



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



In the matter of:

Applicant for Security Clearance

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ISCR Case No. 15-06291

Appearances

For Government: Ray Blank, Esq., Department Counsel

For Applicant: *Pro se*

06/07/2017

Decision

WESLEY, Roger C., Administrative Judge:

Based upon a review of the pleadings, exhibits, and testimony, I conclude that Applicant mitigated the security concerns regarding alcohol consumption and personal conduct, but did not mitigate security concerns regarding financial considerations. Eligibility to access classified information is denied.

Statement of Case

On April 8, 2016, the Department of Defense (DOD) Consolidated Adjudications Facility (CAF) issued a Statement of Reasons (SOR) detailing reasons why DOD adjudicators could not make the affirmative determination of eligibility for a security clearance, and recommended referral to an administrative judge to determine whether a security clearance should be granted, continued, denied, or revoked. The action was taken under Executive Order (Exec. Ord.) 10865, *Safeguarding Classified Information Within Industry* (February 20, 1960), as amended; DOD Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the Adjudicative Guidelines (AGs) implemented by DOD on September 1, 2006.

Applicant responded to the SOR on May 11, 2016, and requested a hearing. The case was assigned to me on August 12, 2016. The Defense Office of Hearings and Appeals (DOHA) scheduled the hearing for October 26, 2016. At the hearing, the Government's case consisted of six exhibits (GEs 1-6). Applicant relied on two witnesses (including herself) and four exhibits (AEs A-D). The transcript (Tr.) was received on November 4, 2016.

Summary of Pleadings

Under Guideline F, Applicant allegedly accumulated 18 delinquent debts exceeding \$16,000. Allegedly, these debts remain outstanding.

Under Guideline G, Applicant allegedly was arrested for extreme driving under the influence (EDUI) in June 2012, and she was convicted of the charge, a Class B misdemeanor, in March 2013. Allegedly, she was sentenced in March 2013 to: supervised probation for two years; pay \$2,500 fine; attend and complete a Mothers Against Drunk Driving (MADD) impact panel at her own expense; have any vehicle she drives equipped with a certified ignition interlock device for one year from the date of conviction; and pay a special assessment fee of \$10.

Under Guideline E, Applicant allegedly was terminated from her non-government employment with a major consumer chain in December 2010 for excessive absences and substandard performance from a major supply chain. Allegedly, she was terminated from her employment with a non-government food-store chain in September 2011 for excessive absences.

In her response to the SOR, Applicant admitted most of the allegations pertaining to financial considerations with explanations. She denied the allegations covered by ¶¶ 1.j and 1.k, claiming the covered \$337 and \$362 debts are duplicates of the debt alleged in ¶ 1.i. She claimed she incurred the remaining listed debts over 25 years during periods of unemployment and getting back on her feet. She further claimed that she is currently self-employed cleaning houses and working part-time for a defense contractor.

Addressing the allegations pertaining to alcohol consumption, Applicant admitted the allegations with explanations. She claimed she is a very active member of Alcoholics Anonymous (AA) with over three years of sobriety.

In answering the allegations pertaining to personal conduct issues, Applicant admitted the allegations covering her alleged terminations in December 2010 and September 2011 for excessive absences and substandard performance. She claimed she worked in a poor environment, lost confidence in herself, and failed to win her fight against alcohol.

Findings of Fact

Applicant is a 54-year-old engineering technician who works for a defense contractor who seeks a security clearance. The allegations covered in the SOR and admitted are incorporated herein. Additional findings will follow.

Background

Applicant married in June 1983 and divorced in February 1997. (GE 1) She has three adult children from her marriage, who she raised mainly on her own. (GEs 1-2; Tr. 48-49) Applicant earned a high school diploma in 1981 and claimed no post-high school college credits. (GEs 1-2) She has never served in the military.

Applicant has worked for her current employer since January 2015 on a part-time basis as an engineering technician, until recently when her hours were increased to 40 hours a week. (GEs 1-2; Tr. 50) She reported unemployment between November 2014 and January 2015 and collected unemployment benefits for this period. She supplemented her income with her house-cleaning business. (Tr. 53-54) Previously, Applicant was employed by various non-DOD employers between September 2011 and August 2014, while supplementing her income with her self-employed house-cleaning business.

