



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



In the matter of:)	
)	
)	ISCR Case No. 24-01270
)	
Applicant for Security Clearance)	

Appearances

For Government: George Hawkins, Esq., Department Counsel
For Applicant: Samir Nakhleh, Esq.

09/26/2025

Decision

FOREMAN, LeRoy F., Administrative Judge:

This case involves security concerns raised under Guidelines G (Alcohol Consumption) and J (Criminal Conduct). Clearance is granted.

Statement of the Case

Applicant submitted a security clearance application (SCA) on May 11, 2022. On September 27, 2024, the Defense Counterintelligence and Security Agency (DCSA) sent him a Statement of Reasons (SOR) alleging security concerns under Guidelines G and J. The DCSA acted under Executive Order (Exec. Or.) 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; Department of Defense (DOD) Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the adjudicative guidelines (AG) promulgated in Security Executive Agent Directive 4, *National Security Adjudicative Guidelines* (December 10, 2016), which became effective on June 8, 2017.

Applicant answered the SOR on November 22, 2024, and requested a hearing before an administrative judge. Department Counsel was ready to proceed on February 4, 2025. The case was assigned to me on June 26, 2025. On July 2, 2025, the Defense Office of Hearings and Appeals (DOHA) notified Applicant that the hearing was scheduled to be conducted by video teleconference on August 18, 2025.

I convened the hearing as scheduled. Government Exhibits (GX) 1 through 13 were admitted in evidence without objection. Department Counsel requested that I take administrative notice of the facts set out in the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition (DSM-5), the Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition, Text Revision (DSM-5-TR), and a fact sheet from the National Institute on Alcohol Abuse and Alcoholism on alcohol use disorder (AUD). The excerpts from those publications are attached to the record as GX 14, 15, and 16. I took administrative notice as requested. Applicant testified and submitted Applicant's Exhibits (AX) A through Q, which were admitted without objection. The record closed upon adjournment of the hearing. DOHA received the transcript on August 29, 2025.

Findings of Fact

In Applicant's answer to the SOR, he admitted the allegations in SOR ¶¶ 1.a, 1.b, and 1.d through 1.h. He admitted SOR ¶ 1.i "with clarification." He denied SOR ¶¶ 1.c and 1.j. His admissions are incorporated in my findings of fact.

Applicant is a 41-year-old business process consultant employed by a defense contractor since March 2020. He was previously employed by defense contractors from February 2013 until he began his current employment. He married in October 2014 and has three children, ages nine, eight, and six.

Applicant graduated from high school in 2002 and began attending college in the fall of that year. He interrupted his college education when he enlisted in the Army National Guard (ARNG) and completed his basic training. He was deployed to Afghanistan from September 2004 to August 2005 and was awarded the Combat Infantry Badge and several other awards and campaign medals. (AX K) He continued to serve in the Army National Guard until August 2016, and he received honorable discharges for each period of service. (AX G) He resumed his college education in 2008 and received a bachelor's degree in January 2011 and a master's degree in December 2017. He received a conditional clearance in June 2010.

The evidence submitted in support of the allegations in the SOR is summarized below.

SOR ¶ 1.a: underage possession of alcohol in August 2001. Applicant disclosed this incident in his SCA and during the psychological evaluation requested by DCSA. He and a group of friends decided to drive to a beach in the middle of the night to socialize and go surfing in the morning. A police officer searched Applicant's vehicle and found a six-pack of beer. Applicant was charged with underage possession because he

was the owner of the vehicle. There is no evidence of a court disposition or any punishment in the record.

SOR ¶ 1.b: underage possession of alcohol in February 2003. Applicant disclosed this incident in his SCA. He was in his dormitory room drinking alcoholic beverages with friends. Their conversations were loud enough for a resident university official to knock on their door. The university official observed them and charged everyone in the room with underage possession of alcohol. (Tr. 27) In June 2003, a *nolle prosequi* was entered for this offense. (AX E)

SOR ¶ 1.c: underage possession of alcohol in June 2003. This is the same incident alleged in SOR ¶ 1.b.

