



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



In the matter of:

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ISCR Case No. 24-00116

Applicant for Security Clearance

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**Appearances**

For Government: Cassie Ford, Esq., Department Counsel

For Applicant: Daniel P. Meyer, Esq.

04/30/2025

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**Decision**

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GOLDSTEIN, Jennifer I., Administrative Judge:

This case involves security concerns raised under Guidelines H (Drug Involvement and Substance Misuse) and E (Personal Conduct). Clearance is granted.

**Statement of the Case**

Applicant submitted a security clearance application (SCA) on October 28, 2022. On February 6, 2024, the Defense Counterintelligence and Security Agency (DCSA) sent her a Statement of Reasons alleging security concerns under Guidelines H and E. The DCSA acted under Executive Order 12968, *Access to Classified Information*, dated August 2, 1995; Department of Defense (DoD) Manual 5200.02, *Procedures for the DoD Personnel Security Program (PSP)*, dated April 3, 2017 (Manual); and Security Executive Agent Directive 4, dated December 10, 2016 (SEAD 4).

Applicant responded to the SOR on February 23, 2024, and requested a hearing. The case was assigned to me on February 5, 2025. On February 19, 2025, the Defense Office of Hearings and Appeals notified him that the hearing was scheduled to be conducted by video teleconference on March 11, 2025. I conducted the hearing as scheduled.

Department Counsel submitted Government Exhibits (GE) 1 through 4, which were admitted without objection. Applicant testified and submitted Applicant's Exhibit (AE) A through AE F, which were admitted without objection. Applicant's Counsel also submitted a hearing brief. I kept the record open until April 1, 2025, to enable Applicant and Department Counsel to submit additional documentary evidence. Department Counsel submitted a one-page brief on April 1, 2025, marked hearing Exhibit (HE) I. Applicant, through Counsel, timely submitted a request to extend the deadline to April 15, 2025. On that date, Applicant submitted AE G, which was admitted without objection. DOHA received the transcript on January 28, 2025.

### **Findings of Fact**

The SOR alleged security concerns related to Applicant's marijuana purchase and use, and his failure to provide information about his marijuana use on his October 28, 2022 security clearance application (SCA-1). Applicant admitted all allegations in the SOR, with clarifications. His admissions are incorporated in my findings of fact.

Applicant is a 33-year-old systems engineer employed by a defense contractor since September 2022. He was granted a secret security clearance on November 28, 2022, after submitting SCA-1. It was upgraded to top secret after submitting a June 16, 2023 security clearance application (SCA-2) on June 26, 2023. Prior to working for the government contractor, he worked at a grocery store chain. He is engaged to be married and has no kids. He is diabetic and has comorbidities of plaque psoriasis, edema, and arthritis, which sometimes leave him bedridden. (GE 4; Tr. 21, 24, 36, 39)

Applicant was 23 and studying at a university when his plaque psoriasis condition first emerged. He was on university insurance that did not cover much of his medical expenses. He was 24 when his friends gave him marijuana to help him mitigate the pain of his condition. He found it helped control his pain. He testified, "It was so bad that when I did take it, it numbed the pain, and I was able to read. I was able to study. So, the things that people talk about when you experience those things, they weren't all that present. It just subdued the things that were ailing me so that I could shower and things of that nature." Applicant admits that he used and purchased marijuana with varying frequency from about March 2016 to January 2024, and that he did so while holding a sensitive position from February 2023 to January 2024. He purchased marijuana from about March 2016 to July 2020. In the beginning, he would purchase joints or blunts, but after it was "sold legally" he would buy vape pens from stores. (GE 3; Tr. 25-31, 36-38)

