



DEPARTMENT OF DEFENSE
DEFENSE OFFICE OF HEARINGS AND APPEALS



In the matter of:)
)
-----) ISCR Case No. 07-15056
SSN: -----)
)
Applicant for Security Clearance)

Appearances

For Government: Eric H. Borgstrom, Esquire, Department Counsel
For Applicant: *Pro se*

February 20, 2009

Decision

MATCHINSKI, Elizabeth M., Administrative Judge:

Applicant submitted an Electronic Questionnaire for Investigations Processing (e-QIP) on April 17, 2007. On July 14, 2008, the Defense Office of Hearings and Appeals (DOHA) issued a Statement of Reasons (SOR) to Applicant detailing the security concerns under Guideline F that provided the basis for its decision to deny her a security clearance and refer the matter to an administrative judge. 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 as of September 1, 2006.

Applicant acknowledged receipt of the SOR on July 24, 2008. She answered the SOR allegations in writing on August 20, 2008, and requested a hearing. The case was assigned to me on September 3, 2008, to conduct a hearing and to determine whether it is clearly consistent with the national interest to grant or continue a security clearance for Applicant. On October 6, 2008, Applicant requested a delay in holding her hearing

until January 2009 due to the unexpected hospitalization of her newborn. Then assigned Department Counsel Gina Marine did not object, and on October 9, 2008, I granted her request. On December 8, 2008, I scheduled a hearing for January 8, 2009.

The parties appeared as scheduled. Four government exhibits (Ex. 1-4) and three Applicant exhibits (Ex. A-C) were admitted. Applicant and her spouse testified, as reflected in a transcript received on January 28, 2009. The record was held open until January 26, 2009, for Applicant to submit additional documentation. On January 23, 2009, Applicant submitted a statement concerning creditor contacts and her plans to repay outstanding accounts (Ex. D), a current personal financial statement (Ex. E), a recent wage and earnings statement for her spouse (Ex. F) and herself (Ex. G), and a character reference letter (Ex. H). Department Counsel did not object and the documents were marked and admitted into the record as noted. Based on a review of the SOR, Answer, transcript, and documentary exhibits, eligibility for access to classified information is granted.

Findings of Fact

DOHA alleged under Guideline F, financial considerations, that Applicant owes delinquent debt totaling \$18,853 (SOR ¶¶ 1.a through 1.s). Applicant denied the debts alleged in SOR ¶¶ 1.a, 1.j, 1.k, 1.l, and 1.o, but admitted the other debts. After considering the evidence of record, I make the following findings of fact.

Applicant is a 28-year-old business operations clerk who has worked on a U.S. military installation since March 2007. She stayed on in her position after the company that had hired her lost the contract (Tr. 81, 114). Applicant has an interim security clearance for her duties (Tr. 81).

In the fall of 1998, Applicant began undergraduate studies at a public university. She financed her education through student loans totaling about \$50,496 (Ex. 4), some financial support from her parents, and seasonal income as a sales associate for a department store over the holidays in 1999 (Ex. 1). She obtained several credit card accounts in her name over the 1998/99 time frame (SOR ¶¶ 1.b,¹1.h, 1.i, 1.l,² 1.n, 1.p, 1.q, and 1.r) (Ex. 4). Applicant paid her credit card bills on time until 2001. In November 2000, she lost her student research position after the professor for whom she had been working left the university (Ex. 1, Tr. 83).

¹Applicant testified with no evidence to the contrary that the debt in SOR ¶ 1.b was incurred by her parents who used the credit card for college-related expenses, including travel to and from the university. She admitted she initiated the account but charged only about \$60 on the card (Tr. 99).

²Applicant denied the debts in SOR ¶¶ 1.a and 1.l, but not the debt in SOR ¶ 1.m. Based on the credit reports, they likely all pertain to the same debt. As reported in May 2007 (Ex. 4), the creditor in SOR ¶ 1.l reported a \$2,349 debt balance for collection in November 2004. The collection agency in SOR ¶ 1.m opened its account in November 2004 with a balance of \$2,350. The named original creditor, Associates, is likely a prior assignee. The creditor named in SOR ¶ 1.a then obtained a judgment of \$2,349 in April 2007, which is the reported balance of the debt in SOR ¶ 1.l. The updated credit report of June 25, 2008, reports only the \$2,349 judgment and does not include either of the creditors named in SOR ¶¶ 1.l or 1.m.

