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United States Department of Energy  
Office of Hearings and Appeals

In the Matter of Personnel Security Hearing )  
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Filing Date: November 6, 2013 )  
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Case No.: PSH-13-0118

Issued: January 30, 2014

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**Decision and Order**  
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Robert B. Palmer, Administrative Judge:

This Decision concerns the eligibility of XXXXXXXXXXXX (hereinafter referred to as “the individual”) for access authorization under the regulations set forth at 10 C.F.R. Part 710, entitled "Criteria and Procedures for Determining Eligibility for Access to Classified Matter or Special Nuclear Material.”<sup>1</sup> For the reasons set forth below, I conclude that the individual’s security clearance should not be restored at this time.<sup>2</sup>

**I. BACKGROUND**

**A. Procedural Background**

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<sup>1</sup>An access authorization is an administrative determination that an individual is eligible for access to classified matter or special nuclear material. 10 C.F.R. § 710.5. Such authorization will also be referred to in this Decision as a security clearance.

<sup>2</sup> Decisions issued by the Office of Hearings and Appeals (OHA) are available on the OHA website located at <http://www.oha.doe.gov> . The text of a cited decision may be accessed by entering the case number of the decision in the search engine located at <http://www.oha.doe.gov/search.htm>.

The individual is employed by the Department of Energy (DOE), and was granted a security clearance in connection with that employment. In August 2013, the individual tested positive for marijuana usage during a random drug screening. Because of this result, the local security office (LSO) summoned the individual for an interview with a personnel security specialist. After this Personnel Security Interview (PSI) revealed additional information that raised security concerns, the LSO determined that derogatory information existed that cast into doubt the individual's eligibility for access authorization. It informed the individual of this determination in a letter that set forth the DOE's security concerns and the reasons for those concerns. I will hereinafter refer to this letter as the Notification Letter. The Notification Letter also informed the individual that he was entitled to a hearing before an Administrative Judge in order to resolve the substantial doubt concerning his eligibility for access authorization.

The individual requested a hearing on this matter. The LSO forwarded this request to the Office of Hearings and Appeals, and I was appointed the Administrative Judge. The DOE introduced 13 exhibits into the record of this proceeding and presented the testimony of a personnel security specialist. The individual introduced ten exhibits and presented the testimony of two witnesses, in addition to testifying himself.

## **B. Factual Background**

The following facts are undisputed. Since 1991, the individual has been employed by the Department of Energy and has held a security clearance. In October 1991, the individual signed a DOE Drug Certification, in which he agreed that he would not use or be associated with any illegal drug (as listed in the Controlled Substances Act of 1970), unless lawfully prescribed by a licensed physician. The Certification provided that, if the individual violated this commitment "even once," he could lose his access authorization. DOE Exhibit (Ex.) 7.

In 2006 and 2011, the individual received and signed Security Acknowledgments, in which he was informed that any involvement with illegal drugs could lead to the loss of his security clearance. In 2011, the individual also completed and signed a Questionnaire for National Security Positions (QNSP) as part of a routine reinvestigation. Section 23 of that Questionnaire, entitled "Illegal Use of Drugs or Drug Activity" asked, in pertinent part, "have you ever illegally used or otherwise been involved with a drug or controlled substance while possessing a security clearance . . .?" The individual indicated that he had not. DOE Ex. 4.

The individual tested positive for marijuana usage during a random drug screening in August 2013. DOE Ex. 2. During the PSI that followed, the individual admitted that he had used marijuana "two or three times" during his vacation "a few weeks" prior to the screening. DOE Ex. 2 at 3. He explained that he was wind-surfing in a neighboring state with a "youthful crowd," when the marijuana was offered to him. Initially he declined, but subsequently he "lost [his] better judgment" and used the drug. *Id.* at 4-5. The individual also revealed that he had used marijuana "once or twice" previously while holding a security clearance, in 2000 or 2001. *Id.* at 5-6, 9-10. He knew at the time of this earlier usage that use of illegal drugs was a violation of DOE security policy. *Id.* at 6.

