Student Guide

Short: CI Concerns for National Security Adjudicators

Objective	Recognize potential espionage indicators
Estimated completion time	15 minutes

Introduction

The following scene unfolds:

> *From a distance, a figure in a trench coat and hat walks across a large deserted parking lot. The figure enters a building with a sign reading "Train Station." A train pulls into the station. The figure steps aboard the train and enters compartment "1408." The figure removes its coat and hat, revealing it to be a woman. She sits. She reaches below her seat and removes a messenger bag. She opens the bag to reveal a tablet computer. She opens the tablet and sees a large play button.*

> *Her finger pushes the icon, and a series of images appear on-screen: a SF-86: Questionnaire for National Security Positions; a stack of the forms piling up on a desk; a silhouetted portrait, with the words Loyalty on one side and Reliability on the other; and filling the screen the words: Foreign Influences, Unexplained Affluence, Anti-American Sentiment, Falsification of Records, and Foreign Travel. At the same time as the images appear, a voice reads:*

As you know, national security clearance applications are backlogged. It is imperative that we keep up with the demand for security clearances, while still evaluating each candidate as carefully as possible. Our counterintelligence analysts are finding that most new cases of espionage are perpetrated by individuals with strong ideologies, loyal to other nations, rather than the spies of the past who may have been exploited due to their unreliable characters… or motivated by the promise of great wealth. We have also found that many new adjudicators overlook these loyalty concerns, focusing more on the candidate's general trustworthiness and reliability. Your mission is to review the data pulled from national security clearance applications and report back with your findings. This message will self-destruct.

> *The image on the tablet screen becomes incoherent, loses resolution, and quickly disappears to a bright point.*

Activity Instructions

You will review candidate data in clearance applications and flag any potential espionage indicators. For each application, you will be presented the candidate's name and age. You will also be presented with several pieces of information gleaned from the candidate's SF-86 form, personal interviews, and interviews with the candidate's friends, neighbors, or coworkers.

If, in your opinion, any of this data qualifies as a potential espionage indicator (PEI) identify that data by checking the box next to it. You may see issues that are concerns under the general adjudicative guidelines, but only flag those issues of counterintelligence, or CI, concern.

When you have completed all scenarios, verify your responses with the Answer Key at the end of this guide.

Scenario 1

This is Hanif Alwi, age 52. Explore his file and consider whether he should be recommended for a security clearance. Do you see anything that points to one or more potential espionage indicators?

SF-86	**Developed Character References**
□ Born in Syria and maintains Syrian citizenship and passport □ Naturalized U.S. citizen □ Non-immediate family lives in Syria	□ Member in good standing of his church □ Volunteers with religious organizations □ Volunteers with youth sports organizations

Candidate Interview	**Supervisor/Coworker Statements**
□ Expressed interest in protecting U.S. national security □ Currently works in a cleared facility □ Interested in consulting business using clearance after retirement	□ Adequate work quality □ Indicated unhappiness with U.S. policy as it relates to Syria □ Maintains a home in Syria

Scenario 2

This is Hal Sundergaard, a 44 year old software engineer. Explore his file. Do you see any reason for concern?

SF-86
- Divorced 2 years ago
- Born in Finland
- Naturalized U.S. citizen
- Reports no military service

Developed Character References
- Involved in an amateur theatre
- Purchased a new luxury sports car

Candidate Interview
- Excited at the prospect of new opportunities which will result from a clearance
- Works at a currently cleared facility
- Moved to U.S. from Finland at age 31

Supervisor/Coworker Statements
- Work quality is outstanding
- Excellent success record with difficult projects
- Suddenly began wearing designer clothing and expensive watches

Hint! Finland requires military service for all men between the ages of 19 and 29.

Scenario 3

Next up is Ariana Sharp, age 38. Ariana is a project manager. Take a look at her file and make your determination about whether to recommend her for a security clearance.

SF-86
- Annually visits Montreal for two weeks
- Naturalized U.S. citizen
- Has voluntarily surrendered her Canadian passport

Developed Character References
- Married for 10 years
- Has two children with her husband
- Has close ties to her family living in Canada

Candidate Interview
- Enjoys living and working in the US
- Misses her family
- Considers herself an American

Supervisor/Coworker Statements
- Work quality is sometimes poor
- Pleasant to work with

Scenario 4

The next candidate is Bahar Sasooli, age 49. Review his information and determine if he should be recommended for clearance.

