

BIA & Attorney General Precedent Decisions

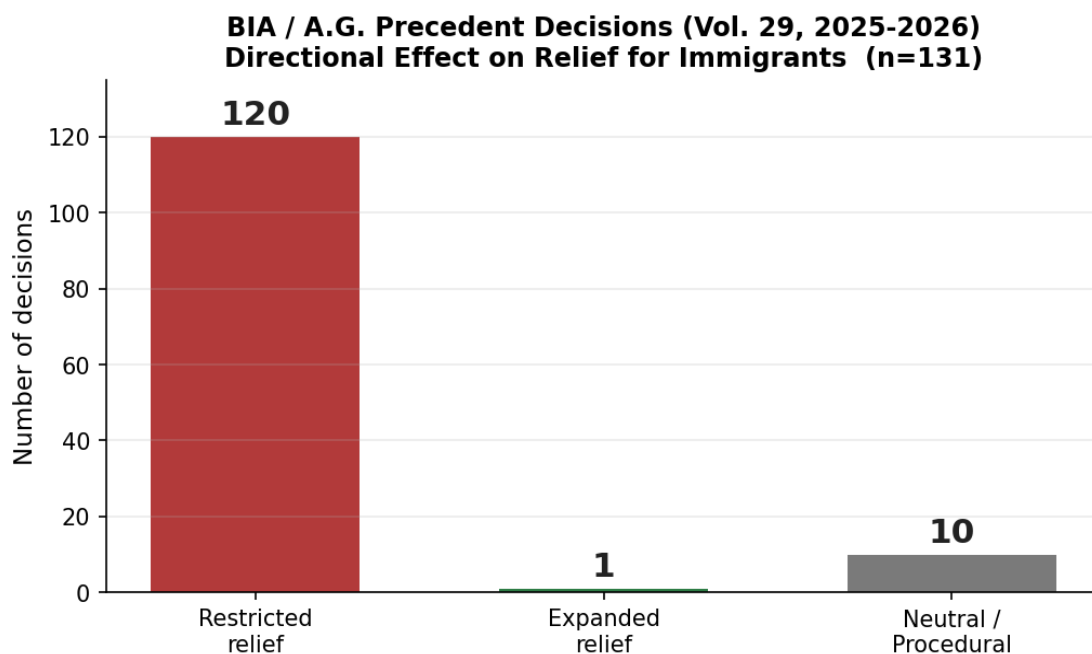
Directional Analysis: Restriction vs. Expansion of Relief for Immigrants

Volume 29, I&N Dec. (2025–2026) · 131 decisions reviewed · Prepared July 10, 2026

Executive Summary

Every one of the 131 precedent decisions in this set was read in full and classified by the direction of the legal rule it announces — whether it makes relief or protection **harder** to obtain (Restrict), **easier** to obtain (Expand), or has no clear directional effect (Neutral/procedural).

The result is overwhelmingly one-directional. Of the 131 decisions, 120 restricted relief, 1 expanded it, and 10 were neutral or purely procedural. Only one decision (4087, Matter of C-A-R-R-) announced a net rule favoring noncitizens — holding that an asylum application cannot be deemed abandoned solely because it lacks a declaration. Virtually every other substantive merits holding — across asylum, withholding, CAT, cancellation, bond/detention, and removability — cut against the immigrant, and in most cases the Board or Attorney General reversed an Immigration Judge's grant of relief.



Direction	Count	Share
Restricted relief for immigrants	120	92%
Expanded relief for immigrants	1	1%
Neutral / procedural (no clear direction)	10	8%
Total decisions reviewed	131	100%

How each decision was classified

Restrict — the holding narrows eligibility for relief, broadens grounds of removability/inadmissibility, expands a disqualifying crime or bar, increases government/DHS authority against the noncitizen, or otherwise makes protection harder to obtain.

Expand — the holding broadens eligibility for relief, narrows a bar or removability ground, recognizes or extends a protection, or limits government authority in the noncitizen's favor.

Neutral — purely procedural, jurisdictional, or evidentiary rules with no clear directional effect, or genuinely mixed holdings that offset. These include the two short Attorney General referral/remand orders (29 I&N Dec. 201 and 206) and an attorney-discipline decision.

Classification reflects the *precedential rule* announced, not merely which party won. A handful of decisions framed as evidentiary standards (e.g., 4161, 4168, 4176) were scored Restrict because the rule directionally raises the bar on the noncitizen and each reversed a grant of protection. This is a directional coding of legal effect, not legal advice.