Applicant's finances

Between 2013 and 2015, Applicant incurred a number of delinquent debts, many of them medically-related. (GEs 3-4) Some of these debts were opened in 2007 and earlier and only became delinquent in 2013 and 2014. (GEs 3-4) While others (including her medically-related debts) were opened more recently and became delinquent in 2013 and 2014. (GEs 3-4)

Together, Applicant accumulated delinquent debts exceeding \$16,000. She attributed most of her debt delinquencies to unemployment and alcohol abuse. (Tr. 50-51, 55-56) Three of the listed debts in the SOR reflect duplicate accounts with the same creditor. SOR debts ¶¶ 1.j (\$337), 1.k (\$362), and 1.l (\$362) are all linked to the same medical creditor. Only one of these listed debts (SOR debt ¶ 1.l) can be reasonably charged to Applicant and carried as an outstanding debt.

Since returning to employment in January 2015, Applicant has been unable to address her old debts with the income available to her from both her part-time defense contractor employment (increased to full-time employment) and private house-cleaning work. (Tr. 38, 54) While she has been able to pay her current bills timely with the \$800 to \$1,200 she nets monthly from her work, she has not been able to address any of the debts listed in the SOR with the financial resources available to her. (Tr. 38-39) Mindful of her financial duties to address her old debts, she expressed her intention to "look into consolidation." (Tr. 38) To date, she has provided no probative evidence that she has pursued debt consolidation. The only debts she has been able to address with her current income are four non-SOR debts. (AEs C-F)

From the evidence of record, Applicant has not reached out to any of her individual creditors holding SOR-covered debts to explore the availability of even modest payment arrangements. She has developed no plan for addressing her delinquent debts. Nor has she provided a budget or evidence of financial counseling. And while she expressed intentions to explore the availability of consolidation plans, she has not provided any evidence of follow-through consolidation initiatives.

Applicant's alcohol-related arrest

Records document that Applicant was arrested on a military installation in June 2012 and charged with EDUI. The military police report covering the June 2012 incident cited the arresting officer's impressions of Applicant's displaying watery eyes, slurred speech and a strong odor of alcohol beverage when he stopped her. (GE 2).

Based on his impressions at the scene, he administered a field sobriety test on Applicant that produced indications of probable intoxication. (GE 2) Applicant was thereafter arrested at the scene and transported to a local military station. Two Breathalyzer tests that were administered to Applicant at the station revealed blood alcohol ratios of .20 and .207 percent blood alcohol content (BAC) levels. Based on the BAC results, police charged Applicant with EDUI. (GEs 2 and 5)

In March 2013, Applicant was convicted of the EDUI charge. (AEs 2 and 5) The court sentenced her to (a) supervised probation for two years; (b) payment of a \$2,500 fine; (c) attend and complete a MADD impact panel at her own expense; (d) have her vehicle equipped with a certified ignition interlock device for one year from the date of conviction; and (e) pay a special assessment fee of \$10. (GE 2) Applicant documented her compliance with her probation conditions relative to her March 2013 sentencing order. (AE B)

Applicant's alcohol history

Between September 2010 and February 2013, Applicant regularly consumed alcohol on a frequent basis. (Tr. 49, 55) By August 2011, alcohol consumption was beginning to have a negative impact on her ability to manage her finances and her work and personal relationships. (GE 6) Her alcohol consumption pattern during the 2010-2011 period consisted of weekend drinking.

Typically, Applicant consumed alcohol with friends and often to the point of intoxication. Alcohol consumption helped her to erase her problems and escape her emotions. (GE 6) Intoxication caused her to occasionally pass out or lose vision in her lazy eye, experience slurred speech, and lose tolerance to drinking. (GE 6) Her abuse of alcohol adversely effected her ability to get to work and caused her to break relationships and become a closet drinker.

