



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



In the matter of:)	
)	
)	ISCR Case No. 17-03645
)	
Applicant for Security Clearance)	

Appearances

For Government: Robert B. Blazewick, Esq., Department Counsel
For Applicant: *Pro se*

10/24/2018

Decision

RIVERA, Juan J., Administrative Judge:

Applicant mitigated foreign influence security concerns raised by family members in Iraq. His past behavior demonstrates he can resolve any potential conflict of interest in favor of the United States. His undivided allegiance to the United States is corroborated by his dependability and performance while exposed to possible harm. He also mitigated the financial considerations concerns. Clearance is granted.

Statement of the Case

Applicant submitted a security clearance application (SCA) on September 16, 2016. An investigator from the Office of Personnel Management (OPM) interviewed him on January 5, 2017. After reviewing the information gathered during the background investigation, the Department of Defense (DOD) on December 27, 2017, issued him a Statement of Reasons (SOR) alleging security concerns under Guidelines B (foreign influence) and F (financial considerations). Applicant answered the SOR on February 14, 2018, and requested a decision based on the written record in lieu of a hearing.

A copy of the Government's file of relevant material (FORM), submitting the evidence supporting the security concerns, was provided to Applicant by letter dated May 15, 2018. Applicant received the FORM on May 21, 2018, and submitted a two-

page letter with attachments to refute, extenuate, and mitigate the concerns, dated June 15, 2018. The case was assigned to me on July 26, 2018. Lacking any objections, I admitted and considered both the Government's proposed evidence and Applicant's submissions.

Procedural Issue

In the FORM, Department Counsel advised Applicant that the FORM included his unauthenticated summary of interview with a government background investigator from January 5, 2017. (FORM, Item 4) Applicant was informed he could object to the summary of his interview, and it would not be admitted or considered, or that he could make corrections, additions, deletions, and update the document to make it accurate. Applicant was informed that his failure to respond to the FORM or to raise any objections could be construed as a waiver and the proposed FORM evidence would be considered. Applicant responded to the FORM and raised no objections. I admitted the FORM's proffered evidence and considered it.

Neither Department Counsel nor Applicant requested I take administrative notice of facts concerning Iraq. Because the circumstances of Iraq and its relationship with the United States are required for the foreign influence concern analysis, I took administrative notice of facts about Iraq outlined in U.S. Department of State recent publications. The noted facts are incorporated in my findings of fact. Statements about the United States' relationship with Iraq from the Department of State are admissible. See ISCR Case No. 02-00318 at 5 (App. Bd. Feb. 25, 2004).

Findings of Fact

Applicant admitted all the SOR allegations under Guideline B (§§ 1.a through 1.g), and Guideline F (§§ 2.a through 2.h). His SOR and FORM admissions are incorporated herein as findings of fact. After a thorough review of the record evidence, I make the following additional findings of fact:

Applicant is a 32-year-old linguist and translator. He has worked for U.S. forces and federal contractors on and off since 2005. He was offered a full-time linguist position with a federal contractor contingent on his eligibility for a clearance in September 2016.

Applicant was born, raised, and attended high school in Iraq, graduating in 2003. He has never been married and has no children. He worked for federal contractors supporting U.S. military personnel in different Middle East countries from 2005 to September 2009. He did not serve in the Iraqi army. Applicant's eight letters of reference, provided by U.S. military personnel (a sergeant, a sergeant first class, three captains (company commanders), one lieutenant, one lieutenant colonel, and a colonel) most of whom served with Applicant under dangerous conditions, establish that he earned the trust and confidence of the U.S. military personnel.

Applicant is considered to have served courageously, often times placing himself in danger to accomplish the mission and to help U.S. interests. He “constantly faced danger,” and on numerous occasions came under enemy fire while working with U.S. special forces teams. He demonstrated exceptional skills and ability as an interpreter and proved to be extremely valuable to the U.S. forces. He was lauded for his integrity, trustworthiness, dedication to duty, and for being a team player. (Applicant’s reference letters are included in his Answer to the FORM.)

