



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



In the matter of:

Applicant for Security Clearance

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ISCR Case No. 22-02129

**Appearances**

For Government:  
Aubrey De Angelis, Esquire, Department Counsel

For Applicant:  
Nekeisha Campbell, Esquire  
Alan Lescht & Associates, P.C.

12/02/2025

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**Decision**

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ROSS, Wilford H., Administrative Judge:

Applicant has not mitigated the security concerns under Guidelines E (Personal Conduct) and B (Foreign Influence). Eligibility for access to classified information is denied.

## **Statement of the Case**

On June 6, 2024, the Defense Counterintelligence and Security Agency (DCSA) issued a Statement of Reasons (SOR) to Applicant detailing security concerns under Guidelines E and B. The action was taken under Executive Order (EO) 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) implemented by the DOD on June 8, 2017.

Applicant responded to the SOR in writing (Answer) on July 25, 2024, and requested a hearing before an administrative judge. Department Counsel was prepared to proceed on November 12, 2024. The case was assigned to me on April 10, 2025. The Defense Office of Hearings and Appeals (DOHA) issued a Notice of Hearing on April 16, 2025. I convened the hearing as scheduled on July 8, 2025. The Government offered Government Exhibits 1 through 9, which were admitted without objection. Applicant testified on her own behalf and submitted Applicant Exhibits A, B, and C. They were admitted without objection. DOHA received the transcript of the hearing (Tr.) on July 23, 2025. This decision was delayed when all administrative judges were furloughed from October 1 through November 12, 2025, during a federal government shutdown due to a lapse in federal funding.

## **Procedural Rulings**

At the hearing, the Government requested I take administrative notice of certain facts relating to the People's Republic of China (China). Department Counsel provided a thirteen-page summary of the facts, supported by 21 Government documents pertaining to China, identified as HE I. The documents provide elaboration and context for the summary. I take administrative notice of the facts included in the U.S. Government reports. They are limited to matters of general knowledge, not subject to reasonable dispute. They are set out in the Findings of Fact. (Tr. 16-17.)

## **Findings of Fact**

Applicant is 43 years old and married. She is employed by a defense contractor as a senior analyst. She began working for her current employer in 2022. She served on active duty with the Army from 2007 through 2012, receiving an Honorable Discharge. She subsequently served in the Army Reserve from 2012 through 2017. She worked for various government contractors and as a civilian employee in the Department of Defense

from 2012 until her dismissal from Federal service in 2019 for the reasons stated in the SOR. She now works for a civilian employer and is applying for a security clearance. (Government Exhibit 3 at Sections 12 and 17; Applicant Exhibits B and C; Tr. 21-24, 73-74, 100-102.)

#### **Paragraph 1 (Guideline E, Personal Conduct)**

The Government alleges in this paragraph that Applicant is ineligible for clearance because she has engaged in conduct that shows poor judgment, untrustworthiness, or unreliability.

Applicant admitted allegations 1.a and 1.e under this guideline with explanations. She denied allegations 1.b, 1.c, and 1.d under this guideline with explanations.

#### **Paragraph 2 (Guideline B, Foreign Influence)**

The Government alleges in this paragraph that Applicant is ineligible for clearance because she has foreign contacts and interests that may be a national security concern and may 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 of coercion by any foreign interest.

Applicant admitted allegations 2.a and 2.b under this guideline with explanations. She denied allegation 2.c with explanations.

Applicant worked in the intelligence field for the DoD for many years, beginning in the Army. Once she left active duty she started working as a civilian intelligence professional for one of the armed services. She did this as both a contractor and eventually as a Government employee. At the time of the incidents in question she was working as a Government employee, specifically as a Branch Chief for an Intelligence Agency. (Tr. 21-32.)

Applicant was born in China and is a naturalized American citizen. Her father was a Chinese citizen who lived in China. He died in 2015. According to Applicant, she and her brother inherited her father's real estate in China. In 2017 her father's estate was settled and each of them received approximately \$250,000 to \$350,000. At this point Applicant became concerned and frustrated by Chinese currency policies that restricted people from sending more than \$50,000 a year from China to overseas banks. (Tr. 20-21, 32-33, 50-52, 88-90.)

