



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



In the matter of:)	
)	
)	ISCR Case No. 07-10940
SSN:)	
)	
Applicant for Security Clearance)	

Appearances

For Government: Emilio Jaksetic, Esq., Department Counsel
 For Applicant: Kristen Ittig, Esq.
 Avi M. Baldinger, Esq.

February 6, 2009

Decision

RICCIARDELLO, Carol G., Administrative Judge:

Applicant mitigated the government's security concerns under Guideline B, Foreign Influence. Applicant's eligibility for a security clearance is granted.

On July 14, 2008, the Defense Office of Hearings and Appeals (DOHA) issued to Applicant a Statement of Reasons (SOR) detailing the security concerns under Guidelines B. The action was taken under Executive Order 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; Department of Defense Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the revised adjudicative guidelines (AG) promulgated by the President on December 29, 2005, and effective within the Department of Defense for SORs issued after September 1, 2006.

Applicant answered the SOR in writing on August 18, 2008, and requested a hearing before an administrative judge. The case was assigned to me on December 2, 2008. DOHA issued a notice of hearing on December 8, 2008, and after coordinating the date with both sides I convened the hearing as scheduled on January 13, 2009. The

government offered Exhibits (GE) 1 through 9. Applicant did not object and they were admitted. The government also requested administrative notice be taken on exhibits marked as Hearing Exhibit (HE) I through III, which was granted. Applicant testified and offered Exhibits (AE) A through F. Department Counsel did not object and they were admitted. Applicant also offered a post-hearing request for administrative notice of HE IV through HE VI. Department Counsel's response is HE VII. The request is partially granted. I have considered for administrative notice purposes the source documents provided as hearing exhibits by both parties. I have considered the persuasive briefs and the other documents that were not from official U.S. Government sources as evidentiary documents. DOHA received the transcript of the hearing (Tr.) on January 26, 2009.

Findings of Fact

Applicant's admissions to the allegations in the SOR are incorporated herein. In addition, after a thorough and careful review of the pleadings, exhibits, and testimony, I make the following findings of fact.

Applicant is a 28-year-old college graduate. She was born in the U.S., is a U.S. citizen, and is married to a U.S. citizen. After college, Applicant worked as a mental health counselor for approximately nine months before returning to school to become a paralegal in 1998. She continued to work and then attended law school at night from 1999 to 2003, when she graduated and passed the bar. She worked for a small law firm for approximately two years before joining a consulting company that has contracts with the Department of Defense.¹

Applicant's father was born and raised in Lebanon. He moved to the U.S. in 1970 to attend school. After completing his college education he worked in the U.S. for a period of time. He married his wife, a native born U.S. citizen in 1973. He became a naturalized U.S. citizen in 1977. He does not hold a Lebanese passport, but under Lebanese laws he is considered a Lebanese citizen and it also considers his children citizens of that country, without any action on their part. It is immaterial if they do not hold passports or renounce their citizenship, they are still considered Lebanese citizens. At one time, as a minor, Applicant held a Lebanese passport, so she could travel easily to Lebanon. The passport has expired and been destroyed. Her father's passport also has been destroyed. Neither Applicant nor her father considers themselves dual citizens of the U.S. and Lebanon. Applicant's brother was born in the U.S. and has the same citizenship status as Applicant. He is married to a U.S. citizen and they reside in a neighboring state with their ten-month old son. All of Applicant's immediate family are citizens and residents of the U.S. Applicant has formally renounced her ancestral citizenship. Applicant has no interest in being recognized as a Lebanese citizen and professed her loyalty only to the U.S. Applicant's father also professed his loyalty only to the U.S. and no other country.²

¹ Tr. 31-43.

² Tr. 43-46, 53, 59-63, 94-99, 126-133, 140-143.

Applicant's father is employed by a Lebanese owned foundation (Foundation) and he serves as the president of its U.S. division. The Foundation is a non-profit educational foundation properly registered under the tax laws of the U.S. It is a separate Foundation not affiliated with any Lebanese companies. Applicant's father was asked by a Lebanese businessman and his family to form the Foundation in 1978. The Foundation is nonpartisan, nonsectarian, and philanthropic. It identifies qualified and worthy Lebanese students wishing to study abroad and coordinates their interests and needs with approximately 340 colleges and universities. The Foundation's Board of Directors are American officials and members of the American business community, some of whom are former senators and political appointees of the U.S. government. He has been affiliated with the family and the Foundation since its founding. The U.S. Foundation has no contact with the Lebanese government.³