## **II. THE NOTIFICATION LETTER AND THE DOE'S SECURITY CONCERNS**

As indicated above, the Notification Letter included a statement of derogatory information that created a substantial doubt as to the individual's eligibility to hold a clearance. This information pertains to paragraphs (f), (k) and (l) of the criteria for eligibility for access to classified matter or special nuclear material set forth at 10 C.F.R. § 710.8, and to the Bond Amendment (section 1072 of the National Defense Authorization Act for Fiscal Year 2008).

Under criterion (f), information is derogatory if it indicates that the individual "has deliberately misrepresented, falsified or omitted significant information from . . . a Questionnaire for Sensitive (or National Security) Positions, . . . a personnel security interview," or written or oral statements made in response to official inquiry on a matter that is relevant to a determination regarding eligibility for DOE access authorization. As support for this criterion, the Letter cites the individual's failure to mention his marijuana usage in 2000-2001 while holding a security clearance in response to Section 23 of his 2011 QNSP.<sup>3</sup>

Criterion (k) defines as derogatory information tending to show that the individual has "sold, transferred, possessed, used, or experimented with a . . . substance listed in the Schedule of Controlled Substances established pursuant to section 202 of the Controlled Substances Act of 1970 (such as marijuana, cocaine, amphetamines, . . . etc.) except as prescribed or administered by a physician" or otherwise authorized by federal law. Criterion (l) refers to information indicating that the individual has engaged in criminal or any other unusual conduct or is subject to any circumstances which tend to show that he is not honest, reliable or trustworthy, or that he may be subject to pressure, coercion, exploitation or duress which may cause the individual to act contrary to the best interests of national security. Such conduct or circumstances also include violation of any commitment or promise upon which the DOE previously relied to favorably resolve an issue of clearance eligibility. The Bond Amendment prohibits federal agencies from granting or renewing the security clearances of persons who are addicted to, or are unlawful users of, illegal drugs. In support of both of these criteria and of its invocation of the Bond Amendment, the Letter cites the individual's admitted marijuana usage and his positive result during the 2013 drug screening.

The derogatory information set forth above adequately justifies the DOE's invocation of the Bond Amendment and criteria (f), (k) and (l), and it raises significant security concerns. Conduct involving lack of candor or dishonesty can raise questions about an individual's reliability, trustworthiness and ability to protect classified information. Use of an illegal drug can also raise questions about an individual's reliability and trustworthiness, both because such usage may impair judgment and because it raises questions about a person's ability or willingness to comply with laws, rules, and regulations. *See Revised Adjudicative Guidelines for Determining Eligibility for Access to Classified Information, The White House (December 19, 2005), Guidelines E, H and J (Adjudicative Guidelines).*

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<sup>3</sup> The Letter also cites the individual's repeated violations of his Drug Certification and his 2013 usage despite having acknowledged in 2006 and 2011 that illegal drug usage was contrary to DOE policy as support for its invocation of criterion (f). However, I find that these actions more appropriately support the DOE's application of criteria (k) and (l). I will therefore discuss these issues within the context of those criteria.

### III. REGULATORY STANDARDS

The criteria for determining eligibility for security clearances set forth at 10 C.F.R. Part 710 dictate that in these proceedings, an Administrative Judge must undertake a careful review of all of the relevant facts and circumstances, and make a “common-sense judgment . . . after consideration of all relevant information.” 10 C.F.R. § 710.7(a). I must therefore consider all information, favorable or unfavorable, that has a bearing on the question of whether granting or restoring a security clearance would compromise national security concerns. Specifically, the regulations compel me to consider the nature, extent, and seriousness of the individual’s conduct; the circumstances surrounding the conduct; the frequency and recency of the conduct; the age and maturity of the individual at the time of the conduct; the absence or presence of rehabilitation or reformation and other pertinent behavioral changes; the likelihood of continuation or recurrence of the conduct; and any other relevant and material factors. 10 C.F.R. § 710.7(c).

A DOE administrative proceeding under 10 C.F.R. Part 710 is “for the purpose of affording the individual an opportunity of supporting his eligibility for access authorization.” 10 C.F.R. § 710.21(b)(6). Once the DOE has made a showing of derogatory information raising security concerns, the burden is on the individual to produce evidence sufficient to convince the DOE that granting or restoring access authorization “will not endanger the common defense and security and will be clearly consistent with the national interest.” 10 C.F.R. § 710.27(d). *See Personnel Security Hearing*, Case No. VSO-0013, 24 DOE ¶ 82,752 at 85,511 (1995) (*affirmed* by OSA, 1996), and cases cited therein. The regulations further instruct me to resolve any doubts concerning the individual’s eligibility for access authorization in favor of the national security. 10 C.F.R. § 710.7(a).

