

**20. *Conditions that could mitigate security concerns include:***

- (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, or a death, divorce or separation), and the individual acted responsibly under the circumstances;**
- (c) the person has received or is receiving counseling for the problem and/or there are clear indications that the problem is being resolved or is under control;**
- (d) the individual initiated a good-faith effort to repay overdue creditors or otherwise resolve debts;**
- (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;**
- (f) the affluence resulted from a legal source of income.**