



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



In the matter of:)
)
) ISCR Case No. 23-02802
)
Applicant for Security Clearance)

Appearances

For Government: Cassie Ford, Esq., Department Counsel
For Applicant: *Pro se*

07/11/2025

Decision

HOGAN, Erin C., Administrative Judge:

Applicant did not mitigate the security concerns raised under Guideline F, Financial Considerations. Eligibility for access to classified information is denied.

Statement of the Case

On April 12, 2022, Applicant completed and signed an Electronic Questionnaires for Investigations Processing (e-QIP). (Government Exhibit (GE) 1) On April 2, 2024, the Department of Defense Counterintelligence and Security Agency Consolidated Adjudication Services (DCSA CAS) issued a statement of reasons (SOR) to Applicant under Executive Order (Exec. Or.) 10865, *Safeguarding Classified Information within Industry* (February 20, 1960); DOD Directive 5220.6, *Defense Industrial Personnel Security Clearance Review Program* (Directive) (January 2, 1992), as amended; and Security Executive Agent Directive 4, establishing in Appendix A the *National Security Adjudicative Guidelines for Determining Eligibility for Access to Classified Information or Eligibility to Hold a Sensitive Position* (AGs), effective June 8, 2017.

The SOR detailed reasons why the DCSA CAS did not find under the Directive that it is clearly consistent with the interests of national security to grant or continue a security clearance for Applicant and recommended referral to an administrative judge to determine whether a clearance should be granted, continued, denied, or revoked.

Specifically, the SOR set forth security concerns arising under Guideline F, Financial Considerations. On April 7, 2024, Applicant responded to the SOR and requested a hearing before an administrative judge. On June 17, 2024, Department Counsel was ready to proceed. The case was assigned to me on December 9, 2024. On March 28, 2025, DOHA issued a notice of hearing, setting the hearing for April 17, 2025. The hearing was held as scheduled via video-teleconference.

During the hearing, Department Counsel offered 12 exhibits, Government Exhibits (GE) 1 - 12, which were admitted without objection. Applicant offered one exhibit which was admitted as Applicant Exhibit (AE) A (16 pgs), without objection. The record was held open until May 1, 2025, to allow Applicant to submit additional exhibits. She timely submitted 11 exhibits which were admitted as AE B – AE L, without objection. On April 28, 2025, DOHA received a transcript (Tr.) of the hearing. The record closed on that date.

As a matter of record-keeping, Applicant's post-hearing exhibits are as follows: AE B – Applicant's 2020 Federal Income Tax Return (3 pgs); AE C – Applicant's 2021 State Income Tax Return (3 pgs); AE D – Internal Revenue Service (IRS) Tax Return Transcript for 2021 (5 pgs); AE E – History of payments to the IRS (6 pgs); AE F – IRS Account Balance, Total Amount Owed for Tax Years 2018, 2019, 2020, 2021, 2022, 2023 (2 pgs); AE G - Applicant's State Tax Balance as of April 26, 2025 (2 pgs); AE H – Applicant's IRS Balance and Installment Plan as of April 21, 2025 (3 pgs); AE I – Applicant's pay stubs 16-31 March 2025 and 1-15 April 2025 (2 pgs); AE J – Applicant's Personal Monthly Budget (1 pg); AE K – Child Support Order and Agreement, dated December 6, 2005 (12 pgs); and AE L – Two Character References. (3 pgs)

Some details in the decision were excluded to protect Applicant's right to privacy. Specific information is available in the cited exhibits and transcript.

Findings of Fact

In Applicant's SOR response, she admits the allegations in SOR ¶¶ 1.a – 1.p, 1.r, 1.t, 1.x, and 1.y and denied the allegations in the SOR ¶¶ 1.q, 1.s, 1.u - 1.w, 1.z, and 1.aa. Her admissions are accepted as findings of fact. Additional findings follow.