<table>
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SF-86
- A partner in a Pakistani import business
- Naturalized U.S. citizen
- Charged with "drunk and disorderly" four years ago

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**Developed
Character References**
- Owns business specializing in the import of electronics for the Pakistani military
- Indicated that if he were to lose his job he would seek another job in the U.S.

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Candidate Interview
- Making plans to attend both children's college graduations
- Children are attending college in Pakistan
- Fluent in four languages (Punjabi, English, French, Hindi)

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**Supervisor/Coworker
Statements**
- Has been suspected in not properly securing classified information on two occasions
- Hard-working and frequently works late

</td>
</tr>
</table>

Scenario 5

Finally, here is Seth DiJiulian's information. Seth is a 32 year old electronic engineer. Take a look at his file and flag any CI concerns that you find.

<table>
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SF-86
- U.S. citizen
- Served in the US Navy
- Has lived in Ukraine, Belarus and Estonia

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**Developed
Character References**
- Has discussed living outside the US in the future
- Graduated *summa cum laude* with a BA in Electronic Engineering

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Subject Interview
- Shares an apartment with a Ukrainian female
- Indicated that the Ukrainian roommate is an occasional sex partner
- Learning the Ukrainian language

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**Supervisor/Coworker
Statements**
- Work quality is adequate
- Candidate indicated to one coworker that he may purchase a house in Ukraine
- Performance level which does not justify promotion

</td>
</tr>
</table>

Answer Key

Scenario 1

This is Hanif Alwi, age 52. Explore his file and consider whether he should be recommended for a security clearance. Do you see anything that points to one or more potential espionage indicators?

<table>
<tr><td>

SF-86
- ☑ Born in Syria and maintains Syrian citizenship and passport
- ☐ Naturalized U.S. citizen
- ☑ Non-immediate family lives in Syria

</td><td>

Developed Character References
- ☐ Member in good standing of his church
- ☐ Volunteers with religious organizations
- ☐ Volunteers with youth sports organizations

</td></tr>
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Candidate Interview
- ☐ Expressed interest in protecting U.S. national security
- ☐ Currently works in a cleared facility
- ☐ Interested in consulting business using clearance after retirement

</td><td>

Supervisor/Coworker Statements
- ☐ Adequate work quality
- ☑ Indicated unhappiness with U.S. policy as it relates to Syria
- ☑ Maintains a home in Syria

</td></tr>
</table>

Rationale: You should have identified the following as PEIs:

- *Born in Syria and maintains Syrian citizenship and passport*
- *Non-immediate family lives in Syria*
- *Indicated unhappiness with U.S. policy as it relates to Syria*
- *Maintains a home in Syria*

Multiple data points in this candidate's information indicate a strong preference for Syria. This candidate should be referred to the appropriate counterintelligence agency for their analysis, and we should also recommend suspension of his interim clearance.

Scenario 2

This is Hal Sundergaard, a 44 year old software engineer. Explore his file. Do you see any reason for concern?

SF-86
□ Divorced 2 years ago
□ Born in Finland
□ Naturalized U.S. citizen
□ Reports no military service

Developed Character References
□ Involved in an amateur theatre
□ Purchased a new luxury sports car

Candidate Interview
□ Excited at the prospect of new opportunities which will result from a clearance
□ Works at a currently cleared facility
□ Moved to U.S. from Finland at age 31

Supervisor/Coworker Statements
□ Work quality is outstanding
□ Excellent success record with difficult projects
□ Suddenly began wearing designer clothing and expensive watches

Hint! *Finland requires military service for all men between the ages of 19 and 29.*

Rationale: You should have identified the following as PEIs:

- *Reports no military service*
- *Purchased a new luxury sports car*
- *Moved to U.S. from Finland at age 31*
- *Suddenly began wearing designer clothing and expensive watches*

As noted in the Hint, Finland requires military service, yet this candidate reported no military service. This contradictory information may have just been a mistake, but it could indicate that he falsified his records. Combined with the candidate's apparent new-found wealth, this candidate's application should be referred to OPM case controllers for additional investigation.

Scenario 3

Next up is Ariana Sharp, age 38. Ariana is a project manager. Take a look at her file and make your determination about whether to recommend her for a security clearance.

