



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



In the matter of: )  
)  
) ISCR Case No. 10-07893  
)  
Applicant for Security Clearance )

**Appearances**

For Government: Philip J. Katauskas, Esquire, Department Counsel  
For Applicant: *Pro se*

July 17, 2011

**Decision**

ANTHONY, Joan Caton, Administrative Judge:

After a thorough review of the written record in this case, I conclude that Applicant failed to rebut or mitigate the Government's security concerns under Guideline B (Foreign Influence) and Guideline E (Personal Conduct). Her eligibility for a security clearance is denied.

**Statement of Case**

Applicant completed and certified an Electronic Questionnaire for Investigations Processing (e-QIP) on March 10, 2010. On November 26, 2010, the Defense Office of Hearings and Appeals (DOHA) issued Applicant a Statement of Reasons (SOR) detailing security concerns under Guideline B (Foreign Influence) and Guideline E (Personal Conduct). DOHA acted 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 issued after September 1, 2006.

On January 24, 2011, Applicant answered the SOR in writing and requested that her case be determined on the record in lieu of a hearing. The Government compiled its File of Relevant Material (FORM) on February 22, 2011. The FORM contained documents identified as Items 1 through 6. Additionally, in the FORM, the Government requested that the administrative judge take administrative notice of certain facts about Thailand and provided, as reference materials, official U.S. documents.<sup>1</sup>

By letter dated February 24, 2011, DOHA forwarded a copy of the FORM, including the documents offered for administrative notice, to Applicant, with instructions to submit any additional information and/or objections within 30 days of receipt. Applicant received the file on March 16, 2011. Her response was due on April 15, 2011. Applicant did not submit any information or file any objections within the required time period. On April 27, 2011, the case was assigned to me for a decision. I marked the Government's administrative notice documents as Hearing Exhibit (H.E.) A and admitted them to the record.

### **Findings of Fact**

The SOR contains three allegations that raise security concerns under Guideline B, Foreign Influence (SOR ¶¶ 1.a. through 1.c.), and four allegations that raise security concerns under Guideline E, Personal Conduct (SOR ¶¶ 2.a. through 2.d.). In her Answer to the SOR, Applicant admitted the three Guideline B allegations. Under Guideline E, she admitted the allegations at SOR ¶¶ 2.a. and 2.b. She denied the Guideline E allegations at ¶¶ 2.c. and 2.d. Her admissions are admitted as findings of fact. (Item 1; Item 4.)

In May 12, 2010, Applicant was interviewed under oath about her foreign contacts and her foreign passport by an authorized investigator from the U.S. Office of Personnel Management (OPM). On November 15, 2010, she provided signed, sworn responses to foreign influence and personal conduct interrogatories sent to her by DOHA.<sup>2</sup>

Applicant is 30 years old, married, and the mother of a small child. She is employed as a senior program coordinator and liaison by a government contractor. She seeks a security clearance for the first time. (Item 5; Item 6 at 1, 3, 5-6, 12-13.)

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<sup>1</sup> The Government provided four official U.S. documents and a three-page summary containing factual information about Thailand derived from the official documents.

<sup>2</sup> On November 15, 2010, Applicant reviewed the investigator's summary of her personal subject interview. She corrected the occupation listed for one of her friends in Thailand from college professor to high school teacher. She added information about her reasons for retaining her Thai passport, her family connections in Thailand, her friends and associates in Thailand, and her mother's health condition. She also added information about her awareness of the importance of guarding sensitive and proprietary information. Subject to those additions, corrections, and clarifications, she provided a sworn statement in which she adopted the investigator's summary as accurate. (Item 6 at 23-25.)

Applicant was born and raised in Thailand. In 2002, she was awarded a bachelor's degree by a university in Thailand. She immigrated to the United States in 2005. She became a naturalized U.S. citizen in May 2009. She acquired a U.S. passport in June 2009. (Item 5).

Question 6 under Section 20B of the e-QIP asks: "Have you EVER held or do you now hold a passport that was issued by a foreign government?" On her March 10, 2010 e-QIP, Applicant answered "Yes" to Question 6. She stated that she had been awarded a Thai passport in November 2003, which had expired in November 2008. Applicant further stated on her e-QIP that she had "turned in" her expired Thai passport. At her personal subject interview in May 2010, Applicant also told the OPM investigator that she had relinquished her Thai passport, which had expired in 2008. (Item 5; Item 6 at 30.)