### IV. ANALYSIS

#### A. The Individual’s Pre-Hearing Brief

On December 17, 2013, the individual submitted a written answer to the allegations set forth in the Notification Letter in the form of a pre-hearing brief. In this brief, the individual contends that the individual’s statements during his August 2013 PSI cannot be used in this proceeding because they were taken in violation of the Fifth Amendment to the U.S. Constitution; that the individual’s usage of marijuana did not implicate the Bond Amendment because that Amendment concerns only the illegal usage of drugs, and the individual’s marijuana usage occurred in a state in which such usage is legal; that the individual’s usage of marijuana in 2000-2001 occurred too long ago to be of relevance in this proceeding; and that the totality of the circumstances and the “whole person” concept described in the *Adjudicative Guidelines For Determining Eligibility For Access To Classified Information* (hereinafter referred to as the “*Adjudicative Guidelines*”) support the restoration of the individual’s access authorization.

The individual cites a host of U.S. Supreme Court, federal appeals court and state court decisions in support of his contention that use of the individual’s statements during his August 2013 PSI about his marijuana usage would violate the Fifth Amendment’s prohibition against involuntary

self-incrimination. However, none of these cases arose within the context of a security clearance proceeding, and none are applicable to the matter at hand. The first such case is *Baxter v. Palmigiano*, 425 U.S. 308 (1975) (*Baxter*), which concerned the rights of prison inmates during disciplinary proceedings. In that case, the U.S. Supreme Court stated that the fifth amendment “privileges [a person] not to answer official questions put to him in any . . . proceeding, civil or criminal, formal or informal, where the answers might incriminate him in future criminal proceedings.” 425 U.S. at 316 (citing *Lefkowitz v. Turley*, 412 U.S. 70, 77). However, the individual in this case *did* answer the questions that were put to him by the DOE personnel security specialist about his marijuana usage. There is nothing in *Baxter* that would require that these statements not be used in a subsequent security clearance proceeding.

The individual next cites *Garrity v. New Jersey*, 385 U.S. 493 (1967) (*Garrity*), and *Spevack v. Klein*, 385 U.S. 511 (1967) (*Spevack*), in support of the proposition that an individual may remain silent without suffering a sanction or penalty that would make assertion of the privilege against self-incrimination costly. While this is undoubtedly true, it also has no application to the case at hand. In *Garrity*, a state gave police officers the choice of either answering questions or losing their jobs. After the officers were subsequently convicted of a criminal offense using the answers given by them, the Court ruled that the answers were coerced, and therefore inadmissible in the subsequent criminal proceeding. In *Spevack*, the Court held that an attorney who refused to incriminate himself could not be disbarred for exercising his Fifth Amendment rights. In this case, the individual was not penalized for remaining silent or forced to choose between exercising his Fifth Amendment rights and losing his job, and his statements were not used against him in a later criminal proceeding. Neither of these cases supports the individual’s claim that using his statements about his previous drug usage in this proceeding would violate his Fifth Amendment right against self-incrimination.

In his final Fifth Amendment argument, the individual asserts that the personnel security specialist should have given the individual a “*Miranda*-like” warning before conducting the PSI, and that his resulting “confession” should not be considered in this proceeding.<sup>4</sup> However, the individual does not cite any regulatory, statutory or judicial authority that requires such a result, and I decline to apply rules that were designed to protect the rights of criminal suspects during custodial interrogations by law enforcement personnel to non-custodial interviews conducted by personnel security specialists for the purpose of ascertaining whether the subject of the interview represents an unacceptable security risk. I therefore reject the individual’s Fifth Amendment claims.

