



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



In the matter of:)	
)	
XXXXXXXXXXXX, XXXXX)	ISCR Case No. 10-01231
SSN: XXX-XX-XXXX)	
)	
Applicant for Security Clearance)	

Appearances

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

December 17, 2010

Decision

TUIDER, Robert J., Administrative Judge:

Applicant has mitigated security concerns pertaining to Guideline B (foreign influence). Clearance is granted.

Statement of the Case

On July 30, 2009, Applicant submitted an Electronic Questionnaire for Investigations Processing (e-QIP). On June 30, 2010, the Defense Office of Hearings and Appeals (DOHA) issued a Statement of Reasons (SOR) detailing security concerns under Guideline B (foreign influence) for Applicant. 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 adjudicative guidelines (AG) effective within the Department of Defense for SORs after September 1, 2006.

Applicant answered the SOR on July 8, 2010, and DOHA received her response on July 12, 2010. Department Counsel was prepared to proceed on July 31,

2010. The case was previously assigned to another administrative judge on August 6, 2010, and reassigned to me on September 8, 2010. DOHA issued a notice of hearing on August 26, 2010, scheduling the hearing for September 15, 2010. The hearing was held as scheduled.

The Government offered Government Exhibits (GE) 1 and 2, which were received without objection. The Applicant offered Applicant Exhibits (AE) A through D, which were received without objection, and she testified on her own behalf. DOHA received the hearing transcript (Tr.) on September 24, 2010.

Procedural and Evidentiary Rulings

Request for Administrative Notice

Department Counsel submitted a formal request that I take administrative notice of certain facts relating to Israel contained in Ex. I. Without objection from the Applicant, I took administrative notice of the documents offered by Department Counsel, which pertain to Israel. (Tr. 13-14.)

Administrative or official notice is the appropriate type of notice used for administrative proceedings. See ISCR Case No. 05-11292 at 4 n.1 (App. Bd. Apr. 12, 2007); ISCR Case No. 02-24875 at 2 (App. Bd. Oct. 12, 2006) (citing ISCR Case No. 02-18668 at 3 (App. Bd. Feb. 10, 2004)); *McLeod v. Immigration and Naturalization Service*, 802 F.2d 89, 93 n.4 (3d Cir. 1986)). The most common basis for administrative notice at ISCR proceedings, is to notice facts that are either well known or from government reports. See Stein, *Administrative Law*, Section 25.01 (Bender & Co. 2006) (listing fifteen types of facts for administrative notice). Various facts pertaining to Israel were derived from Ex. I as indicated under subheading "Israel" of this decision. The facts administratively noticed are set out in the Findings of Fact, below.

Findings of Fact

Applicant admitted all of the SOR allegations. Her answers are incorporated as findings of fact. After a thorough review of the evidence, I make the following additional findings of fact.

Background Information

Applicant is a 35-year-old materials manager, who has worked for a defense contractor since February 2009. She seeks a secret security clearance, which is a condition of her continued employment. (GE 1, Tr. 16-17, 19-20.) Applicant is a U.S.-born citizen. (GE 1.)

Applicant graduated from a prestigious university with a Bachelor of Arts Degree with honors in economics and planning in January 1997. She later attended

graduate school and was awarded a Master of Business Administration in August 2006. (GE 1, AE D, Tr. 17-18.) Applicant was initially introduced to her husband, who had come to the United States from Israel in “about 2000,” to visit his family members. Applicant and her husband later married in August 2000 at a ceremony that took place in the United States. Her husband is an Israeli-born citizen. She and her husband have two U.S.-born daughters, ages five and two. (GE 1, AE A, Tr. 20, 22-23.)

Before moving to the United States, Applicant’s husband had completed his mandatory military service in the Israeli Army. Her husband has a pending application to become a U.S. citizen. He has complied with all requirements to become a U.S. citizen and is awaiting further instructions from the U.S. Citizenship and Immigration Services. (AE A, Tr. 22-24, 66.) Applicant’s husband is co-owner of a business in the United States that reviews workmen’s compensation cases and analyzes premiums. He does not have any ties to the Israeli military or government. (Tr. 26-27.)