The parent company of the Foundation is also owned by the same Lebanese family. The father of that family became the prime minister of Lebanon. He was assassinated in 2006. Applicant's father still has some contact with other members of the family due to his responsibilities with the Foundation. One of the family members is a member of parliament. He has some dealings with this person only as it relates to the educational commitments of the Foundation. The Foundation and Applicant's father do not have dealings with the Lebanese government and he is not involved in any of the politics of Lebanon.⁴

Applicant met the woman who is a member of parliament one time at a reception when she was in high school. She also met a brother of that family during trips to Lebanon. The meetings were at large luncheon receptions of a least 20-30 people. She did not have private conversations, but rather was one of many people attending. Due to her father's position as the president of the Foundation, he gets invited to many receptions in his official capacity. These are obligatory events and he does not have personal relationships with the attendees. Applicant likewise has met some dignitaries, but does not have personal relationships with them.⁵

The parent company of the Foundation is international in nature and has offices in other countries throughout the world. The parent company's headquarters are located in Saudi Arabia. Applicant's father sits on the Board of Directors and Executive Board of the parent company and consults on policy issues regarding the financial aspects of the company. The parent company is a privately held company, owned by the same Lebanese family that owns the Foundation and does not have any government affiliation or ties with any country. The company has clients worldwide. Applicant travels to Saudi Arabia when there is a Board of Director's meeting.⁶

³ Tr. 46-59, 100-112, 133-135, 144-149.

⁴ Tr. 100-112, 144-153.

⁵ Tr. 54-59, 100-112, 133-139, 149-153, 158-162.

⁶ Tr. 101, 133-139, 144-153.

Applicant's father's contact with the parliamentary family member is not political, but rather because of her interest in the continuing success of the Foundation. Applicant's father may see her at social events, but she is not a personal friend. He travels to Lebanon several times a year due to Foundation's business and board meetings. While there he will visit family that still lives in Lebanon.⁷

Applicant's father at one time owned land in Lebanon that was titled in both of his children's names. Until recently, Applicant was unaware that there was land in her name. Her father sold the land and no longer owns any land in Lebanon. Applicant does not have any financial interests in Lebanon, nor does any of the rest of her immediate family. All of Applicant's parent's assets are in the U.S.⁸

Applicant has a large extended family, both in the U.S. and abroad. Her father has seven siblings who have various citizenships, including U.S., Lebanese, and French, who live in various countries around the world, to include the U.S., Lebanon, France and Saudi Arabia. These seven siblings collectively have 25 children with the same citizenships and residences, plus some others residences in Qatar, Canada, and the United Arab Emirates. Applicant's mother has four brothers and collectively 13 children, all of whom are U.S. born citizens.

Applicant has had sporadic contact with different relatives in her extended family. When she lived with her parents she had more frequent contact and received updates on her relatives. She is not close to her overseas relatives. She exchanged emails with some family members a few times a year. Since her marriage she only has occasional physical contact with relatives living in the U.S. and none with those overseas. Her email contact is also less frequent.

Applicant traveled to Lebanon during several summer vacations when she was in high school and college. Her last trip was in 2003 for a weekend to attend a cousin's wedding and later the same summer for another cousin's wedding.

All of Applicant's family members on her mother's side are U.S. citizens residing in the U.S.

Applicant has two cousins from her father's side who are U.S. citizens residing in the U.S. One other cousin lives in the U.S. and is in the process of obtaining a green card. Three cousins are citizens and residents of France. One uncle is a U.S. citizen who splits his residence between the U.S. and Lebanon. One cousin is a citizen and resident of Canada.⁹

⁷ Tr. 56-59, 100-109, 133-139, 149-153.

⁸ Tr. 63-64, 99-100, 113, 124-126, 140, 157.

⁹ Tr. 65-89, 115-121.

Applicant's other uncles and aunts are citizens and residents of Lebanon. She also has cousins who are citizens and residents of Lebanon.¹⁰

Applicant has a cousin who is a citizen of Lebanon and resides in the U.A.E.¹¹

Applicant has five cousins who are citizens of Lebanon and reside in Saudi Arabia.¹²

Applicant has a cousin who is a citizen of Lebanon and resides in Qatar.¹³

Applicant has a cousin who is a dual citizen of the U.S. and Lebanon. Her cousin's wife is a dual citizen of the U.S. and Tunisia. They reside in the U.S.¹⁴

Applicant has a cousin who is a Palestinian national, has a U.S. green card and resides in the U.S.¹⁵