He used "hemp derived THC" once recreationally with his fiancée, to celebrate her college graduation in January 2024. Prior to that, his last use of marijuana "was about 2020/2021." In January 2024, he "had purchased a hand-held vape in celebration of [his] significant other's graduation. It was obtained at a local Walmart's exterior smoke shop. It was some sort of THC derivative mix to the tune of HHC, HHC-P, THC-0, Delta-9. Harder to tell nowadays with constant new compounds." (GE 3; AE C; Tr. 49) He was "under assumption that it was being sold legally, [and he] partook of it." (Tr. 34) He indicated he thought that the little vape pens were "a legal thing." (Tr. 40) He explained in his August 2023 subject interview that he began to use CBD products to help with his psoriasis. (Tr. 41) He further testified that between 2020 to 2023, he was not using "the

kind that you'd buy off the street, again. You had CBD products, gummies, things of that nature, and that was when I ingested, yes, or consumed and partook." (Tr.41-42) He noted that after he started his job with the government contractor, he thought marijuana plant derivatives were legal because his coworkers, who were military vets, discussed using them to treat their ailments. (Tr. 49)

In Applicant's 2023 responses to Government Interrogatories, he noted that he may possibly use "illegal substances (to include marijuana and derivative products)" if he is "in need of a Sleep-aid, hunger inducer, and calming agent for skin and psoriasis flare-ups" and that he was in possession of an illegal substance or frequented places where they might be used at that time. (GE 3) However, he now finds his prescription medications effective, and he no longer intends to use marijuana or its derivatives again. He presented a May 2024 negative urinalysis in support of his claim. Applicant provided a signed statement of intent to abstain from marijuana use and he no longer associates with those that provided him marijuana. He now has health insurance and is on a prescription immunosuppressant that helps him manage his plaque psoriasis. (AE E; Tr. 31-32)

On SCA-1, Applicant answered "No" to two questions in Section 23, which "pertain to the illegal use of drugs or controlled substances or drug or controlled substance activity in accordance with Federal laws, even though permissible under state laws." He answered "No" to the question that asked, "have you illegally used any drugs or controlled substances." He also answered "No" to the question that asked in the last seven years, "have you been involved in the illegal purchase, manufacture, cultivation, trafficking, production, transfer, shipping, receiving, handling or sale of any drug or controlled substance?" (GE 1) However, when he completed updated SCA-2 on June 16, 2023, he fully disclosed his "Uncontrolled substance use & Controlled-Legal THC product use" between March 2016 and April 2023. (GE 2)

Applicant acknowledges that he provided false answers to Section 23, with respect to his marijuana use and purchases. He accepted responsibility for his error. Seven months later, he completed SCA-2. He noticed he incorrectly put "No" on SCA-1 in Section 23 because it was populated by his prior answers. He asked others what he should do to correct that mistake and was advised to "just say yes and just fill it out" correctly the second time. He did so. Further, he voluntarily disclosed his January 2024 use in his interrogatory answers. (GE 1, GE 2, GE 3; AE C; Tr. 56-66)

Applicant participated in counseling in July and August 2024 to discuss his history of self-medicating with marijuana and anxiety issues with a therapist. He was diagnosed with adjustment disorder with mixed anxiety and depressed mood. His medical records reflect that he was taught cognitive behavioral therapy (CBT) techniques during therapy and responded well to those techniques. (AE C, AE F, AE G; Tr. 28, 34, 63-64) Applicant's records also reflect several statements about why he sought counseling, which was primarily to help himself in these proceedings. The notes reflect: "[DSCA] accused him of lying on his application" (AE G at 4); "Recently patient loses his top security clearance after he lied on his application" (AE G at 16); and a second note that "[DCSA] accused him of lying on his application." (AE G at 21). AE G was a post-hearing submission, and he was not cross examined on these statements.

Applicant presented letters of recommendation from colleagues, all of whom were informed about the specific allegations in this case. He is said to have a strong moral character and to have impeccable personal conduct. One reflected, Applicant “was widely known and respected for his ability to manage any situation with poise and dignity, whether it was dealing with difficult people or sensitive information.” Those that know him best reflect that they have no concerns about Applicant’s integrity or ability to protect classified information. (AE D)

### **Administrative Notice**

At the close of the hearing, I invited both parties to submit any additional documentation, including administrative notice documents on CBD and the status of cannabis products that can be sold legally in Applicant’s state. Department Counsel submitted HE I, which reflects in part:

An [applicant] may rebut this presumption by demonstrating that the cannabis product(s) used or possessed qualify as ‘hemp’ within the meaning of section 16390 of Title 7, United States Code. To do so, the applicant must demonstrate, through independent testing, that the product:

- (1)Derives from cannabis plants containing no more than 0.3 percent delta-9 THC by dry weight.
- (2)Does not itself contain more than 0.3 percent delta-9 THC by dry weight.