SOR ¶ 1.d: driving after illegally consuming alcohol in December 2003. Applicant disclosed this incident in his SCA. A university campus police officer saw him drive across the center lane line after making a right turn. A blood alcohol content (BAC) test was below the legal limit, but because Applicant was underage, he was charged with driving after illegally consuming alcohol. He was convicted, fined \$500, and his driver's license was suspended for six months.

SOR ¶ 1.e: driving under the influence (DUI) in December 2008. Applicant was arrested and charged with DUI with a BAC greater than .20 after he decided to drive home after drinking with friends at a bar. (GX 8 at 11) He testified that he and his friends were drinking pitchers of beer and playing darts. (Tr. 30) He was convicted and fined \$300. His driver's license was suspended for one year, he was placed on probation for one year, and he was required to attend an alcohol safety action program (ASAP). His university placed him on disciplinary hold, which was satisfied and released in August 2009, and he was allowed to complete his education at the university. (GX 11)

SOR ¶ 1.f: drunk in public in May 2009. Applicant was walking to a friend's house after drinking with friends at a bar. A police officer observed him crossing the street at a point where there was no marked crosswalk. The police officer stopped him, apparently thinking that he was walking in the street, and administered a field sobriety test. He was charged with drunk in public. Because he was still on probation for the DUI in December 2008, he sought treatment and enrolled in the Wounded Warrior program. He completed the program, which consisted of three months of educational courses, group therapy sessions, and attendance at Alcoholics Anonymous (AA) meetings. The charge was then dismissed.

SOR ¶ 1.g: drunk in public in June 2010. After a long weekend involving an overnight drive and an all-day party, Applicant and a friend ordered some food and called a taxi. While waiting for the taxi, they both fell asleep on the sidewalk. Police officers awakened them and charged them with being drunk in public. The charge against Applicant was dismissed.

SOR ¶ 1.h: DUI in December 2019. Applicant was charged with DUI after being stopped by a police officer who observed the vehicle weaving in its lane and braking

several times for no apparent reason. A breathalyzer test registered a blood-alcohol content (BAC) of 0.17. He plead guilty to a misdemeanor with a BAC of 0.14. He was sentenced to 60 days in jail, suspended for 60 days, unsupervised probation for 12 months, and a \$600 fine, with \$300 suspended. His driver's license was restricted for 12 months. He was required to install an interlock device, attend a victim impact panel, and complete an ASAP. (GX 1 at 39; GX 8 at 9; GX 10; GX 13) Applicant testified that on this occasion, he had consumed six beers while watching the first half of a football game, and then drove to a friend's house to watch the second half, during which he consumed one more beer and two glasses of scotch whiskey. (Tr. 36-37)

SOR ¶ 1.i: psychological evaluation in January 2024, evaluation of alcohol use disorder, moderate, in sustained remission, but evaluator declined a favorable recommendation because of continued use of alcohol. In January 2024, Applicant was evaluated by a licensed psychologist at the request of DCSA. He was diagnosed with alcohol use disorder, moderate, in sustained remission. The psychologist noted that Applicant's insight was good, because he was able to reflect on his past and take accountability for his conduct. His impulse control was also intact. The psychologist's evaluation is unclear. His "impression" was that Applicant's self-report "does not indicate that he is experiencing any current issues or symptoms which would meet criteria for a use disorder." His diagnosis was "alcohol use disorder, moderate, in sustained remission." His prognosis states that Applicant "does not currently appear to meet criteria for an AUD." However, he expressed concern about Applicant's continued use of alcohol, which is a "constant risk factor" that could lead to future alcohol-related incidents. He concluded that, because of Applicant's continued use of alcohol, he could not give Applicant a favorable recommendation as of the time of the evaluation. (GX 7)