Applicant is a 50-year-old employee of a defense contractor seeking to obtain a security clearance. She has worked for her current employer since December 2023. She briefly served in the Army National Guard from October 1993 to February 1994. She served in the U.S. Navy active reserve from October 2008 to February 2010. She has a general equivalency degree (GED) and some college credit. She has been married three times and is in the process of divorcing her third husband. She has five children, four are adults and her youngest is 16 and lives with her father. (Tr. 24-28; GE 1; GE 2)

Financial Considerations

The SOR alleges two Chapter 7 bankruptcies. The first bankruptcy was filed in November 1999. Applicant's debts were discharged in February 2000. (SOR ¶ 1.b: GE 5) The second bankruptcy was filed in February 2016. Applicant's debts were discharged in May 2016. (SOR ¶ 1.a: GE 4 at 7; GE 6) Several federal and state tax issues were also alleged to include: a \$12,614 debt owed to the Internal Revenue Service (IRS) for federal income taxes owed for tax years 2018, 2019, 2021, and 2022 (SOR ¶ 1.x: GE 4 at 38-39); a \$1,213 state income tax debt for delinquent state income taxes (SOR ¶ 1.y: GE 4 at 45); Applicant failed to file her federal income tax return for tax year 2020 (SOR ¶ 1.z: GE 4 at 7, 24); and Applicant failed to file her state income tax returns for tax years 2020 and 2021. (SOR ¶ 1.aa: GE 4 at 7, 25).

The SOR also alleged 21 delinquent consumer accounts, an approximate total of \$57,501.00. The accounts include: a \$21,986 account owed to an apartment complex that was placed for collection (SOR ¶ 1.c: GE 10 at 1); a \$20,497 motorcycle loan that was placed for collection (SOR ¶ 1.d: GE 10 at 1; GE 12 at 1); a \$2,798 charged-off account (SOR ¶ 1.e: GE 10 at 3; GE 11 at 6; GE 12 at 2); a \$1,299 delinquent cell phone account placed for collection (SOR ¶ 1.f: GE 10 at 3; GE 11 at 10); an \$814 account with a bank that was placed for collection (SOR ¶ 1.g: GE 11 at 8; GE 12 at 7); a \$774 account owed to a bank that was placed for collection (SOR ¶ 1.h: GE 10 at 3; GE 11 at 9; GE 12 at 8); and a \$683 account owed to a bank that was placed for collection. (SOR ¶ 1.i: GE 10 at 3; GE 11 at 7; GE 12 at 6)

Additional delinquent accounts include: a \$654 account owed to a bank that was placed for collection (SOR ¶ 1.j: GE 11 at 7, 15; GE 12 at 7); a \$644 charged-off credit card account (SOR ¶ 1.k: GE 10 at 3; GE 11 at 20; GE 12 at 8); a \$752 charged-off credit card account (SOR ¶ 1.l: GE 10 at 4; GE 11 at 6; GE 12 at 8); a \$399 delinquent credit union account placed for collection (SOR ¶ 1.m: GE 10 at 4; GE 11 at 11; GE 12 at 2); a \$326 charged-off credit card account (SOR ¶ 1.n: GE 10 at 4); a \$202 insurance bill that was placed for collection (SOR ¶ 1.o: GE 10 at 4; GE 11 at 2); and a \$179 cell phone account that was placed for collection. (SOR ¶ 1.p: GE 10 at 5)

Additional delinquent accounts include: a \$128 gym account that was placed for collection (SOR ¶ 1.q: GE 10 at 5); a \$390 charged-off account (SOR ¶ 1.r: GE 10 at 5; GE 11 at 7; GE 12 at 1); a \$244 delinquent account placed for collection (SOR ¶ 1.s: GE 9 at 3); a \$869 delinquent cell phone account placed for collection (SOR ¶ 1.t: GE 11 at 2); a \$373 delinquent cell phone account placed for collection (SOR ¶ 1.u: GE 11 at 2); a \$675 delinquent cell phone account that was placed for collection (SOR ¶ 1.v: GE 11 at 5; GE 12 at 6); and a \$2,805 delinquent cell phone account that was placed for collection. (SOR ¶ 1.w: GE 11 at 6; GE 12 at 6)

Bankruptcies

Applicant's first Chapter 7 bankruptcy was filed in 1999. She and her first husband were struggling with making ends meet while raising three children. Her husband had separated from active duty in the U.S. Navy and was working in an entry-level position with limited pay. Applicant was a stay-at-home mother. They made the mutual decision to file bankruptcy. (Tr. 15, 33)

Applicant divorced her first husband in October 2004. She remarried in February 2010 and divorced her second husband in April 2016. Applicant testified that she struggled with a very limited income. Her second husband quit his job and she ended up supporting him financially. She struggled to meet basic living expenses. She could not keep up with the expenses and providing support for her children. She filed for Chapter 7 bankruptcy in February 2016 towards the end of her second marriage. (Tr. 15 -16, 29, 36)