As of July 2022, [State A] statute has conformed to this language. To the extent [Applicant] argues his use of THC derivative products were legal and the Agricultural Improvement Act of 2018 (also known as the 2018 Farm Bill), Applicant has not provided evidence outside of self-serving statements that the products he used after 2020 meet the burden of rebutting this presumption.

Applicant did not present any administrative notice materials.

### **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 [or her] 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 H, Drug Involvement and Substance Misuse**

The concern under this guideline is set out in AG ¶ 24:

The illegal use of controlled substances, to include the misuse of prescription and non-prescription drugs, and the use of other substances that cause physical or mental impairment or are used in a manner inconsistent with their intended purpose can raise questions about an individual's reliability and trustworthiness, both because such behavior may lead to physical or psychological impairment and because it raises questions about a person's ability or willingness to comply with laws, rules, and regulations. *Controlled substance* means any "controlled substance" as defined in 21 U.S.C. 802. *Substance misuse* is the generic term adopted in this guideline to describe any of the behaviors listed above.

Applicant's admissions and the evidence submitted at the hearing establish the following disqualifying conditions under this guideline:

AG ¶ 25(a): any substance misuse (see above definition);

AG ¶ 25(c): illegal possession of a controlled substance, including cultivation, processing, manufacture, purchase, sale, or distribution; or possession of drug paraphernalia;

AG ¶ 25(f): any illegal drug use while granted access to classified information or holding a sensitive position; and

AG ¶ 25(g): expressed intent to continue drug involvement and substance misuse, or failure to clearly and convincingly commit to discontinue such misuse.

Applicant admitted he used marijuana products from March 2016 to January 2024. He acknowledged that up until July 2020, he purchased and used marijuana, a Federally controlled substance. After that date, he admitted he bought marijuana from stores. From February 2023 to January 2024, he used marijuana purchased from stores despite holding a security clearance. He did not provide enough information about the substances he purchased and used to conclude that he used a substance Federally legal under the Farm Bill, given his admissions. AG ¶¶ 25(a), 25(c), and 25(f) are applicable.

While he expressed the desire to continue using marijuana products to relieve his medical condition in his answers to interrogatories, this was not alleged on the SOR and is only considered with respect to mitigation. AG ¶ 25(g) does not apply.

The following mitigating conditions are potentially applicable:

AG ¶ 26(a): the behavior happened so long ago, was so infrequent, or happened under such circumstances that it is unlikely to recur or does not

cast doubt on the individual's current reliability, trustworthiness, or good judgment;

AG ¶ 26(b): the individual acknowledges his or her drug involvement and substance misuse, provides evidence of actions taken to overcome this problem, and has established a pattern of abstinence, including, but not limited to:

- (1) disassociation from drug-using associates and contacts;
- (2) changing or avoiding the environment where drugs were used; and
- (3) providing a signed statement of intent to abstain from all drug involvement and substance misuse, acknowledging that any future involvement or misuse is grounds for revocation of national security eligibility.

Security clearance eligibility determinations must be made under the basic premise that use of marijuana remains illegal under Federal law. Illegal drug use is inconsistent with holding a security clearance. See ISCR Case No. 20-01772 at 3 (App. Bd. Sep. 14, 2021). "Simply put, there is no exception that permits security clearance holders or applicants to use marijuana or any other drug that is illegal under Federal laws, regardless of state laws that may permit such use." See ISCR Case No. 23-00521 at 5 (App. Bd. April 11, 2024).