<table>
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SF-86
- Annually visits Montreal for two weeks
- Naturalized U.S. citizen
- Has voluntarily surrendered her Canadian passport

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**Developed
Character References**
- Married for 10 years
- Has two children with her husband
- Has close ties to her family living in Canada

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Candidate Interview
- Enjoys living and working in the US
- Misses her family
- Considers herself an American

</td>
<td>

**Supervisor/Coworker
Statements**
- Work quality is sometimes poor
- Pleasant to work with

</td>
</tr>
</table>

Rationale: This candidate's application shows no PEIs. Even though she retains ties to her family in Canada, she seems to have fully embraced her identity as an American.

Scenario 4

The next candidate is Bahar Sasooli, age 49. Review his information and determine if he should be recommended for clearance.

SF-86	**Developed Character References**
☑ A partner in a Pakistani import business ◻ Naturalized U.S. citizen ◻ Charged with "drunk and disorderly" four years ago	☑ Owns business specializing in the import of electronics for the Pakistani military ◻ Indicated that if he were to lose his job he would seek another job in the U.S.
Candidate Interview	**Supervisor/Coworker Statements**
◻ Making plans to attend both children's college graduations ◻ Children are attending college in Pakistan ◻ Fluent in four languages (Punjabi, English, French, Hindi)	☑ Has been suspected in not properly securing classified information on two occasions ◻ Hard-working and frequently works late

Rationale: You should have identified the following as PEIs:

- *A partner in a Pakistani import business*
- *Owns business specializing in the import of electronics for the Pakistani military*
- *Has been suspected in not properly securing classified information on two occasions*

This candidate's application is a good example of a situation in which a pattern of behavior deserves extra attention, rather than an isolated instance.

Scenario 5

Finally, here is Seth DiJiulian's information. Seth is a 32 year old electronic engineer. Take a look at his file and flag any CI concerns that you find.

SF-86	**Developed Character References**
▫ U.S. citizen ▫ Served in the US Navy ▫ Has lived in Ukraine, Belarus and Estonia	▫ Has discussed living outside the US in the future ▫ Graduated *summa cum laude* with a BA in Electronic Engineering

Subject Interview	**Supervisor/Coworker Statements**
▫ Shares an apartment with a Ukrainian female ☑ Indicated that the Ukrainian roommate is an occasional sex partner ▫ Learning the Ukrainian language	▫ Work quality is adequate ☑ Candidate indicated to one coworker that he may purchase a house in Ukraine ▫ Performance level which does not justify promotion

Rationale: You should have identified the following as PEIs:

- *Indicated that the Ukrainian roommate is an occasional sex partner*
- *Candidate indicated to one coworker that he may purchase a house in Ukraine*

Due to the candidate's indicated preference for Ukraine, he should be referred to CI for additional analysis.

Activity Conclusion

Great work! You have helped clear out the backlog of security clearance applications. I'm sure you recognized many issues that are concerns under the general adjudicative guidelines, but remember we only highlighted those that are specifically CI concerns.

Now take a few minutes to review what you learned while adjudicating these cases.

Potential Espionage Indicators

You have completed an activity which was designed to focus attention on loyalty concerns in the adjudication process. Each of the cases you adjudicated contained information representing a variety of potential espionage indicators that you must take into account when considering whether to recommend a candidate for a security clearance. Take a moment to review each PEI category listed here:

- **Foreign Contacts and Associations:** Information pertains to foreign relatives and associates and foreign government employment or other relationships. Information pertaining to substantial business, financial, or property interests in a foreign country, or participation in a foreign-owned or foreign-operated business, is categorized here. Information pertaining to contact with a foreign family member, business or professional associate, friend, or other person who is a citizen of, or who is resident in, a foreign country, is categorized under this heading. Of special concern are contacts and associations that create a heightened risk of foreign exploitation, inducement, manipulation, or pressure. Information concerning connections to a foreign person, group, government, or country that creates a potential conflict of interest between an individual's obligation to the United States and desire to help a foreign entity is categorized here.

- **Foreign Travel:** Information pertains to instances or patterns of foreign travel which, due to destination, frequency, itinerary, or other factors, suggests an individual may be at increased risk for having engaged in espionage or supporting terrorist activities, or may be vulnerable to becoming involved in such activities.