In light of Applicant’s performance, a U.S. Army colonel recommended him for a special immigration visa. The visa was granted and Applicant immigrated to the United States in September 2009. He became a naturalized U.S. citizen in May 2015, and the colonel attended his naturalization ceremony. Applicant was unemployed between September 2009 and March 2010. He worked as a shipping clerk between March 2010 and April 2012, and as a driver between April 2012 and September 2016. Applicant stated in his June 2018 answer to the FORM that he was currently working for a federal contractor and recently deployed to the Middle East in support of U.S. special operations.

Applicant’s mother is 50 years old, and she has been a homemaker all her life. She is a citizen and resident of Iraq. As of 2016, he was having weekly telephonic contact with his mother. Applicant denied owning any property or financial interests in Iraq. He has been sending about \$200 a month to his mother since about 2010. His father was killed as a result of sectarian violence. Applicant’s five siblings are citizens and residents of Iraq. His two sisters, ages 30 and 21, are homemakers. He had weekly telephonic contact with his sisters. He has two brothers, ages 27 and 26, that are soldiers in the Iraqi army. His 14-year-old brother is a student living with his mother. As of 2016, he was having monthly telephonic contact with his brothers.

Applicant’s two brothers-in-law, ages 32 and 31, and his sister-in-law (24), are resident-citizens of Iraq. One of the brothers-in-law (32) is in the Iraqi army. The second brother-in-law (31) owns a store. When completing his 2016 SCA, Applicant estimated his telephonic contact with both to be quarterly. His sister-in-law is a homemaker. He had monthly telephonic contact with her.

Applicant was issued an Iraqi passport before he immigrated to the United States. The Iraqi passport expired and he surrendered it to his facility security officer for safekeeping and to avoid any security clearance concerns. He only used his Iraqi passport to travel to the United States. Applicant stated that he renounced his Iraqi citizenship on October 25, 2016.

Applicant has not travelled to Iraq for personal reasons after 2009. He claimed he no longer has contact with any of his Iraqi friends. Applicant stated that after he became aware of the security concerns raised by him having frequent contact with family in Iraq, he stopped communicating with most of his family members, except for his mother, with whom he continues to have frequent contact. Applicant stated that neither his mother nor any of his other family members are aware of the work he does for his employers.

He does not discuss his work with his mother or anyone else. He understands that doing so may be detrimental to the security of the United States.

Applicant does not intend to return to live in Iraq. He is happy to be living in the United States and wants to build a future here. He considers himself to be a U.S. citizen first and his loyalty is to the United States. He promised he would resolve any possible conflict of interest in favor of the United States. He highlighted his prior service for the United States and noted that he has always put the protection of any information entrusted to him first as he understands that there are lives at stake as well as damage to U.S. interests if the information is released.

I take administrative notice of the following facts concerning Iraq. The U.S. mission in Iraq remains dedicated to building a strategic partnership with Iraq and the Iraqi people. The December 2011 departure of U.S. troops from Iraq marked a milestone in our relationship as Iraq continues to develop as a sovereign, stable, and self-reliant country. Iraq is now a key partner for the United States in the region as well as a voice of moderation and democracy in the Middle East. Iraq has functioning government institutions including an active legislature, is playing an increasingly constructive role in the region, and has a bright economic future as oil revenues surpass pre-Saddam production levels with continued rapid growth to come. The United States maintains vigorous and broad engagement with Iraq on diplomatic, political, economic, and security issues in accordance with the U.S.-Iraq Strategic Framework Agreement (SFA).

The SFA between Iraq and the United States provides the basis for the U.S.-Iraq bilateral relationship. It covers the range of bilateral issues including political relations and diplomacy, defense and security, trade and finance, energy, judicial and law enforcement issues, services, science, culture, education, and environment. Efforts to implement the SFA are overseen by the Higher Coordinating Committee and several Joint Coordination Committees, which meet periodically.

The U.S. State Department warns that U.S. citizens in Iraq are at high risk for violence and kidnapping and advises U.S. citizens not to travel to Iraq. The current travel advisory level is Level 4: Do not travel.