Since March 2013, Applicant frequently attends AA meetings, quite often more than one a day around her work schedule, and at least five meetings a week. (GE 6; Tr. 39-43, 45-46) Her AA meetings are held at different locations in her community. Some of the meetings are devoted to single-sex attendees, but most are open to both genders. (Tr. 45-46) She has a sponsor and earned an AA chip celebrating three years of sobriety. (AEs A and H; Tr. 39-43) Applicant has worked and completed AA's 12-step program over the past three years and has returned to working on the steps again. (Tr. 44) At these meetings, she sometimes serves as the designated leader and starts the coffee at meetings. (Tr. 44-45)

Since Applicant has given up drinking, she has noticed a positive change in her judgment and reliability. (GE 6) She credited her AA participation for her chosen path of sustained abstinence. (GE 6; Tr. 37)

Applicant's employment terminations

Between December 2010 and September 2011, Applicant was twice terminated by her two employers. In December 2010, she was terminated by her major supply chain employer for cited excessive absence and substandard performance. (GE 6) And in September 2011 she was terminated by her food market chain employer for cited excessive absence. (GE 6) Applicant attributed both of these terminations to a hostile work environment and her excessive drinking, which she has since addressed in a sustained and comprehensive way. (GE 6; Tr. 52-53)

Character References

Applicant is well-regarded by colleagues and friends who have known her. (AE A) Former colleagues who have worked with her characterized her as honest, helpful, intelligent, creative, success oriented, considerate of others, a hard worker, respectful, and reliable. (AE A) Friends who have shared AA meetings with her over a number of years described her as conscientious and one who volunteered for leading AA meetings and helping out with the gathered assemblies. (AE A) They credited her with starting her own business cleaning houses and being trustworthy in caring for their pets while they were away.

Policies

The AGs list guidelines to be used by administrative judges in the decision-making process covering security clearance cases. These guidelines take into account factors that could create a potential conflict of interest for the individual applicant, as well as considerations that could affect the individual's reliability, trustworthiness, and ability to protect classified information.

These AGs include "[c]onditions that could raise a security concern and may be disqualifying" (disqualifying conditions), if any, and any of the "[c]onditions that could mitigate security concerns." These guidelines must be considered before deciding whether or not a security clearance should be granted, continued, or denied. The guidelines do not require administrative judges to place exclusive reliance on the enumerated disqualifying and mitigating conditions in the guidelines in arriving at a decision. Each of the guidelines is to be evaluated in the context of the whole person in accordance with AG ¶ 2(c).

In addition to the relevant AGs, administrative judges must take into account the pertinent considerations for assessing extenuation and mitigation set forth in AG ¶ 2(a) of the AGs, which are intended to assist the judges in reaching a fair and impartial commonsense decision based upon a careful consideration of the pertinent guidelines within the context of the whole person.

The adjudicative process is designed to examine a sufficient period of an applicant's life to enable predictive judgments to be made about whether the applicant is an acceptable security risk. The following AG ¶ 2(a) factors are pertinent: (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.

Viewing the issues raised and evidence as a whole, the following individual guidelines are pertinent in this case:

Financial Considerations

The Concern: 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. Compulsive gambling is a concern as it may lead to financial crimes including espionage. Affluence that cannot be explained by known sources of income is also a security concern. It may indicate proceeds from financially profitable criminal acts. AG ¶ 18.

Alcohol Consumption

The Concern. Excessive alcohol consumption often leads to the exercise of questionable judgment or the failure to control impulses, and can raise questions about an individual's reliability and trustworthiness.

Personal Conduct

The Concern: Conduct involving questionable judgment, untrustworthiness, unreliability, 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. AG, ¶ 15.

Burden of Proof

By virtue of the principles and policies framed by the AGs, a decision to grant or continue an applicant's security clearance may be made only upon a threshold finding that to do so is clearly consistent with the national interest. Because the Directive

requires administrative judges to make a commonsense appraisal of the evidence accumulated in the record, the ultimate determination of an applicant's eligibility for a security clearance depends, in large part, on the relevance and materiality of that evidence. See *United States, v. Gaudin*, 515 U.S. 506, 509-511 (1995).

As with all adversarial proceedings, the judge may draw only those inferences which have a reasonable and logical basis from the evidence of record. Conversely, the judge cannot draw factual inferences that are grounded on speculation or conjecture.