- **Foreign Preference:** Information pertains to the exercise of any right, privilege or obligation of foreign citizenship after becoming a U.S. citizen, or through the foreign citizenship of a family member. Examples of foreign preference information include, but are not limited to, possession of a current foreign passport not approved by and/or reported to the cognizant authority, foreign military service, and the acceptance of educational, medical, retirement, social welfare, or other such benefits from a foreign country. Other indications of foreign preference can include residence in a foreign country to meet citizenship requirements, using foreign citizenship to protect financial or business interests in another country, and seeking or holding political office in a foreign country. Using foreign citizenship or a relationship to protect financial interests or choosing to support a foreign nation's or group's interests over those of the United States is categorized here. Voicing of support for, or contributing monetarily to a foreign cause in opposition to, U.S. policy is categorized under this heading.

- **Anti-American Statements, Activities, and Associations:** Information includes involvement in or advocacy of any act of sabotage, espionage, treason, terrorism, or sedition against the United States. Association or sympathy with persons who are attempting to commit, or who are committing, anti-American acts is included here. Information pertaining to anti-American statements made by Subjects is classified here.

- **Falsification/Failure to Report Substantive Information:** Information includes instances where a Subject failed to provide accurate or complete information related to an issue of CI interest. This includes, but is not limited to, failure to report travel to a region of CI concern, foreign connections and associations, ownership of foreign property, security violations, and sexual behavior that increases vulnerability to being exploited by foreign intelligence services.

- **Sexual Behavior That Increases Vulnerability to Exploitation:** While security clearance applicants sometimes engage in sexual behavior that involves a criminal offense, which may suggest the presence of a personality or emotional disorder, and which may reflect a lack of judgment or discretion. Of particular concern is sexual behavior that may make an individual vulnerable to exploitation by foreign intelligence services. Information categorized under this heading includes that pertaining to sexual relations with foreign nationals—especially adulterous affairs or use of prostitutes.

- **Suspicious Financial Transactions or Undue Affluence:** Information includes deceptive or illegal financial practices such as embezzlement, check fraud, income tax evasion, expense account fraud, filing deceptive loan statements, etc. Unexplained affluence information includes that which indicates a lifestyle or standard of living change or an increase in net worth that cannot be explained by a Subject's known legal sources of income.

- **Illicit Information Collection or Transmittal:** Information includes deliberately removing from the office, collecting or storing classified or other protected information and inappropriate efforts to obtain or view classified or other protected information. Activities that indicate an individual may have transmitted classified or sensitive information, or information otherwise of intelligence value to a foreign entity not authorized to be in possession of such information are included under this heading.

- **Other Counterintelligence Issues:** Information pertains to a range of behaviors that may indicate the presence of a CI issue that is not classifiable under the other headings. Types of issues categorized under this heading include information pertaining to serious security violations, negligent handling of classified information, possible foreign intelligence service solicitation, extreme

debt, relevant criminal activities, mishandling of classified or proprietary information, and other potentially problematic and suspicious activities.

Advice to Adjudicators

Keep in mind these two things.

First, you are making judgment calls. You job is to recognize potential espionage indicators. You are not tasked with uncovering evidence of actual espionage, although you might do so. For example, Seth DiJiulian's file contained PEIs. Mr. DiJiulian may never take part in an act of espionage, but your role is to identify the PEIs, not evaluate Mr. DiJiulian's guilt or innocence.

Second, you are not judging whether the candidate has the suitable experience or skills to perform his or her job. Your role is simply to recognize any issues that might give a foreign power leverage against a candidate.

Finally, remember that the direction a case takes may warrant different actions, depending on the nature of any PEIs you identify. You could recommend that a case be returned to OPM case controllers for additional investigation, or that it be referred to the appropriate counterintelligence agency for analysis. In conjunction with either of those options, you can also recommend that an interim clearance be suspended while work on the case continues.

Conclusion

The following scene unfolds:

> *Hal Sundergaard is seated at a cube in an office, eyes casting furtively to one side. Sundergaard gets up and enters a door labeled "Secure Room – Cleared Personnel Only." He removes a thumb drive from his pocket and inserts it into the USB port of a computer. On the computer monitor, a menu of files is displayed. He highlights the files and selects "Copy." When the files have finished copying, he returns the thumb drive to his pocket and leaves the Secure Room. Sundergaard leaves the building, sirens start to wail, a spotlight floods down on him, and handcuffs are slapped onto his wrists.*

Not everyone with potential espionage indicators is engaged in espionage activities, or will engage in such activities. However, some are. Hal Sundergaard was trying to make off with classified data, but with your help we were able protect national security and stop him before he revealed sensitive information to our enemies.