According to Applicant, she had made an online friend (Ms. A) in China. Ms. A is one of the four friends set forth in allegation 2.c. For a long time in the online relationship Applicant and Ms. A did not exchange real names. Eventually, they did. During a trip to China in 2017 the two of them had dinner, along with Ms. A's spouse, another friend from allegation 2.c. During dinner, the only time the two of them met personally, Applicant talked about her currency transfer issue. Ms. A at this point volunteered to act as a conduit for the money. Basically, Ms. A would use an unnamed business contact to transfer the full amount in a single transaction to Applicant's bank account in the United States. In return, Applicant would pay back Ms. A over time. This was agreed to by both parties. Ms. A fulfilled her part of the bargain and transferred the money. Applicant never learned the name of the person who transferred the money. She also fulfilled her part of the bargain and repaid Ms. A the money that was forwarded. There was no fee for the service. Since this transaction Ms. A and her spouse have left China and now live in Canada. She has had little contact with Ms. A since the transfer. (Tr. 34-36, 50-53, 90-96.)

During this same trip, while in a different Chinese city, Applicant was approached by operatives of China's Ministry of State Security (MSS). She was questioned about her trip to China and asked about her employment. Instead of truthfully identifying her employer, which was an Intelligence Agency in DoD, she lied and said she worked for the State Department and that she did not have access to classified information. She found this interview a very traumatic experience. (Tr. 38-42.)

During this interview the operative from MSS discussed Applicant's aunt and uncle, who are the people named in allegations 2.a and 2.b. Applicant testified that she is not close to these people, but became concerned when she learned that her relationship to them was known by the Chinese government, specifically MSS. After the interview Applicant went to the house of her aunt and uncle to assure herself that they had not been questioned. They assured her that they had not been questioned. She did not discuss the aunt and uncle in the interviews described below because she did not believe they fit within the confines of someone with whom she has "close or continuous contacts." (Tr. 42-46, 64.)

The other two friends who are mentioned in allegation 2.c are schoolmates from elementary school. She would have dinner with them when she visited China. She did not believe that she needed to report them in the interviews even though there was some indication they had been contacted by MSS. She believed these two friends also did not fit the category of "close or continuous contacts." (Answer; Tr. 47-50.)

Upon her return to the United States Applicant appropriately reported her contact with the operatives from MSS to the Intelligence Agency. She was subsequently debriefed

by a security representative of the Intelligence Agency. According to Applicant, as stated in her Answer:

When I told the [Intelligence Agency] security representative that I lied to the MSS to avoid telling them I worked for the [Intelligence Agency] and was part of the intelligence community, she demanded to know why I lied to the MSS and that I should have just told them the truth. I truly felt she was blaming me and chastising me for lying to the Chinese authorities, so I was too scared to tell her about my friend who helped me moved [sic] funds out of China, which then snowballed into keeping that from every other person with whom I spoke. In addition, I honestly thought those two friends were completely unrelated to the MSS incident.

During her testimony Applicant stated:

And I felt that if I, if I could lie to the Chinese Government, if that was saying as something I did wrong, then I was really, then I was really afraid that if I said I was used [sic] a friend of mine to move money out of China than it would just be a, yes, it would just be a completely, it would be a huge thing and then I would get fired. And so I didn't want to talk about.

And also, because it [sic] thought that it was a thing that happened but did not impact on how the MSS incident went or because there was nothing else that happened with it as far as blackmailing or coercion or anything that was concerned, so. (Tr. 54-58, 96-97, 106-107.)

After this initial interview, Applicant was subject to several additional interviews by various investigative agencies in approximately 2018 and 2019. She admits not telling the truth in these interviews about her four friends, her aunt and uncle, and the true facts of the money transfer discussed above. She continued to lie because she didn't want to change her story. (Tr. 62-63, 107-110.)

Applicant admits being interviewed at least twice by the FBI. (Allegation 1.b.) She lied several times to the FBI about the money transfer. Eventually, she failed a polygraph and at that time told the truth about the money transfer and the four friends discussed in allegation 2.c. (Tr. 60, 62-64, 110.)

Applicant admits having an interview with the Defense Intelligence Agency. (Allegation 1.e.) She lied about the money transfer during this interview. (Tr. 59.)

Applicant denied having an interview with the Naval Criminal Investigative Service (NCIS) in February 2019. (Allegation 1.c.) Government Exhibit 9, further discussed below, confirms that she was interviewed by the Federal Bureau of Investigations (FBI) and NCIS. Applicant testified that she was interviewed by a group of people in approximately 2018. She did not know the agencies all of these people worked for. (Tr. 60-62.)