The ability of the U.S. Embassy to provide consular services to U.S. citizens outside Baghdad is limited given the security environment. Anti-U.S. sectarian militias may threaten U.S. citizens and western companies throughout Iraq. Kidnappings and attacks by improvised explosive devices (IED) occur in many areas of the country, including Baghdad. Such attacks may take place in public venues such as cafes and markets.

Iraq witnessed continued terrorist activity in 2016, primarily as a result of the actions of Islamic State of Iraq and Syria (ISIL). In 2016, ISIL remained the greatest terrorist threat globally, maintaining a formidable force in Syria, including a large number of foreign terrorist fighters. ISIL's capacity and territorial control in Iraq has dramatically

eroded in the past two years. According to estimates from the UN Assistance Mission for Iraq, acts of terrorism and violence killed more than 7,000 civilians and injured more than 12,000 in 2016. By the end of 2017, Iraqi Security Forces had liberated all territory from ISIL, drastically reducing ISIL's ability to commit abuses and atrocities.

In its annual human rights report, the U.S. Department of State reported that severe human rights problems were widespread. Sectarian hostility, widespread corruption, and lack of transparency at all levels of government and society weakened the government's authority and worsened effective human rights protections. Iraqi Security Forces, members of the Federal Police, and the Peshmerga committed some human rights violations, and there continued to be reports of Popular Mobilization Forces killing, torturing, kidnapping, and extorting civilians. ISIL committed the overwhelming majority of serious human rights abuses, including attacks against: civilians, (particularly Shia but also Sunnis who opposed ISIL); members of other religious and ethnic minorities; women; and children.

Other significant human rights-related problems include: harsh and life-threatening conditions in detention and prison facilities; arbitrary arrest and lengthy pretrial detention, denial of fair public trial; insufficient judicial institutional capacity; ineffective implementation of civil judicial procedures and remedies; arbitrary interference with privacy and homes; child soldiers; limits on freedom of expression, including press freedoms; violence against and harassment of journalists; undue censorship; social, religious, and political restrictions in academic and cultural matters; limits on freedoms of peaceful assembly and association; limits on religious freedom due to violence by extremist groups; restrictions on freedom of movement; refugee and internally displaced persons (IDP) abuse; both forced IDP returns and preventing IDPs from returning home; discrimination against and societal abuse of women and ethnic, religious, and racial minorities, including exclusion from decision-making roles; trafficking in persons; societal discrimination and violence against lesbian, gay, bisexual, transgender, and intersex (LGBTI) persons; seizure of property without due process; and limitations on worker rights.

The facts gathered for this administrative notice section about Iraq are from the U.S. Department of State website, "U.S. Relations With Iraq," Bureau of Near Eastern Affairs (Jul. 31, 2018); "Iraq 2017 Human Rights Report," U.S. Department of State, Bureau of Democracy, Human Rights and Labor; and "Iraq Travel Advisory," (Oct. 18, 2018). <https://www.state.gov/r/pa/ei/bgn/6804.htm>

Regarding the SOR financial allegations, Applicant submitted documentary evidence showing that he paid off all the accounts: SOR ¶¶ 2.a and 2.f alleged the same account and it was paid on February 26, 2018; SOR ¶¶ 2.b and 2.c alleged the same account and it was paid on August 10, 2017; SOR ¶ 2.d was paid on June 13, 2018; SOR ¶ 2.e was paid on September 25, 2017; SOR ¶ 2.g was paid on February 26, 2018; and SOR ¶ 2.h was paid on June 11, 2018.

Applicant explained that as a new American assimilating from a different culture, the concept of credit was unfamiliar and a completely new experience for him. Because of his lack of understanding and his own mistakes, he accumulated the debts and his accounts became delinquent. To resolve his financial problems, Applicant sought a financial advisor who assisted him to establish a budget and pay all of the debts. Currently, he is debt free. Applicant believes that he is now financially responsible and able to meet future financial obligations. As a result of the clearance process, Applicant is now aware that to be eligible for a clearance, he has to demonstrate and maintain his financial responsibility.

Policies

The SOR was issued under Executive Order (Exec. Or.) 10865, *Safeguarding Classified Information Within Industry* (February 20, 1960), as amended; DOD Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (Directive) (January 2, 1992), as amended; and the *Adjudicative Guidelines for Determining Eligibility for Access to Classified Information* (AG), implemented by the DOD on September 1, 2006.