Federal and State Tax Issues

Applicant admits owing the IRS for delinquent income taxes for tax years 2018, 2019, 2021, and 2022. (SOR ¶ 1.x) After the hearing, she provided a statement from the IRS indicating the balance on her federal tax debt is \$16,920. The total debt also included a tax debt from 2023. She testified that part of the federal tax debt is the result of her son's father claiming their minor son as a dependent in even years even though the court agreement indicated the father shall claim the minor child as a tax dependent in odd years and the mother shall claim the minor child even years. She did not want to take her son's father to court because her son is an adult now and she did not want cause trouble for her son. (Tr. 62, 70-71; AE K)

Applicant testified that she entered into a repayment agreement with the IRS about two years ago. She agreed to pay \$250 a month. She lost her job and was unable to make the payments. Once she found employment, she was able to restart the payment agreement. From July 2024 to April 2025, she made ten payments. (AE E) Her current installment agreement remains at \$250 a month and is to be deducted from her paycheck. (AE H) The record evidence does not verify the payments are being taken out by direct deposit, (AE I). (Tr. 64-65)

Applicant failed to timely file her federal income tax return for tax year 2020. (SOR ¶ 1.z) She claimed her former employer did not provide a W-2. She looked up the information on the IRS website and completed her Federal income tax return for tax year 2020. (AE B) The return indicates Applicant owes the IRS \$2,380 for tax year 2020. Applicant's 2020 Federal income tax return is signed but not dated. It is not clear whether the IRS received a copy of the return. (Tr. 66-68; AE B)

Applicant admits to owing delinquent state income taxes in the amount of \$1,213.48. (SOR ¶ 1.y) During the hearing, Applicant testified that the state is applying her tax refunds towards the state tax debt. She provided proof that she made a \$63.95

payment towards the state tax debt on April 22, 2024. As of April 26, 2025, the total balance owed on the state income tax debt is approximately \$1,250. (Tr. 65; AE A at 13; AE G)

The SOR alleged Applicant failed to file her state income tax returns for tax years 2020 and 2021. (SOR ¶ 1.aa) She provided a document from the state indicating that she owed \$148.64 for tax year 2021. (AE A at 16) She also provided a copy of her 2020 state income tax return. She owed the state \$106 for tax year 2020. The state tax return was signed by Applicant but not dated. (AE C) There is no proof that the state received confirmation of the 2020 or 2021 state income tax return.

Consumer Debts

In her response to the SOR, dated April 7, 2024, Applicant provided a document called "Intended Resolution for Repayment of Debt." Her plan was to resolve the debts listed on the SOR from the debts with the lowest balances to the debts with the highest balances. She indicated her Federal and state tax obligations are factored into her main budget. She anticipated the state tax obligation would be paid off within the year. She hoped to apply \$120 to \$330 towards the delinquent debts. (AE A at 1-6)

During the hearing, Applicant indicated that she was not in a position to immediately pay off past debt. She said that keeping her security clearance is a critical step in helping her repay debts, re-establish financial stability and fulfill obligations. Applicant married her third husband on May 28, 2024. She recently she had to leave him for personal safety and ethical reasons. She has suffered another financial setback. He left her with all of the household bills. She moved out the home with only the clothes on her back. She is currently in process of paying for a divorce. She has reduced her living expenses by renting a room from a friend. She still intends to pay her delinquent debts when her current situation becomes more stable. She also hopes to look for additional part-time work. (Tr. 20-23, 50-52, 87)

Applicant disputes the following delinquent accounts alleged in the SOR:

SOR ¶ 1.c: \$21,986 debt owed to a former landlord that was placed for collection: Applicant admits that she owes her former apartment complex, but disputes the amount owed. She has contacted the property management company and requested all documents to support their claim. She left the lease early in October 2021. The lease expired in December 2021. She states the apartment was left with no damage. The apartment complex claims they vacated her lease in March 2022. She disputes this, but claims she still would not owe the full balance of what they are claiming. She intends to dispute this charge until she receives information from the creditor. She will pay the actual balance that she owes. (Answer to SOR; Tr. 38-40)

SOR ¶ 1.q: \$128 debt owed to a gym placed for collection: Applicant disputed the amount. She contacted the gym and they agreed the balance is \$86.48. The debt remains outstanding. (Answer to SOR; Tr. 54; AE A at 8-12)

SOR ¶ 1.s: \$244 account placed for collection: Applicant does not recognize this debt. She intends to dispute this account with the credit bureau. She filed a dispute with Credit Karma, but as of the hearing date had not filed a formal dispute with any of the three credit bureaus, TransUnion, Experian or Equifax. The debt is unresolved. (Answer to SOR; Tr. 57-58)