The Government's initial burden is twofold: (1) it must prove by substantial evidence any controverted facts alleged in the SOR, and (2) it must demonstrate that the facts proven have a material bearing to the applicant's eligibility to obtain or maintain a security clearance. The required materiality showing, however, does not require the Government to affirmatively demonstrate that the applicant has actually mishandled or abused classified information before it can deny or revoke a security clearance. Rather, the judge must consider and weigh the cognizable risks that an applicant may deliberately or inadvertently fail to safeguard classified information.

Once the Government meets its initial burden of proof of establishing admitted or controverted facts, the evidentiary burden shifts to the applicant for the purpose of establishing his or her security worthiness through evidence of refutation, extenuation, or mitigation. Based on the requirement of E. O. 10865 that all security clearances be clearly consistent with the national interest, the applicant has the ultimate burden of demonstrating his or her clearance eligibility. "[S]ecurity-clearance determinations should err, if they must, on the side of denials." See *Department of the Navy v. Egan*, 484 U.S. 518, 531 (1988).

Analysis

Security concerns are raised over Applicant's accumulation of delinquent debts between 2013 and 2014. Additional security concerns are raised over Applicant's history of alcohol-related incidents, excessive drinking, and losses of employment attributable to excessive absences and substandard performance.

Financial Concerns

Most of Applicant's debts listed in the SOR are medical debts resulting from medical services provided Applicant in prior years. Her incurred delinquent debts warrant the application of two of the disqualifying conditions (DC) of the AGs: DC ¶ 19(a), "inability or unwillingness to satisfy debts," and DC ¶ 19(c), "a history of not meeting financial obligations."

Applicant's listed SOR debts (¶¶ 1.a-1.g) were reported in a series of credit reports issued between November 2014 and November 2015. (GEs 3-4) Credit reports create presumptions of authenticity and accuracy. The Appeal Board has explained that credit reports can "normally meet the substantial evidence standard and the government's obligations under [directive] ¶ E3.1.14 for pertinent allegations." ISCR Case No. 08-12184 at 7 (App. Bd. Jan. 7, 2010) Three of the listed SOR debts reported in applicant's credit

reports reflect duplicate accounts. For the three duplicate accounts reported (SOR debts ¶¶ 1.j-1.l), Applicant is credited with resolution of the ¶¶ 1.j and 1.k debts. SOR debt ¶ 1.l remains Applicant's responsibility.

Holding a security clearance involves the exercise of important fiducial responsibilities, among which is the expectancy of consistent trust and candor. Financial stability in a person cleared to access classified information is required precisely to inspire trust and confidence in the holder of the clearance. While the principal concern of a clearance holder's demonstrated financial difficulties is vulnerability to coercion and influence, judgment and trust concerns are also implicit in financial cases.

Applicant's accumulation of delinquent debts under extenuating circumstances merit partial application of MC ¶ 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." Applicant's evidence of recurrent periods of unemployment and alcohol abuse is extenuating. However, she has failed to meet the other prong of MC ¶ 20(b) that requires probative evidence of the applicant's acting responsibly in addressing the underlying debts when she is financially able to do so. In Applicant's case, she has been gainfully employed with two jobs since January 2015 and ostensibly able to make some modest progress with her SOR debts. Without more evidence of responsible repayment efforts, Applicant may not avail herself of the acting responsibly prong of MC ¶ 20(b).

Because Applicant has not mounted any material efforts to address her incurred delinquent debts, application of MC ¶ 20(d), "the individual initiated a good-faith effort to repay overdue creditors or otherwise resolve debts," is very limited. Prospects for her addressing her delinquent debts with even modest repayment efforts are too uncertain to warrant safe predictions that she will be able to initiate any serious repayment efforts in the foreseeable future.

By failing to provide good evidence of her addressing her delinquent debts after she had returned to gainful employment in 2015, Applicant is not able to show the required level of judgment necessary to meet minimum requirements for security clearance eligibility. To date, Applicant has provided little evidence of her addressing her delinquent debts and no documentation of budgeting or pursuing financial counseling.

From a whole-person standpoint, Applicant's limited attention devoted to addressing her delinquent debts following her return to gainful employment in 2015, reflects questionable judgment and unwillingness to fulfill her financial responsibilities. Limited evidence of her employment evaluations and civic contributions further limited her ability to demonstrate her overall dependability and trustworthiness.