While the case was pending a decision, the Director of National Intelligence implemented Security Executive Agent Directive (SEAD) 4, *National Security Adjudicative Guidelines* (AG), effective June 8, 2017, which replaced the 2006 AG. I decided this case under the current AGs implemented by SEAD 4.

Eligibility for access to classified information may be granted “only upon a finding that it is clearly consistent with the national interest to do so.” Exec. Or. 10865, § 2. The U.S. Supreme Court has recognized the substantial discretion of the Executive Branch in regulating access to information pertaining to national security, emphasizing that “no one has a ‘right’ to a security clearance.” *Department of the Navy v. Egan*, 484 U.S. 518, 528 (1988).

The AG list disqualifying and mitigating conditions for evaluating a person’s suitability for access to classified information. Any one disqualifying or mitigating condition is not, by itself, conclusive. However, the AG should be followed where a case can be measured against them, as they represent policy guidance governing access to classified information. Each decision must reflect a fair, impartial, and commonsense consideration of the whole person and the factors listed in SEAD 4, App. A ¶¶ 2(d) and 2(f). All available, reliable information about the person, past and present, favorable and unfavorable, must be considered.

Security clearance decisions resolve whether it is clearly consistent with the national interest to grant or continue an applicant’s security clearance. The Government must prove, by substantial evidence, controverted facts alleged in the SOR. If it does, the burden shifts to the applicant to rebut, explain, extenuate, or mitigate the facts. The applicant bears the heavy burden of demonstrating that it is clearly consistent with the national interest to grant or continue his or her security clearance.

Persons with access to classified information enter into a fiduciary relationship with the Government based on trust and confidence. Thus, the Government has a compelling interest in ensuring each applicant possesses the requisite judgment, reliability, and trustworthiness of those who must protect national interest as their own. The “clearly consistent with the national interest” standard compels resolution of any reasonable doubt about an applicant’s suitability for access in favor of the Government. “[S]ecurity clearance determinations should err, if they must, on the side of denials.” *Egan*, 484 U.S. at 531; SEAD 4, ¶ E(4); SEAD 4, App. A, ¶¶ 1(d) and 2(b). Clearance decisions are not a determination of the loyalty of the applicant concerned. They are merely an indication that the applicant has or has not met the strict guidelines the Government has established for issuing a clearance.

Analysis

Guideline B, Foreign Influence

The foreign influence security concern is explained at AG ¶ 6:

Foreign contacts and interests, including, but not limited to, business, financial, and property interests, are a national security concern if they result in divided allegiance. They may also be a national security concern if they create circumstances in which the individual may be manipulated or induced to help a foreign person, group, organization, or government in a way inconsistent with U.S. interests or otherwise made vulnerable to pressure or coercion by any foreign interest. Assessment of foreign contacts and interests should consider the country in which the foreign contact or interest is located, including, but not limited to, considerations such as whether it is known to target U.S. citizens to obtain classified or sensitive information or is associated with a risk of terrorism.¹

An individual is not automatically disqualified from holding a security clearance because they have connections and contacts in a foreign country. Instead, in assessing an individual’s potential vulnerability to foreign influence, an administrative judge must take into account the foreign government involved; the intelligence-gathering history of that government; the country’s human rights record; and other pertinent factors.²

The United States and Iraq are allies in the war against ISIL and other terrorists and insurgents. However, the serious security threat posed by these terrorists and other elements hostile to the United States must be taken into account in assessing the security concerns raised by Applicant’s familial connections in Iraq. Applicant’s

¹ ISCR Case No. 09-07565 at 3 (App. Bd. Jul. 12, 2012) (“As the Supreme Court stated in *Egan*, a clearance adjudication may be based not only upon conduct but also upon circumstances unrelated to conduct, such as the foreign residence of an applicant’s close relatives.”) (internal citation omitted).

² ISCR Case No. 05-03250 at 4 (App. Bd. Apr. 6, 2007) (setting forth factors an administrative judge must consider in foreign influence cases).

relationship to these foreign relatives, coupled with the facts administratively noticed, raise a heightened security concern.

