



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



Appearances

For Government: John Renahan, Esq., Department Counsel
For Applicant: *Pro se*

08/18/2025

Decision

LOKEY ANDERSON, Darlene D., Administrative Judge:

Statement of Case

On June 24, 2024, the Department of Defense (DOD) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guideline F, Financial Considerations. The action was taken under Executive Order (EO) 10865, *Safeguarding Classified Information within Industry* (February 20, 1960), as amended; Department of Defense Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (January 2, 1992), as amended (Directive); and the adjudicative guidelines (AG) effective for cases after June 8, 2017.

Applicant answered the SOR on a date uncertain and requested a hearing before an administrative judge. The case was assigned to me on May 5, 2025. The Defense Office of Hearings and Appeals (DOHA) issued a notice of hearing on May 8, 2025, and

the hearing was convened as scheduled on June 30, 2025. The Government offered eleven exhibits, which were marked as Government Exhibits 1 through 11, and admitted without objection. Applicant testified on his own behalf, and offered one exhibit, which was marked as Applicant's Exhibit A, and admitted without objection. The record initially remained open until July 7, 2025, to allow the Applicant to submit additional supporting documentation. However, due to some confusion, Applicant was given additional time to submit his supporting documentation. Applicant submitted two Post-Hearing Exhibits, marked as Applicant's Post-Hearing Exhibits A and B, that were admitted without objection. DOHA received the transcript of the hearing (Tr.) on July 14, 2025. The record closed on July 23, 2025.

Amendments to the Statement of Reasons

On April 4, 2025, Department Counsel, pursuant to Section E.3.1.17 of the Directive amended the Statement of Reasons as follows:

The addition of paragraph 2, Guideline J, Criminal Conduct, allegations 2.a., 2.b., 2.c., and 2.d. Applicant responded on April 22, 2025, and had no objection to the amendments. He admitted each of the allegations under this guideline, except 2.d.

The addition of paragraph 3, Guideline E, Personal Conduct, allegations 3.a. and 3.b. Applicant responded on April 22, 2025, and had no objection to the amendments. He denied allegation 3.a. and admitted allegation 3.b.

Findings of Fact

Applicant is 59-years old. He is divorced with three adult children. He has a high school diploma, two years of college, military service, and has been a firefighter for about 30 years. He currently is a Firefighter and is employed with a defense contractor. A security clearance is required in connection with this employment.

Guideline F - Financial Considerations

The SOR alleges that Applicant has twelve (12) delinquent debts totaling approximately \$225,779, consisting of overdue State and Federal taxes, a past-due mortgage, numerous other delinquent accounts, and at least one account in collections. Applicant also had four bankruptcy petitions dismissed. In his answer, Applicant admits all the allegations, except 1.a. and 1.n. Government Exhibits 4, 5, and 6, are Applicant credit reports dated October 17, 2023; May 23, 2024; and January 10, 2025, that establish the allegations. Since December 2024, he has been on administrative leave without pay pending a decision in this matter.

Applicant served on active duty in the U.S. Navy from 1984 to 1988. He then joined the Navy reserves for one year in 1989, and then the Air National Guard in 1990, where he served until 1992. For the past 30 years, he has worked as a Firefighter for various DoD subcontractors. In July 2015, he began working for his current employer. He held a security clearance in the military and during one short stint when he worked for NASA. This is his first time applying for a security clearance with his current employer.

Applicant explained that his financial problems began in about 2014/2015. His wife was a stay-at-home Mom with three children, and he was the family's sole "breadwinner." He attributes his financial problems to overspending. He and his wife used credit cards to purchase things they could not afford. Eventually they were living on their credit cards. As the children got older, he wanted his wife to go back to work to help with the household expenses, but she did not want to. Things snowballed and over time their indebtedness got worse. He purchased cars and other things he could not afford. At some point he had to pull the children out of private school. (Tr. pp. 37-40.) To further complicate matters, his daughter, who was a college freshman at the time, was diagnosed with a heart blockage requiring treatment and surgery. By 2018/2019, his portion of her medical bills were outstanding. (Tr. p. 43-45.)

Applicant stated that there is no excuse for his financial problems. He further stated that he works for one of the highest paid Fire Departments in the nation. The starting firefighters now earn \$185,000 annually. He has been earning between \$145,000 to \$165,000 annually without overtime over the past ten years. (Tr. pp. 61-62.) With overtime, he has earned about \$200,000 annually.