However, later in her interview, Applicant told the investigator that she was currently in possession of a valid passport issued by the government of Thailand. She stated that she had lied when she stated on her e-QIP and earlier in her security interview that she had relinquished her Thai passport. In fact, she possessed a valid Thai passport with an expiration date of July 28, 2010. Applicant told the investigator that she had not reported her valid Thai passport because she feared she would be denied a security clearance if the Government learned of it. Applicant further told the investigator that she maintained a valid Thai passport so that she could more conveniently visit her mother in Thailand in the event her mother became ill.<sup>3</sup> In her answer to the SOR, Applicant stated she lied about the status of her Thai passport "due to my fear of losing my birth rights as a Thai citizen." (Item 4 at 1; Item 6 at 30-31.)

Applicant's mother, who is retired, is a citizen and resident of Thailand. Applicant's brother, who is unemployed, is also a citizen and resident of Thailand. Applicant's mother and brother live at the same address. Every two weeks, Applicant sends her mother \$150 for her support. Applicant's mother came to the United States to visit her in 2008 and 2010. Applicant told the investigator that she has telephone contact with her mother about once a week. She has telephone contact with her brother once or twice a year. (Item 5; Item 6 at 6, 26-27.)

Section 19 on the e-QIP asks:

Do you have or have you had close and/or continuing contact with foreign nationals within the last 7 years with whom you, your spouse, or your cohabitant are bound by affection, influence, and/or obligation? Include associates, as well as relatives, not already listed in Section 18 (A foreign national is defined as any person who is not a citizen or national of the U.S.).

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<sup>3</sup> Applicant presented documentation from an official of the Thai government confirming that she relinquished her Thai passport on November 12, 2010. (Item 6 at 15.)

Applicant answered “No” to Section 19. She failed to disclose numerous social relationships and friendships she has with citizens and residents of Thailand. These relationships date to her life in Thailand before she immigrated to the United States. (Item 5 at 31.)

At her personal subject interview, Applicant stated that her failure to list her associates and friends who are citizens and residents of Thailand on her e-QIP was not intentional. In response to DOHA interrogatories, she identified 21 citizens and residents of Thailand with whom she has regular social contact over the internet. One of her associates, a former college friend, is a high school teacher in Thailand. Applicant has contact with him once or twice a month via instant messaging and other social network media. Additionally, Applicant has contact with 20 other individuals she identified as “former co-workers and college mates [with] whom I am in contact . . . via social network (Facebook) in [a] random, inconsistent basis, approximately once a month.” She characterized the purpose of her contacts with these individuals as “chatting, posting and commenting on status updates.” Applicant provided the names and citizenship of the 20 individuals, but, for most of them, she did not know their titles or their occupations. (Item 6 at 6-7.)

Question 1 under Item 20A on the e-QIP asks: “Do you have or have you EVER had any foreign financial businesses, foreign bank accounts, or other foreign financial interests of which you have direct control or direct ownership?” Applicant responded “Yes” to Question 20A, and she listed a bank account containing funds equivalent to \$1,500. Under “additional comments,” at the end of Item 20A, Applicant wrote: “I have personal bank account in Thailand, which I had opened. . . a long time ago [:] however it is not being used for any purposes.” (Item 5 at 31-32.)

At her personal subject interview, Applicant told the OPM investigator that she has three bank accounts in Thailand. She stated that she has a total of approximately \$3,200 invested in the three bank accounts. She stated that she failed to list two of her bank accounts in Thailand due to unintentional oversight. She said she maintains the accounts for convenience, and never felt the need to close them. She also stated that Thai banks require that bank accounts be closed in person by the account holder. She stated she would close the accounts when next she traveled to Thailand. (Item 6 at 28.)

Applicant does not claim dual citizenship with Thailand. She estimates that she and her husband, a U.S. citizen, have joint assets worth approximately \$150,000. These assets are in the United States. (Item 5 at 6, 9, 30.)

