



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



In the matter of:

Applicant for Security Clearance

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ISCR Case No. 15-00761

Appearances

For Government: Tara R. Karoian, Esquire, Department Counsel

For Applicant: *Pro se*

02/23/2016

Decision

GALES, Robert Robinson, Administrative Judge:

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

Statement of the Case

On July 3, 2012, Applicant applied for a security clearance and submitted an Electronic Questionnaire for Investigations Processing (e-QIP) version of a Security Clearance Application.¹ On September 5, 2015, the Department of Defense (DOD) Consolidated Adjudications Facility (CAF) issued a Statement of Reasons (SOR) to her, pursuant to 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 Item 3 (e-QIP, dated July 3, 2012).

Considerations), and detailed reasons why the DOD CAF was unable to make an affirmative finding under the Directive 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.

It is unclear when Applicant received the SOR as there is no receipt in the case file. In sworn statement, dated September 28, 2014, Applicant responded to the SOR allegations and elected to have her case decided on the written record in lieu of a hearing.² A complete copy of the Government's file of relevant material (FORM) was provided to Applicant on November 9, 2015, and she was afforded an opportunity, within a period of 30 days after receipt of the FORM, to file objections and submit material in refutation, extenuation, or mitigation. In addition to the FORM, Applicant was furnished a copy of the Directive as well as the Guidelines applicable to her case. Applicant received the FORM on November 12, 2015. A response was due by December 12, 2015. On December 4, 2015, Applicant submitted her response with attachments. Department Counsel had no objections to the documents submitted, and I marked them as Applicant Items (AI) A through AI Q. The case was assigned to me on December 28, 2015.

Findings of Fact

In her Answer to the SOR, Applicant admitted most of the factual allegations pertaining to financial considerations in the SOR (§§ 1.a. through 1.d., 1.h., 1.i., 1.n., 1.o., 1.q. through 1.t., 1.v., 1.x., and 1.y.). Applicant's admissions 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 46-year-old employee of a defense contractor. She has been serving as a security staff member with her current employer since January 1991.³ A 1988 high school graduate, Applicant has continued her education online in an unspecified discipline since 2011, but has not earned a degree.⁴ She has never served with the U.S. military.⁵ Applicant was granted a secret security clearance in 1991, and a top secret security clearance in 2003.⁶ Applicant was married in June 1994, and divorced in December 1997.⁷ She married a second time in September 2004.⁸ She has three children, born in 1990, 1993, and 1995.⁹

² Item 2 (Applicant's Answer to the SOR, dated September 28, 2015).

³ Item 3, *supra* note 1, at 11.

⁴ Item 3, *supra* note 1, at 10-11.

⁵ Item 3, *supra* note 1, at 13.

⁶ Item 3, *supra* note 1, at 28-29.

⁷ Item 3, *supra* note 1, at 16.

Financial Considerations¹⁰

Although Applicant experienced some periodic financial difficulties as early as 2006, there was essentially nothing unusual about Applicant's finances until 2010 when she experienced several significant medical issues. In early 2010, she had two surgeries on her foot. In August 2010, she experienced an epileptic seizure (she had an earlier seizure in 2006) while cooking and spilled hot grease on herself causing 2nd and 3rd degree burns. She was out of work for three months, and needed 24-hour care from her husband who left his job to care for her. In July 2012, she had her third seizure, and was out of work for three weeks. At some unspecified point in 2012, Applicant's husband lost his job due to cutbacks. As a result of a combination of those factors, Applicant had insufficient money to maintain all of her monthly payments. She was forced to prioritize her bills (children, mortgage, car, insurance, food, and utilities) before making other payments, and various accounts became delinquent and were placed for collection. She was evicted from an apartment; had judgments entered against her; vehicles were repossessed; and her salary was garnished on several occasions.