Not alleged is the fact that Applicant was a dual citizen of the United States and Israel by virtue of her mother being an Israeli citizen. As a child, Applicant’s mother obtained an Israeli passport for her. Her Israeli passport has since expired and Applicant renounced her Israeli citizenship. Her renunciation became effective on December 9, 2009. The only passport Applicant holds is a U.S. passport, which she renewed in July 2008. (GE 2

Applicant’s mother was born in Israel, is 62 years old, and is a dual citizen of Israel and the United States. Her mother is a naturalized U.S. citizen. Applicant’s father is 62 years old and is a U.S.-born citizen. Both of Applicant’s parents reside in the United States. Her mother is a social worker and her father is a dentist. In addition to her parents residing in the United States, Applicant has two brothers, ages 30 and 25. Both brothers are U.S. citizens and reside in the United States. (GE 1, Tr. 27-30.) Her 30-year-old brother is unmarried and is currently studying sign language. Her 25-year-old brother is married and is a dentist. His wife is also a dentist. (Tr. 32-33, 57-59.)

Applicant describes her relationship with her parents as close, especially with her mother. Her parents are divorced. Applicant also maintains a “very close” relationship with her two brothers and the spouse of her married brother. Applicant lives near her immediate family members and maintains frequent contact with them. (Tr. 56-59.)

Applicant’s mother-in-law, age 60, and her father-in-law, age 58, are Israeli-born citizens and residents. Applicant’s father-in-law works for a private company that uses computers and statistics to gather demographic information. Her mother-in-law is a day care teacher. Applicant maintains monthly contact with her in-laws by e-mail or telephone. They do not have any ties to the Israeli military or government. (GE 1, GE 2, Tr. 33-37.)

Additionally, Applicant has a sister-in-law, age 31, and a brother-in-law, approximately age 30, who are residents and citizens of Israel. Her brother-in-law works for a private computer company. He is married and his wife also works for a private computer company. Applicant's sister-in-law is a teacher. She is married and her husband is serving in the Israeli Army. They have two young children. Applicant maintains contact with her brother and sister-in-law "once every three or four months, not very often." Apart from her sister-in-law's husband, Applicant is unaware of any ties that her in-laws may have to the Israeli military or government. (GE 2, 36-42.)

Lastly, Applicant has two distant female U.S. citizen cousins residing in Israel. They are her "grandmother's brother's child and child's child." One cousin is a retired receptionist in her "60's," who worked in a health center. The other cousin is a mother in her "early 50's" and works in the home. Applicant maintains contact with her distant cousins "once every couple of months, in the holidays." Neither cousin has any ties to the Israeli military or government. (GE 2, AE A, Tr. 43-46.)

Applicant traveled to Israel in August 2000, May 2006, September 2008, and June 2010 to visit family. When she traveled to Israel in June 2010, she used her U.S. passport. As noted *supra*, she no longer is an Israeli citizen and is no longer eligible to hold an Israeli passport. Applicant and her husband do not provide any financial support to any family members in Israel. (GE 1, AE A, Tr. 48-50.)

Applicant spends her discretionary free time with her family, working out in the gym, and attending events at their local community center. (Tr. 46-48, 64-65.) All of the assets that Applicant and her husband own, to include their real and personal property, and bank accounts such as checking and savings accounts and college funds for their children, are U.S.-based. This is in contrast to having no assets in Israel. (AE C, Tr. 59-64, 66.)

Character Evidence

Applicant submitted three reference letters: (1) a letter from her materials manager, who described her as "a very conscientious worker who is honest and leads with integrity," and "consistently demonstrates the highest level of ethical integrity;" (2) a letter from her former "mentor" and supervisor, who described her as "capable and reliable, and therefore [he has] no reservations in recommending her for any position;" and (3) a letter from a former neighbor, who has known Applicant since she was a child, and said, "I often entrusted [Applicant] with the care of my daughters and always found her to be honest, trustworthy and respectful." (AE B, Tr. 68-70.)

Israel

Israel is a parliamentary democracy of about 6.4 million people. Israel generally respects the human rights of its citizens, although there have been some allegations of mistreatment of Palestinian detainees and discrimination against Israel's Arab citizens. Despite the instability and armed conflict that have marked Israel's relations

within the region since it came into existence, Israel has developed a diversified, technologically advanced market economy focused on high-technology electronic and biomedical equipment, chemicals, and transport equipment.

The United States and Israel have a close friendship based on common democratic values, religious affinities, and security interests. In 1948, the United States was the first country to officially recognize Israel. In 1985, Israel and the United States concluded a Free Trade Agreement designed to strengthen economic ties by eliminating tariffs. The United States is Israel's largest trading partner. As of 2006, 38.4% of Israel's exports went to the United States while 12.4% of its imports came from the United States. In 2007, Israel imported \$7.8 billion of goods from the United States and exported \$18.9 billion from the United States.