In June 2001, Applicant transferred to another campus of the same university (Ex. 1). Her father lost his job that fall, and her parents had to reduce their financial support by 75% (Tr. 84). In addition to working as a student recruiter for the university until January 2004, Applicant held several other jobs while going to college. She worked as a cashier for a lingerie store from July to December 2001, and was a semi-professional cheerleader part-time from August 2001 to August 2002. Her income was not sufficient to pay off her credit card balances in full each month so she just stopped paying on her credit cards (SOR ¶¶ 1.h, 1.i, 1.l, 1.n, 1.p, 1.q, and 1.r) (Ex. 4). She notified her creditors that she was unable to pay on her credit cards but they refused her request to close the accounts and interest continued to accrue (Tr. 102).

In February 2003, Applicant and her spouse were married (Ex. 1). He had attended college from 1996 to 2000, in part financed through student loans of \$20,000. He left before finishing his degree (Tr. 70-71), and went to work for an office supply retailer with the intent of entering an assistant manager's program (Tr. 34-35). Three days after their marriage, Applicant's spouse was deployed with his reserve unit. He was called up until about July 2003 (Tr. 37). Applicant stayed in school. She worked that summer as a junior budget analyst from May 2003 to October 2003 (Ex. 1), but made no payments toward the credit card debts in SOR ¶¶ 1.h, 1.l, 1.n, 1.p, 1.q, and 1.r that had been delinquent since 2001/02. In December 2003, one of her credit lenders obtained a \$2,656 judgment against her (SOR ¶ 1.b) (Ex. 4). Applicant appeared in court with her father and promised to pay the debt (Tr. 98).

In March 2004, Applicant and her spouse had their first child (Ex. 1). His medical insurance did not cover the full costs of her unexpected cesarean delivery (Tr. 89). A medical debt of \$1,968 was subsequently placed for collection in April 2005 (SOR ¶ 1.d) (Ex. 4, Tr. 89). Additional medical debts of \$109 (SOR ¶ 1.c) \$161 (SOR ¶ 1.e) \$125 (SOR ¶ 1.f), and \$225 (SOR ¶ 1.g) from 2004 were placed for collection (Exs. 3, 4).

Faced with the choice of staying with the office supply retailer in the hope of becoming a salaried employee or of going on active duty in the military, Applicant's spouse enlisted as an active duty soldier in August 2004. He is a light wheel mechanic (Tr. 123). Ordered to report for active duty in January 2005, he asked for a cash advance to cover the costs of the family's relocation. Due to an error, he was paid an advance of two months' pay. He assumed the second advance was some type of entitlement, but discovered that he had to repay the total amount at \$336 per month. So that he could obtain the clearance he needed for his military duties, he focused on repaying some of his debts, which did not include his student loan debt from 1996 that due to interest had doubled from its original \$20,000 (Tr. 70). Applicant's delinquent debts went unpaid (Exs. 3, 4, Tr. 37-38, 40). In November 2004, a collection agency that had held Applicant's debt in SOR ¶ 1.l placed the unpaid balance for collection with

the creditor in SOR ¶ 1.m. Another credit card debt of \$1,060 (SOR ¶ 1.n) was placed as well with the same collection agency (Ex. 4).³

In May 2005, Applicant dropped out of college and joined her spouse at his duty station. She was expecting their second child, and had no earned income. She could not find a job that would pay her enough to compensate for the cost of daycare (Tr. 115-16). In September 2005, they had a son (Ex. 1, Tr. 38). Their financial struggles continued despite his E-5 salary. In 2006, they began to fall behind in their bills. Applicant's spouse accepted financial assistance from the Red Cross that he had to repay at \$84 per month for the next two years (Tr. 41-42, 52).

In June 2006, Applicant's spouse began to make payments of \$178 per month to take his student loans out of forbearance with the intent of eventually finishing his degree under the military's education benefit. He made payments for about a year (Tr. 54-56, 70-71). As of January 2009, he owed about \$45,000 in student loan debt largely due to interest (Tr. 59). He was in the process of negotiating with the lender to resume payments that he could afford so that he can reenroll in college (Tr. 55).

