02-09389 at 4 (App. Bd. Dec. 29, 2004).

³⁶Directive, ¶ E2.2.1.8.

³⁷See ISCR Case No. 04-11414 at 4 (App. Bd. March 5, 2007).

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

Paragraph 1. Guideline B:	FOR APPLICANT
Subparagraph 1.a:	For Applicant
Subparagraph 1.b:	For Applicant
Subparagraph 1.c:	For Applicant

DECISION

In light of all of the circumstances in this case, it is clearly consistent with the national interest to grant or continue a security clearance for Applicant. Clearance is granted.

Christopher Graham
Administrative Judge