He testified that he is currently on administrative leave without pay and is now in the middle of the financial problem that started years ago. He admits that he made bad financial decisions about his debts in the past, that still exist. Currently, the firefighters he works with are "Zelleing" him money to keep him afloat. They have given up a lot of their vacation, overtime, and sick leave to help him. Even his Human Resource office has been helpful. The money he receives from his coworkers he uses to keep the utilities on and to purchase food for the family. (Tr. pp. 41-42.)

Applicant has taken on some part-time side work to help bring in some money to help support his family. He is working as a painter for a friend who owns a painting business. He is being paid "under the table." (Tr. p. 47.)

The following delinquent debts became delinquent and are of security concern:

1.a. Applicant is indebted to the State Franchise Tax Board for delinquent taxes in the approximate amount of \$14,433, for tax years 2019, 2020, and 2021. Applicant agreed to allow the state to garnish his wages in order to get the state tax debt paid. The state has been and is currently withholding about \$400 monthly from his paycheck to resolve

this debt. Applicant believes that he has now satisfied the state taxes, and that they are paid in full. (Tr. p. 87.)

1.b. A debt is owed to the Federal Government for taxes in the approximate amount of \$165,931, for tax years 2017, 2018, 2019, 2020, and 2021. Applicant stated that he incurred enormous Federal tax debt for several reasons. He worked a lot of overtime, and he did not adjust his tax withholdings as his tax attorney advised. He went tax exempt for about five months to receive more money in his check. In 2019, he received a settlement from a class action lawsuit of between \$45,000 to \$50,000, and no taxes were taken out. Applicant stated that he had planned to start paying off his federal taxes after satisfying his state tax debt. He was going to set up a wage garnishment like he had with the state, to pay his federal taxes, but when he was taken off the job in November 2024, and placed on administrative leave, he has not had the money to pay them. (Tr. p. 87.) A letter dated June 27, 2025, from the enrolled agent who is working with him on resolving these taxes, indicates that they are still in the process of working out an arrangement. (Applicant's Exhibit A.) This debt remains unsatisfied.

1.c. Applicant filed for Chapter 13 Bankruptcy in about April 2015. The bankruptcy was dismissed in about July 2015 for failure to make payments under the plan. Applicant stated that he made 3 or 4 monthly payments of \$1,800 to \$2,000 before he stopped the payments. He thought he could lower the payments if he did it on his own. He was mistaken. (Tr. pp. 51-52, and Government Exhibit 7.)

1.d. Applicant filed for Chapter 13 Bankruptcy in August 2015. The bankruptcy was dismissed in about December 2015 for failure to make payments under the plan. Applicant stated that he made 3 or 4 monthly payments of \$1,500 to \$2,500 before he stopped the payments. He thought he could lower the payments if he did it on his own. He was mistaken. (Tr. p. 52-53, and Government Exhibit 8.)

1.e. Applicant filed for Chapter 13 Bankruptcy in May 2020. The bankruptcy was dismissed in about August 2020 for failure to make payments under the plan. Applicant stopped making payments because he thought he could lower the payments if he did it on his own. He was mistaken. (Tr. p.56, and Government Exhibit 9.)

1.f. Applicant filed for Chapter 13 Bankruptcy in March 2021. The bankruptcy was dismissed in about December 2021 for failure to make payments under the plan. At this point, Applicant's monthly payments were between \$3,500 to \$3,800. After 3 or 4 monthly payments he stopped the payments because he thought he could lower the payments if he did it on his own. He was mistaken. Each time he filed Bankruptcy, his monthly payments went up and became more unaffordable. (Tr. p.57, and Government Exhibit 10.)

Applicant stated that he made a big mistake by not just sticking to the terms of the payment plan initiated during the first Bankruptcy. At that time the payments were lower, and the debts would have all been paid off by now. (Tr. p. 58.)

1.g. A debt is owed to a creditor in the approximate amount of \$21,014. This is a car loan for a Cadillac he purchased for himself. The vehicle was voluntarily repossessed. This debt remains unsatisfied. (Tr. pp. 69, 71-72.)

1.h. A debt is owed to a creditor in the approximate amount of \$27,400. This is a car loan for a Jeep he purchased for his daughter. The vehicle has not been repossessed or returned to the dealer. This debt remains unsatisfied. (Tr. 64-67, and 71.)

1.i. A debt is owed to a creditor in the approximate amount of \$806. This is a bank account that became delinquent. This debt remains unsatisfied. (Tr. p. 74.)

