



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



In the matter of:)	
)	
)	ISCR Case No. 14-02605
)	
Applicant for Security Clearance)	

Appearances

For Government: Eric H. Borgstrom, Esq., Department Counsel
For Applicant: Terence E. Coles, Esq.

03/31/2016

Decision

MATCHINSKI, Elizabeth M., Administrative Judge:

Applicant has largely taken a hands-off approach to his finances, allowing his cohabitant girlfriend to pay their bills. After three credit-card judgments were entered against him totaling \$12,925 and another credit-card account was charged off for \$1,949, he contacted his creditors and began repayment in December 2014. He has satisfied a \$1,919 judgment and paid another \$2,025 toward his other delinquencies. However, concerns about his financial judgment persist because of his lack of knowledge and involvement in his finances. He has yet to establish a sufficient track record of delinquent debt payment. Clearance is denied.

Statement of the Case

On October 22, 2014, the Department of Defense Consolidated Adjudications Facility (DOD CAF) issued a Statement of Reasons (SOR) to Applicant, detailing the security concerns under Guideline F, Financial Considerations, and explaining why it was unable to find it clearly consistent with the national interest to grant or continue his security clearance eligibility. The DOD CAF took the action under Executive Order 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; DOD Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program*

(January 2, 1992), as amended (Directive); and the adjudicative guidelines (AG) effective within the DOD on September 1, 2006.

Applicant answered the SOR allegations on November 14, 2014. He did not indicate whether he wanted a hearing before an administrative judge with the Defense Office of Hearings and Appeals (DOHA) or a decision on the written record without a hearing. On June 8, 2015, the case was assigned to me to conduct a hearing to determine whether it is clearly consistent with the national interest to grant or continue a security clearance for Applicant. After some coordination of schedules with the parties, on November 2, 2015, I scheduled the hearing for November 30, 2015.

At the hearing, three Government exhibits (GEs 1-3) and eight Applicant exhibits (AEs A-H) were admitted into evidence without objection. Applicant testified on his behalf, as reflected in a transcript (Tr.) received on December 9, 2015.

I held the record open after the hearing for one month. The Government was granted two weeks to submit a consolidated report of Applicant's credit. Applicant was granted one month to respond to any newly proposed exhibit from the Government and to submit additional documentation. I received nothing from the Government by the two-week deadline. On December 29, 2015, Applicant submitted through his counsel additional documentation for inclusion in AEs D, F, G, and H admitted at his hearing. He also requested an extension to January 14, 2016, to further supplement AE F. On December 30, 2015, I granted his request for the extension and gave Department Counsel until January 8, 2016, to comment on the information submitted by Applicant on December 29, 2015. The Government filed no objections by the January 8, 2016 deadline, so the information was accepted into evidence and incorporated within the respective exhibits D, F, G, and H. Applicant submitted no additional information by the January 14, 2016 deadline, so the record closed on that date.

Findings of Fact

The SOR alleges that Applicant owed delinquent balances totaling \$15,172 on five credit-card accounts (SOR ¶¶ 1.a-1.e) as of October 22, 2014. When he answered the SOR allegations, Applicant admitted that he was fully responsible for each of the debts and failed to follow through on payments. He explained that he incurred veterinary bills exceeding \$16,000 that strained his finances, and that he was also not aware of when the accounts were placed for collection or charged off because he does not manage the finances in his home. After considering the pleadings, exhibits, and transcript, I make the following findings of fact.

Applicant is a 58-year-old high school graduate with one year of community college from September 1981 to May 1982. Twice married and divorced, Applicant has two daughters now ages 35 and 25, and a son age 28. Applicant has been in a cohabitant relationship since March 2002. His longtime girlfriend owns the home in which they reside. (GE 1.) The mortgage is in her name only. (Tr. 57.)

