



**DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF HEARINGS AND APPEALS**



In the matter of:

Applicant for Security Clearance

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ISCR Case No. 14-02198

Appearances

For Government: Gina Marine, Esquire, Department Counsel

For Applicant: *Pro se*

01/09/2015

Decision

GALES, Robert Robinson, Administrative Judge:

Applicant mitigated the security concerns regarding financial considerations. Eligibility for a security clearance and access to classified information is granted.

Statement of the Case

On March 12, 2013, Applicant applied for a security clearance and submitted an Electronic Questionnaire for Investigations Processing (e-QIP) version of a Security Clearance Application (SF 86).¹ On July 7, 2014, the Department of Defense (DOD) Consolidated Adjudications Facility – Division A (CAF) issued a Statement of Reasons (SOR) to him, under Executive Order 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended and modified; DOD Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended and modified (Directive); and the *Adjudicative Guidelines for Determining Eligibility For Access to Classified Information* (December 29, 2005) (AG) applicable to all adjudications and other determinations made under the Directive, effective September 1, 2006. The SOR alleged security concerns under Guideline F (Financial

¹ GE 1 ((SF 86), dated March 12, 2013).

Considerations), and detailed reasons why the DOD adjudicators were unable to find that it is clearly consistent with the national interest to grant or continue a security clearance for Applicant. The SOR recommended referral to an administrative judge to determine whether a clearance should be granted, continued, denied, or revoked.

Applicant received the SOR on July 16, 2014. On an unspecified date, Applicant responded to the SOR allegations and requested a hearing before an administrative judge. Department Counsel indicated the Government was prepared to proceed on October 6, 2014. The case was assigned to me on November 14, 2014. A Notice of Hearing was issued on December 1, 2014, and I convened the hearing as scheduled on December 16, 2014.

During the hearing, five Government exhibits (GE 1 through GE 5) and four Applicant exhibits (AE A through AE 4) were admitted into evidence without objection. Applicant and two other witnesses testified. The transcript (Tr.) was received on January 5, 2015. I kept the record open to enable Applicant to supplement it. Applicant took advantage of that opportunity. He submitted additional documents which were marked as AE E through AE L and admitted into evidence without objection. The record closed on December 22, 2014.

Findings of Fact

In his Answer to the SOR, Applicant admitted all of the factual allegations pertaining to financial considerations (§§ 1.a. through 1.c.). Applicant's answers are incorporated herein as findings of fact. After a complete and thorough review of the evidence in the record, and upon due consideration of same, I make the following additional findings of fact:

Applicant is a 54-year-old employee of a defense contractor. Although he has worked on the same contract since April 2007, when his initial employer's contract expired in September 2010, Applicant was retained and employed in the same position by the defense contractor that took over the contract.² A June 1978 high school graduate,³ Applicant received an associate's degree in applied science in October 2003,⁴ and is well on his way to completing requirements for a bachelor's degree in psychology, with an anticipated completion date of May 2017.⁵ He has held a secret (and sometimes a top secret) security clearance since 1981.⁶ Applicant was married in December 1986, and divorced in October 1991. He remarried in January 1997, and was again divorced in July 2007.⁷ Although he has no biological offspring, Applicant adopted a son (born in 1993) of his second wife, and that child resides with him.

² GE 1, *supra* note 1, at 10-11.

³ GE 2 (Personal Subject Interview, dated April 2, 2013), at 1.

⁴ AE H (Diploma, dated October 3, 2003).

⁵ AE K (Academic Evaluation, dated December 19, 2014); GE 1, *supra* note 1, at 9.

⁶ GE 1, *supra* note 1, at 28; GE 2, *supra* note 3, at 1; Tr. at 52.

Military Service

Applicant enlisted in the U.S. Air Force in May 1981, and he served on active duty until he retired honorably in May 2007. During his military service, he was awarded the Meritorious Service Medal (with one cluster), the Air Force Commendation Medal (with two clusters), the Air Force Achievement Medal (with one cluster), the Joint Meritorious Unit Award, the Air Force Outstanding Unit Award (with eight clusters), the Air Force Good Conduct Medal (with eight clusters), the National Defense Service Medal (with one service star), the Armed Forces Expeditionary Medal, the Southwest Asia Service Medal (with two service stars), the Global War on Terrorism Service Medal, the Armed Forces Service Medal, the Humanitarian Service Medal (with one service star), the Air Force Overseas Ribbon Short, the Air Force Overseas Ribbon Long, the Air Force Longevity Service Ribbon (with five clusters), the USAF NCO PME Graduate Ribbon (with one cluster), the Small Arms Expert Marksmanship Ribbon (Rifle), the Air Force Training Ribbon, the NATO Medal, the Kuwait Liberation of Kuwait Medal, and the Saudi Arabian Medal for the Liberation of Kuwait.⁸