Applicant has another cousin whose wife is a dual citizen of the U.S. and Lebanon. She also has three cousins who are citizens of Lebanon and currently reside in the U.S.¹⁶

Applicant knows who her relatives are and except for a few cousins around her age, she has minimal contact with many of them and no contact with others. She may hear about their well-being from her father, but only in a customary family situation. She traveled to Lebanon twice in 2003 to attend two cousins' weddings. The two cousins she considers herself closer to than other cousins. Some of her other cousins she has had no contact with at all.¹⁷

None of Applicant's family members work for the governments of their countries or other countries. She has two cousins that she is closer to than the others because they are close in age and were in the U.S. for awhile when Applicant was growing up so she got to know them. The last time she saw one was in 2007 when he came to the U.S for a visit and she saw him for a day. The other cousin she has not seen since 2003. All

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ Tr. 65-89, 90-91, 97, 115-121.

of her other cousins she has no physical contact with. She does not telephone them and has only very occasional email contact, usually to send a photo.¹⁸

Applicant credibly testified that although she has relatives that live in Lebanon and it is half of her ancestral heritage, she has no loyalty to the country and would not do anything to compromise her loyalty to the U.S., even if requested by a relative. She also credibly testified she would not do anything regarding her father's business that would conflict with the U.S. interests.¹⁹

Applicant provided character witnesses who testified on her behalf. She also provided character letters from people who know her and who hold top secret clearances and access to sensitive compartmented information. They attest to her loyalty, professionalism, trustworthiness, reliability, honesty, dedication, diligence, maturity, responsibility and ethics. I have considered all of the letters.²⁰

Lebanon²¹

Lebanon is a parliamentary democracy in which people have the constitutional right to change their government. Due to civil war the exercise of political rights were precluded until 1992. Lebanon has a free-market economy and a strong laissez-faire commercial tradition. The economy is service-oriented. The U.S. enjoys a strong exporter position with Lebanon and is its fifth largest source of imported goods. More than 160 offices representing U.S. businesses operate in Lebanon. Since the lifting of passport restrictions in 1997, a number of large U.S. companies have opened branch or regional offices in Lebanon.

The foreign policy of Lebanon reflects its geographic location, the composition of its population and its reliance on commerce and trade. Its foreign policy is heavily influenced by neighboring Syria, which has also long influenced Lebanon's internal policies as well. Lebanon, like most Arab states, does not recognize Israel, with which it has been technically at war since Israel's establishment.

Lebanon has had some human rights problems including the arbitrary arrest and detainment of individuals and instances of arbitrary and unlawful deprivation of life, torture and other abuses.

The terrorist group Hezbollah is a Lebanese-based radical Shi'a group and is designated by the U.S. as a "Foreign Terrorist Organization." The Lebanese government recognizes Hezbollah as a "legitimate resistance group" and political party

¹⁸ Tr.141-142.

¹⁹ Tr. 92-94.

²⁰ AE A, B, C, D, and E Tr. 121-124, 167-180.

²¹ HE I and IV.

and until recently was represented by elected officials in the Lebanese parliament. Hezbollah also provides support to several Palestinian terrorist organizations and is known to be involved in numerous anti-US. and anti-Israeli terrorist attacks. Americans have been the targets of numerous terrorist attacks in Lebanon.

The United States seeks to maintain its traditionally close ties with Lebanon and to help preserve its independence, sovereignty, national unity and territorial integrity. The U.S. provides more than \$400 million in aid to Lebanon and pledged \$1 billion in additional aid. The aid reflects the importance the U.S. attaches to Lebanon's development as a unified, independent and sovereign country.

U.S. citizens who also possess Lebanese nationality may be subject to laws that impose special obligations on them as Lebanese citizens. Presently there is a travel warning for U.S. citizens traveling to Lebanon due to the threat against westerners.

Saudi Arabia²²

Saudi Arabia is a monarchy ruled by the Al Saud Family. The government is the monarchy and there are no political parties or national elections. There are significant human rights problems, including no right to peacefully change the government, infliction of severe pain by judicially sanctioned punishment, beatings and other abuses. Some prisoners are subjected to torture, abuse, violence, and forced confessions.

The U.S. and Saudi Arabia share a common concern about security, oil exports and imports and sustainable developments. In addition to economic ties there is a longstanding security relationship that continues to be important to the U.S.-Saudi relationship. The U.S. military provides training and support in the use of weapons and other security-related services to the Saudi armed forces. There are serious concerns regarding terrorist activity by Saudis against westerners. Individuals and organizations based in Saudi Arabia have been designated by the U.S. government as providing financial and material support to Al-Qaeda and other terrorist groups. The Saudi government has confronted terrorism and extremist ideologies and has frozen assets and enforced travel bans on certain of their citizens.