Applicant chose not to seek bankruptcy protection. Instead, she reached out to a number of creditors in an effort to establish settlement agreements or enter into repayment plans. She was unable to contact all of her creditors for some of them had gone out of business. Various accounts were resolved before the SOR was issued. Some accounts were resolved through garnishment.¹¹ Other accounts are currently in a repayment plan, and payments are continuing. Applicant stated that it was never her intention to not pay her bills, but she noted that under her financial and health circumstances, the entire process is expected to take time.¹²

The SOR identified 23 delinquent debts that had been placed for collection, as reflected by her July 2012 credit report and her January 2015 credit report. Her 23 debts total approximately \$51,652. Those allegations 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.

Applicant has already either resolved, or is in the process of resolving, the following accounts: three medical accounts for \$407 (SOR ¶ 1.d.), \$35 (SOR ¶ 1.h.), and \$33 (SOR ¶ 1.i.), and a cellular telephone account for \$154 (SOR ¶ 1.q.), are represented by the same collection agency and combined, and Applicant is making

⁸ Item 3, *supra* note 1, at 15.

⁹ Item 3, *supra* note 1, at 18-20.

¹⁰ General source information pertaining to the financial accounts discussed below can be found in the following exhibits: Item 5 (Equifax Credit Report, dated January 16, 2015); Item 6 (Combined Experian, TransUnion, and Equifax Credit Report, dated July 13, 2012); Item 7 (Personal Subject Interview, dated October 16, 2012). More recent information can be found in the exhibits furnished and individually identified.

¹¹ AI A (Statement, dated December 4, 2015).

¹² Item 2, *supra* note 2, at 2.

unspecified combined payments to it;¹³ a loan account that went to judgment for \$388 (SOR ¶ 1.e.) and was paid in full by garnishment of her wages in December 2014;¹⁴ a cellular telephone account for \$228 (SOR ¶ 1.f.) that was settled for \$100 and paid in full on May 4, 2012;¹⁵ a loan account (SOR ¶ 1.j.) that went to judgment for \$496 and was paid in full by garnishment of her wages in November 2006;¹⁶ a utility account (SOR ¶ 1.k.) that went to judgment for \$392 and was paid in full on March 3, 2015;¹⁷ a residential lease account (SOR ¶ 1.l.) that went to judgment for \$3,125 and was paid in full by garnishment of her wages in December 2012;¹⁸ a telephone account for \$322 (SOR ¶ 1.m.) that was paid in full;¹⁹ an automobile loan account for \$3,638 (SOR ¶ 1.p.) that was charged off and paid in full by garnishment of her wages in November 2004;²⁰ a retail charge account for \$692 (SOR ¶ 1.r.) that was paid in full on April 7, 1998;²¹ a bank credit card account for \$1,949 (SOR ¶ 1.t.) that was sold to a debt buyer and is under a repayment plan with monthly payments of \$50;²² an insurance account for \$223 (SOR ¶ 1.v.) that is currently under a repayment plan with unspecified payments being made;²³ and a book club account for \$135 (SOR ¶ 1.w.) that was paid off over four years ago.²⁴

There are several creditors that Applicant has contacted in an effort to make payment arrangements, but no arrangements have yet been established: an automobile loan on an automobile (SOR ¶ 1.a.) that was voluntarily repossessed leaving an unpaid balance of \$12,256 that was charged off;²⁵ an unspecified type of account (SOR ¶ 1.b.) that was charged off in the amount of \$661;²⁶ an unspecified type of account (SOR ¶

¹³ AI G (Notice, dated May 19, 2015); Item 2, *supra* note 2, at 2.

¹⁴ Item 2, *supra* note 2, at 1.

¹⁵ AI H (Statement, dated April 24, 2012); Item 2, *supra* note 2, at 1.

¹⁶ AI M (Letter of Satisfaction, dated November 12, 2015); AI N (Garnishee's Answer, dated September 20, 2006); Item 2, *supra* note 2, at 1.

¹⁷ AI Q (Notice of Satisfaction, undated); Item 2, *supra* note 2, at 1.

¹⁸ Item 2, *supra* note 2, at 1; AI O (Order to Condemn Funds, dated September 15, 2010).

¹⁹ Item 2, *supra* note 2, at 1; AI E (Collection Notice, dated October 22, 2015).

²⁰ Item 2, *supra* note 2, at 2.