1.j. A debt is owed to a creditor in the approximate amount of \$583. This is for cable equipment that should have been returned to the company. Applicant stated that he still has the equipment in a box, and he plans to turn it in. This debt remains unsatisfied. (Tr. p. 75-76.)

1.k. A debt is owed to a creditor in the approximate amount of \$7,320. This is for delinquent HOA fees that were not paid for a period of two to three years. This debt remains unsatisfied. (Tr. pp. 77-78.)

1.l. A debt is owed to a creditor in the approximate amount of \$1,754. This is a bank account that became delinquent. This debt remains unsatisfied. (Tr. pp. 78-80.)

1.m. A debt is owed to a creditor in the approximate amount of \$408. This is a delinquent credit card debt. This debt remains unsatisfied. (Tr. pp. 80-81.)

1.n. This was a debt to a creditor in the approximate amount of \$10,572. This is a delinquent mortgage account on Applicant's house. Applicant stated that he has been able to modify the loan by putting the delinquency on the back of the new loan. He is now current with his mortgage payment. (Tr. pp. 81-82, and Applicant's Post-Hearing Exhibit A.) The debt is no longer delinquent.

1.o. This was a debt to a creditor in the approximate amount of \$563. This is a late payment on an auto loan Applicant obtained to purchase a Lexus. He stated that an extension was approved, he has brought the payment current and is continuing to make timely payments. (Tr. pp. 83-85, and Applicant's Post-Hearing Exhibit B.) The debt is not longer delinquent.

1.p. A debt is owed to a creditor for an account placed for collection in the approximate amount of \$158. Applicant does not know what this debt is. This debt remains unsatisfied.

Guideline J – Criminal Conduct

Applicant has a history of criminal conduct involving at least two arrests, charges, and convictions, and other encounters with law enforcement. He admits to a 20-year marital history of discord and volatile behavior including verbal and physical fights, arguments, frustration, disagreements, and accusations of adulterous behavior. Several encounters with law enforcement were for criminal conduct described below.

2.a. On September 23, 2008, Applicant was arrested and charged with Domestic Battery committed against his spouse. Applicant's version of the events goes as follows: His wife and daughter were arguing nonstop while he was watching television. He threw an empty Gatorade bottle in his spouse's direction, and grabbed her, and she called the police. The police report gives a different version of the event. His spouse and children report that Applicant kicked his spouse in her thigh, slapped her, and pushed her during an argument over the children. She attempted to call 911, but Applicant took her phone away from her, spoke to 911 himself, and then hung up the phone. Applicant then left the premises with his loaded gun, got into his car, and drove away. His spouse requested an emergency protective order that was granted by the judge. Applicant was gone when the police arrived but was contacted by telephone and was informed about the restraining order. (Government Exhibit 11.)

2.b. On September 23, 2008, later that day, Applicant was arrested and charged with Violating a Protective Order. The police were parked in the driveway of Applicant's home when they saw Applicant standing on the sidewalk directly in front of his house. Applicant was placed under arrest for Domestic Violence and for Violating an Emergency Protective Order. His weapon was confiscated. Applicant told the police that his wife had asked him to come home and he thought the matter had been resolved. Applicant was detained in jail for five or six hours before he was released. (Government Exhibit 11.)

2.c. On November 30, 2018, police officers responded to a domestic violence call at his home. During this police response, Applicant's wife alleged that Applicant committed battery upon her. The police report indicates that Applicant and his wife were in a verbal argument that escalated to a physical fight. Applicant had accused his wife of having an affair while he was working in San Francisco as a Firefighter. His wife, while holding the phone in her hands, pushed the Applicant, and the phone struck him on his jaw. At some point, Applicant picked his wife up and threw her onto the couch on the second-floor loft of the residence. She complained of pain to her back, right hand, (thumb area) and upper (bicep area) of the left arm. Applicant complained of jaw pain. The protective order was denied by the judge. (Government Exhibit 11.)

2.d. On June 22, 2020, Applicant was involved in an altercation in a retail business that resulted in police response. The person with whom Applicant argued with, alleged to the police that Applicant claimed to be an off-duty police officer and that he threatened to retrieve his weapon and shoot him. Applicant denies the allegation. The police

report indicates that the victim went into a juice shop to order a drink. He was not wearing a mask due to breathing issues. He was asked by the establishment to put on a mask. The victim attempted to explain why he was not wearing a mask, but several customers seemed to gang up on him. The victim went outside to wait for his order. While outside, the Applicant told the victim that he was going to "grab his weapon and put him down." The victim walked to his vehicle and called the police. When the police arrived, Applicant had left the establishment. (Government Exhibit 11.)