Next, the individual argues that the Bond Amendment is inapplicable because the individual’s marijuana usage occurred in a state that has legalized the personal use and possession of the drug. This argument is equally unavailing. As acknowledged by the individual, he used a drug that is illegal under federal law. As it is well established, and not disputed by the individual, that state law cannot supersede federal law, the individual’s 2013 marijuana usage was illegal, even though the state in which it took place has chosen not to recognize the act as being criminal in

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<sup>4</sup> *Miranda* refers to *Miranda v. Arizona*, 384 U.S. 436 (1966), in which the Court held that the Fifth and Fourteenth Amendments require law enforcement officials to advise a suspect during a custodial interrogation of his right to remain silent and of his right to counsel.

nature. The individual was therefore an “unlawful user of a controlled substance” within the meaning of the Bond Amendment.

The individual correctly argues, however, that his conduct does not automatically disqualify him from eligibility for access authorization under the Bond Amendment or the *Adjudicative Guidelines*. I will address his contention that the totality of the circumstances and a proper application of the *Adjudicative Guidelines* support restoration of his access authorization in sections IV.B, IV.C and IV.D below.<sup>5</sup>

## **B. Criterion (k) and the Bond Amendment**

As set forth above, the individual’s marijuana usage implicates the Bond Amendment and raises substantial security concerns under criterion (k) and *Adjudicative Guideline H*. Because the *Adjudicative Guidelines* are relevant to the application of both criterion (k) and the Bond Amendment, I will apply those *Guidelines* in determining whether the individual has successfully addressed the security concerns under that criterion and in ascertaining whether he is an unlawful user of a controlled substance within the meaning of the Bond Amendment.

Among the conditions listed in that *Guideline* that “could raise a security concern and may be disqualifying,” *Adjudicative Guidelines*, ¶ 25, are (i) any illegal use of a drug; (ii) testing positive for illegal drug use; and (iii) any illegal drug use after being granted a security clearance. The individual tested positive for marijuana usage while holding a security clearance, and admitted to previous marijuana usage while holding a security clearance during a post-test PSI. These potentially disqualifying factors are applicable to this case.

*Guideline H* also includes conditions that could mitigate security concerns. The first such condition is that “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.” The individual’s marijuana usage was recent, as the latest incidents of that usage happened approximately five months prior to the hearing. As for the frequency of his usage, the individual said that he used marijuana “once or twice” during the latter part of the 1990s or the early part of the 2000s to deal with stress related to his then-wife’s mental illness, DOE Ex. 3 at 5; Hearing Transcript (Tr.) at 87, and “two or three” times during his vacation in July 2013. DOE Ex. 3 at 3.<sup>6</sup>

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<sup>5</sup> The individual also contends that the Notification Letter’s allegations of falsification pursuant to criterion (f) are too vague to permit him to formulate a meaningful response. This claim is without merit. The Notification Letter specifically directed the individual’s attention to section 23 of the electronic version of the QNSP that the individual executed in 2011. One of the three questions in that section concerning the individual’s usage of illegal drugs asks whether he ever used such substances while holding a security clearance. During the hearing, the individual was specifically asked about that question, and was therefore given an adequate opportunity to explain his negative response.

<sup>6</sup> During his PSI, the individual said that the earlier usage occurred during the “2000 time frame.” DOE Ex. 3 at 9. However, at the hearing, the individual testified that these usages occurred “closer to ’97, ’98, possibly ’99.” Tr. at 87.

The individual's testimony in this regard was not corroborated by any independent supporting testimony or evidence, and even if his usage was as sporadic as the individual suggests, I cannot conclude that the behavior is unlikely to recur, or does not cast doubt upon the individual's reliability, trustworthiness, or judgment. The first factor that leads me to conclude that the individual has failed to demonstrate that a recurrence of his drug usage is unlikely is the fact that the individual can point to only five months of abstinence from such usage, as of the date of the hearing. I find this to be simply too short a period of time to conclude that a recurrence of the behavior in question is unlikely. The second factor is that, although the earlier usages may have been triggered by his then-wife's unfortunate illness, there was no evidence of any particularly unusual circumstances surrounding his 2013 usages. More to the point, there was nothing about those later usages that would suggest that future usages would be unlikely.