Israel is a prominent recipient of U.S. aid. Since 1949, the United States has provided over \$30 billion in economic assistance to Israel. Between 1976 and 2003, Israel was the largest recipient of U.S. foreign aid. The United States has also provided Israel with \$9 billion in loan guarantees since 2003, which enable Israel to borrow money from commercial lenders at a lower rate. In April 1988, the United States and Israel established a Joint Economic Development Group to develop the Israeli economy by exchanging views of Israel economic policy planning, stabilization efforts, and structural reform.

Although the United States has often publicly committed to Israel's security and well-being, Israel and the United States do not have a mutual defense agreement. In 1989, Israel was one of the first countries designated a Major Non-NATO ally. As such, Israel receives preferential treatment in bidding for U.S. defense contracts and access to expanded weapons systems at lower prices. Israel and the United States are partners in the "Star Wars" missile defense project, and have concluded numerous treaties and agreements aimed at strengthening military ties, including agreements on mutual defense assistance, procurement, and security of information. Israel and the United States have established joint groups to further military cooperation. The two countries participate in joint military exercises and collaborate on military research and weapons development. The United States has pledged to ensure that Israel maintains a "qualitative military edge" over its neighbors, and has been a major source of Israeli military funding. Strong congressional support for Israel has resulted in Israel receiving benefits not available to other countries. Israeli is permitted to use part of its foreign military assistance grant for procurement spending from Israeli defense companies.

Israel and U.S. military and diplomatic goals are not always consistent. Although arms agreements between Israel and the United States limit the use of U.S. military equipment to defensive purposes, the United States has rebuked Israel for possible improper use of U.S.-supplied military equipment. The United States is concerned about Israeli settlements, Israel's military sales to China, Israel's inadequate protection of U.S. intellectual property, and espionage-related cases implicating Israeli officials. In 2000, Israel was listed as one of the nations aggressively targeting U.S. economic intelligence. There are several cases of U.S. citizens

convicted for selling, or attempting to sell, classified documents to Israeli Embassy officials, and Israeli nationals indicted for espionage. There have also been investigations of the illegal export, or attempted illegal export, of United States' restricted, dual use technology to Israel. In Director of National Intelligence's 2008 Annual Threat Assessment, Israel is not identified in any way as representing a threat to or having interest inimical to the United States.

Improper release of sensitive and proprietary information potentially threatens U.S. national security in both military and economic terms. Industrial espionage is intelligence-gathering "conducted by a foreign government or by a foreign company with direct assistance of a foreign government against a private U.S. company for the purpose of obtaining commercial secrets." Industrial espionage may target commercial secrets of a civilian nature, or commercial secrets that have military applications, resulting in disclosure of sensitive technology that can be used to harm the United States and its allies, and/or disclosure of classified information.

Terrorist attacks are a continuing threat to Israel, and American interests in Israel. Terrorists in Israel, the West Bank and Gaza have injured or killed U.S. tourists, students, residents, and mission personnel. Due to the volatile security environment in Gaza and the West Bank, the United States continues to warn against any travel to those areas. In June 2007, Hamas, a State Department-designated foreign terrorist organization, assumed control over Gaza and in 2008, conflict between Hamas and Israel resulted in the loss of hundreds of lives.

In 1996, Israel and the United States signed a Counterterrorism Cooperation Accord, which established a joint counterterrorism group aimed at enhancing the countries' capabilities to deter, respond to, and investigate international terrorist attacks or threats of international terrorist acts against Israel and the United States. The United States is the principal international proponent of the Arab-Israeli peace process, and has been actively involved in negotiating an end to the Israeli-Palestinian conflict. With the European Union, the United Nations, and Russia, the Bush Administration has been active in attempting to negotiate agreements between Israel and the Palestinian authority. The Obama administration has promised to continue to work for peace in the Middle East.

Policies

When evaluating an applicant's suitability for a security clearance, 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 used 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 overarching

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 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

Upon consideration of all the facts in evidence, and after application of all appropriate legal precepts, factors, and conditions, including those described briefly above, I conclude that a relevant security concern exists under Guideline B (foreign influence).

AG ¶ 6 explains the security concern about “foreign contacts and interests” stating:

[I]f the individual has divided loyalties or foreign financial interests, [he or she] 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 lists three conditions that could raise a security concern and may be disqualifying in this case:

(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

(d) sharing living quarters with a person or persons, regardless of citizenship status, if that relationship creates a heightened risk of foreign inducement, manipulation, pressure, or coercion.