SOR ¶ 1.j: conditional clearance granted, with a warning that "subsequent unfavorable information may result in the suspension of your security clearance." Applicant received a conditional security clearance in June 2010. Because of his record of alcohol-related incidents and alcohol abuse, he was warned that "subsequent unfavorable information may result in the suspension of your security clearance." (GX 6) This allegation is established by the evidence. However, it fails to allege disqualifying conduct. A conditional clearance or a warning about future conduct are relevant facts in evaluating potentially disqualifying conduct, but they are not independent allegations of an applicant's disqualifying conduct. Thus, I have resolved SOR ¶ 1.j for Applicant

Acting on the advice of his lawyer, Applicant began treatment from a licensed clinical social worker (LCSW) in January 2020. The LCSW evaluated him in June 2020, after he completed 16 sessions of individual counseling and 16 sessions of group counseling, and she rated his attitude, involvement, and insight into alcohol use as excellent. She commented that he "made excellent progress in counseling and is solid in sobriety." (AX D) Applicant has not received any alcohol counseling since June 2020. (Tr 54)

When Applicant was interviewed by a security investigator in October 2020, he reported that he began drinking beer in high school, consuming beer once or twice a month. In college, he consumed alcohol every weekend. In 2004 and 2005, while serving

on active duty in the National Guard, he did not consume alcohol. In 2010, he was consuming more than one or two beers on one or two weekends a month. He did not consume alcohol while he was assigned overseas in 2011 and 2012. From 2012 to December 2019, he consumed alcohol one or two weekends per month. He told the investigator that he had been sober since December 2019. (GX 9 at 38-39)

At the hearing, Applicant testified that he abstained from alcohol after his arrest for DUI in December 2019. (Tr. 75) He continued his abstinence until April 2022. At that time, he and his family were on vacation and celebrating his birthday. He and his wife shared a bottle of wine. (Tr. 41) After this event, he began limited use of alcohol at social events, consuming one or two drinks one or two times a month. (Tr. 41-42)

When Applicant responded to DOHA interrogatories in August 2024, he reported that he was drinking one to three beers one or two times a month until August 10, 2024. He also reported that he was consuming one or two drinks of hard liquor "less than monthly," and that his last consumption of hard liquor was February 24, 2024. (Tr. 59; GX 9 at 7) In the same interrogatories, he reported that he attended Alcoholics Anonymous (AA) meetings as required by the Wounded Warrior Program from September 2010 to January 2011, but that he did not currently plan to participate in AA. (GX 9 at 11)

I have taken administrative notice that the National Institute on Alcohol Abuse and Alcoholism (NIAAA) defines "heavy alcohol use" as consuming more than four drinks on any day for men or more than three drinks for women. The NIAAA defines "binge drinking" as a pattern of drinking alcohol that brings the BAC to 0.08 percent, which, for a typical adult, corresponds to consuming five or more drinks (male) or four or more drinks (female) in about two hours. (GX 16)

I have also taken administrative notice of the DSM-TR discussion of alcohol use disorder, which defines the diagnostic criteria for alcohol abuse disorder as follows: "A problematic pattern of alcohol use leading to clinically significant impairment or distress, as manifested by at least two of [11 listed symptoms] occurring within a 12-month period." The psychologist diagnosed Applicant with alcohol use disorder, moderate, in sustained remission. "Moderate" is defined as the presence of four or five symptoms. "Sustained remission" is defined as "none of the criteria for alcohol use disorder have been met at any time during a period of 12 months or longer." (DSM-TR at 553-55)

I have also taken administrative notice of the following DSM-TR discussion of the development and course of alcohol use disorder:

Alcohol use disorder has a variable course that is characterized by periods of remission and relapse. A decision to stop drinking, often in response to a crisis, is likely to be followed by a period of weeks or more of abstinence, which is often followed by limited periods of controlled or nonproblematic drinking. However, once alcohol intake resumes, it is highly likely that consumption will rapidly escalate and that severe problems will once again develop.

Alcohol use disorder is often erroneously perceived as an intractable condition, perhaps based on the fact that individuals who present for treatment typically have a history of many years of severe alcohol-related problems. However, these most severe cases represent only a small proportion of individuals with this disorder, and the typical individual with the disorder has a much more promising prognosis.