Applicant generally denied allegation 1.d. This allegation has three parts. One part states that she lied during an interview with the Intelligence Agency. She did not admit or deny this allegation. Documentary and testimonial evidence confirms that she lied during this interview.

The second part of allegation 1.d states that she gave differing stories to different supervisors about her foreign contacts in China and that the supervisors were able to compare notes and corroborate that she was changing her story depending on which supervisor was interviewing her. She stated in her Answer, "I did not provide different stories to different supervisors in October 2017. I only had one supervisor in October 2017." This allegation is based on documentary evidence in the record, specifically a Security Access Eligibility Report (SAER) prepared in September 2019. That document states, "[Applicant] provided different stories about her meetings with foreign contacts to different supervisors, who were able to corroborate that she was changing her story once the supervisors compared notes." There is sufficient documentary evidence to support the allegation. (Government Exhibit 3 at 3-6.)

The third part states that Applicant made a statement to the [Intelligence Agency] that she had been approached by two males who she assumed worked for the MSS of China. This was a true statement.

Government Exhibit 7 shows that in 2012 Applicant filled out a "Mandatory Foreign Contact Interview Questions" form. This was in relation to a trip to China in 2012. Question 5 of the form asks, "Has a foreign national asked you any questions concerning your employment or the job you are doing for the Government/Navy?" Question 9 asks, "Has the foreign national ever been affiliated, either directly or indirectly, with the military government, intelligence, or internal security agency of a foreign country?" She admits that questions like these are common after a foreign trip, such as to China. (Tr. 105-106.)

As discussed, Applicant was the subject of a joint investigation with NCIS and the FBI. On April 12, 2022, NCIS submitted a “Recommendation to Proceed with Adjudicative Action” memorandum to DCSA. (Government Exhibit 9.) Paragraph 2 on page 1 of the memorandum states:

The results of the joint investigation revealed [Applicant] failed to report foreign contacts during her travel to China circa October 2017, and subsequently provided falsified statements to federal law enforcement agents on several occasions between February and July 2019 when [Applicant] participated in voluntary interviews with the FBI and NCIS.

After receiving the above memorandum Applicant’s employer, the Intelligence Agency, prepared two SAERs. (Government Exhibit 9 at 3-6; Applicant Exhibit A.)

Applicant Exhibit A is an Initial SAER prepared in September 2019. Paragraph 5 of Applicant Exhibit A is entitled, “Command observations and actions.” It states:

The incident is wholly outside of [Applicant’s] known and observed character. She has been a model employee at [Intelligence Agency] both as a contractor (since 2014) and as a government employee (since 2017). She is considered trustworthy, reliable, and dependable. She is known for showing discretion, has no security incidents, and outside of this incident is a model of overall personal conduct.

Government Exhibit 9 at 3-6 is the Final SAER submitted by the Intelligence Agency. It was prepared subsequent to Applicant Exhibit A. Paragraph 5 of the Final SAER is entitled, “Command observations and actions.” It states:

[Applicant], during the course of the investigation, confessed to failing to report foreign contacts and lying to federal investigators about her foreign contacts. Furthermore, upon review, [Applicant] provided different stories about her meetings with foreign contacts to different supervisors, who were able to corroborate that she was changing her story once the supervisors compared notes. [Applicant] is not considered trustworthy or reliable based on these events.

Paragraph 6 asks for a command recommendation regarding Applicant’s SCI eligibility. The command states:

Due to [Applicant’s] repeated unsatisfactory CSPs [Counterintelligence Scope Polygraphs], and lying during the investigation with the FBI, and

NCIS, [Intelligence Agency] does not intend to return the member to a special sensitive billet requiring access to SCI information, and no longer supports the need for an SCI determination.

## **China**

I take administrative notice of the facts set forth in the Administrative Notice documents concerning China, which are incorporated herein by reference.

China is a large and economically powerful country, with a population of over a billion people and an economy growing at about 10% per year. China has an authoritarian government, dominated by the Chinese Communist Party. It has a poor record with respect to human rights, suppresses political dissent, and engages in arbitrary arrests and detentions, forced confessions, torture, and mistreatment of prisoners.

China is one of the most aggressive countries in seeking sensitive and protected U.S. technology and economic intelligence. It targets the United States with active intelligence gathering programs, both legal and illegal. As a result, it is a growing threat to U.S. national security. In China, authorities routinely monitor telephone conversations, facsimile transmissions, e-mail, text messaging, and internet communications. Authorities open and censor mail. Its security services have entered personal residences and offices to gain access to computers, telephones, and fax machines. All major hotels have a sizable internal security presence, and hotel guestrooms are sometimes bugged and searched for sensitive or proprietary materials. There are several recent cases involving actual or attempted espionage, as well as the illegal export of information to China.