I take administrative notice of facts about Thailand. The facts in the following summary were provided by Department Counsel to Applicant and to me. The facts were derived from official U.S. Government documents provided as attachments to the FORM and are identified in the record as H.E. A<sup>4</sup>:

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<sup>4</sup> The following official U.S. Government documents were used to provide the factual summary on Thailand quoted in this decision: U.S. Department of State, *Background Note: Thailand*, July 28, 2010 (10

The Kingdom of Thailand is a constitutional monarchy composed of a king, prime minister, and bicameral legislature. In 2006, a violent coup by top military officers overthrew the government, repealed the constitution, and abolished both houses of parliament. In December 2007, free and fair multi-party elections restored democratic governance. However, since this election, two subsequent prime ministers were forced to resign because of decisions by Thailand's court system. After political protests from May through December 2008, resulting in 90 deaths and 80 injuries, a revised coalition came to power.

In addition to the political turmoil since the 2006 coup, Thailand has endured a persistent separatist insurgency in its majority-Muslim southern provinces. Sectarian violence between insurgents and security forces in Thailand's majority-Muslim provinces has left around 4,000 people dead since 2004. Since 2007, attacks have become more sophisticated and coordinated. This insurgency has resulted in numerous human rights abuses, including killings, committed by ethnic Malay Muslim insurgents, Buddhist defense volunteers, and government security forces. In the spring of 2010, political turmoil and protests wracked Thailand resulting in the deaths of over 90 people and injuries to over 260 people, including two U.S. citizens.

The Department of State has criticized the Thai government's overall human rights record. Security forces continued at times to use excessive force against criminal suspects, and some elements also committed or were connected to extrajudicial, arbitrary, and unlawful killings. Reports also linked police to disappearances, torture, beatings and abuse. The government also maintains some limits on freedom of speech, press, and assembly.

The State Department is concerned that there is an increased risk of terrorism in Southeast Asia, including Thailand. The State Department warns all Americans to exercise caution when in Thailand for several reasons. Thailand's southern region has been experiencing almost daily incidents of criminally and politically motivated violence, including incidents attributed to armed local separatist/extremist groups. While extremist groups primarily focus on Thai government interests in south Thailand, recent violence has also targeted public places, including tourist areas. Finally, the Thai/Burma border is the site of ongoing conflicts between the Burmese army and armed opposition groups as well as clashes between Thai security forces and armed drug traffickers.

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pages); U.S. Department of State, *Country Specific Information: Thailand*, September 16, 2010 (11 pages); U.S. Department of State, *2009 Human Rights Report: Thailand*, March 11, 2010 (29 pages); Thailand: Background and U.S. Relations, June 21, 2010, Emma Chanlett-Avery, Specialist in Asian Affairs, Congressional Research Service, CRS Report for Congress (26 pages). I have omitted footnotes in the quoted text and have modified some spelling and punctuation.

## **Burden of Proof**

The Government has the initial burden of proving controverted facts alleged in the SOR. The responsibility then shifts to the applicant to refute, extenuate, or mitigate the Government's case. Because no one has a right to a security clearance, the applicant then bears the burden of persuasion. The "clearly consistent with the national interest" standard compels resolution of any reasonable doubt about an applicant's suitability for access to classified information in favor of protecting national security.

## **Policies**

The U.S. Supreme Court has recognized the substantial discretion of the Executive Branch in regulating access to information pertaining to national security, and it has emphasized that "no one has a 'right' to a security clearance." *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988). As Commander in Chief, the President has the authority to control access to information bearing on national security and to determine whether an individual is sufficiently trustworthy to have access to such information." *Id.* at 527. The President has authorized the Secretary of Defense or his designee to grant an applicant's eligibility for access to classified information "only upon a finding that it is clearly consistent with the national interest to do so." Exec. Or. 10865, *Safeguarding Classified Information within Industry* § 2 (Feb. 20, 1960), as amended.

When evaluating an applicant's suitability for a security clearance, an administrative judge must consider the adjudicative guidelines (AG). 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, the administrative judge applies these guidelines 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 in seeking to obtain a favorable security decision.

A person who seeks access to classified information enters into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours. The Government reposes a high degree of trust and confidence in individuals to whom it grants access to classified information. Decisions include, by necessity, consideration of the possible risk 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 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 identifies foreign influence security concerns as follows: “[f]oreign 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.” Additionally, adjudications under Guideline B “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 U.S. citizens to obtain protected information and/or is associated with the risk of terrorism.” AG ¶ 6.