(DSM-TR at 557-58)

In November 2024, Applicant executed a statement of intent, declaring that he will never abuse alcohol while holding a security clearance, that he will not consume alcohol in the future, and acknowledging that any future involvement in drinking alcohol will be grounds for revocation of his national security eligibility. (AX A) At the hearing, he submitted the results of a phosphatidyl ethanol (PeTH) alcohol screen for a sample collected on July 31, 2025, which was negative, indicating the absence of alcohol consumption for the two to four preceding weeks. (AX P)

A member of the committee that hired Applicant for his current position submitted a letter attesting to his academic knowledge, open mindedness, and personal character. (AX M) A colleague who retired after 38 years of civilian service and is now employed by a defense contractor also submitted a letter attesting to his integrity, honesty, trustworthiness, and acceptance of responsibility for his previous conduct. (AX N) Applicant's performance appraisal for the calendar year 2024 rated him as 4.45 on a five-point scale. A rating of 4 is "very good" and 5 is "exceptional." (AX Q)

Policies

"[N]o 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 applicants 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 § 2.

Eligibility for a security clearance is predicated upon the applicant meeting the criteria contained in the adjudicative guidelines. These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, an administrative judge applies these guidelines in conjunction with an evaluation of the whole person. An administrative judge's overarching adjudicative goal is a fair, impartial, and commonsense decision. An administrative judge must consider all available and reliable information about the person, past and present, favorable and unfavorable.

The Government reposes a high degree of trust and confidence in persons with access to classified information. This relationship transcends normal duty hours and endures throughout off-duty hours. Decisions include, by necessity, consideration of the possible risk that the applicant may deliberately or inadvertently fail to safeguard

classified information. Such decisions entail a certain degree of legally permissible extrapolation about potential, rather than actual, risk of compromise of classified information.

Clearance decisions must be made “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” Exec. Or. 10865 § 7. Thus, a decision to deny a security clearance is merely an indication the applicant has not met the strict guidelines the President and the Secretary of Defense have established for issuing a clearance.

Initially, the Government must establish, by substantial evidence, conditions in the personal or professional history of the applicant that may disqualify the applicant from being eligible for access to classified information. The Government has the burden of establishing controverted facts alleged in the SOR. See *Egan* at 531. Substantial evidence is “such relevant evidence as a reasonable mind might accept as adequate to support a conclusion in light of all the contrary evidence in the same record.” See ISCR Case No. 17-04166 at 3 (App. Bd. Mar. 21, 2019). It is “less than the weight of the evidence, and the possibility of drawing two inconsistent conclusions from the evidence does not prevent [a Judge’s] finding from being supported by substantial evidence.” *Consolo v. Federal Maritime Comm’n*, 383 U.S. 607, 620 (1966). “Substantial evidence” is “more than a scintilla but less than a preponderance.” See *v. Washington Metro. Area Transit Auth.*, 36 F.3d 375, 380 (4th Cir. 1994). The guidelines presume a nexus or rational connection between proven conduct under any of the criteria listed therein and an applicant’s security suitability. ISCR Case No. 15-01253 at 3 (App. Bd. Apr. 20, 2016).

Once the Government establishes a disqualifying condition by substantial evidence, the burden shifts to the applicant to rebut, explain, extenuate, or mitigate the facts. Directive ¶ E3.1.15. An applicant has the burden of proving a mitigating condition, and the burden of disproving it never shifts to the Government. See ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005).

An applicant “has the ultimate burden of demonstrating that it is clearly consistent with the national interest to grant or continue his security clearance.” ISCR Case No. 01-20700 at 3 (App. Bd. Dec. 19, 2002). “[S]ecurity clearance determinations should err, if they must, on the side of denials.” *Egan* at 531.

Analysis

Guideline G, Alcohol Consumption

The concern under this guideline is set out in AG ¶ 21: “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.”