SOR ¶ 1.u: \$373 delinquent cell phone account placed for collection: Applicant has no knowledge of this debt and is disputing the debt. Outcome of dispute is unknown. (Answer to SOR; Tr. 58)

SOR ¶ 1.v: \$675 delinquent cell phone account placed for collection: Applicant has no knowledge of this debt and is disputing the debt. Outcome of dispute is unknown. (Answer to SOR; Tr. 60)

SOR ¶ 1.w: \$2,805 delinquent cell phone account placed for collection: Applicant has no knowledge of this debt and is disputing the debt. Outcome of dispute is unknown. (Answer to SOR; Tr. 60)

The personal monthly budget Applicant included in her Answer to the SOR, indicates that her net monthly income is approximately \$5,000. Her monthly expenses are \$4,670, leaving her with \$330 left over each month after expenses. The budget does not include payments towards her delinquent consumer accounts. (AE A at 7) She provided an updated monthly budget after the hearing. Her net monthly income remained around \$5,000. Her month expenses were listed as \$4,093, leaving her with \$907 left over after expenses. (AE J)

Several periods of unemployment or under-employment had an adverse effect on Applicant's finances. She had periods of unemployment from September 2017 to October 2017, from March 2020 to June 2020, and from October 2023 to December 2023 (COVID adversely affected her job search). (GE 1; GE 2; Tr. 26, 47,72)

Applicant attended financial counseling in conjunction with her bankruptcies. She recently has been reading information from Dave Ramsey and Suze Orman. She is dealing with some health issues. She had surgery a year ago and is will soon have another surgery. (Tr. 80-86)

Whole-Person Factors

Ms. L.M. wrote a letter in support of Applicant. Ms. L.M. is a Facility Security Officer. She has known her for seven years as a close colleague and friend. She

describes her as “honest, dependable, and genuinely kind-hearted.” She approaches every situation with integrity and thoughtfulness. Her positive attitude and calm presence make her a trusted and respected member of any group. She recommends her for any position of trust or responsibility based on her strong moral compass and reliability. (AE L at 2)

Mr. A.P. was Applicant’s former direct supervisor from 2023 to April 2025. He indicates Applicant has consistently demonstrated qualities expected of a federal contractor employee. She has “integrity, accountability, and sound judgment.” She has earned a reputation as being honest, dependable, and fully committed to upholding the standards of federal service. He has full confidence in her ability to continue serving honorably and responsibly within the federal contractor workforce. (AE L at 3)

Policies

The U.S. Supreme Court has recognized the substantial discretion of the Executive Branch in regulating access to information pertaining to national security emphasizing, “no 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, *Safeguarding Classified Information within Industry* § 2 (Feb. 20, 1960), as amended.

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, these guidelines are applied 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, 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 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 “in terms of the national interest and shall in no sense be a determination as to the loyalty of the applicant concerned.” See Exec. Or. 10865 § 7. Thus, a decision to deny a security clearance should not be construed to suggest that it is based, in whole or in part, on any express or implied determination about an applicant’s

allegiance, loyalty, or patriotism. It is merely an indication the applicant has not met the strict guidelines the President, Secretary of Defense, and Director of National Intelligence 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*, 484 U.S. at 531. "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. See ISCR Case No. 95-0611 at 2 (App. Bd. May 2, 1996).

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 ultimate burden of demonstrating that it is clearly consistent with the national interest to grant or continue his security clearance." ISCR Case No. 01-20700 at 3 (App. Bd. Dec. 19, 2002). The burden of disproving a mitigating condition never shifts to the Government. See ISCR Case No. 02-31154 at 5 (App. Bd. Sep. 22, 2005). "[S]ecurity clearance determinations should err, if they must, on the side of denials." *Egan*, 484 U.S. at 531; see AG ¶ 2(b).

Analysis

Guideline F, Financial Considerations

AG ¶ 18 expresses the security concern for financial considerations:

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. The following are potentially applicable in this case:

- (a) inability to satisfy debts;
- (c) a history of not meeting financial obligations: and
- (f) failure to file or fraudulently filing annual Federal, state, or local income tax returns or failure to pay annual Federal, state, or local income tax as required.

Applicant has a history of financial problems and delinquent debts. She filed for Chapter 7 bankruptcy on two occasions, the most recent bankruptcy occurred in 2016. She has over \$57,000 in unresolved delinquent consumer debt. AG ¶¶ 19(a) and 19(c) are applicable. AG ¶ 19(f) applies regarding Applicant's federal and state income tax debts. She currently owes the IRS approximately \$16,920 for tax years 2018, 2019, 2021, 2022 and 2023. She currently owes delinquent state income taxes in the approximate amount of \$1,250. Applicant failed to timely file her 2020 federal income tax return and failed to timely file state income tax returns for 2020 and 2021.