Applicant served on active duty in the U.S. military from August 1975 to August 1979. In October 1981, he enlisted in the active reserve. He worked as a federal civilian employee for a few years on the base, starting in April 1983 before becoming a full-time technician in the reserve. Around June 1998, he retired from the military at the rank of E-7 (Tr. 82) and transferred to a federal civil service position on the base. He became a defense-contractor employee in March 2000 after his civil service position was impacted by a base realignment and closure action. Five years later, his present employer took over the contract, and Applicant was hired for his current position. Applicant has held a DOD secret clearance since he was on active duty in the military. His clearance was last renewed around 2002. (GE 1; Tr. 22-24, 49.)

Applicant's cohabitant has handled the household finances for the duration of their cohabitant relationship. (Tr. 55, 57.) Applicant testified that he and his girlfriend have one bank account. He gets paid by check and gives his girlfriend all of his pay. (Tr. 55-56.) Available payments by check show only her name on the bank account. (AE D.) He has not been involved in tracking their household expenses and does not know whether his girlfriend maintains a household budget. (Tr. 57.)

In 2007, Applicant and his girlfriend acquired an eight-week-old puppy. (Tr. 26.) A large breed, the dog accidentally sustained injuries to her left hind leg in February 2010. On February 26, 2010, their dog underwent the first of two surgeries for bilateral hind-limb lameness. Applicant and his girlfriend chose to proceed with the surgery for their dog after being advised that the dog would likely sustain the same injury to his other leg because of favoring the non-damaged limb. (Tr. 63.) The surgery and related hospitalization cost \$4,780, of which they paid \$3,000 upfront. In June 2010, they incurred another \$4,262 in veterinary costs for surgery to the dog's other leg. They had to pay most, if not all of the remaining costs for the first surgery before the vet would perform the second surgery. (AEs A, B; Tr. 27-30, 37.) Applicant estimates the total costs for their dog's care at \$16,000. (Tr. 31.) Veterinary invoices in the record show additional veterinary costs of \$2,120 incurred between February 2010 and October 2014 (AEs B, C), which does not include therapy for the dog totaling approximately \$925. (AE D.) They relied in part on credit cards to pay the veterinary and rehabilitation bills.¹ As of April 9, 2014, they had paid all outstanding vet balances. Subsequent veterinary charges of \$462 in October 2014 were paid by VISA credit card. (AE C.)

To renew his security clearance, Applicant completed and certified to the accuracy of a Questionnaire for National Security Positions (SF 86 Format) on January 18, 2013. Applicant responded negatively to all inquiries concerning any delinquency involving routine accounts in the past seven years. (GE 1; Tr. 53.) Available credit information (GEs 2, 3) shows that three of Applicant's credit-card accounts were delinquent at that time (SOR ¶¶ 1.c-1.e), which he now attributes to unexpected veterinary costs. (Tr. 37.) Applicant was

¹ Payment records show that payments by check were drafted by his girlfriend on her checking account. Most but not all of the payments by credit card were on an account ending in x4001. (AEs C, D.) Applicant has one account with the credit lender on his credit record, but he is listed only as an authorized user on the account. (GEs 2, 3.) These records buttress his testimony that his girlfriend handles their bill payments ("I work and she manages the money."). (Tr. 55.)

unaware at the time that any of his accounts were past due. He had little to no involvement in paying the household bills. (Tr. 53, 55, 57.)

A few weeks after he completed his SF 86, Applicant was interviewed by an investigator for his background investigation. Applicant denies present recall of what was specifically discussed during his interview, but he acknowledges that his financials were likely discussed. (Tr. 53-54.) He took no steps to obtain his credit report. It did not occur to him to do so. (Tr. 70.)

Available credit information obtained during Applicant's background investigation revealed that some of Applicant's accounts became seriously delinquent, as follows:

A credit card account opened by Applicant in April 2006 was charged off for \$2,125 (SOR ¶ 1.e) and sold in November 2012 (duplicated in SOR ¶ 1.a).² (GE 2; AE H.) In March 2015, the debt buyer was awarded a default judgment of \$2,802.45.³ A payment review hearing was scheduled for May 12, 2015. Available payment records show that Applicant began repaying the debt at \$100 per month on May 15, 2015, although Applicant was unable to testify as to how many payments he had made as of his security clearance hearing. (Tr. 94.) As of November 3, 2015, Applicant had paid \$600 toward the balance. (AE H.)