²¹ AI J (Letter, dated June 20, 2001); Item 2, *supra* note 2, at 2.

²² Item 2, *supra* note 2, at 2; AI D (Letter, dated February 7, 2014); AI B (Letter, dated August 21, 2013); AI C (Payment Memo, dated August 31, 2013).

²³ Item 2, *supra* note 2, at 2.

²⁴ Item 2, *supra* note 2, at 2; AI I (Customer's Receipt, dated February 3, 2004).

²⁵ Item 2, *supra* note 2, at 1.

²⁶ Item 2, *supra* note 2, at 1.

1.c.) that was charged off in the amount of \$623;²⁷ a bank credit card account (SOR ¶ 1.o.) with an unpaid balance of \$1,356 that was charged off;²⁸ and an automobile loan on an automobile (SOR ¶ 1.s.) that was voluntarily repossessed leaving an unpaid balance of \$2,931.²⁹

The three remaining accounts fall within two categories. Applicant has been unable to identify the creditors for two medical accounts for \$153 (SOR ¶ 1.g.) and \$135 (SOR ¶ 1.u.).³⁰ The remaining account is a credit card account (SOR ¶ 1.n.) with a credit limit of \$500 and a high credit of \$1,899 for which Applicant offered two different explanations. She initially told the investigator from the U.S. Office of Personnel Management (OPM) that the account had been paid in full,³¹ but subsequently indicated that she is “currently trying to reach a settlement with them or some type of payment plan to pay this debt.”³²

Documentation to support the current status of each of the aforementioned accounts has not been uniformly consistent or furnished. Nevertheless, there is substantial documentation to support the conclusion that many of the accounts have been resolved or are in the process of being resolved. A number of the accounts were resolved or were in the process of being resolved well before the SOR was issued. Applicant did not submit a Personal Financial Statement reflecting her net monthly income, her estimated monthly expenses, her debt payments, or any monthly remainder available for discretionary spending or savings. There is no evidence that Applicant ever received financial counseling. While she is in repayment plans with some creditors, even though some of the accounts have not yet been resolved, it appears that Applicant’s financial problems are finally under control and that her financial status is improving.

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.”³³ 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

²⁷ Item 2, *supra* note 2, at 1.

²⁸ Item 2, *supra* note 2, at 1.

²⁹ Item 2, *supra* note 2, at 2.

³⁰ Item 2, *supra* note 2, at 1-2. It should be noted that the account in SOR ¶ 1.u. is no longer listed in her January 2015 credit report.

³¹ Item 7, *supra* note 10, at 4.

³² Item 2, *supra* note 2, at 1.

³³ *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.”³⁴

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.”³⁵ 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.³⁶

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.”³⁷

³⁴ Exec. Or. 10865, *Safeguarding Classified Information within Industry* § 2 (Feb. 20, 1960), as amended and modified.

³⁵ “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).

³⁶ *See* ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005).

³⁷ *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.”³⁸ 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 financial problems initially arose in 2010 when she had insufficient money to maintain all of her monthly payments. She was forced to prioritize her bills, and various accounts became delinquent and were placed for collection. She was evicted from an apartment; had judgments entered against her; vehicles were repossessed; and her salary was garnished on several occasions. Several of her delinquent accounts are still unresolved. 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

³⁸ See Exec. Or. 10865 § 7.

clear indications that the problem is being resolved or is under control” is potentially 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.”³⁹ Under AG ¶ 20(e) it is potentially mitigating if “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), 20(b), 20(c), and 20(d) apply. AG ¶ 20(e) does not apply. Applicant’s financial problems were not caused by her frivolous or irresponsible spending, and she did not spend beyond her means. Instead, those financial problems were largely beyond her control. They initially arose in early 2010 when she had two surgeries. In August 2010, she experienced her second epileptic seizure while cooking and spilled hot grease on herself causing 2nd and 3rd degree burns. She was out of work for three months, and needed 24-hour care from her husband who left his job to care for her. In July 2012, she had her third seizure, and was out of work for three weeks. At some unspecified point in 2012, Applicant’s husband lost his job due to cutbacks. As a result of a combination of those factors, Applicant had insufficient money to maintain all of her monthly payments. She was forced to prioritize her bills.