The following disqualifying conditions under this guideline are potentially relevant:

AG ¶ 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 the frequency of the individual's alcohol use or whether the individual has been diagnosed with alcohol use disorder;

AG ¶ 22(c): habitual or binge consumption of alcohol to the point of impaired judgment, regardless of whether the individual is diagnosed with alcohol use disorder;

AG ¶ 22(d): diagnosis by a duly qualified medical or mental health professional (e.g., physician, clinical psychologist, psychiatrist, or licensed clinical social worker) of alcohol use disorder;

AG ¶ 22(e): the failure to follow treatment advice once diagnosed;

AG ¶ 22(f): alcohol consumption, which is not in accordance with treatment recommendations, after a diagnosis of alcohol use disorder; and

AG ¶ 22(g): failure to follow any court order regarding alcohol education, evaluation, treatment, or abstinence.

AG ¶ 22(a) is established by Applicant's two DUI convictions and two occasions of being charged with being drunk in public.

AG ¶ 22(c) is established. Applicant's alcohol consumption in December 2008 (SOR ¶ 1.e), June 2010 (SOR ¶ 1.g), and December 2019 (SOR ¶ 1.h) qualifies as binge drinking for each occasion.

AG ¶ 22(d) is established. The psychologist who diagnosed Applicant in response to a DCSA request diagnosed him with an alcohol abuse disorder.

AG ¶¶ 22(e), 22(e), 22(f), and 22(g) are not established. There is no evidence that any medical professional gave Applicant any advice or treatment recommendations. Applicant was court-ordered to complete ASAP, and he complied with that order.

The following mitigating conditions are potentially applicable:

AG ¶ 23(a): 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 judgment;

AG ¶ 23(b): the individual acknowledges his or her pattern of maladaptive alcohol use, provides evidence of actions taken to overcome this problem, and has demonstrated a clear and established pattern of modified consumption or abstinence in accordance with treatment recommendations;

AG ¶ 23(c): the individual is participating in counseling or a treatment program, has no previous history of treatment and relapse, and is making satisfactory progress in a treatment program; and

AG ¶ 23(d): the individual has successfully completed a treatment program along with any required aftercare and has demonstrated a clear and established pattern of modified consumption or abstinence in accordance with treatment recommendations.

The first prong of AG ¶ 23(a) (“so much time has passed”) focuses on whether the conduct was recent. There are no bright line rules for determining when conduct is recent. The determination must be based on a careful evaluation of the totality of the evidence. If the evidence shows a significant period of time has passed without any evidence of misconduct, then an administrative judge must determine whether that period of time demonstrates changed circumstances or conduct sufficient to warrant a finding of reform or rehabilitation. ISCR Case No. 02-24452 at 6 (App. Bd. Aug. 4, 2004).

Applicant’s last alcohol-related incident was in December 2019, more than five years ago, which is “a significant period of time.” After that incident, he abstained from alcohol until April 2022, when he and his wife shared a bottle of wine while on vacation. Afterwards, he consumed one or two drinks of liquor “less than monthly,” and he drank one to three beers one or two times a month. In February 2024, he was evaluated at DCSA’s request and diagnosed with alcohol use disorder, moderate, in sustained remission. However, the psychologist concluded that he could not give Applicant a favorable recommendation because of his continued use of alcohol.

In November 2024, after Applicant was made aware that his security clearance was in jeopardy, he executed a statement of intent acknowledging that any future involvement in drinking alcohol would be grounds for revocation of his national security eligibility. As of the date of the hearing in August 2025, he had not consumed alcohol since executing the statement.