United Arab Emirate²³

The United Arab Emirates is located in the Persian Gulf region, and it is a federation of emirates, each with its own ruler. The federal government is a constitutional republic headed by a president and council of ministers. There are no democratically elected legislative institutions or political parties, and no general election. Only 15-20% of the U.A.E.'s population are U.A.E. citizens.

²² HE II and V.

²³ AE III and IV.

The U.A.E. contributes to the continued security and stability of the Gulf and the Straits of Hormuz. It is a leading partner in the campaign against global terrorism, providing assistance in military, diplomatic, and financial arenas since September 11, 2001. U.A.E is a member of the Gulf Cooperation Council (GCC). Following Iraq's invasion and attempted annexation of Kuwait, the U.A.E. has sought to rely on the GCC, the United States and other Western allies for its security. The U.A.E. believes that the Arab League needs to be restructured to become a viable institution and would like to increase strength and interoperability of the GCC defense forces.

The U.S. and U.A.E. have enjoyed friendly relations since 1971. Private commercial ties, especially oil, have developed into friendly government-to-government ties which include security assistance. The U.S. and U.A.E. relations increased dramatically when the U.S. led the campaign to end Iraqi occupation of Kuwait. The U.S. and U.A.E. launched a strategic partnership and it has been a key partner in the War on Terror. U.A.E. ports host more U.S. Navy ships than any port outside the U.S. The U.S. was the third country to establish formal diplomatic relations with the U.A.E. and has had an ambassador resident in the U.A.E. since 1974.

Policies

When evaluating an Applicant's suitability for a security clearance, the Administrative Judge must consider the revised adjudicative guidelines (AG). In addition to brief introductory explanations for each guideline, the adjudicative guidelines list potentially disqualifying conditions and mitigating conditions, which are useful 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 over-arching adjudicative goal is a fair, impartial and common sense 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. Likewise, I have avoided drawing inferences grounded on mere speculation or conjecture.

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 as to obtaining 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 the 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.

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 B, Foreign Influence

AG ¶ 6 expresses the security concern regarding foreign influence:

Foreign contacts and interests may be a security concern if the individual has divided loyalties or foreign financial interests, may be manipulated or induced to help a foreign person, group, organization, or government in a way that is not in U.S. interests, or is vulnerable to pressure or coercion by any foreign interest. Adjudication under this Guideline can and should consider the identity of the foreign country in which the foreign contact or financial interest is located, including, but not limited to, such considerations as whether the foreign country is known to target United States citizens to obtain protected information and/or is associated with a risk of terrorism.

AG ¶ 7 describes conditions that could raise a security concern and may be disqualifying. I have considered all of them and especially considered the following:

- (a) contact with a foreign family member, business or professional associate, friend, or other person who is a citizen of or resident in a foreign country if that contact creates a heightened risk of foreign exploitation, inducement, manipulation, pressure, or coercion;
- (b) connections to a foreign person, group, government, or country that create a potential conflict of interest between the individual's obligation to

protect sensitive information or technology and the individual's desire to help a foreign person, group, or country by providing that information; and

(e) a substantial business, financial, or property interest in a foreign country, or in any foreign-owned or foreign operated business, which could subject the individual to heightened risk of foreign influence or exploitation.

Applicant has many extended family members who are citizens of Lebanon and reside in Lebanon and other countries, including Saudi Arabia and the U.A.E. She has some contact with some of these family members. She has attended weddings of two cousins. There is no evidence to suggest that her limited contact with her extended family that are not U.S. citizens and reside in other countries creates a heightened risk of foreign exploitation, inducement, manipulation, pressure or coercion. All of her immediate family are U.S. citizens residing in the U.S. Her father works for the U.S. Division of a Foundation that provides educational opportunities to Lebanese students. There is no question he has business contacts in other countries, but there is no evidence that his business in any way creates a heightened risk. He sits on the Board of Directors of a parent company that has its headquarters in Saudi Arabia. However, there is no evidence that these business entities create a heightened risk or have ties to a foreign government. Applicant's father has been a U.S. citizen for more than 30 years. Applicant and none of her immediate family have financial interests in any foreign country. Her connections to her foreign relatives do not create a potential conflict of interest between Applicant and her relatives or her ancestral country. Applicant has many family members who are U.S. citizens, by birth and by choice. None of them work for foreign governments. I have considered all of the disqualifying conditions and conclude none apply.