In assessing the security concern raised by Applicant's foreign contacts and interests, I have considered the following disqualifying conditions under AG ¶ 7, and mitigating conditions under AG ¶ 8:

AG ¶ 7(a): contact, regardless of method, 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): connections to a foreign person, group, government, or country that create a potential conflict of interest between the individual's obligation to protect classified or sensitive information or technology and the individual's desire to help a foreign person, group, or country by providing that information or technology;

AG ¶ 8(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

AG ¶ 8(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.

An individual with family members and other connections in a foreign country faces a high, but not insurmountable hurdle in mitigating security concerns raised by such foreign ties. An applicant is not required "to sever all ties with a foreign country before he or she can be granted access to classified information."³ However, what factor or combination of factors will mitigate security concerns raised by an applicant with family members in a foreign country is not easily identifiable or quantifiable.⁴

In the present case, Applicant's mother, five siblings, and his in-laws, are citizens and residents of Iraq. They have financial and property interests in Iraq, and have chosen to remain in Iraq with the rest of their families. Applicant used to maintain

³ ISCR Case No. 07-13739 at 4 (App. Bd. Nov. 12, 2008).

⁴ ISCR Case No. 11-12202 at 5 (App. Bd. Jun. 23, 2014).

frequent contact and communication with most of his relatives in Iraq. Because of the clearance process, he has learned of the possible security concerns raised by his communication with relatives in Iraq. After 2016, Applicant chose to limit his contact and communication to only his mother. Applicant is aware of the threat and possible harm to him or his family if the wrong people find out about his job with U.S. forces. Notwithstanding, he has continued to serve the U.S. forces on other missions and would like to continue working for U.S. forces in the future.

Applicant's statement that he would report any attempted coercion or threats, and that he would resolve any potential conflict in favor of the United States, is supported by his track record. His undivided allegiance to the United States is corroborated by his dependability and performance while under enemy fire and possible harm for working with U.S. personnel. U.S. personnel who served with him in Iraq endorsed his eligibility for a U.S. visa.⁵ Additionally, Applicant has developed deep and long-lasting bonds in the United States, as evidenced by some of his references attending his naturalization ceremony, and Applicant's desire to continue working for U.S. personnel in Iraq.

Applicant's past behavior demonstrates his ability to resolve any potential conflict of interest in favor of the United States even under threats and facing possible harm. Accordingly, after a complete and thorough review of the record evidence, and while remaining mindful of my duty to resolve any unmitigated doubt in favor of protecting national security, I find that Applicant mitigated the security concerns raised by his connections to and contact with his family in Iraq.

Financial Considerations

AG ¶ 18 articulates the security concern relating to financial problems:

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

⁵ ISCR Case No. 07-00034 at 2 (App. Bd. Feb. 5, 2008) ("Generally, an Applicant's statements, by themselves, as to what he would do in the face of threats by a foreign government or entity are entitled to little weight. On the other hand, an applicant's proven record of action in defense of the U.S. is very important and can lead to a favorable result for an applicant in a Guideline B case. In this case, Applicant has served the U.S. military as a translator in dangerous circumstances in Afghanistan and has risked his life to protect American personnel there.) See also ISCR Case No. 05-03846 at 6 (App. Bd. Nov. 14, 2006) ("As a general rule, Judges are not required to assign an applicant's prior history of complying with security procedures and regulations significant probative value for purposes of refuting, mitigating, or extenuating the security concerns raised by the applicant's more immediate disqualifying conduct or circumstances. However, the Board has recognized an exception to that general rule in Guideline B cases, where the applicant has established by credible, independent evidence that his compliance with security procedures and regulations occurred in the context of dangerous, high-risk circumstances in which the applicant had made a significant contribution to the national security. The presence of such circumstances can give credibility to an applicant's assertion that he can be relied upon to recognize, resist, and report a foreign power's attempts at coercion or exploitation.") (internal citations omitted).

questions about an individual's reliability, trustworthiness, and ability to protect classified information. Financial distress can also be caused or exacerbated by, and thus can be a possible indicator of, other issues of personnel security concern such as excessive gambling, mental health conditions, substance misuse, or alcohol abuse or dependence. An individual who is financially overextended is at greater risk of having to engage in illegal or otherwise questionable acts to generate funds.