The mere possession of close family ties with a person in a foreign country is not, as a matter of law, disqualifying under Guideline B. However, if only one relative lives in a foreign country and an applicant has contacts with that relative, this factor alone is sufficient to create the potential for foreign influence and could potentially result in the compromise of classified information. See ISCR Case No. 03-02382 at 5 (App. Bd. Feb. 15, 2006); ISCR Case No. 99-0424 (App. Bd. Feb. 8, 2001). Applicant has frequent contacts with her in-laws and distant cousins, who are citizens and residents of Israel. These close relationships with her relatives create a heightened risk of foreign pressure or attempted exploitation because Israel has an active collection program.

The Government produced substantial evidence of these three disqualifying conditions as a result of her being married to an Israeli citizen and her contacts and relationship with her in-laws and distant cousins, and her travel to Israel. The burden shifted to Applicant to produce evidence and prove a mitigating condition. As previously indicated, the burden of disproving a mitigating condition never shifts to the Government.

Two Foreign Influence Mitigating Conditions under Guideline ¶ 8 are potentially applicable to these disqualifying conditions:

(a) the nature of the relationships 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, or government and the interests of the U.S.; and

(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 interest in favor of the U.S. interest.

AG ¶ 8(a) partially applies. With the exception of her sister-in-law's husband, who is serving in the Israeli Army, Applicant's in-laws and distant cousins are not associated with or connected with the Israeli government. Applicant's husband is in the process of becoming a U.S. citizen. On the other hand, Applicant's relatives do live in Israel, and she has emotional ties to them, as evidenced by her frequent contact with them and visits to Israel. With regard to her husband and Israeli relatives, Applicant did not establish "it is unlikely [she] will be placed in a position of having to choose between the interests of [her husband and relatives] and the interests of the U.S." Her frequent contacts with her relatives in Israel could potentially force her to choose between the United States and Israel. On balance, she did not fully meet her burden of showing there is "little likelihood that [her relationship with her husband and relatives] could create a risk for foreign influence or exploitation."

AG ¶ 8(b) fully applies. Applicant was born in the United States, was educated here, and lived in the United States her entire life. Her parents and two brothers live in the United States. She and her husband are completely vested in the U.S. Her husband has taken all possible steps to become a U.S. citizen, and her two young children are U.S. citizens by birth. Although Applicant is fond of her relatives in Israel, she has no immediate family members residing there. On the contrary, all of her immediate family members are resident citizens in the United States with whom she maintains frequent contact.

Appellant has developed a sufficient relationship and loyalty to the United States, that she can be expected to resolve any conflict of interest in favor of the U.S. interest. All of her assets, as well of the assets of her husband, are in the United States. Applicant has been employed by her defense contractor employer since February 2009 and is very highly regarded at work. Applicant's contacts and linkage to the U.S. are greater than her linkage to Israel. She is heavily vested in the United States -- financially and emotionally.

Whole-Person Analysis

In addition to the enumerated disqualifying and mitigating conditions as discussed previously, I have considered the general adjudicative guidelines related to the whole-person concept under Directive ¶ E2.2.1. “Under the whole-person concept, the administrative judge must not consider and weigh incidents in an applicant’s life separately, in a piecemeal manner. Rather, the Judge must evaluate an applicant’s security eligibility by considering the totality of an applicant’s conduct and circumstances.”¹

The directive lists nine adjudicative process factors (APF) which are used for “whole-person” analysis. Because foreign influence does not involve misconduct, voluntariness of participation, rehabilitation and behavior changes, etc., the eighth APF, “the potential for pressure, coercion, exploitation, or duress,” Directive ¶ E2.2.1.8, is the most relevant of the nine APFs to this adjudication.² In addition to the eighth APF, other “[a]vailable, reliable information about the person, past and present, favorable and unfavorable, should be considered in reaching a determination.” Directive ¶ E2.2.1. Ultimately, the clearance decision is “an overall common sense determination.” Directive ¶ E2.2(c).

The Appeal Board requires the whole person analysis address “evidence of an applicant’s personal loyalties; the nature and extent of an applicant’s family’s ties to the U.S. relative to his [or her] ties to a foreign country; his or her ties social ties within the U.S.; and many others raised by the facts of a given case.” ISCR Case No. 04-00540 at 7 (App. Bd. Jan. 5, 2007).