Considering all of the circumstances surrounding Applicant's payment delinquencies and minimal efforts in addressing her delinquent debts since receiving the SOR in April 2016, her actions to date in stabilizing her finances are concluded to be insufficient to meet the mitigation requirements imposed by the guideline governing financial considerations.

Unfavorable conclusions are warranted with respect to the allegations covered by ¶¶ 1.a through 1.i and 1.l through 1.r of Guideline F. Favorable conclusions are warranted with respect to ¶¶ 1.j and 1.k of the SOR.

Alcohol Concerns

Additional security concerns are raised over Applicant's 2012 alcohol-related arrest and conviction and her history of excessive drinking. By all accounts, Applicant is a highly regarded engineering technician who has since been promoted to full-time employment. Employment-related stresses in her life contributed to increased drinking and an alcohol-related incident in 2012. Principal security issues raised in this case center on Applicant's history of alcohol abuse. Since her 2012 EDUI arrest and conviction, she has satisfied all of the imposed probation conditions.

Applicant's recurrent problems with abusive drinking over a period of several years (dating to 2010) raise initial concerns over the risk of her returning to abusive drinking in the foreseeable future. On the strength of the evidence presented, two disqualifying conditions (DC) of the AGs for alcohol consumption (AG ¶ 21) may be applied: DC ¶ 22(a), "alcohol-related incidents away from work, such as driving while under the influence, fighting, child or spouse abuse, disturbing the peace, or other incidents of concern, regardless of whether the individual is diagnosed as an alcohol abuser or alcohol dependent," and DC ¶ 22(c), "habitual or binge consumption of alcohol to the point of impaired judgment, regardless of whether the individual is diagnosed as an alcohol abuser or alcohol dependent."

Once Applicant ceased drinking altogether following her 2012 EDUI conviction, she committed to sobriety with the support of her AA network. Over the course of the ensuing three and one-half years, her faithful commitments to her AA meetings and its principles of sobriety earned her praise from her colleagues and AA friends (including her sponsor). Strengthened in her resolve to remain sober, she has earned an AA chip celebrating three years of sobriety and has gained the confidence she will need to maintain her sobriety without fear of a relapse.

Applicant's sustained abstinence for over three years entitle her to the benefits of two mitigating conditions (MCs). MC ¶ 23(a) of Guideline G, "so much time has passed, or the behavior was so infrequent, or it happened under such unusual circumstances that it is unlikely to recur or does not cast doubt on the individual's current reliability, trustworthiness, or good judgment," and MC ¶ 23(b), "the individual acknowledges his or her alcoholism or issues of alcohol abuse, provides evidence of actions taken to overcome this problem, and has established a pattern of abstinence (if alcohol dependent) or responsible use (if an alcohol abuser)." MC ¶ 23(d), "the individual has successfully completed inpatient or outpatient counseling or rehabilitation along with any required aftercare, has demonstrated a clear and established pattern of modified consumption or abstinence in accordance with treatment recommendations, such as

participation in meetings of Alcoholics Anonymous or a similar organization and has received a favorable prognosis by duly qualified medical professional or a licensed clinical social worker who is a staff member of a recognized alcohol treatment program,” has partial application to Applicant’s situation based on her commitments to AA.

While neither MC ¶ 23(b) nor MC ¶ 23(d) of Guideline G provide any bright lines for gauging the sufficiency of an applicant’s period of sustained abstinence, the DSM-5 suggests a period of at least 12 months of sustained abstinence as a factor to consider when assessing an applicant’s recovery progress and recurrence risks. Alcohol avoidance for over three years is something that Applicant has credibly demonstrated with her evidence. Her continued abstinence is an important consideration in determining what weight to assign to her reformed drinking claims. See ISCR Case 02-03186 (App. Bd. Feb. 16, 2006); ISCR Case 01-20579, at 5 (App. Bd. Apr. 14, 2004).