Despite her financial situation, Applicant never shied away from her fiscal responsibility. She did not ignore her creditors. After maintaining her prioritized accounts, she managed to whittle away the delinquent accounts. Over the ensuing years, Applicant resolved a number of those accounts well before the SOR was issued. Her repayment strategy was simple: chip away at her debts and pay off some accounts before addressing others. Accounts are currently in the process of being resolved or are awaiting their turn in the process. Her financial problems are being resolved or are under control. While Applicant may not have enjoyed the benefit of financial counseling, she appears to have acted prudently and responsibly. Applicant’s actions, under the circumstances confronting her, do not cast doubt on her current reliability, trustworthiness, or good judgment.⁴⁰

³⁹ 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 [or statute of limitations]) 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)).

⁴⁰ See ISCR Case No. 09-08533 at 3-4 (App. Bd. Oct. 6, 2010).

Security clearance adjudications are aimed at evaluating an applicant's judgment, reliability, and trustworthiness. They are not a debt-collection procedure. The adjudicative guidelines do not require an applicant to establish resolution of each and every debt alleged in the SOR. An applicant need only establish a plan to resolve financial problems and take significant actions to implement the plan. There is no requirement that an applicant immediately resolve or make payments on all delinquent debts simultaneously, nor is there a requirement that the debts alleged in an SOR be paid first. Rather, a reasonable plan and concomitant conduct may provide for the payment of such debts one at a time.

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.⁴¹

There is some evidence against mitigating Applicant's conduct. Applicant failed to insure that her family accounts were kept current. As a result, she was evicted from an apartment; had judgments entered against her; vehicles were repossessed; and her salary was garnished on several occasions. Several of her delinquent accounts are still unresolved.

The mitigating evidence is more substantial and compelling. There is no evidence of misuse of information technology systems, mishandling protected information, substance abuse, or criminal conduct. Applicant's financial problems were not caused by her frivolous or irresponsible spending, and she did not spend beyond her means. Rather, they were largely beyond her control. They arose in 2010, when she was initially significantly negatively impacted by a series of serious health issues. They

⁴¹ 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. June 2, 2006).

were exacerbated when Applicant's husband lost his job. She did not ignore her delinquent accounts. Applicant chose not to seek bankruptcy protection. Instead, she reached out to a number of creditors in an effort to establish settlement agreements or enter into repayment plans. Various accounts were resolved before the SOR was issued. Some accounts were resolved through garnishment. Other accounts are currently in a repayment plan, and payments are continuing. Applicant stated that it was never her intention to not pay her bills, but she noted that under her financial and health circumstances, the entire process is expected to take time. While two medical accounts remain unresolved because Applicant is unable to identify her creditors, her difficulties of identifying the actual healthcare providers cannot be overemphasized. Nevertheless, there are clear indications that Applicant's financial problems are under control.

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 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.⁴²

Applicant has demonstrated a "meaningful track record" of debt reduction and elimination efforts, and she started to do so years before the SOR was issued. This decision should serve as a warning that Applicant's failure to continue her debt resolution efforts pertaining to her remaining delinquent accounts, or the actual accrual of new delinquent debts, will adversely affect her future eligibility for a security clearance.⁴³

⁴² ISCR Case No. 07-06482 at 2-3 (App. Bd. May 21, 2008) (internal citations omitted).

⁴³ While this decision should serve as a warning to Applicant as security officials may continue to monitor her finances, this decision, including the warning, should not be interpreted as a conditional eligibility to hold a security clearance. The Defense Office of Hearings and Appeals (DOHA) has no authority to attach limiting conditions to an applicant's security clearance. See, e.g., ISCR Case No. 10-06943 at 4 (App. Bd. Feb. 17, 2012) (citing ISCR Case No. 10-03646 at 2 (App. Bd. Dec. 28, 2011)). See also ISCR Case No. 06-26686 at 2 (App. Bd. Mar. 21, 2008);

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 her 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
Subparagraphs 1.a. through 1.y.:	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