Complete Decision Chart (all 131 decisions)

Ordered by interim decision number, then by the named 2025 decisions. Direction is color-coded: **red = Restrict**, **green = Expand**, **gray = Neutral**.

Dec. #	Citation	Case Name	Issue / Relief Area	Holding	Direction
4085	29 I&N Dec. 1 (BIA 2025)	Matter of Baeza-Galindo	Removability – two CIMTs / single scheme	Proximity in time is necessary but not sufficient to show a single scheme; two CIMTs with different objectives are separate schemes.	Restrict
4086	29 I&N Dec. 7 (BIA 2025)	Matter of De Jesus-Platon	Cancellation – vacatur / CIMA	A generic Cal. Penal Code 1473.7 vacatur did not show the conviction was vacated for a substantive defect rather than immigration hardship.	Restrict
4087	29 I&N Dec. 13 (BIA 2025)	Matter of C-A-R-R-	Asylum application completeness	An asylum application may not be deemed abandoned solely for lack of a declaration; the Board reinstated the claim and remanded (though an incomplete I-589 may still be waived).	Expand
4088	29 I&N Dec. 20 (BIA 2025)	Matter of Dor	Removability – drug schedule timing	The time of conviction, not of removal adjudication, governs the state/federal drug-schedule comparison.	Restrict
4089	29 I&N Dec. 26 (BIA 2025)	Matter of Iskandarani	Appeal deadline computation	The 30-day appeal period runs from the date an oral decision is rendered, unaffected by later mailing of a memorandum.	Restrict
4090	29 I&N Dec. 30 (BIA 2025)	Matter of O-A-R-G-	Asylum/CAT – former-status nexus / acquiescence	Harm for conduct done while a current member is not persecution on account of 'former' status; CAT acquiescence requires greater complicity.	Restrict
4091	29 I&N Dec. 38 (BIA 2025)	Matter of A-A-R-	CAT – former gang member (El Salvador)	A former MS-13 member did not show he would more likely than not be tortured; harsh conditions do not show individualized torture.	Restrict
4092	29 I&N Dec. 48 (BIA 2025)	Matter of Choc-Tut	Bond – deference to state custody order	An IJ may consider but owes no deference to a state court's custody/bail decision in immigration bond proceedings.	Restrict
4093	29 I&N Dec. 52 (BIA 2025)	Matter of F-B-G-M-	Notice – electronic service	Electronic notification to the email of record is sufficient notice, subject to a rebuttable presumption of delivery.	Neutral
4094	29 I&N Dec. 61 (BIA 2025)	Matter of M-S-I-	CAT – acquiescence standard	The CAT acquiescence standard differs from the asylum unable-or-unwilling standard; private violence plus speculation is insufficient.	Restrict
4095	29 I&N Dec. 66 (BIA 2025)	Matter of Q. Li	Bond – 235(b) detention	An arriving applicant arrested without a warrant is detained under 235(b) and ineligible for bond; terminated parole returns her to 235(b).	Restrict
4096	29 I&N Dec. 72 (BIA 2025)	Matter of Bain	Cancellation – discretion	Given recent repeated criminal history and no rehabilitation, the LPR did not warrant cancellation as a matter of discretion.	Restrict
4097	29 I&N Dec. 76 (BIA 2025)	Matter of Beltrand-Rodriguez	Bond – dangerousness	Release would pose a danger where the respondent subjected a vulnerable minor relative to unlawful sexual conduct.	Restrict