Applicant's financial problems are documented in the record. Between 2009 and 2017, he accumulated six consumer accounts that he was unable to repay and became delinquent, were charged off, or placed in collection. AG ¶ 19 provides two disqualifying conditions that could raise a security concern and may be disqualifying in this case: "(a) inability to satisfy debts"; and "(c) a history of not meeting financial obligations." The record established the disqualifying conditions, requiring additional inquiry about the possible applicability of mitigating conditions.

Three mitigating conditions under AG ¶ 20 are potentially applicable:

(a) the behavior happened so long ago, was so infrequent, or occurred under such circumstances that it is unlikely to recur and does not cast doubt on the individual's current reliability, trustworthiness, or good judgment;

(c) the person has received or is receiving counseling for the problem from a legitimate and credible source, such as a non-profit credit counseling service, and there are clear indications that the problem is being resolved or is under control; and

(d) the individual initiated and is adhering to a good-faith effort to repay overdue creditors or otherwise resolve debts.

The Appeal Board concisely explained Applicant's responsibility for proving the applicability of mitigating conditions as follows:

Once a concern arises regarding an Applicant's security clearance eligibility, there is a strong presumption against the grant or maintenance of a security clearance. See *Dorfmont v. Brown*, 913 F. 2d 1399, 1401 (9th Cir. 1990), *cert. denied*, 499 U.S. 905 (1991). After the Government presents evidence raising security concerns, the burden shifts to the applicant to rebut or mitigate those concerns. See Directive ¶ E3.1.15. The standard applicable in security clearance decisions is that articulated in *Egan, supra*. "Any doubt concerning personnel being considered for access to classified information will be resolved in favor of the national security." Directive, Enclosure 2 ¶ 2(b).

ISCR Case No. 10-04641 at 4 (App. Bd. Sept. 24, 2013).

Applicant paid off all of his delinquent accounts. His financial problems are resolved. Applicant explained that as a new American assimilating from a different culture, the concept of credit was unfamiliar and a completely new experience for him. Because of his lack of understanding and his own mistakes, he accumulated the debts and his accounts became delinquent. To resolve his financial problems, Applicant sought a financial advisor who assisted him to establish a budget and pay all of the debts. Currently, he is debt free. Applicant is now financially responsible and able to meet future financial obligations. Applicant is aware that to be eligible for a clearance, he has to demonstrate and maintain his financial responsibility.

Considering the evidence as a whole, I find that Applicant's financial problems occurred under circumstances unlikely to recur. He has learned his lesson. He acted responsibly under the circumstances by paying his delinquent debts. There is no evidence of any financial problems or additional delinquent accounts. His current financial situation is stable and he promised to continue to live within his financial means and to pay all of his debts. There are clear indications that his financial problems are resolved.

Whole-Person Concept

I considered the potentially disqualifying and mitigating conditions in light of all the facts and circumstances surrounding this case, and under the whole-person concept. (SEAD 4, App. A, ¶¶ 2(a)) I also considered the nine adjudicative process factors listed at SEAD 4, App. A, AG ¶ 2(d). I have incorporated my comments under Guidelines B and F in my whole-person analysis. Some of these factors were addressed under that guideline, but some warrant additional comment.

Applicant is a 32-year-old linguist employed with a federal contractor. He worked for federal contractors and with U.S. personnel in Iraq between 2005 and 2009. He established an excellent reputation for his knowledge, cultural expertise, and linguistic abilities. He is considered to have good skills and abilities as an interpreter. Moreover, Applicant is considered to be a trusted employee, who is reliable, dependable, and a loyal American. Most importantly, he assisted U.S. forces on numerous occasions where he risked his life to help U.S. personnel accomplish their missions. (See footnote 5, *supra*.)

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.g:	For Applicant

Paragraph 2, Guideline F:

FOR APPLICANT

Subparagraphs 2.a - 2.h:

For Applicant

Conclusion

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

JUAN J. RIVERA
Administrative Judge