Historically, the Appeal Board has emphasized the importance of a strong rehabilitation program and a seasoned track record. See ISCR Case No. 06-17541 (App. Bd. Jan. 14, 2008); ISCR Case No. 04-10799 (App. Bd. Nov. 9, 2007); ISCR Case No. 05-16753 at 2-3 (App. Bd. Aug. 2, 2007). Applicant has met these requirements with an impressive showing of sustained abstinence over a three-year-plus period with the aid of her AA support group.

Taking into account both Applicant’s history of alcohol abuse and incident away from work and corresponding solid probative evidence of a seasoned track record of abstinence (both with and without probation reporting requirements), the applicable guidelines, and a whole-person assessment of her avoidance of alcohol following her only alcohol-related incident in 2012, it is safe to conclude that Applicant’s sustained abstinence will likely to remain so for the foreseeable future.

Based on both Applicant’s strong showing of sustained abstinence, aided by her AA participation and a whole-person assessment of the overall trust and reliability that Applicant enjoys with her colleagues and AA friends who are familiar with her alcohol issues and work performance, conclusions are warranted that Applicant has mitigated security concerns over her history of abusive drinking. Favorable conclusions are warranted with respect to the allegations covered by Guidelines G.

Applicant’s Involuntary Terminations

Based on Applicant’s two involuntary terminations from her employers in 2010 and 2011, respectively, for excessive absences and unsatisfactory performance (2010 employer only), security concerns are raised about her trustworthiness and reliability. Applicant never challenged the cited reasons for the terminations or appealed the outcomes. Applicant’s terminations are covered by DC ¶ 16(c), “credible adverse information in several adjudicative issue areas that is not sufficient for an adverse determination under any other single guideline, but which, when considered as a whole,

supports a whole-person assessment of questionable judgment, untrustworthiness, unreliability, lack of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the person may not properly safeguard protected information.” DC ¶ 16(c) fully applies to the judgment issues raised by Applicant’s involuntary terminations.

Applicant’s 2010 and 2011 terminations were not all the result of cited excessive absences and unsatisfactory performance. Alcohol issues clearly played a role in her employment relationships and performance assessments. The cited reasons for her terminations, though, are enough to sustain the terminations, absent more evidence from Applicant as to why her employers were not justified in taking the termination actions they chose.

DOHA jurisdiction over employment issues is limited and is generally confined to assessing the factual basis of employment decisions for their effect on security clearance eligibility assessments. Based on the information provided from Applicant and her prior employers, the termination actions taken by these employers cannot be determined to have been made on an arbitrary or erroneous basis.

Mitigation of the adverse personnel actions taken by Applicant’s prior employers against her is available to her. The terminations were made over five years ago and have been followed by favorable employment conditions. Applicant is well regarded by her colleagues and AA friends and has recently received added hours of work by her defense contractor employer.

Employing a whole-person assessment, any adverse inferences to be drawn from Applicant’s cited excessive absences and unsatisfactory work performance with her 2010 and 2011 employers, respectively, must be balanced with the positive reinforcements she has earned from sustained abstinence from alcohol consumption and support she continues to receive from her colleagues and AA friends.

Considering all of the facts and circumstances surrounding Applicant’s terminations from her prior employers and steps she has taken to restore trust and reliability with her current employer, colleagues, and AA friends, personal conduct concerns over Applicant’s involuntary terminations covered by SOR ¶¶ 3.a and 3.b of Guideline E are mitigated.

Formal Findings

In reviewing the allegations of the SOR in the context of the findings of fact, conclusions, and the factors and conditions listed above, I make the following separate formal findings with respect to Applicant’s eligibility for a security clearance.

GUIDELINE F (FINANCIAL CONSIDERATIONS): AGAINST APPLICANT

Subparagraphs 1.a-1i and 1.l-1.r:	Against Applicant
Subparagraphs 1.j-1.k:	For Applicant
GUIDELINE G (ALCOHOL CONSUMPTION):	FOR APPLICANT
Subparagraph 2.a:	For Applicant
GUIDELINE E (CRIMINAL CONDUCT)	FOR APPLICANT
Subparagraphs 3.a and 3b:	For Applicant

Conclusions

In light of all the circumstances presented by the record in this case, it is not clearly consistent with the national interest to grant or continue Applicant's security clearance. Clearance is denied.

Roger C. Wesley
Administrative Judge