The guideline also includes conditions that could mitigate security concerns arising from financial difficulties. I have considered all of the mitigating conditions under AG ¶ 20 and the following potentially apply:

- (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; and

(g) the individual has made arrangements with the appropriate tax authority to file or pay the amount owed and is in compliance with those arrangements.

AG ¶ 20(a) does not apply. Applicant has a history of financial problems. Her financial issues are ongoing.

AG ¶ 20(b) partially applies. Applicant's pending divorce, past divorces, periods of unemployment and under-employment, and health issues can be considered circumstances beyond her control. However, it is given less weight because I cannot conclude Applicant acted responsibly under the circumstances. She neglected her federal income taxes over a period of six years, she also neglected her state income taxes. She has incurred over \$57,000 in consumer debt. I cannot conclude that she acted responsibly under the circumstances.

AG ¶ 20(c) does not apply. While Applicant follows Dave Ramsey and Suze Orman, she has not received formal financial counseling from a legitimate and credible source. While she intends to pay her debts, there is no clear indication that the problem is being resolved or under control.

AG ¶ 20(d) applies with respect to Applicant's payment plan with the IRS. It is too soon to tell whether Applicant will be able to keep making timely payments on the payment plan. Her "Intended Resolution for Repayment of Debt" outlines a plan for future payments towards her debts. However, a promise to pay in the future is not sufficient to indicated a good-faith effort to resolve one's debts. She has not taken steps to resolve the remaining debts so this mitigating factor is given less weight.

AG ¶ 20(e) does not apply. Applicant may have legitimate disputes with the debts alleged in SOR ¶¶ 1.c, 1.q, 1.s, 1.u, 1.v and 1.w. She did not provide information as to whether she formally disputed any of the above debts with the credit reporting agencies and the outcome of the disputes.

AG ¶ 20(g) applies with respect to SOR ¶¶ 1.z and 1.aa. Though not perfect, Applicant provided sufficient proof that she filed her federal income tax return for 2020 and her state income tax returns for 2020 and 2021. While Applicant entered into a repayment plan with the IRS regarding her federal income tax debt, it is too soon to conclude that she will continue to make monthly payments. She has not made consistent payments towards her state income tax debt. AG ¶ 20(g) is partially mitigated.

The DOHA Appeal Board has held that failure to comply with tax laws suggests that an applicant has a problem with abiding by well-established government rules and systems. Voluntary compliance with rules and systems is essential for protecting classified information. See, e.g., ISCR Case No. 16-01726 at 5 (App. Bd. Feb. 28, 2018). A person who fails repeatedly to fulfill his or her legal obligations, such as filing tax returns

and paying taxes when due, does not demonstrate the high degree of good judgment and reliability required of those granted access to classified information. See, e.g., ISCR Case No. 17-01382 at 4 (App. Bd. May 16, 2018).

Overall, Applicant did not meet his burden of proof to mitigate the concerns raised under financial considerations.

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 the 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), “[t]he ultimate determination” of whether to grant a security clearance “must be an overall commonsense judgment based upon careful consideration of the guidelines, each of which is to be evaluated in the context of the whole-person.” My comments under Guideline F are incorporated in my whole-person analysis. Some of the factors in AG ¶ 2(d) were addressed under those guidelines but some warrant additional comment.

I considered Applicant's service in the Army National Guard and in the Naval Reserve. I considered her favorable employment history with several DOD contractors. I considered the challenges she has faced in the past with her failed marriages and attempts to support her children, and periods of unemployment. I considered she recently had to flee her recent marriage from an abusive husband. I also considered Applicant has had significant delinquent federal and state tax debts for years and over \$57,000 in delinquent consumer debt. While she recently entered into a repayment plan with the I.R.S., it is too soon to conclude she will be able to continue to make timely payments. She has not taken steps towards resolving any of her delinquent consumer accounts. Her significant financial issues raise doubts about her ability to be entrusted with access to classified information. In cases where there is doubt, national security concerns must take priority. The security concerns raised under Financial Considerations are not mitigated.

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 - 1.y: Against Applicant

Subparagraphs 1.z – 1.aa: For Applicant

Conclusion

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

Erin C. Hogan
Administrative Judge