In November 2006, Applicant's spouse received orders to transfer to the Northeast (Ex. 1, Tr. 42, 52). He obtained a loan that he used to replace his 1992 Geo Storm (Ex. 53) with a 2000 Ford Explorer (they also had a 1998 Passat, Tr. 123-24), and to temporarily move his family to his in-laws' home in the Midwest. Initially, repayment of the loan was at \$164.99 per month for 36 months, although his monthly obligation increased to \$181.90 in July 2007 after he missed a payment (Ex. B, Tr. 45). In January or February 2007, he took a cash advance of one month's pay to cover the costs of moving his family to their present locale. He had just about paid off his Red Cross loan (Tr. 44). In April 2007, a medical provider placed an unpaid debt of Applicant's for collection in the amount of \$469 (Ex. 4).

Applicant's spouse primarily handled the family's finances until he was deployed to Iraq in late March 2008 (Tr. 57-58, 110, 127). While he was in Iraq, she had to spend \$2,300 to repair the Explorer (Tr. 124). In response to DOHA interrogatories inquiring about her unpaid debt, Applicant explained in June 2008 that she and her spouse had been paying off his debts over the past year; that since his debts had been paid off in May 2008, they would be able to concentrate on her debts (Ex. 2).

Following the birth of their third child in 2008, Applicant's spouse was granted emergency leave to return to the U.S. in early September 2008. Their infant daughter was hospitalized for a couple of weeks for treatment of a life-threatening illness (Tr. 59-61). Since her discharge, they have incurred early intervention costs (clinical assessments) for their daughter that are not covered by insurance (Tr. 61).

³This is likely the \$1,500 credit card debt Applicant listed on her SF 86 (Ex. 1). The obligee named by her on the SF 86 does not appear on either of her credit reports. She testified she had two Visa cards (the debt in SOR ¶ 1.h and the debt she listed on her SF 86, Tr. 104).

Starting in October 2008, Applicant's spouse has been paid at the E-6 rate. He was recently released from duty in Iraq (Tr. 64), and his hazardous location pay, hazard duty pay, and family separation pay (\$575 total, Ex. F) will end in February 2009 (Ex. D). He expects he may have to repay some of those entitlements (Tr. 60).

Applicant and her spouse live on a military installation, so his housing allowance of \$1,765 per month is taken directly out of his pay (Tr. 48-49). Daycare costs of \$834 every two weeks and automobile insurance at \$122 per month are paid by Applicant out of her earnings. Her net remainder of about \$378 every two weeks goes toward groceries, gasoline, diapers, formula, and whatever else may be needed in the household (Tr. 119). Her spouse usually pays the cable television (\$140 per month) and cellular phone costs (\$85 per month) (Tr. 50-51) in addition to the \$182 loan repayment (Tr. 109). On occasion, she will give him some of her money if he needs it for unexpected expenses like car repairs (Tr. 121-22). Neither Applicant nor her spouse has an active credit card account (Tr. 95, 130). They do not fully agree on how to handle their financial affairs (Tr. 78, 127). As of her hearing, Applicant had not contacted any of the creditors listed in the SOR. She planned to pay off her smaller debts first (Tr. 99-100). As of May 2008, her student loans, which had a balance of \$49,099, were in deferred status (Ex. 3).

Following her hearing, Applicant contacted the creditor that had held those accounts in SOR ¶¶ 1.p, 1.q, and 1.r. The accounts were no longer in the creditor's records and she was advised to dispute them with the credit bureaus. If she is informed she does not have to repay them, she intends to pursue debt consolidation to resolve the four larger credit card debts she recognizes (SOR ¶¶ 1.h, 1.i, 1.m and 1.n)⁴ (Ex. D). As of the pay period ending December 19, 2008, Applicant's gross pay for the year totaled \$22,529.10 (Ex. G). Her spouse's Medicare/security wages for 2008 totaled \$31,818.20. His monthly take home pay for December 2008 was \$1,665.39 (Ex. F). On January 26, 2009, Applicant estimated that she and her spouse had joint monthly discretionary funds of \$766.82 after paying expenses and the \$182 monthly loan (Ex. E).