In addition to his formal awards, Applicant was the recipient of frequent accolades, “pat on the back” awards, and letters of appreciation from a number of unit commanders. He was named the Senior NCO of the Month on at least three occasions.⁹ Applicant’s performance reports for the last five years reflect the highest ratings possible – called firewalls.¹⁰ The common assessment of his judgment was “highly respected and skilled.”¹¹ Applicant’s military duties involved nuclear weapons, and as such, for many years he was under the Air Force Personnel Reliability Program (PRP), used by all branches of the military service with such duties to ensure personnel are reliable to perform nuclear-related responsibilities.¹²

Financial Considerations

There was nothing unusual about Applicant’s finances until about February 2012. Applicant attributed most of his financial problems to difficulties derived from his teenage son’s “knucklehead years,” during which he had anger issues and punched holes through walls, smashed dashboards and car windows, and lost his job. Applicant assisted him financially, using his credit card to purchase needed items, which he did not describe. Because of Applicant’s work, the economy, and rising gasoline prices,

⁷ GE 1, *supra* note 1, at 17-18.

⁸ AE I (Certificate of Release or Discharge from Active Duty (DD Form 214, dated May 31, 2007); AE L (Verification of Military Experience and Training, dated July 1, 2014).

⁹ AE G (Certificates and Letters, various dates).

¹⁰ AE J (Senior Enlisted Performance Reports, various dates); Tr. at 53.

¹¹ AE J, *supra* note 10, at 1, 3, 5, 7, 9.

¹² Tr. at 53. A PRP-certified individual is observed for compliance with reliability standards on an ongoing basis that considers duty performance, and on- and off-duty behavior, and reliability on a continuing and frequent basis. See § DL. 12, DoD 5210.42-R, *Nuclear Weapons Personnel Reliability Program (PRP)*, June 30, 2006.

Applicant was unable to keep up with his monthly payments, and while he would sometimes have some extra funds to make larger payments, he was eventually forced to prioritize his expenses, and made food and shelter his priorities over making credit card payments.¹³

Applicant contacted his creditors in an effort to make repayment arrangements, and, with financial benefits of up to approximately \$700 per month obtained under the G.I Bill from the U.S. Department of Veterans Affairs, he was able to pay down some of his balances. In March 2012, he paid off his vehicle, and then started paying down other accounts.¹⁴ In April 2013, it was Applicant's intention to bring all of his delinquent accounts current within two or three months.¹⁵ He stopped using credit cards and reduced his expenses by cutting back on cable, the phone, and eating out.¹⁶ He managed to pay off some of the smaller accounts, and he just keeps "hacking away on them."¹⁷ He eventually caught up on nearly every one of his debts by either paying them off entirely or by reducing the balances.¹⁸ Although Applicant had not received any financial counseling before the hearing, he is scheduled to attend a financial counseling session on budgeting basics in February 2015. He would have attended an earlier January 2015 session but was unable to do so because of a work-related absence.¹⁹

The SOR identified three delinquent debts that had been placed for collection or charged off, as reflected by a March 2013 credit report,²⁰ a March 2014 credit report,²¹ and a November 2014 credit report.²² Those debts, totaling approximately \$16,070, and their respective current status, according to the credit reports, other evidence submitted by the Government and Applicant, and Applicant's comments regarding same, are described below.

(SOR ¶ 1.a.): There is a credit card with a credit limit of \$8,500 and a remaining balance of \$8,853 that was placed for collection and charged off.²³ Although none of the credit reports reflect that the account has been transferred or sold, the account was

¹³ GE 2, *supra* note 3, at 1-2; Tr. at 32-34.

¹⁴ Tr. at 36-37.

¹⁵ GE 2, *supra* note 3, at 2.

¹⁶ Tr. at 54-55.

¹⁷ Tr. at 36.

¹⁸ Tr. at 54.

¹⁹ Tr. at 56; AE E (e-mail, dated December 19, 2014), at 2; AE F (Family Readiness Center Calendar, undated), at 1.

²⁰ GE 4 (Combined Experian, TransUnion, and Equifax Credit Report, dated March 15, 2013).

²¹ GE 3 (Equifax Credit Report, dated March 24, 2014).

²² GE 5 (Equifax Credit Report, dated November 7, 2014).