In the past several years, Thailand has experienced political turmoil, sectarian violence, and instability. Within the country, security forces have used excessive force against suspected criminals, and police have been linked to disappearances, torture, and abuse. The Thai government has imposed limitations on the press, free speech, and free assembly.

The U.S. Department of State has warned U.S. citizens to exercise caution when traveling to Thailand. There is a danger to tourists of politically motivated violence from extremist groups in Thailand’s southern region.

Applicant’s mother and brother are citizens and residents of Thailand. Applicant’s mother is retired, and her brother is unemployed. Every two weeks, Applicant provides her mother with approximately \$150 in support. Additionally, Applicant has internet contact with approximately 20 associates and friends who are citizens and residents of

Thailand. For most of these contacts, Applicant does not know their titles or their occupations.

Applicant maintains three bank accounts in Thailand. All together, the three accounts contain approximately \$3,200.

I have considered all of the disqualifying conditions under the Foreign Influence guideline. The facts in this case raise security concerns under disqualifying conditions AG ¶¶ 7(a), 7(b), and 7(e). AG ¶ 7(a) reads: “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.” AG ¶ 7(b) reads: “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.” AG ¶ 7(e) reads: “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.”

Several mitigating conditions under AG ¶ 8 might be applicable to Applicant’s case. If “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.,” then AG ¶ 8(a) might apply. If “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,” then AG ¶ 8(b) might apply. If “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,” then AG ¶ 8(c) might apply. If “the value or routine nature of the foreign business, financial, or property interests is such that they are unlikely to result in a conflict and could not be used effectively to influence, manipulate, or pressure the individual,” then AG ¶ 8(f) might apply.

Applicant has extensive family and friendship ties with citizens and residents of Thailand. Additionally, her relationships with her mother and her brother are neither casual nor infrequent, but are based on long-standing family ties of affection and obligation. Moreover, Applicant’s affection for and feeling of obligation toward her mother has led her to give her mother \$150 every two weeks in financial support.

Applicant also has relationships via internet social media with 21 citizens and residents of Thailand. Applicant’s contacts with these individuals occur monthly. While these may be casual relationships with former co-workers and college associates,



Applicant's ongoing contacts with foreign individuals she does not know well raise concerns about possible of foreign exploitation, coercion, or pressure.

Applicant and her husband have a joint net worth of approximately \$150,000. Applicant acknowledged that she has three small bank accounts in Thailand, with a total value of approximately \$3,200, a very small percentage of her total net worth. Applicant noted a requirement that Thai bank accounts must be closed by personally appearing at a bank to do so. She stated her intention to close the three accounts when next she returned to Thailand.

Applicant has the burden of persuasion in obtaining a favorable security clearance decision. That burden of persuasion includes presenting evidence to warrant application of Guideline B mitigating conditions. The Government does not have the burden of affirmatively disproving the applicability of the foreign influence mitigating conditions. In this FORM case, I conclude that the facts alleged at SOR ¶ 1.b., when weighed with information provided by Applicant, merit the application of AG ¶ 8(f). However, I also conclude that Applicant has failed to produce sufficient evidence to establish that any of the other Guideline B mitigating conditions apply to the allegations at SOR ¶¶ 1.a. and 1.c.

#### **Guideline E, Personal Conduct**

AG ¶ 15 explains why personal conduct is a security concern:

Conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations can raise questions about an individual's reliability, trustworthiness and ability to protect classified information. Of special interest is any failure to provide truthful and candid answers during the security clearance process or any other failure to cooperate with the security clearance process.

Applicant admitted she deliberately lied when she stated on her e-QIP and in her personnel security interview that her Thai passport had expired in 2008 and she had returned it to responsible authorities, when, in fact, she knew she was in possession of a current Thai passport, which did not expire until July 28, 2010. At her personnel security interview, Applicant stated that she lied because she believed she would not receive a clearance if she acknowledged that she had an active Thai passport. Later, in her answer to the SOR, she stated that she lied about relinquishing her expired 2008 passport "due to my fear of losing my birth rights as a Thai-born citizen."

Applicant also acknowledged that she did not list or identify her internet social media contacts with 21 citizens and residents of Thailand. She reported that these contacts were co-workers and college friends from her life in Thailand before she immigrated to the United States. She later provided information on these individuals, and she denied that her omission on her e-QIP was intentional. Additionally, Applicant acknowledged that she listed one of her Thai bank accounts on her e-QIP but failed to

list two additional bank accounts she owned in Thailand. She denied that her failure to list two of the accounts was intentional.