A credit-card account opened in December 2004 was charged off for \$1,809 (SOR ¶ 1.b). It first fell delinquent in July 2013. (GEs 2, 3.) In October 2014, the creditor obtained a default judgment against Applicant totaling \$1,919.13 (\$1,809 plus interest and costs).⁴ (GE 3; AE E.) Applicant made payments at \$250 per month from December 2014 to July 2015 to satisfy the judgment. (AEs D, E; Tr. 38-39.)

A credit-card account opened in October 2005 was charged off for \$6,596 (SOR ¶ 1.c) around October 2012 due to nonpayment since April 2012. (GE 3.) The account was sold and a judgment was entered against Applicant for \$8,203.86 in 2014. Repayment was arranged at \$100 per month starting in mid-December 2014. As of December 2015, Applicant had paid \$1,350 to reduce the balance to \$6,853. (AE G.)

A credit-card account opened in April 2007 was charged off for \$1,949 (SOR ¶ 1.d) after no payment since April 2012. (GEs 2, 3.) Applicant arranged to repay the debt at

² Court and collection records (AE H) show that an account originally held by the lender in SOR 1.e ending in x9085 was purchased by the lender in SOR ¶ 1.a in November 2012. Available credit reports show only the first 12 numbers of the account in SOR ¶ 1.e, but they match the account that was sold in November 2012 to the creditor in SOR ¶ 1.a, which was reportedly in collection as of March 2014. (GE 2.) There is no separate credit listing on either of the November 2015 (GE 3) or March 2014 (GE 2) credit reports which would indicate that Applicant opened an account directly with the lender in SOR ¶ 1.a.

³ Both the complaint and the judgment award identify Applicant as defendant by name and his current address. (AE H.)

⁴ Applicant denies that he ever received any notice of hearings on the judgment actions pursued by his creditors. However, he admits that he received notice of the judgment award from the court as to SOR ¶ 1.b. (Tr. 88.) Court records show that the judgment award was mailed to Applicant at his current address. (AE E.)

\$150 per month in two \$75 increments. (Tr. 75.) He testified that the payments were being automatically deducted from their checking account. (Tr. 78.) He owed a \$1,991.37 balance as of November 24, 2015. (AE F.)

Applicant had more than one discussion with his girlfriend after he tried to use one or more of his credit cards and was denied. (Tr. 69.) Yet he did not become more involved in their finances. (Tr. 73.) On October 22, 2014, the DOD CAF issued an SOR because of the unresolved delinquencies on Applicant's credit record. After Applicant received the SOR, he confronted his girlfriend about the debts and had what he characterizes as "a pretty disturbing discussion." He contacted his creditors and arranged repayment terms, as shown above. (Tr. 61, 74.) However, he left it up to his girlfriend to make the payments. (Tr. 62.)

On six separate occasions, Applicant's girlfriend has been late 30 days making the payments on a \$17,410 auto loan opened by Applicant in August 2010 for a 2008 model-year car. As of October 2015, this loan was current with a balance of \$3,233. Applicant and his girlfriend opened a joint auto loan of \$39,670 for a new truck for him in May 2014, to be repaid at \$716 per month for 75 months. As of October 2015, the loan was reportedly \$297 past due, likely because they were late in their payment that month.⁵ Payments were otherwise made on time. (GE 3; Tr. 80-81.) Applicant denied knowing at his security clearance hearing that their truck loan was past due. (Tr. 81.) He also did not know the interest rate on the truck loan. (Tr. 81, 94.)