## **Mitigation**

Applicant had a successful military career as shown by her receiving various awards and decorations. (Applicant Exhibits B and C.)

## **Policies**

When evaluating an applicant's national security eligibility for a security clearance, the administrative judge must consider the adjudicative guidelines. In addition to brief introductory explanations for each guideline, the adjudicative guidelines (AG) list potentially disqualifying conditions and mitigating conditions, which are to be used in evaluating an applicant's national security eligibility.

These guidelines are not inflexible rules of law. Instead, recognizing the complexities of human behavior, these guidelines are applied 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 applicable guidelines in the context 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, "Any 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. I have not drawn inferences based on mere speculation or conjecture.

Directive ¶ E3.1.14, requires the Government to 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, and has the ultimate burden of persuasion as to obtaining 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 national security eligibility. Decisions include, by necessity, consideration of the possible risk the applicant may deliberately or inadvertently fail to protect or safeguard classified information. Such decisions entail a certain degree of legally permissible extrapolation as to potential, rather than actual, risk of compromise of classified or sensitive information. Finally, as emphasized in Section 7 of Executive Order 10865, "Any determination under this order adverse to an applicant shall be a determination in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned." See also Executive Order 12968, Section 3.1(b) (listing multiple prerequisites for access to classified or sensitive information.)

## **Analysis**

### **Paragraph 1 (Guideline E, Personal Conduct)**

The security concern relating to the guideline for Personal Conduct 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 or sensitive information. Of special interest is any failure to cooperate or provide truthful and candid answers during national security investigative or adjudicative processes. The following will normally result in an unfavorable national security eligibility determination, security clearance action, or cancellation of further processing for national security eligibility:

- (a) refusal, or failure without reasonable cause, to undergo or cooperate with security processing, including but not limited to meeting with a security investigator for subject interview, completing security forms or releases, cooperation with medical or psychological evaluation, or polygraph examination, if authorized and required; and
- (b) refusal to provide full, frank, and truthful answers to lawful questions of investigators, security officials, or other official representatives in connection with a personnel security or trustworthiness determination.

The guideline notes several conditions that could raise security concerns under AG ¶ 16. Three are potentially applicable in this case:

- (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 government representative;
- (c) credible adverse information in several adjudicative issue areas that is not sufficient for an adverse determination under any other single guideline, but which, when considered as a whole, supports a whole-person assessment of questionable judgment, untrustworthiness, unreliability, lack

of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the individual may not properly safeguard classified or sensitive information; and

(d) credible adverse information that is not explicitly covered under any other guideline and may not be sufficient by itself for an adverse determination, but which, when combined with all available information, supports a whole-person assessment of questionable judgment, untrustworthiness, unreliability, lack of candor, unwillingness to comply with rules and regulations, or other characteristics indicating that the individual may not properly safeguard classified or sensitive information. This includes, but is not limited to, consideration of:

- (1) untrustworthy or unreliable behavior to include breach of client confidentiality, release or proprietary information, unauthorized release of sensitive corporate or government protected information;
- (2) any disruptive, violent, or other inappropriate behavior;
- (3) a pattern of dishonesty or rule violations; and
- (4) evidence of significant misuse of Government or other employer's time or resources.

I considered the following mitigating conditions under ¶ 17 and none of them apply to the facts of this case:

- (a) the individual made prompt, good-faith efforts to correct the omission, concealment, or falsification before being confronted with the facts;
- (b) the refusal or failure to cooperate, omission, or concealment was caused or significantly contributed to by advice of legal counsel or of a person with professional responsibilities for advising or instructing the individual specifically concerning security processes, Upon being made aware of the requirement to cooperate or provide the information, the individual cooperated fully and truthfully;
- (c) the offense was 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; and

(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.

Applicant lied, and lied repeatedly, in several interviews to various investigators about important matters between 2017 and 2019. Her lies were only discovered when she failed a polygraph and confessed after additional interrogation. Her repeated lies were in connection to her rather bizarre story about how she transferred at least \$250,000 out of China using a person she never met, and her contact with the Chinese MSS.