Applicant has been an "avid volunteer" at the daycare center on base. In 2008, she was in charge of organizing several important events at the center and she fulfilled those duties responsibly (Ex. C). A senior acquisitions' security specialist familiar with Applicant's work since March 2007 has found her to be very professional in carrying out her duties. She is aware that Applicant has financial difficulties and she does not doubt Applicant's intention to resolve her debts (Ex. C, Ex. H).

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

⁴See footnotes 2 and 3, *supra*.

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 overarching 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 that 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 F, Financial Considerations

The security concern for financial considerations is set out in AG ¶ 18 of the adjudicative guidelines:

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.

Applicant does not dispute that she incurred delinquent balances on seven credit card accounts: SOR ¶¶ 1.h and 1.i, two VISA card accounts that are likely those collection debts in SOR ¶¶ 1.m and 1.n, and SOR ¶¶ 1.p, 1.q, and 1.r. Whether or not her parents incurred the debt in SOR ¶ 1.b, she is legally responsible for the judgment balance as well since the account was in her name. She appeared in court with her father and promised to pay the debt with his assistance but did not do so (Tr. 98). Applicant also admits unpaid medical debt totaling about \$3,057 (SOR ¶¶ 1.c, 1.d, 1.e, 1.f, 1.g, and 1.r). As of January 2009, those debts, totaling about \$14,000, had not been paid. Significant security concerns are raised by “inability or unwillingness to satisfy debts” (AG ¶ 19(a)) and by “a history of not meeting financial obligations” (AG ¶ 19(c)).

The government did not meet its burden of proving that Applicant owed the additional \$4,854 in disputed debt alleged in SOR ¶¶ 1.a, 1.j, 1.k, 1.l, and 1.o. As noted in footnote 2, *supra*, although the amounts differ, the debts in SOR ¶¶ 1.a and 1.l are likely the same debt as the collection debt in SOR ¶ 1.m. Applicant did not recognize any debt to the creditor in SOR ¶ 1.k or the medical debt in SOR ¶ 1.j. She acknowledged having had cellular phone service in college with the creditor that had referred a \$224 debt for collection (SOR ¶ 1.o), but she denied any knowledge of an outstanding balance. The debts alleged in SOR ¶¶ 1.j, 1.k, and 1.o are not included on her more recent June 2008 credit report (Ex. 3). However, AG ¶ 20(e), “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,” does not mitigate the \$14,000 in proven debt.

Applicant’s credit card accounts became delinquent over the 2001/02 time frame, when she was unmarried, attending college, and working at minimum wages. Yet, AG 20(a), “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,” cannot be fully applied in mitigation because of her more recent delinquent medical debt, including the \$1,968 hospital bill incurred in the birth of her first child, and the fact that her debts have yet to be resolved.

AG ¶ 20(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,” is implicated. The loss of her student research employment, the significant drop in financial assistance from her parents after her father lost his job in 2001, the low wages paid her when she was employed while in school from 2001 to 2005, insufficient medical insurance to cover an unexpected C-section in March 2004, and her inability to find a job that would pay her enough to cover daycare costs at her spouse’s first active duty station, are all factors outside of her control that led to the delinquencies and then her failure to resolve the debts in a timely manner.

For AG ¶ 20(b) to fully apply, Applicant must have acted responsibly to address her debts once she was in a position to do so. Applicant did not work outside of the home and the family needed a loan from the Red Cross to pay their bills in 2006. At the same time, her spouse began repaying his student loan in June 2006 in an effort to bring it out of forbearance so that he could return to school. Any available funds during that time also went to pay off some of her spouse's debt so that he could obtain the security clearance he needed for the military. Even after Applicant began working in March 2007, she did not have the funds to devote to her old debts.

In response to DOHA interrogatories, Applicant indicated in June 2008 that they had paid off her spouse's debt and would be able to concentrate on her delinquent accounts. She had not contacted her creditors before her hearing in January 2009, but her spouse's deployment, the birth of their third child that summer, and then her newborn's life-threatening illness, are significant extenuating factors. Although she probably could have paid the smaller medical debts in SOR ¶¶ 1.c, 1.e, and 1.f, AG ¶ 20(b) applies in part.