I have carefully considered Applicant’s family connections and personal connections to Israel. Her husband is an Israeli citizen, she has relatives living in Israel, and she has undertaken time and expense to visit those relatives. She has frequent, non-casual contact with her relatives living in Israel. Applicant traveled to Israel four times since 2000. Although not alleged, she was a dual citizen with Israel and held an Israeli passport. However, she unilaterally addressed this concern by renouncing her Israeli citizenship, and she no longer has an Israeli passport.

¹ ISCR Case No. 03-04147 at 3 (App. Bd. Nov. 4, 2005) (quoting ISCR Case No. 02-01093 at 4 (App. Bd. Dec. 11, 2003)); ISCR Case No. 05-02833 at 2 (App. Bd. Mar. 19, 2007) (citing *Raffone v. Adams*, 468 F.2d 860 (2nd Cir. 1972) (taken together, separate events may have a significance that is missing when each event is viewed in isolation).

² See ISCR Case No. 02-24566 at 3 (App. Bd. July 17, 2006) (stating that an analysis under the eighth APF apparently without discussion of the other APFs was sustainable); ISCR Case No. 03-10954 at 5 (App. Bd. Mar. 8, 2006) (sole APF mentioned is eighth APF); ISCR Case No. 03-17620 at 4 (App. Bd. Apr. 17, 2006) (remanding grant of clearance because Judge did not assess “the realistic potential for exploitation”), *but see* ISCR Case No. 04-00540 at 6 (App. Bd. Jan. 5, 2007) (rejecting contention that eighth APF is exclusive circumstance in whole-person analysis in foreign influence cases).

Substantial mitigating evidence weighs towards grant of Applicant's security clearance. Applicant is a U.S.-born citizen, who has lived in the United States her entire life. Her husband who has taken all necessary steps to become a U.S. citizen and all of her immediate family reside in the United States. Applicant was educated in the United States. She and her husband have set aside money for their children's college education. Applicant has a successful career with a defense contractor. Her husband also has a successful career as an owner of a small business. Applicant and her husband own a home in the United States and are involved in their community. Applicant and her husband have no financial ties to Israel. All of Applicant's immediate family is in the United States and she maintains a close relationship with them. In short, Applicant's entire life is U.S.-based. Her ties to the United States are clearly stronger than her ties to Israel. She has no financial ties to Israel in contrast to his U.S. financial ties. She took the affirmative step of formally renouncing her Israeli citizenship, which exceeded the requirements of "express[ing] a willingness to renounce dual citizenship." There is no evidence she has ever taken any action which could cause potential harm to the United States.

Applicant's employer has considerable trust in her. This is clearly evident by the company official who submitted a letter on her behalf. Her supervisor, former mentor, and long-time family friend assess her as loyal, trustworthy, conscientious, responsible, mature, and of high integrity. She has an excellent reputation as a friend, family member, employee and U.S. citizen. Her documentary evidence supports her for a security clearance. There is no derogatory information about her in the record.

Israel is a highly developed, stable, democratic republic with a modern economy that has supported the U.S. war against terrorism. Israel is a country that has been and continues to be friendly with the U.S. for more than 50 years.

This case must be adjudged on its own merits, taking into consideration all relevant circumstances, and applying sound judgment, mature thinking, and careful analysis. This Analysis must answer the question whether there is a legitimate concern under the facts presented that the Israeli government or its agents might exploit or attempt to exploit Applicant's immediate family members in such a way that this U.S. citizen would have to choose between her pledged loyalty to the U.S. and those family members.

After weighing the disqualifying and mitigating conditions, all the facts and circumstances, in the context of the whole person, I conclude Applicant has mitigated the security concerns pertaining to foreign influence.

I take this position based on the law, as set forth in *Department of Navy v. Egan*, 484 U.S. 518 (1988), my "careful consideration of the whole person factors"³ and supporting evidence, my application of the pertinent factors under the Adjudicative Process, and my interpretation of my responsibilities under the Guidelines. Applicant

³See ISCR Case No. 04-06242 at 2 (App. Bd. June 28, 2006).

has mitigated the Government's case. For the reasons stated, I conclude she is eligible for access to classified information.

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.e.:	For Applicant

Decision

In light of all the circumstances presented by the record in this case, it is clearly consistent with the national interest to grant or continue a security clearance for Applicant. Clearance is granted.

Robert J. Tuidor
Administrative Judge