Finally, the individual's primary reaction to failing the drug test appears to have been regret at getting caught, and not a realization of the importance of following DOE security guidelines or of keeping his commitments to the DOE. When asked during the PSI how the positive test had changed his mind-set, the individual replied that he would not have used marijuana if he had thought that he was going to be tested. The individual's testimony at the hearing was devoid of any expressed regret at violating DOE guidelines or failing to keep his 1991 promise to refrain from illegal drug usage while holding a security clearance. Since the individual has entered into a 12-month program under which he will be tested for drug use, DOE Ex. 10, I believe it to be highly unlikely that the individual will use marijuana during this period. However, once the program has ended and spotlight provided by this proceeding has faded, I believe that the risk of eventual future drug usage will be unacceptably high. Furthermore, the individual's repeated usage of marijuana after promising the DOE that he would not use illegal drugs and after being advised on multiple occasions that such usage was a violation of DOE security guidelines casts serious and continuing doubt upon his reliability, trustworthiness, and judgment. This mitigating condition does not apply to the case at hand.

The next potentially mitigating condition is "a demonstrated intent not to abuse any drugs in the future, such as" (i) disassociation from drug using associates and contacts; (ii) changing or avoiding the environment where drugs are used; (iii) an appropriate period of abstinence; and (iv) a signed statement of intent with automatic revocation of clearance for any violation. This mitigating condition does apply to the individual. In September 2013, he signed a "Drug Use Acknowledgment Form," in which he promised to not use illegal drugs, and was informed that any further illegal drug usage would trigger action to remove him from federal service. Furthermore, during the PSI, he expressed an intent to not use illegal drugs in the future. DOE Ex. 3 at 7. However, the mitigating value of this factor is attenuated by the fact that the individual previously committed that he would not use illegal drugs while holding a DOE security clearance, and then subsequently used such drugs on three to five occasions while holding access authorization. Although the 1991 Drug Certification did not provide for automatic termination of the individual's employment or clearance for a violation, it did say that breaking the agreement could lead to losing his access authorization. DOE Ex. 7.

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The third potentially mitigating condition, which concerns the abuse of prescription drugs, does not apply in this case. I find that the fourth and final listed mitigating condition, “satisfactory completion of a prescribed drug treatment program, including but not limited to rehabilitation and aftercare requirements, without recurrence of abuse, and a favorable prognosis by a duly qualified medical professional,” is substantially applicable to the individual. Although the individual’s therapist recommended “four to eight” counseling sessions with the individual, and testified that, as of the date of the hearing, he had seen him only three times, Tr. at 76-77, he also said that the individual did not suffer from any diagnosable substance use disorder, and that he did not believe him to be at risk of using illegal drugs in the future. Tr. at 76, 78.

After considering all of these factors, and the record as a whole, I conclude that the individual is an unlawful user of a controlled substance under the Bond Amendment, and that, accordingly, valid security concerns remain under criterion (k) regarding the individual’s marijuana usage. Although that usage appears to have been sporadic, it occurred, repeatedly, while the individual was holding a DOE security clearance, after he had promised to refrain from such usage and after he had been informed of the DOE guidelines regarding illegal drugs on multiple occasions. This casts the individual’s reliability, judgment and trustworthiness into serious doubt. Furthermore, given the recency of his 2013 usages, and the other factors discussed above, I cannot conclude that the chances of future usage are remote. The individual has failed to demonstrate that he is not an unlawful user of a controlled substance or to adequately address the DOE’s security concerns under criterion (k).

### **C. Criterion (f)**

The individual’s failure to mention his marijuana usage during the late 1990s or early 2000s in response to Section 23 of his 2011 QNSP raises serious concerns under criterion (f) and *Adjudicative Guideline E*. Under that *Guideline*, the “deliberate omission, concealment, or falsification of relevant facts from any personnel security questionnaire” or similar form used to determine security clearance eligibility is a potentially disqualifying condition. *Adjudicative Guidelines*, ¶ 16(a). In this case, it is undisputed that the individual incorrectly indicated that he had never illegally used a controlled substance while holding a security clearance. When asked about this at the hearing, the individual said that, while he could not say for sure what he was thinking at the time that he answered the question, he “truly believed that [his earlier] use was incidental . . . and [he] certainly didn’t believe it was ever going to come to light.” Tr. at 90. Given this testimony, I believe that the omission was deliberate. This potentially disqualifying factor is applicable to the case at hand.