²³ GE 4, *supra* note 20, at 7.

sold, in turn, to two different debt purchasers.²⁴ Applicant made intermittent payments to the original creditor when he could do so, and then several substantial payments (of \$200 or more per month) to the first debt purchaser in 2013 and 2014. Upon receiving a notice from the successor debt purchaser in July 2014, he has been making smaller, but more frequent, payments to that debt purchaser.²⁵ Although Applicant's repayment arrangement with the current debt purchaser calls for him to make monthly \$100 payments, Applicant has made several increased payments when he is able to.²⁶ In July 2014, Applicant's remaining balance had diminished to approximately \$7,953, and by December 2014, it was approximately \$7,300.²⁷ The account is in the process of being resolved.

(SOR ¶ 1.b.): There is an account with a warehouse club store with a credit limit of \$2,100 and a remaining balance of \$1,794 that was placed for collection and sold to a debt purchaser.²⁸ Applicant initially confused this account with another account, and thought he was making payments on it, but he was wrong. He subsequently made intermittent payments of \$100 or more to the debt purchaser when he could do so in 2013 and 2014.²⁹ Applicant was informed by the debt purchaser that it had sold the account to another debt purchaser, and refused to accept his last attempted payment.³⁰ Applicant's effort to pay the original creditor was also refused.³¹ Applicant called the telephone number associated with the second debt purchaser on two or three occasions, but the number was never answered.³² He also sent the company an e-mail, but never received a reply.³³ He researched the second company on the Internet and all the references to that company were negative.³⁴ Applicant wants to pay the debt, but he does not know how since they will not answer their phone.³⁵ While the account has not been resolved, it appears that Applicant has made extensive, reasonable efforts to do so, and those efforts have been rejected by the current debt owner.

²⁴ Tr. at 31-32.

²⁵ AE A (Schedule of Payments, undated); Tr. at 31, 38-41.

²⁶ Tr. at 40; AE A, *supra* note 25; AE D (Bank Register, undated).

²⁷ Tr. at 31, 39.

²⁸ GE 4, *supra* note 20, at 9; GE 3, *supra* note 15, at 6.

²⁹ Tr. at 42-43; AE B (Schedule of Payments, undated); AE D, *supra* note 26.

³⁰ Tr. at 43-44.

³¹ Tr. at 43.

³² Tr. at 43-47.

³³ Tr. at 47.

³⁴ Tr. at 43.

³⁵ Tr. at 44, 46.

(SOR ¶ 1.c.): There is a credit card with a credit limit of \$4,950 and a remaining past due balance of \$5,896 that was placed for collection and charged off.³⁶ Applicant made intermittent payments when he could do so in 2013, but when the account was charged off, he could no longer enter the company website to continue doing so. He eventually called the collection agent in July 2014 and set up a repayment arrangement under which \$150 is automatically withdrawn from his bank account on the same day each month. Monthly payments have been made each month since the arrangement was established.³⁷ As of December 2014, the unpaid balance has been reduced to approximately \$4,946.³⁸ The account is in the process of being resolved.

Work Performance and Character References

Applicant's supervisor and task lead has known Applicant for over seven years, and he sees Applicant daily, if not hourly. He characterized Applicant as the most reliable, trustworthy, and responsible person on "their task." Applicant is dedicated to his team and job, and travels world-wide to train individuals whenever there is a requirement within a major center where technical data is being written and produced. He is aware of Applicant's financial issues and has no reservations about supporting Applicant's application to retain a security clearance.³⁹ Applicant's friend and professional colleague for over 32 years also is highly supportive of Applicant's application. He indicated Applicant has an outstanding reputation for reliability and trustworthiness. He noted Applicant's community activities in support of Toys-For-Tots.⁴⁰ While on active duty with the U.S. Air Force, Applicant served as a Webelos scout leader, coach for the intramural softball teams, and assistant coach for the high school track team, and erected playground equipment for the local elementary school.⁴¹

Policies

The U.S. Supreme Court has recognized the substantial discretion of the Executive Branch in regulating access to information pertaining to national security emphasizing, "no one has a 'right' to a security clearance."⁴² 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. The President has authorized the Secretary of Defense or his

³⁶ GE 4, *supra* note 20, at 7.

³⁷ Tr. at 51; AE C (Schedule of Payments, undated); AE D, *supra* note 26.

³⁸ AE C, *supra* note 37.

³⁹ Tr. at 20-25.

⁴⁰ Tr. at 26-29.

⁴¹ AE J, *supra* note 10, at 2, 6, 8, 10; AE G (Letter of Appreciation, dated June 4, 2004).