Applicant earns between \$65,000 and \$70,000 annually with his defense-contractor employer. (Tr. 82.) He contributes to his 401(k) account at work. His employer does not allow loans against the 401(k). (Tr. 56-57, 86.) Applicant's girlfriend works outside the home in a medical office. (Tr. 58.) There is no evidence about her income in the record before me for review. Applicant testified that it has been "tough every month" for them financially. (Tr. 66.) To his knowledge, he and his girlfriend owe no federal or state income tax liabilities, but he was unable to name the tax professional retained by his girlfriend to prepare their tax returns. (Tr. 85.) While he knows that his girlfriend has been behind on some of her credit obligations in the past, he is unaware whether she has any accounts that were delinquent as of November 2015. (Tr. 73.)

Applicant has not been reprimanded or suspended at work for any reason. He has committed no security infractions or violations. He has been recognized as Employee of the Quarter a couple of times. (Tr. 83.)

Policies

The U.S. Supreme Court has recognized the substantial discretion the Executive Branch has in regulating access to information pertaining to national security, emphasizing that "no one has a 'right' to a security clearance." *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). When evaluating an applicant's suitability for a security clearance,

⁵ Applicant's credit report indicates that the loan was first delinquent in October 2015, but also that a payment was made in October 2015. (GE 3.)

the administrative judge must consider the adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines list potentially disqualifying conditions and mitigating conditions, which are required to be considered in evaluating an applicant's eligibility for access to classified information. These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied in conjunction with the factors listed in the adjudicative process. The administrative judge's overall adjudicative goal is a fair, impartial, and commonsense decision. According to AG ¶ 2(c), 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 decision.

The protection of the national security is the paramount consideration. AG ¶ 2(b) requires that "[a]ny doubt concerning personnel being considered for access to classified information will be resolved in favor 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. Under Directive ¶ E3.1.14, the Government must present evidence to establish controverted facts alleged in the SOR. Under Directive ¶ E3.1.15, 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. . . ." The applicant has the ultimate burden of persuasion to obtain a favorable security decision.

A person who seeks access to classified information enters into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours. The Government reposes a high degree of trust and confidence in individuals to whom it grants access to classified information. Decisions include, by necessity, consideration of the possible risk 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. Section 7 of Executive Order 10865 provides that 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." See *also* EO 12968, Section 3.1(b) (listing multiple prerequisites for access to classified or sensitive information).

Analysis

Guideline F, Financial Considerations

The security concern about financial considerations is articulated 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 F concerns are established by Applicant's delinquent credit-card accounts. The creditors in SOR ¶¶ 1.a-1.c obtained judgments against Applicant totaling \$12,925.44. The credit-card account in SOR ¶ 1.d was charged off for \$1,949. Disqualifying conditions AG ¶ 19(a), "inability or unwillingness to satisfy debts," and AG ¶ 19(c), "a history of not meeting financial obligations," apply in this case.

Mitigating condition AG ¶ 20(a), "the behavior happened so long ago, was so infrequent, or occurred under circumstances that it is unlikely to recur and does not cast doubt on the individual's current, reliability, or good judgment" cannot reasonably apply. The accounts became seriously delinquent in 2012 (SOR ¶¶ 1.a, 1.c, and 1.d) or 2013 (SOR ¶ 1.b), but only the default judgment in SOR 1.b has been satisfied.

Applicant attributes his financial problems to unexpected vet bills of \$16,000. He presented documentation of approximately \$12,087 in vet and therapy expenses for his dog between February 2010 and October 2014. When Applicant and his girlfriend elected to proceed with the original surgery, they knowingly accepted the risk of additional veterinary bills if their dog required surgery to his other leg. However, mitigating condition AG ¶ 20(b) applies in that Applicant could not have foreseen the initial injury sustained by his dog. AG ¶ 20(b) provides:

(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, or a death, divorce or separation), and the individual acted responsibly under the circumstances.