Applicant's personal conduct raises security concerns under AG ¶¶ 16(a) and 16(b). AG ¶ 16(a) reads: "deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar form used to conduct investigations, determine employment qualifications, award benefits or status, determine security clearance eligibility or trustworthiness, or award fiduciary responsibilities." AG ¶ 16(b) reads: "deliberately providing false or misleading information concerning relevant facts to an employer, investigator, security official, competent medical authority, or other official government representative."

AG ¶¶ 17(a) and 17(b) provide conditions that could mitigate security concerns in this case. AG 17(a) reads: "the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts." AG ¶ 17(b) reads: "the refusal or failure to cooperate, omission, or concealment was caused or significantly contributed to by improper or inadequate advice of authorized personnel or legal counsel advising or instructing the individual specifically concerning the security clearance process. Upon being made aware of the requirement to cooperate or provide the information, the individual cooperated fully and truthfully."

Neither AG ¶ 17(a) nor AG ¶ 17(b) applies to Applicant's admitted deliberate falsifications on her e-QIP and in her interview with the OPM investigator, which were intended to conceal the fact that she possessed an active Thai passport. Accordingly, the SOR allegations at ¶¶ 2.a. and 2.b. are concluded against Applicant.

Applicant denied she deliberately falsified or concealed information about her social network contacts with citizens and residents of Thailand on her e-QIP. She also denied she deliberately concealed the existence of two of her three Thai bank accounts on her e-QIP. Absent an opportunity to question Applicant, observe her demeanor, and assess her credibility, I conclude that there is insufficient record evidence to conclude that she deliberately falsified her answers to Section 19 and Item 20A on the e-QIP she completed and certified on March 10, 2010. Accordingly, the allegations at SOR ¶¶ 2.c. and 2.d. are concluded for Applicant.

### **Whole-Person Concept**

Under the whole-person concept, an administrative judge must evaluate an Applicant's eligibility for a security clearance by considering the totality of an applicant's conduct and all relevant circumstances. The administrative judge should consider the nine adjudicative process factors listed at AG ¶ 2(a):

- (1) the nature, extent, and seriousness of the conduct;
- (2) the circumstances surrounding the conduct, to include knowledgeable participation;
- (3) the frequency and recency of the conduct;
- (4) the individual's age and maturity at the time of the conduct;
- (5) the extent to

which participation is voluntary; (6) the presence or absence of rehabilitation and other permanent behavioral changes; (7) the motivation for the conduct; (8) the potential for pressure, coercion, exploitation, or duress; and (9) the likelihood of continuation or recurrence.

Under AG ¶ 2(c), the ultimate determination of whether to grant eligibility for a security clearance must be an overall commonsense judgment based upon careful consideration of the guidelines and the whole-person concept.

Applicant is a loyal and communicative family member and friend. She has close familial ties with her mother and her brother, who are citizens and residents of Thailand. She provides her mother with \$150 in support every two weeks. Via internet social media, she is in frequent contact with many friends and former associates in Thailand. She does not know the titles and occupations of many of these contacts, thereby raising concerns about her judgment in sharing personal information with them. She failed to provide evidence to mitigate the Government's security concerns about her foreign relationships and contacts.

Applicant deliberately falsified information about her Thai passport on her e-QIP and in an interview with an OPM investigator. Applicant's falsifications are recent and significant. Because they raise serious questions about her judgment, trustworthiness, and reliability, they go to the very heart of her eligibility for a security clearance.

Overall, the record evidence leaves me with questions and doubts about Applicant's eligibility and suitability for a security clearance. For these reasons, I conclude Applicant failed to mitigate the security concerns arising under the foreign preference and personal conduct adjudicative guidelines.

### **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:	AGAINST APPLICANT
Subparagraph 1.a.:	Against Applicant
Subparagraph 1.b.:	For Applicant
Subparagraph 1.c.:	Against Applicant
Paragraph 2, Guideline E:	AGAINST APPLICANT
Subparagraphs 2.a. - 2.b.:	Against Applicant
Subparagraphs 2.c. -2.d.:	For Applicant

### **Conclusion**

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

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Joan Caton Anthony  
Administrative Judge