⁴² *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988).

designee to grant an applicant eligibility for access to classified information “only upon a finding that it is clearly consistent with the national interest to do so.”⁴³

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

An administrative judge need not view the guidelines as inflexible, ironclad rules of law. Instead, acknowledging the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in the adjudicative process. The administrative judge’s overarching adjudicative goal is a fair, impartial, and commonsense decision. The entire process is a conscientious scrutiny of a number of variables known as the “whole-person concept.” The administrative judge must consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a meaningful decision.

In the decision-making process, facts must be established by “substantial evidence.”⁴⁴ The Government initially has the burden of producing evidence to establish a potentially disqualifying condition under the Directive, and has the burden of establishing controverted facts alleged in the SOR. Once the Government has produced substantial evidence of a disqualifying condition, under Directive ¶ E3.1.15, the applicant has the burden of persuasion to present evidence in refutation, explanation, extenuation or mitigation, sufficient to overcome the doubts raised by the Government’s case. The burden of disproving a mitigating condition never shifts to the Government.⁴⁵

A person who seeks access to classified information enters into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours as well. It is because of this special relationship that 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 include, by necessity, consideration of the possible risk the applicant may deliberately or inadvertently fail to safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified information. Furthermore, “security clearance determinations should err, if they must, on the side of denials.”⁴⁶

⁴³ Exec. Or. 10865, *Safeguarding Classified Information within Industry* § 2 (Feb. 20, 1960), as amended and modified.

⁴⁴ “Substantial evidence [is] such relevant evidence as a reasonable mind might accept as adequate to support a conclusion in light of all contrary evidence in the record.” ISCR Case No. 04-11463 at 2 (App. Bd. Aug. 4, 2006) (citing Directive ¶ E3.1.32.1). “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).

⁴⁵ *See* ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005).

⁴⁶ *Egan*, 484 U.S. at 531.

Clearance decisions must be “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.”⁴⁷ Thus, 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. It is merely an indication the Applicant has or has not met the strict guidelines the President and the Secretary of Defense have established for issuing a clearance. 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.

Analysis

Guideline F, Financial Considerations

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

Failure or inability 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 information. An individual who is financially overextended is at risk of having to engage in illegal acts to generate funds. . . .

The guideline notes several conditions that could raise security concerns. Under AG ¶ 19(a), an “inability or unwillingness to satisfy debts” is potentially disqualifying. Similarly, under AG ¶ 19(c), a “history of not meeting financial obligations” may raise security concerns. Applicant’s most significant financial problems arose in February 2012. He was unable to continue making his routine monthly payments and various accounts became delinquent and were placed for collection or charged off. AG ¶¶ 19(a) and 19(c) apply.

The guideline also includes examples of conditions that could mitigate security concerns arising from financial difficulties. Under AG ¶ 20(a), the disqualifying condition may be mitigated where “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.” Also, under AG ¶ 20(b), financial security concerns may be mitigated where “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, or a death, divorce or separation), and the individual acted responsibly under the circumstances.” Evidence that “the person has received or is receiving counseling for the problem and/or there are clear indications that the problem is being resolved or is under control” is potentially

⁴⁷ See Exec. Or. 10865 § 7.

mitigating under AG ¶ 20(c). Similarly, AG ¶ 20(d) applies where the evidence shows “the individual initiated a good-faith effort to repay overdue creditors or otherwise resolve debts.”⁴⁸

AG ¶¶ 20(a), 20(b), 20(c), and 20(d) apply. Applicant’s financial problems were not caused by frivolous or irresponsible spending, and he did not spend beyond his means. Instead, as noted above, Applicant’s initial financial problems started in February 2012, occasioned by his son’s emotional issues and destructive actions. As a single parent and loving father, Applicant assisted his son financially, to his own financial peril. The combination of the poor economy, increasing gasoline prices, and Applicant’s work took its toll, and Applicant was forced to prioritize his monthly payments because of an inability to make his normal payments. To his credit, Applicant took control over the perilous financial situation and contacted his creditors in an effort to make repayment arrangements. He enrolled in school full-time to obtain the maximum G.I. Bill benefits, and started addressing his delinquent accounts. He reduced unnecessary expenses. Applicant’s overall repayment strategy has been successful, and he has resolved, or is in the process of resolving, with only one exception, all of his delinquent debts.