Guideline E - Personal Conduct

Applicant has engaged in conduct involving questionable judgment, lack of candor, dishonesty, or unwillingness to comply with rules and regulations which raise questions about his security clearance worthiness.

3.a. Applicant was arrested and charged in September 2008, for Domestic Violence, and for Violating a Protective Order. (Government Exhibit 11.)

3.b. During an interview with an investigator for the DoD in November 2022, Applicant denied that he was ever arrested or charged with a crime of domestic violence. Applicant was not truthful with the investigator. Applicant failed to disclose that he has been arrested and charged with Domestic violence as set forth above in 2.a. and 2.b., of the SOR. (Government Exhibit 3.)

Policies

When evaluating an applicant's suitability for national security eligibility, the administrative judge must consider the adjudicative guidelines (AG). In addition to brief introductory explanations for each guideline, the adjudicative guidelines list potentially disqualifying conditions and mitigating conditions, which are to be used in evaluating an applicant's eligibility for access to classified information. These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, administrative judges apply the guidelines in conjunction with the factors listed in AG ¶ 2 describing the adjudicative process. The administrative judge's overarching adjudicative goal is a fair, impartial, and commonsense decision. The entire process is a conscientious scrutiny of a number of variables known as the whole-person concept. The administrative judge must consider all available, reliable information about the person, past and present, favorable and unfavorable, in making a decision.

The protection of the national security is the paramount consideration. AG ¶ 2(b) requires that "[a]ny doubt concerning personnel being considered for national security eligibility will be resolved in favor of the national security." In reaching this decision, I have drawn only those conclusions that are reasonable, logical and based on the evidence contained in the record. Likewise, I have avoided drawing inferences grounded on mere speculation or conjecture.

Under Directive ¶ E3.1.14, the Government must present evidence to establish controverted facts alleged in the SOR. Under Directive ¶ E3.1.15, the applicant is responsible for presenting “witnesses and other evidence to rebut, explain, extenuate, or mitigate facts admitted by the applicant or proven by Department Counsel.” The applicant has the ultimate burden of persuasion to obtain a favorable clearance decision.

A person who seeks access to classified information enters into a fiduciary relationship with the Government predicated upon trust and confidence. This relationship transcends normal duty hours and endures throughout off-duty hours. The Government reposes a high degree of trust and confidence in individuals to whom it grants access to classified information. Decisions include, by necessity, consideration of the possible risk the applicant may deliberately or inadvertently fail to safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified information.

Section 7 of EO 10865 provides that adverse decisions shall be “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” See also EO 12968, Section 3.1(b) (listing multiple prerequisites for access to classified or sensitive information).

Analysis

Guideline F - Financial Considerations

The security concern for Financial Considerations is set out in AG ¶ 18:

Failure 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 or sensitive 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. Affluence that cannot be explained by known sources of income is also a security concern insofar as it may result from criminal activity, including espionage.

The guideline notes several conditions that could raise security concerns under AG ¶ 19. Two are potentially applicable in this case:

- (a) inability to satisfy debts; and
- (c) a history of not meeting financial obligations.

Applicant's history of overspending and his failure to pay his income taxes resulted in excessive consumer debt and delinquent tax debt that he cannot afford to pay. At this time there is insufficient information in the record to conclude that he is financially stable, can afford his lifestyle, or that he has the financial resources available to handle his financial obligations. Except for his state tax, which is subject to a wage garnishment, there is no evidence in the record to show that any regular monthly payments have been or are being made towards his unpaid debts. In fact, most of his delinquent debts remain outstanding. The evidence is sufficient to raise the above disqualifying conditions.

The following mitigating conditions under Financial Considerations are potentially applicable under AG ¶ 20.

- (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;
- (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, a death, divorce, or separation, clear victimization by predatory lending practices, or identity theft), and the individual acted responsibly under the circumstances;
- (c) the individual has received or is receiving financial 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;
- (d) the individual initiated and is adhering to a good-faith effort to repay overdue creditors or otherwise resolve debts; and
- (e) the individual has a reasonable basis to dispute the legitimacy of the past-due debt which is the cause of the problem and provides documented proof to substantiate the basis of the dispute or provides evidence of actions to resolve the issue.