Dec. #	Citation	Case Name	Issue / Relief Area	Holding	Direction
4098	29 I&N Dec. 79 (BIA 2025)	Matter of N-N-B-	CAT – legal standard	The IJ applied the wrong 'could be' standard instead of 'more likely than not,' and the record did not meet the correct standard.	Restrict
4099	29 I&N Dec. 83 (BIA 2025)	Matter of D-E-B-	Motions to reopen – supplements	A supplement raising fundamentally different claims is treated as a separate (here time-barred) motion.	Restrict
4100	29 I&N Dec. 90 (BIA 2025)	Matter of Lopez-Ticas	NTA defect – withdrawal of pleadings	A missing time/place on the NTA does not invalidate admissions or charges and is not a basis to withdraw pleadings.	Restrict
4101	29 I&N Dec. 96 (BIA 2025)	Matter of B-N-K-	Administrative closure	Merits resolution is the primary consideration; a pending TPS application generally will not warrant administrative closure.	Restrict
4102	29 I&N Dec. 103 (BIA 2025)	Matter of E-Y-F-G-	Bond – flight risk	A withholding grant pending on appeal does not justify release where flight-risk factors weigh strongly against it.	Restrict
4103	29 I&N Dec. 106 (BIA 2025)	Matter of Roque-Izada	Termination – Cuban Adjustment Act	Termination is not warranted to pursue CAA adjustment before USCIS based on speculation that USCIS will grant parole.	Restrict
4104	29 I&N Dec. 110 (BIA 2025)	Matter of Mayorga Ipina	CIMT / mandatory detention	Virginia indecent exposure is a CIMT because its 'obscene display' element necessarily involves lewd intent.	Restrict
4105	29 I&N Dec. 114 (BIA 2025)	Matter of C-I-R-H-	Asylum – nexus	Nexus requires a connection beyond speculation, not merely statistical likelihood or unfortunate coincidence.	Restrict
4106	29 I&N Dec. 118 (BIA 2025)	Matter of A-A-F-V-	CAT – individualized risk (El Salvador)	A bisexual deportee with gang tattoos did not establish an individualized (>50%) risk of torture in detention.	Restrict
4107	29 I&N Dec. 123 (BIA 2025)	Matter of Sherstobitov	CAT – predictive findings (Russia)	An IJ's predictive finding of future torture built on a chain of suppositions is legally insufficient.	Restrict
4108	29 I&N Dec. 129 (BIA 2025)	Matter of Gonzalez Jimenez	Cancellation / voluntary departure – discretion	Use of false/stolen SSNs and false tax filings are negative discretionary factors; a professional-advice excuse needs specific proof.	Restrict
4109	29 I&N Dec. 136 (BIA 2025)	Matter of S-S-	CAT – detention conditions (Haiti)	Harsh detention conditions are not torture absent proof of specific intent and of long-term detention.	Restrict
4110	29 I&N Dec. 141 (BIA 2025)	Matter of C-M-M-	Bond – flight risk	An extensive history of removals and illegal reentries makes an applicant such a flight risk that no bond suffices.	Restrict
4111	29 I&N Dec. 145 (BIA 2025)	Matter of K-E-S-G-	Asylum/withholding – PSG	A PSG defined by sex, or sex plus nationality, standing alone is overbroad and not cognizable.	Restrict
4112	29 I&N Dec. 157 (BIA 2025)	Matter of Felix-Figueroa	Removability – drug conviction	The realistic-probability test applies to isomer mismatches; the respondent must show actual overbroad prosecution.	Restrict
4113	29 I&N Dec. 166 (BIA 2025)	Matter of Akhmedov	Bond – flight risk	Address discrepancies and failure to file change-of-address notices establish flight risk warranting no bond.	Restrict
4114	29 I&N Dec. 169 (BIA 2025)	Matter of Garcia Martinez	Fee waivers	A non-detained alien with private counsel is presumed able to pay fees; an all-zeros fee-waiver request is presumptively invalid.	Restrict
4115	29 I&N Dec. 173 (BIA 2025)	Matter of Salas Pena	Bond – dangerousness	A recent arrest for large-quantity cocaine trafficking shows dangerousness warranting no bond, even absent conviction.	Restrict