He is scheduled to receive counseling from a financial counselor, and the counselor will be guiding him on budget basics. All of Applicant’s newer accounts are current. Two of Applicant’s SOR-related accounts are in the process of being resolved with monthly payment arrangements, and those payments are being routinely made. The one remaining account is difficult to resolve, not because of any lack of effort by Applicant, but rather by the refusal of the debt purchaser to respond to Applicant’s efforts to contact it. Applicant’s son is now older, and there is no evidence of continuing problems with his conduct. There are clear indications that Applicant’s financial problems are under control. Applicant’s actions under the circumstances confronting him, do not cast doubt on his current reliability, trustworthiness, or good judgment.⁴⁹

⁴⁸ The Appeal Board has previously explained what constitutes a good-faith effort to repay overdue creditors or otherwise resolve debts:

In order to qualify for application of [the “good-faith” mitigating condition], an applicant must present evidence showing either a good-faith effort to repay overdue creditors or some other good-faith action aimed at resolving the applicant’s debts. The Directive does not define the term ‘good-faith.’ However, the Board has indicated that the concept of good-faith ‘requires a showing that a person acts in a way that shows reasonableness, prudence, honesty, and adherence to duty or obligation.’ Accordingly, an applicant must do more than merely show that he or she relied on a legally available option (such as bankruptcy) in order to claim the benefit of [the “good-faith” mitigating condition].

(internal citation and footnote omitted) ISCR Case No. 02-30304 at 3 (App. Bd. Apr. 20, 2004) (quoting ISCR Case No. 99-9020 at 5-6 (App. Bd. June 4, 2001)).

⁴⁹ See ISCR Case No. 09-08533 at 3-4 (App. Bd. Oct. 6, 2010).

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for a security clearance by considering the totality of the applicant's conduct and all the circumstances. The administrative judge should consider the nine adjudicative process factors listed at AG ¶ 2(a):

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

Under AG ¶ 2(c), the ultimate determination of whether to grant eligibility for a security clearance must be an overall commonsense judgment based upon careful consideration of the guidelines and the whole-person concept. Moreover, I have evaluated the various aspects of this case in light of the totality of the record evidence and have not merely performed a piecemeal analysis.⁵⁰

There is some evidence against mitigating Applicant's conduct. His handling of his finances permitted a number of accounts to become delinquent. As a result, various accounts became delinquent and were placed for collection or charged off.

The mitigating evidence under the whole-person concept is more substantial. Applicant has an outstanding reputation in the workplace and in the communities in which he has resided. Applicant's financial problems were not caused by frivolous or irresponsible spending, and he did not spend beyond his means. Rather, his problems were caused by his son's emotional outbursts and destructive actions, all of which were largely beyond Applicant's control. He helped his son financially when he could really not afford to do so. With the exception of one debt purchaser's account, Applicant has resolved, or is in the process of resolving, all of the accounts identified in the SOR, as well the ones not listed in the SOR. There are clear indications that Applicant's financial problems are under control. His actions under the circumstances confronting him do not cast doubt on his current reliability, trustworthiness, or good judgment.

The Appeal Board has addressed a key element in the whole-person analysis in financial cases stating:

In evaluating Guideline F cases, the Board has previously noted that the concept of "meaningful track record" necessarily includes evidence of actual debt reduction through payment of debts." However, an applicant is

⁵⁰ See *U.S. v. Bottone*, 365 F.2d 389, 392 (2d Cir. 1966); See also ISCR Case No. 03-22861 at 2-3 (App. Bd. Jun. 2, 2006).

not required, as a matter of law, to establish that he [or she] has paid off each and every debt listed in the SOR. All that is required is that an applicant demonstrate that he [or she] has “. . . established a plan to resolve his [or her] financial problems and taken significant actions to implement that plan.” The Judge can reasonably consider the entirety of an applicant’s financial situation and his [or her] actions in evaluating the extent to which that applicant’s plan for the reduction of his outstanding indebtedness is credible and realistic. See Directive ¶ E2.2(a) (“Available, reliable information about the person, past and present, favorable and unfavorable, should be considered in reaching a determination.”) There is no requirement that a plan provide for payments on all outstanding debts simultaneously. Rather, a reasonable plan (and concomitant conduct) may provide for the payment of such debts one at a time. Likewise, there is no requirement that the first debts actually paid in furtherance of a reasonable debt plan be the ones listed in the SOR.⁵¹

Applicant has demonstrated a “meaningful track record” of debt reduction and elimination efforts. Overall, the evidence leaves me without questions and doubts as to Applicant’s eligibility and suitability for a security clearance. For all of these reasons, I conclude Applicant has mitigated the security concerns arising from his financial considerations. See AG ¶ 2(a)(1) through AG ¶ 2(a)(9).

Formal Findings

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

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

Conclusion

In light of all of the circumstances presented by the record in this case, it is clearly consistent with the national interest to grant Applicant eligibility for a security clearance. Eligibility for access to classified information is granted.

ROBERT ROBINSON GALES
Administrative Judge

⁵¹ ISCR Case No. 07-06482 at 2-3 (App. Bd. May 21, 2008) (internal citations omitted).