On October 25, 2014, the Director of National Intelligence (the Security Executive Agent (SecEA)) issued DNI Memorandum ES 2014-00674, "*Adherence to Federal Laws Prohibiting Marijuana Use*," which states:

[C]hanges to state laws and the laws of the District of Columbia pertaining to marijuana use do not alter the existing National Security Adjudicative Guidelines . . . . An individual's disregard of federal law pertaining to the use, sale, or manufacture of marijuana remains adjudicatively relevant in national security determinations. As always, adjudicative authorities are expected to evaluate claimed or developed use of, or involvement with, marijuana using the current adjudicative criteria. The adjudicative authority must determine if the use of, or involvement with, marijuana raises questions about the individual's judgment, reliability, trustworthiness, and willingness to comply with law, rules, and regulations, including federal laws, when making eligibility decisions of persons proposed for, or occupying, sensitive national security positions.

On December 21, 2021, the SecEA promulgated clarifying guidance concerning marijuana-related issues in security clearance adjudications. It states in pertinent part:

[Federal] agencies are instructed that prior recreational marijuana use by an individual may be relevant to adjudications but not determinative. The

SecEA has provided direction in [the adjudicative guidelines] to agencies that requires them to use a “whole-person concept.” This requires adjudicators to carefully weigh a number of variables in an individual’s life to determine whether that individual’s behavior raises a security concern, if at all, and whether that concern has been mitigated such that the individual may now receive a favorable adjudicative determination. Relevant mitigations include, but are not limited to, frequency of use and whether the individual can demonstrate that future use is unlikely to recur, including by signing an attestation or other such appropriate mitigation.

The Appeal Board has noted that the “evolving landscape of marijuana law and policy in the United States informs us that simple recreational marijuana use no longer holds the same severe negative implications as many other illegal drugs. This is especially, but not exclusively, true when the use occurs permissibly under state law.” “The Whole-Person Concept, which identifies ‘nature, extent, and seriousness’ among the factors to consider in assessing the relevance of conduct, therefore plays an especially important role in cases alleging prior recreational marijuana use.” See ISCR Case No. 24-00914 at 3 (App. Bd. April 9, 2025).

With respect to the ‘nature, extent, and seriousness’ of Applicant’s marijuana use as well as the circumstances surrounding it, he was using marijuana for medical reasons to deal with pain, in the absence of affordable treatment. He was only 24 years old when he was first offered the marijuana. He was motivated to use it due to the pain from his medical condition. He used it on an as needed basis between 2016 and 2020. He admitted to buying it illegally prior to 2020. Since 2020, he purchased the products in question at stores, like the one connected to Walmart. He also admitted to some recreational use, believing that products sold in stores were legal. He attended college and worked at a grocery store until 2022, when he had an opportunity to take his first job in the technology industry. He was not knowledgeable in the laws regarding marijuana and assumed that since his military colleagues talked of using similar products for their ailments, that he was not doing anything wrong. That is consistent with his earlier statement that he intended to continue to use marijuana. However, Applicant has now matured. He stopped using marijuana in January 2024, which is over a year ago. He tested negative on a urinalysis in May 2024. He participated in therapy and learned CBT skills. He now understands that marijuana is federally illegal, and he has removed it from his home. His fiancée no longer uses it. He has matured. Further, he relies on his job for medical insurance and is unlikely to jeopardize the good insurance he now has. The likelihood of recurrence is low. After considering these whole-person factors, the evidence weights in favor of mitigation.

AG ¶ 26(a) is established. Applicant’s last use of a cannabis product was over a year ago, and it is not likely to recur now that Applicant understands it is illegal under federal law and inconsistent with holding a security clearance. The Appeal Board has “long held that applicants who use marijuana after having been placed on notice of the security significance of such conduct may be lacking in the judgment and reliability expected of those with access to classified information.” See, e.g., ISCR Case No. 17-04198 at 3 (App. Bd. Jan. 15, 2019). In this case, Applicant has overcome that security significance of his marijuana use because he naïvely did not understand the concern

surrounding marijuana products until he got the statement of reasons. While he was lacking in judgment through January 2024, for the past year he has demonstrated his commitment to abstain from marijuana use. He has matured as discussed under the whole-person analysis above. He is no longer lacking in judgment and reliability. His marijuana usage no longer casts doubt on his current trustworthiness.

AG ¶ 26(b) is established. Applicant has acknowledged his drug involvement, he has disassociated from his marijuana-using associates, and he has removed marijuana products from his environment. He has provided the signed statement of intent provided for in AG ¶ 26(b)(3).