Applicant’s history of alcohol abuse reflects a long series of social incidents involving alcohol and bad judgment, but it does not necessarily constitute the “intractable condition” referred to in DSM-TR. To the contrary, he has demonstrated that he is able to control his alcohol use. He refrained from alcohol use during his military training in 2004 and 2005 and during overseas military duty in 2011 and 2012. His last incident of alcohol abuse and last alcohol-related offense was in December 2019, almost six years ago. He abstained from alcohol from December 2019 to April 2022. He drank in moderation from April 2022 until November 2024, without any alcohol-related incidents. Recognizing that his continued alcohol use was the basis for the concern raised during his psychological evaluation and a potential impediment to maintaining his security clearance, he stopped drinking in November 2024 and submitted his letter of intent to refrain from further alcohol consumption. Based on the evidence and the relevant portions of DSM-TR regarding abstention and relapse, I am convinced that he likely will refrain from further alcohol

abuse. I find that AG ¶ 23(a) is established, and I conclude that Applicant's alcohol abuse is mitigated by the passage of time without recurrence.

AG ¶¶ 23(b), 23(c), and 23(d) are not established. Applicant's completion of ASAP in 2009, treatment in June 2020, and treatment in January 2024 did not include any recommendations for modified consumption or abstinence.

Guideline J, Criminal Conduct

The conduct alleged under Guideline G is cross-alleged under this guideline. The concern under this guideline is set out in AG ¶ 30: "Criminal activity creates doubt about a person's judgment, reliability, and trustworthiness. By its very nature, it calls into question a person's ability or willingness to comply with laws, rules, and regulations."

The following disqualifying conditions under this guideline are relevant:

AG ¶ 31(a): a pattern of minor offenses, any one of which on its own would be unlikely to affect a national security eligibility decision, but which in combination cast doubt on the individual's judgment, reliability, or trustworthiness; and

AG ¶ 31(b): evidence (including, but not limited to, a credible allegation, an admission, and matters of official record) of criminal conduct, regardless of whether the individual was formally charged, prosecuted, or convicted.

Based on Applicant's record of seven alcohol-related charges and citations between 2001 and 2010 and his DUI in 2019, both disqualifying conditions are established.

The following mitigating conditions are potentially relevant:

AG ¶ 32(a): so much time has elapsed since the criminal behavior happened, or it happened under such unusual circumstances, that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment; and

AG ¶ 32(d): there is evidence of successful rehabilitation; including, but not limited to, the passage of time without recurrence of criminal activity, restitution, compliance with the terms of parole or probation, job training or higher education, good employment record, or constructive community involvement.

Both mitigating conditions are established, for the reasons set out in the above discussion of Guideline G.

Whole-Person Analysis

Under AG ¶ 2(c), the ultimate determination of whether to grant a security clearance must be an overall commonsense judgment based upon careful consideration of the guidelines and the whole-person concept. An administrative judge must evaluate an applicant's security eligibility by considering the totality of the applicant's conduct and all the relevant circumstances. An administrative judge should consider the nine adjudicative process factors listed at AG ¶ 2(d):

(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.

Security clearance adjudications are not intended to be punitive. An unfavorable security clearance decision should not be based on a notion that Applicant should be punished for his past misconduct. ISCR Case No. 03-24233 (App. Bd. Oct. 12, 2005).

I have incorporated my comments under Guidelines G and J in my whole-person analysis and applied the adjudicative factors in AG ¶ 2(d). Applicant was candid, sincere, remorseful, and credible at the hearing. He has not had an alcohol-related incident or offense in almost six years. His alcohol use disorder was in sustained remission in January 2024, and there is no evidence of problematic drinking since then. He has an established history of several years of abstinence or drinking in moderation. This evidence mitigates the risk of future relapse and recurrence. After weighing the disqualifying and mitigating conditions under these guidelines and evaluating all the evidence in the context of the whole person, I conclude Applicant has mitigated the security concerns raised by his alcohol use and criminal conduct.

Formal Findings

I make the following formal findings on the allegations in the SOR:

Paragraph 1, Guideline G (Alcohol Consumption): FOR APPLICANT

Subparagraphs 1.a-1.j: For Applicant

Paragraph 2, Guideline J (Criminal Conduct): FOR APPLICANT

Subparagraph 2.a: For Applicant

Conclusion

I conclude that it is clearly consistent with the national security interests of the United States to grant Applicant eligibility for access to classified information. Clearance is granted.

LeRoy F. Foreman
Administrative Judge