*Guideline E* also sets forth potentially mitigating conditions. The first such condition is that “the individual made prompt, good-faith efforts to correct the omission, concealment or falsification before being confronted with the facts.” *Adjudicative Guidelines*, ¶ 17(a). The individual’s admission that he used marijuana in the late 1990s or early 2000s was not prompt, as it occurred almost two years after he signed his 2011 QNSP. Moreover, while it is true that this usage probably would not have come to light without the individual’s admission, it is also true that the admission came in response to a question about the individual’s drug usage posed by the security analyst, and that the individual was prohibited by federal statute from responding falsely. It is of scant mitigating value that the individual has been honest on some, but not all, of the occasions



on which honesty was required of him. This potentially mitigating factor does not apply to the individual.

The only other potentially mitigating conditions listed in *Guideline E* that find some support in the record of this proceeding are that (i) “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,” *Adjudicative Guidelines*, ¶ 17(c), and (ii) “the individual has taken positive steps to reduce or eliminate vulnerability to exploitation, manipulation, or duress,” *Adjudicative Guidelines*, ¶ 17(e). With regard to the first of these conditions, the offense was not minor, as it appears to have been a violation both of federal law and of the trust between the DOE and cleared individuals that is such an important part of the agency’s security program. Furthermore, although the actual omission occurred approximately two years ago, the individual’s deception was continuous, from 2011 until August 2013, approximately four months prior to the hearing. This is an insufficient amount of time to constitute a mitigating factor. There is also no evidence of unique circumstances that would lessen the doubts about the individual’s honesty and trustworthiness raised by this omission. This potentially mitigating condition does not exist in this case. With regard to the second condition, the individual’s disclosure of previous illegal drug usage, though tardy, did reduce or eliminate his vulnerability to exploitation or duress. Therefore, this mitigating condition does apply to the individual. However, I find it to be outweighed by the individual’s deliberate omission on his 2011 QNSP, and his maintenance of that deception for approximately two years. I find that significant security concerns remain under criterion (f).

#### **D. Criterion (I)**

As previously discussed, criterion (I) relates to information indicating that the individual has engaged in criminal or any other unusual conduct that tends to show that he is not honest, reliable or trustworthy, or that he may be subject to pressure, coercion, exploitation or duress which may cause the individual to act contrary to the best interests of national security. The individual’s illegal usages of marijuana and his violations of DOE security guidelines and of the Drug Certification that he signed in 1991 raise substantial concerns under this criterion.

*Adjudicative Guideline J* addresses allegations of criminal conduct by clearance holders and applicants. Under that *Guideline*, a serious crime or multiple lesser offenses, and allegations or admissions of criminal conduct, regardless of whether the person was formally charged or convicted, are potentially disqualifying conditions. Both of these conditions exist in this case.

Furthermore, none of the potentially mitigating conditions listed under *Guideline J* are applicable to the individual. The passage of time since the illegal conduct is not a mitigating factor, since the most recent instances of illegal drug usage occurred five months before the hearing, and there was nothing particularly unusual about the circumstances surrounding those usages. There is no evidence that the individual was pressured or coerced into using marijuana, nor is there sufficient evidence of rehabilitation from that usage. The individual has not adequately addressed the security concerns raised by his illegal behavior.

Also of concern under criterion (l) is the individual's repeated violation DOE security guidelines and of his 1991 Drug Certification. This is unusual conduct that calls into serious question the individual's judgment, reliability and trustworthiness. The individual points out that the Certification was signed "over a decade before" his earlier marijuana usages took place, Pre-hearing Brief at 19, and argues, without citing any relevant authority, that this passage of time renders the Certification "stale" and inapplicable to the individual's conduct. However, the Certification, by its terms, does not contain a time limitation, and a DOE security analyst testified at the hearing that such a Certification never expires. Tr. at 62. The individual has not adequately addressed the DOE's security concerns under criterion (l).

## V. CONCLUSION

For the reasons set forth above, I find that the individual has not adequately addressed the DOE's concerns under criteria (f), (k) and (l) and under the *Adjudicative Guidelines*. Consequently, he has failed to convince me that restoring his access authorization would not endanger the common defense and would be clearly consistent with the national interest. Accordingly, I find that the DOE should not restore the individual's security clearance at this time. Review of this decision by an Appeal Panel is available under the procedures set forth at 10 C.F.R. § 710.28.

Robert B. Palmer  
Administrative Judge  
Office of Hearings and Appeals

Date: January 30, 2014