Their decision to proceed with the initial surgery was understandable, given their dog was still young, even if the dog was likely to come up lame in his other leg because of his size. Even so, the veterinary costs do not fully explain Applicant's financial difficulties. Some of the payments for the veterinary fees were on credit, but they had to pay most of the cost of the first surgery before the second surgery in June 2010. After the second surgery, they owed only \$3,258 to the veterinary hospital. Subsequent therapy costs at \$40 a month were primarily paid by check. It is unclear what led Applicant's girlfriend to stop paying some of Applicant's credit cards in 2012. She apparently had delinquent accounts of her own and may have given priority to her debts, but Applicant presented little information on that issue.

For AG ¶ 20(b) to fully apply in mitigation, Applicant is required to have acted responsibly once the situation that caused financial stress had passed. Applicant did not act responsibly toward his creditors when he did little to investigate or address the credit problems that left him eventually unable to use some of his credit cards. He testified that he had some discussions with his girlfriend after he was denied credit, although he did not present evidence of any concrete actions on his part to ensure that she paid their bills on time. Applicant admits that his finances were likely discussed during his subject interview in

early 2013, although he claims no present recall of the specifics discussed with the investigator. Whether or not Applicant realized in 2013 that his finances were of security concern to the DOD, he had an obligation to his creditors to ensure that debt balances were being paid. He took no steps to verify debt balances, claiming that it did not occur to him to obtain his credit record. (Tr. 70.)

Two (SOR ¶¶ 1.a, 1.b) if not three of the financial judgments against Applicant were entered in default. Applicant denies ever appearing at a hearing on his debts, so the judgment awarded the creditor in SOR ¶ 1.c may also have been a default judgment. Applicant claims he did not receive any notices of hearing on the judgment actions pursued by his creditors. However, he admits that he received notice of the judgment award from the court as to SOR ¶ 1.b. (Tr. 88.) Court records show that the judgment award was mailed to Applicant at his current address. (AE E.) It is unclear why he did not receive notice of the hearing. Both the complaint and the judgment award for the debt in SOR ¶ 1.a are accurate as to Applicant's name and address. That judgment was issued in March 2015, after Applicant was placed on notice by the SOR in October 2014 that his account was reportedly in collection. There is no evidence that Applicant tried to enter into repayment arrangements for the debt before the judgment award in March 2015.

Applicant is credited with contacting the courts and making arrangements with collection agents to repay the judgments after they were issued. Applicant satisfied the judgment in SOR ¶ 1.b in July 2015 after payments by his girlfriend for him since December 2014. Between December 2014 and December 2015, Applicant's girlfriend made payments totaling \$1,350 to reduce the balance of SOR ¶ 1.c to \$6,853. As of early November 2015, Applicant's girlfriend had paid \$600 toward the \$2,802 judgment in SOR ¶ 1.a (SOR ¶ 1.e same debt). He arranged to repay the \$1,949 charged-off balance of SOR ¶ 1.d at \$150 a month, and his girlfriend made the first of bi-weekly \$75 payments. However, repayments in response to a court order do not carry the same weight in mitigation as voluntary efforts. He had an obligation to his creditors beyond just confronting his girlfriend when he was denied credit. If he did not take over payment of the debts himself, he should have taken steps to ensure that she made payments for him. AG ¶ 20(d), "the individual initiated a good-faith effort to repay overdue creditors or otherwise resolve debts," does not apply, although his recent payments could implicate AG ¶ 20(c), "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." There is no evidence that Applicant or his girlfriend has received any financial counseling, but steps have been taken since late 2014 toward resolving the debts. The judgment in SOR ¶ 1.b has been paid.