## **Guideline E, Personal Conduct**

The security concern under this 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 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 disqualifying condition is relevant:

AG ¶16(a): deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire, personal history statement, or similar form used to conduct investigations, determine employment qualifications, award benefits or status, determine national security eligibility or trustworthiness, or award fiduciary responsibilities;

Applicant failed to disclose his marijuana use on his 2022 SCA. He accepted full responsibility for the false information on his 2022 SCA. AG 16(a) is established.

AG ¶ 17 lists the conditions that could mitigate personal conduct security concerns:

(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; and

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

In regard to the Applicant's failure to disclose his marijuana use on both questions in Section 23 of SCA-1, AG ¶ 17(a) is established. While "prompt" and "good faith" are not defined in the SEAD 4, and Appeal Board defined them in ISCR Case No. 22-02601, (App. Bd. Feb. 22, 2024):

We have, however, interpreted "prompt" to mean acting within a reasonable time. Id. A reasonable time does not mean "immediate." AG ¶ 17(a) – "the individual made prompt, good faith efforts to correct the omission, concealment, or falsification before being confronted with the facts."

Turning to the second element of the mitigating condition, the concept of "good faith" requires a showing that a person acts in a way that reflects reasonableness, prudence, honesty, and adherence to duty or obligation. See ISCR Case No. 99-0201 at \*3. Just as with the term "prompt," what constitutes a "good faith" effort will depend on the particular facts of the case.

Applicant corrected the omission seven months later when he completed SCA-2. He did so voluntarily without being confronted about his marijuana use when he noticed that it was previously omitted. He continued to provide the government information on his marijuana use throughout the security clearance adjudication process. His ability to accept responsibility for the omission on SCA-1 and correct it on SCA-2 speaks volumes about his candor and trustworthiness. In this situation, I find that the approximately seven months it took Applicant to correct his omission was within a reasonable time and done in good faith.

AG ¶ 17(c) is established. Applicant's falsification happened three years ago and occurred only once. It happened under unique circumstances surrounding his confusion about the legality of marijuana derivatives. Falsification of an SCA is not "minor." It is serious misconduct that undermines the integrity of the security-clearance process. However, his disclosure in his most recent SCA was voluntary, and it is unlikely that his previous marijuana use would have been discovered if he had not disclosed it. Based on all the evidence, I am satisfied that his concealment of marijuana use in 2022 happened under unique circumstances, is unlikely to recur, and does not cast doubt on his reliability, trustworthiness, or good judgment. Personal conduct security concerns are mitigated.

AG ¶¶ 17(d) and 17(e) are also established. Applicant has acknowledged the omission of his marijuana use on SCA-1. He has attended counseling in July and August 2024. He learned CBT methods to manage stressors. For the same reasons noted above, further falsification is unlikely. He is not vulnerable to exploitation, manipulation or duress, as he has shared the allegations with his colleagues.

## **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.

I have incorporated my comments under Guidelines H and E in my whole-person analysis and applied the adjudicative factors in AG ¶ 2(d). With respect to Applicant's marijuana use while holding a security clearance, I have incorporated the SecEA guidance in my evaluation of Applicant's eligibility for a security clearance. I have considered that he has worked for federal contractors and held a security clearance when he purchased and used marijuana products. His naivete about the legality of marijuana use gives me pause, but the strong support from his colleagues and his candor, demeanor, and sincerity at the hearing have satisfied me that he will refrain from further illegal use of marijuana and further falsifications.

After weighing the disqualifying and mitigating conditions under Guidelines H, and E, and evaluating all the evidence in the context of the whole person, I conclude Applicant has mitigated the security concerns raised by his drug involvement and substance misuse, and failure to disclose his drug involvement in SCA-1.

## **Formal Findings**

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

Paragraph 1, Guideline H (Drug Involvement):                   FOR APPLICANT

Subparagraph 1.a-1.c:    For Applicant

Paragraph 2, Guideline E (Personal Conduct):                   FOR APPLICANT

Subparagraph 2.a-2.b:    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.

Jennifer Goldstein  
Administrative Judge