Before the record closed, Applicant provided a statement indicating she had contacted one lender in an effort to make payments on the debts in SOR ¶¶ 1.p, 1.q, and 1.r. On the advice of the creditor, who was unable to confirm any outstanding balances, Applicant disputed them with Trans Union. Assuming she will not be required to repay those debts, her debt burden would be reduced by only \$898. While these efforts post-hearing to address her indebtedness are not enough in and of themselves to qualify for mitigation under 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," or AG ¶ 20(d), "the individual initiated a good-faith effort to repay overdue creditors or otherwise resolve debts," the evidence warrants partial application of AG ¶¶ 20(c) and 20(d) taking the household as a whole.⁵ Applicant's spouse, who handled repayment of old debt obligations until he went to Iraq, focused on repaying his debts first. His debts have been resolved with the exception of his student loans. Applicant and her spouse have yet to fully agree as to how to handle some of their financial obligations, but they do not rely on consumer credit and there is no evidence of extravagant expenditure.

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 conduct and all the circumstances in light of 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

⁵Applicant's financial situation cannot fairly be evaluated without taking into account her spouse's income and his debt obligations, as they affect her finances. Daycare costs (\$1,668 per month), which she covers, amount to more than half of her monthly take-home pay (\$1,349.68 every two weeks).

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.

The DOHA 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 has paid off each and every debt listed in the SOR. All that is required is that an applicant demonstrate that he has ' . . . established a plan to resolve his 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 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.

ISCR Case No. 07-06482 at 2-3 (App. Bd. May 21, 2008) (internal citations omitted). Applicant has "a meaningful track record" of paying her current financial obligations, and she has a credible and realistic plan to pay her delinquent debt.

Applicant candidly acknowledged the existence of delinquent debt, including consumer credit obligations incurred when she was in college. Her failure to repay this debt to date was reasonably explained, however. Despite full time employment since March 2007, most of her income has gone to child care, car insurance, and essential expenses for the care of their children. Applicant needed her spouse's agreement and financial assistance to resolve her old debts, and he was focused on his old debts. They could ill afford jeopardizing his clearance by ignoring the debt he brought into the marriage or incurred in moving the family for his military career. While she had some control over their finances following his deployment to Iraq in March 2008, she incurred \$2,300 in unexpected auto repair expenses. Although she indicated in June 2008 that

they could begin to repay her debts, she had the day-to-day responsibilities of a single parent caring for two preschool age children and then a newborn who became ill with a life-threatening illness. Her spouse returned from Iraq in early September 2008, but they were understandably focused on their daughter.

As of her hearing in January 2009, Applicant's spouse had been released from further duty in Iraq, and their infant had recovered sufficiently to attend daycare. Certainly, Applicant would have had a stronger case in mitigation had she started repaying her delinquent debts. However, she expressed a credible plan to pay off her smaller debts first and then obtain a consolidation loan to resolve the others. Before the record closed in this case, she contacted the lender who had extended credit to her on the smaller accounts that she planned to pay off first. She is unlikely to have contacted the lender unless she planned to repay the debts. The corporate security manager who handled Applicant's request for clearance with their previous employer does not doubt Applicant's intent to resolve her old debts. The concerted efforts by Applicant and her spouse to satisfy his delinquent debts and to live within their means indicate that they both understand the importance of addressing her debt as well.

Formal Findings

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

Paragraph 1, Guideline F: FOR APPLICANT

Subparagraph 1.a:	For Applicant (Duplication of ¶ 1.m)
Subparagraph 1.b:	For Applicant
Subparagraph 1.c:	For Applicant
Subparagraph 1.d:	For Applicant
Subparagraph 1.e:	For Applicant
Subparagraph 1.f:	For Applicant
Subparagraph 1.g:	For Applicant
Subparagraph 1.h:	For Applicant
Subparagraph 1.i:	For Applicant
Subparagraph 1.j:	For Applicant
Subparagraph 1.k:	For Applicant
Subparagraph 1.l:	For Applicant (Duplication of ¶ 1.m)
Subparagraph 1.m:	For Applicant
Subparagraph 1.n:	For Applicant
Subparagraph 1.o:	For Applicant
Subparagraph 1.p:	For Applicant
Subparagraph 1.q:	For Applicant
Subparagraph 1.r:	For Applicant
Subparagraph 1.s:	For Applicant

Conclusion

In light of 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.

ELIZABETH M. MATCHINSKI
Administrative Judge