Despite her mismanagement of Applicant's credit-card accounts, Applicant's girlfriend is handling repayment of the judgments as well as their household bills with little oversight or input from Applicant. Applicant's continued hands-off approach to his finances extends to the sizeable loan for his truck. While Applicant may not have known that the truck loan was past due in October 2015, it is difficult to find that he is fully financially responsible when he does not know the interest rate on a truck loan for which he is contractually liable for repayment at \$716 per month. He testified that to his knowledge,

they owe no federal or state income taxes. While their returns are prepared by a professional, he testified that he did not know the identity of the tax preparer. Applicant does not even know whether his girlfriend has a household budget. It is certainly his choice to have his girlfriend handle their finances, but he would have had a stronger case in mitigation had he been able to testify in detail about any steps taken by him to ensure that she pays their debts on time.

As of the close of the record, Applicant owed approximately \$11,046 in delinquent credit-card debt. Nothing in the Directive requires that he fully satisfy all of his past-due debts for security clearance eligibility. Available information shows that Applicant's girlfriend made a \$100 payment toward the judgment debt in SOR ¶ 1.c on December 10, 2015, after his security clearance hearing. It is some evidence that his girlfriend understands the importance of repaying Applicant's debts for his clearance. Even so, the DOD must have adequate assurances that Applicant's financial situation does not pose a risk of future financial problems and that payments toward his delinquencies will be on time.

Applicant earns between \$65,000 and \$70,000 annually from his work with a defense contractor, and yet he testified that it has been financially tough in his household every month. Evidence suggests that their loan payment for his truck was late in October 2015, but they have otherwise paid the loan on time since it was opened in May 2014. Applicant has no open credit card accounts except for an account on which he is an authorized user. That account had a balance of \$963 as of October 2015 and was rated as current. There is no recent evidence of credit-card overuse on Applicant's part that could further strain his finances going forward. Little is known about his girlfriend's finances apart from that she has had some delinquencies of her own in the past. Applicant does not know whether his girlfriend is currently behind on any of her financial obligations. He is not legally liable for her debts, but as a practical matter, her debt has a bearing on the financial stability of their household. Applicant's lack of awareness of his financial situation when facing the potential loss of his security clearance eligibility shows a lack of judgment. Not enough is known about his household finances for me to find that he is not at risk of future financial problems. Applicant does not meet the criteria for full mitigation under AG ¶ 20, and the financial considerations concerns are not mitigated.

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 his 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.

The financial analysis under Guideline F is incorporated in my whole-person analysis. Some of the factors in AG ¶ 2(a) were addressed under those guidelines, but some warrant additional comment.

There is nothing in the evidentiary record that raises security concerns about Applicant's work performance or his reliability in carrying out his duties. His uncorroborated but also unrebutted testimony is that he was selected as Employee of the Quarter a couple of times. However, Applicant's handling of his personal finances is inconsistent with the good judgment that is expected of someone who has held security clearance for more than 30 years. He seemed to know that he and his girlfriend struggle financially each month and yet was unable or unwilling to provide the salient details about their expenses or circumstances that impact their finances. It is well settled that once a concern arises regarding an applicant's security clearance eligibility, there is a strong presumption against the grant or renewal of a security clearance. See *Dorfmont v. Brown*, 913 F. 2d 1399, 1401 (9th Cir. 1990). While the payments toward his credit-card delinquencies weigh in his favor, I am unable to rule out future financial problems based on the record evidence. I have lingering doubts about his ability to maintain his financial responsibility. For the reasons noted above, I am unable to conclude that it is clearly consistent with the national interest to continue security clearance eligibility for Applicant at this time.

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:	AGAINST APPLICANT
Subparagraph 1.a:	Against Applicant
Subparagraph 1.b:	For Applicant
Subparagraph 1.c:	Against Applicant
Subparagraph 1.d:	Against Applicant
Subparagraph 1.e:	For Applicant ⁶

⁶ The debt alleged in SOR ¶ 1.e is found for Applicant in that it was not proven to be an additional balance beyond the judgment alleged in SOR ¶ 1.a.

Conclusion

In light of all of the circumstances presented by the record in this case, it is not clearly consistent with the national interest to continue Applicant's eligibility for a security clearance. Eligibility for access to classified information is denied.

Elizabeth M. Matchinski
Administrative Judge