Circumstances beyond Applicant's control, namely, his daughter's unexpected medical condition, created medical bills that contributed to some of Applicant's financial difficulties. However, the main reason for his overwhelming debt was caused by overspending and financial irresponsibility. For many years, he spent more than what

he could afford. He has done very little to resolve this delinquent debt. All of his delinquent debts, except one debt, remain outstanding. I am unable to find that he acted responsibly under the circumstances or that he made a good-faith effort to pay his debts. None of the mitigating conditions individually or collectively are sufficiently applicable to mitigate the security concerns. Guideline F is found against Applicant.

Guideline J – Criminal Conduct

The security concern relating to the guideline for Criminal Conduct 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 guideline at AG ¶ 31 contains five disqualifying conditions that could raise a security concern and may be disqualifying. Two conditions apply, as discussed below:

- (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
- (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.

Applicant's criminal history includes at least two charges and arrests in 2008, and other encounters with law enforcement. This conduct raises the above security concerns.

The guideline in AG ¶ 32 contains several conditions that could mitigate criminal conduct security concerns. None are applicable in this case:

- (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;
- (b) the individual was pressured or coerced into committing the act and those pressures are no longer present in the person's life;
- (c) no reliable evidence to support that the individual committed the offense; and

(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.

Applicant's history of criminal conduct last occurred in 2018, about seven years ago. He is now divorced from his wife, who was the person against whom he committed the crimes. His criminal behavior is unlikely to recur because they are no longer together. He has had no recent recurrence of criminal behavior. Guideline J is found for the Applicant.

Guideline E - Personal Conduct

The security concern for the personal conduct guideline is set out in AG ¶ 15:

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

AG ¶ 16 describes conditions that could raise a security concern and may be disqualifying. The following disqualifying condition is potentially applicable:

(b) deliberately providing false or misleading information; or concealing or omitting information, concerning relevant facts to an employer, investigator, security official, competent medical or mental health professional involved in making a recommendation relevant to a national security eligibility determination, or other official government representative.

AG ¶ 17 provides conditions that could mitigate security concerns. I have considered each of the mitigating conditions below:

(a) the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts;

(c) the offense is so minor, or so much time has passed, or the behavior is so infrequent, or it happened under such unique circumstances that it is unlikely to recur and does not cast doubt on the individual's reliability, trustworthiness, or good judgment;

(d) the individual has acknowledged the behavior and obtained counseling to change the behavior or taken other positive steps to alleviate the stressors, circumstances, or factors that contributed to untrustworthy, unreliable, or other inappropriate behavior, and such behavior is unlikely to recur;

(e) the individual has taken positive steps to reduce or eliminate vulnerability to exploitation, manipulation, or duress;

(f) the information was unsubstantiated or from a source of questionable reliability; and

(g) association with persons involved in criminal activities was unwitting, has ceased, or occurs under circumstances that do not cast doubt upon the individual's reliability, trustworthiness, judgment, or willingness to comply with rules and regulations.

Applicant was not honest during his interview with the DoD investigator on November 2, 2022. This conduct shows poor judgment, untrustworthiness and unreliability. Applicant knew or should have known that he must always tell the truth to the Government. His deliberate falsification raises serious questions about his credibility and trustworthiness. It also shows immaturity and irresponsibility. In this case, none of the mitigating conditions are applicable here, and Applicant does not meet the eligibility requirement to access classified information. Guideline E is found against Applicant.

Whole-Person Concept

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for a security clearance by considering the totality of the applicant's conduct and all relevant circumstances. The 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.

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

I considered the potentially disqualifying and mitigating conditions in light of all relevant facts and circumstances surrounding this case. Applicant has not engaged in criminal conduct for the past seven years and this security concern has been mitigated. On the other hand, regarding his financial delinquencies, he remains excessively indebted and has made no good-faith effort to show substantial progress towards resolving his debts. Furthermore, he was not truthful when he failed to reveal his arrest for domestic violence during his interview with the DoD investigator. Based upon the totality of the evidence, insufficient mitigation has been shown to establish that he is eligible for a security clearance. Applicant has not mitigated the Financial Considerations and Personal Conduct security concerns.

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 F:	AGAINST APPLICANT
Subparagraphs 1.a. through 1.m.	Against Applicant
Subparagraphs 1.n., 1.o., and 1.p.	For Applicant
Paragraph 2, Guideline J:	FOR APPLICANT
Subparagraphs 2.a. through 2.d.	FOR Applicant
Paragraph 3, Guideline E:	AGAINST APPLICANT
Subparagraphs 3.a. and 3.b.	Against Applicant

Conclusion

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

Darlene Lokey Anderson
Administrative Judge