In an abundance of caution, I have also analyzed all of the facts and considered all of the mitigating conditions for this security concern under AG ¶ 8 and especially considered the following:

(a) the nature of the relationship with foreign persons, the country in which these persons are located, or the positions or activities of those persons in that country are such that it is unlikely the individual will be placed in a position of having to choose between the interests of a foreign individual, group, organization and interests of the U.S.;

(b) there is no conflict of interest, either because the individual's sense of loyalty or obligation to the foreign person, group, government, or country is so minimal, or the individual has such deep and longstanding relationships and loyalties in the U.S., that the individual can be expected to resolve any conflict of interests in favor of the U.S. interests; and

(c) contact or communication with foreign citizens is so casual and infrequent that there is little likelihood that it could create a risk for foreign influence or exploitation.

Applicant was born in the U.S. and has lived her entire life in the U.S. Like most Americans she has ancestral ties to other countries. Her father has been a naturalized citizen for more than 30 years and works for a Foundation that although it has ties to a family in Lebanon, it is a U.S. entity. There was no evidence to suggest that he is influenced by the politics of Lebanon. Merely knowing people from other countries does not create a heightened risk. Applicant has a large extended family, on both her father's and mother's side of the family. She does not know those that live in other countries very well and hears updates of their well-being only occasionally from her father. Others she is closer to depending on whether they spent time in the U.S. or if they are closer in her age. None are employed by the country where they are either citizens of or reside in. The countries noted have some issues with human rights. Her relatives do not have jobs or contacts with the government where they are citizens or reside. It is unlikely that Applicant would be placed in a position of having to choose between the interest of a distant relative or her father's business and the U.S. It is very clear that even in the unlikely event such a situation would arise she would choose the interests of the U.S. Therefore, I find (a) applies.

I have considered all of the facts and it is abundantly clear there is no conflict of interest because of Applicant's complete and undivided loyalty to the U.S. She has no loyalty to any other country and never has. The diversity and the number of different countries that Applicant has some family ties also decreases the likelihood that she would harbor a sense of obligation to a distant relative living in a country she has never had ties to. Or in the case of Lebanon, her ties are to her cultural heritage and not to the policies of its government, much like most Americans. Even if there was remote possibility of a conflict of interest, it is clear Applicant would unequivocally resolve all potential conflicts of interests in favor of the U.S. Hence I find (b) applies.

Applicant's contact with her relatives in other countries is infrequent and although somewhat sentimental, it is casual. She has not divorced herself from acknowledging that she has a large family who lives all over the world. She can not control her family ties, but it does not diminish her loyalty to her country. Applicant does not deny her ties to her father's side of her family, but many of those ties have some type of foot hold in the U.S. either by living in the U.S. or they are citizens, or they have green cards, etc. Also noted are the ties she has on her maternal side of the family. The sheer number and complexity of the different relationships with both sides of her family reduces any issues that would create a heightened risk of foreign influence or exploitation. Therefore, I find (c) also applies.

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) 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 common sense judgment based upon careful consideration of the guidelines and the whole person concept.

I considered the potentially disqualifying and mitigating conditions in light of all the facts and circumstances surrounding this case. Applicant was born, educated and lived in the U.S. her entire life. She has many relatives; many are citizens of the U.S.; many are citizens of Lebanon; and some are citizens of other countries. The one constant of her international family is Applicant's loyalty to her country, the U.S. Her father adopted the U.S. as his country. His job allows him to have contacts with foreign citizens of different countries. Those contacts are part of every international business venture. Applicant's internationally diverse family, their citizenry and residency is broad. Her entire mother's side of the family are citizens and residents of the U.S. Many of her father's side of the family have connections to the U.S., either as citizens, residents, or green card holders. Saudi Arabia has strong ties with the U.S., but there have been issues of their commitment to fight terrorism. Lebanon equally has a strong relationship with the U.S., but also has terrorist factions. The U.A.E. is a committed U.S. ally. I considered Applicant's maturity, demeanor and credibility. I found her testimony to be sincere and thoughtful. Overall, the record evidence leaves me with no questions about Applicant's eligibility and suitability for a security clearance. For all these reasons, I conclude Appellant has mitigated the security concerns arising from the foreign influence security concerns raised under guideline B.

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 B:	For Applicant
Subparagraphs 1.a-1.r:	For Applicant

Conclusion

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

Carol G. Ricciardello
Administrative Judge