Applicant obviously felt she had something to conceal when she hid all the facts about the money transfer from her management and from various investigators for years. The fact that she felt she might be fired for her conduct shows that she knew it was, at the very least, questionable.

Turning to Applicant's failure to report her foreign contacts, her argument here is simply not credible. She argues that none of these six people were important to her. Her actions belie her words. Ms. A and her spouse assisted in her scheme to avoid Chinese currency transfer regulations. Applicant felt that the two elementary school friends may have been contacted by MSS about her. Finally, she made a special trip to visit her aunt and uncle, who she argues she does not have "close and continuing contact," because she was afraid that MSS may have contacted them after interviewing her. Her repeated lies about these people deprived the Government, for years, of the ability to determine whether these contacts had security significance.

## **Paragraph 2 (Guideline B, Foreign Influence)**

AG ¶ 6 explains the security concerns pertaining to foreign influence as follows:

Foreign contacts and interest may be a security concern if the individual has divided loyalties or foreign financial interests, may be manipulated or induced to help a foreign person, group, organization, or government in a way that is not in U.S. interests, or is vulnerable to pressure or coercion by any foreign interest. Adjudication under this Guideline can and should consider the identity of the foreign country in which the foreign contact or financial interest is located, including, but not limited to, such considerations as whether the foreign country is known to target United States citizens to obtain protected information and/or is associated with a risk of terrorism.

AG ¶ 7 sets out five conditions that could raise a security concern and may be disqualifying in this case:

- (a) contact with a foreign family member, business or professional associate, friend, or other person who is a citizen of or resident in a foreign country if that contact creates a heightened risk of foreign exploitation, inducement, manipulation, pressure, or coercion;
- (b) connections to a foreign person, group, government, or country that create a potential conflict of interest between the individual's obligation to protect sensitive information or technology and the individual's desire to help a foreign person, group, or country by providing that information;
- (c) failure to report or fully disclose, when required, association with a foreign person, group, government, or country;
- (d) counterintelligence information, whether classified or unclassified, that indicates the individual's access to classified information or eligibility for a sensitive position my involve unacceptable risk to national security;
- (i) conduct, especially while traveling or residing outside the U.S., that may make the individual vulnerable to exploitation, pressure, or coercion by a foreign person, group, government or country.

China is known to target U.S. citizens to obtain protected information and has a significant interest in acquiring defense-related intelligence and technology. As described at length above, Applicant's conduct in China with her friends and relations, her contact with MSS, and her repeated lies about those contacts and actions, are very concerning. Applicant's conduct made her very vulnerable to coercion, exploitation, or pressure from China, a country that generates a heightened risk. The evidence is sufficient to raise potential security concerns under AG ¶¶ 7(a), 7(b), 7(c), 7(d), and 7(i). The Government has more than met its burden of production by raising the above disqualifying conditions and shifts the burden to Applicant to prove mitigation.

AG ¶ 8 lists three conditions that could mitigate foreign influence security concerns. Those with potential application in mitigating the security concerns in this case are:

- (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.;

(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; and

(c) contact or communication with foreign citizens is so casual and infrequent that there is little likelihood that it could create a risk for foreign influence or exploitation.

None of these mitigating conditions apply to the facts of this case. Applicant attempts to argue that none of the six people described under this allegation are important to her. Her conduct, as set forth above, belies that fact. Her act in lying about them shows that they were important. This guideline is found against Applicant.

### **Whole-Person Concept**

Under the whole-person concept, the administrative judge must evaluate an applicant's eligibility for national security eligibility 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 national security 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 pertinent facts and circumstances surrounding this case. Applicant has not met her burden of mitigating the alleged conduct. It is hard to conceive someone who was more

vulnerable than Applicant. She appears to still not realize or appreciate that fact. What is especially alarming is that she was a long-time intelligence professional. In fact, she was a Branch Chief at the time of the incidents. Her conduct was knowing and willful and designed to deprive the Government of important information. Paragraphs 1 and 2 are found against Applicant.

## **Formal Findings**

Formal findings for or against Applicant on the allegations set forth in the SOR, as required by ¶ E3.1.25 of Enclosure 3 of the Directive, are:

**Paragraph 1, Guideline E: AGAINST APPLICANT**

**Subparagraphs 1.a through 1.e:** **Against Applicant**

Paragraph 2, Guideline B: AGAINST APPLICANT

Subparagraphs 2.a through 2.c: 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.

**WILFORD H. ROSS**  
Administrative Judge