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4116	29 I&N Dec. 176 (BIA 2025)	Matter of G-C-I-	Asylum/CAT – credibility & corroboration	Nonresponsive testimony supports adverse credibility, and lack of corroboration is an independent basis to deny relief.	Restrict
4117	29 I&N Dec. 186 (BIA 2025)	Matter of Buri Mora	Cancellation – hardship	Economic detriment and family separation, with care unaffected, do not meet the exceptional-and-extremely-unusual standard.	Restrict
4118	29 I&N Dec. 190 (BIA 2025)	Matter of O-Y-A-E-	CAT (Venezuela)	Past threats years before departure, followed by unharmed residence, do not establish an individualized risk of torture.	Restrict
4119	29 I&N Dec. 195 (BIA 2025)	Matter of J-A-F-S-	Continuances	An IJ generally should not continue a hearing based on a speculative assertion of possible new relief.	Restrict
4124	29 I&N Dec. 211 (BIA 2025)	Matter of Dobrotvorskii	Bond – evidence	A reliable sponsor is relevant to flight risk, and IJs may weigh all probative evidence regardless of which party filed it.	Neutral
4126	29 I&N Dec. 230 (BIA 2025)	Matter of Garcia-Flores	Cancellation – discretion	In discretionary analysis an IJ may not go behind a conviction to find the respondent factually innocent.	Restrict
4127	29 I&N Dec. 233 (BIA 2025)	Matter of H-A-A-V-	Asylum/CAT – procedure	If facts viewed most favorably do not show prima facie eligibility, an IJ may pretermite without a full hearing.	Restrict
4129	29 I&N Dec. 249 (BIA 2025)	Matter of McDonald	Cancellation – discretion	Child-endangerment convictions plus the underlying conduct warrant denial of discretionary relief.	Restrict
4131	29 I&N Dec. 259 (BIA 2025)	Matter of Frias Ulloa	Removability – aggravated felony	N.J. drug statute is divisible by substance, so the modified categorical approach identifies a removable fentanyl conviction.	Restrict
4132	29 I&N Dec. 264 (BIA 2025)	Matter of Cotrufo	Bond – dangerousness	Recent unlawful-sexual-conduct-with-a-minor convictions plus a probation report establish dangerousness warranting no bond.	Restrict
4133	29 I&N Dec. 269 (BIA 2025)	Matter of L-A-L-T-	Asylum/withholding – PSG	Perceived membership is cognizable only if the underlying group is; 'perceived Salvadoran gang members' is not.	Restrict
4134	29 I&N Dec. 278 (BIA 2025)	Matter of J-H-M-H-	CAT – stipulations	IJs exercise independent judgment and need not accept party stipulations, even a joint stipulation to CAT eligibility.	Restrict
4135	29 I&N Dec. 285 (A.G. 2025)	Matter of Negusie	Asylum – persecutor bar	The persecutor bar contains no duress or coercion exception, and the applicant must disprove its application.	Restrict
4136	29 I&N Dec. 287 (BIA 2025)	Matter of J-A-N-M-	Withholding-only – termination	Discretionary termination of an applicant's withholding-only proceedings is prohibited by regulation.	Restrict
4137	29 I&N Dec. 291 (BIA 2025)	Matter of C-I-G-M-	Asylum – safe third country bar	The IJ must decide the safe-third-country bar first, with the respondent bearing the burden to avoid it.	Restrict
4138	29 I&N Dec. 300 (BIA 2025)	Matter of Cahuec Tzalam	Administrative closure / SIJ	Granting closure was error given no prima facie SIJ showing and a lengthy visa wait.	Restrict
4139	29 I&N Dec. 307 (BIA 2025)	Matter of K-S-H-	Asylum – 'unable or unwilling'	A single failed police report, without more, does not show the government is unable or unwilling to protect.	Restrict
4140	29 I&N Dec. 313 (BIA 2025)	Matter of B-S-H-	Motions to reopen / VAWA	The extraordinary-circumstances waiver reaches only the time limit, not the numerical bar, on VAWA motions.	Restrict
4141	29 I&N Dec. 319 (BIA 2025)	Matter of W-F-	CAT (Haiti)	Anecdotal bribery in prisons and generalized gang violence do not establish a particularized likelihood of torture.	Restrict

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4142	29 I&N Dec. 325 (BIA 2025)	Matter of Jimenez-Ayala	Cancellation – discretion	Drug use and exposing children to drugs outweigh equities and warrant discretionary denial.	Restrict
4143	29 I&N Dec. 331 (BIA 2025)	Matter of J-C-A-G-	CAT	Fear based on a coconspirator's jailhouse statements and generalized cartel violence does not show a clear probability of torture.	Restrict
4144	29 I&N Dec. 335 (BIA 2025)	Matter of Dubon Miranda	Bond – dangerousness	Given conduct toward his stepdaughter, DUI, and unexplained convictions, the respondent failed to show he is not a danger.	Restrict
4145	29 I&N Dec. 339 (BIA 2025)	Matter of Kim	Cancellation – discretion	Decades of systemic fraud outweigh recent remorse and rehabilitation, defeating a favorable exercise of discretion.	Restrict
4146	29 I&N Dec. 343 (BIA 2025)	Matter of L-A-G-B-	CAT	Predictive findings built on a chain of unsupported suppositions are clearly erroneous and cannot support CAT relief.	Restrict
4147	29 I&N Dec. 347 (BIA 2025)	Matter of N-P-A-	Asylum – well-founded fear	A pretextual summons plus general country conditions did not establish well-founded fear where the son was unharmed.	Restrict
4148	29 I&N Dec. 351 (BIA 2025)	Matter of Lema Mizhirumbay	Cancellation – discretion	Repeated OSHA violations causing two worker deaths are significant adverse factors defeating cancellation.	Restrict
4149	29 I&N Dec. 355 (BIA 2025)	Matter of Palma-Olvera	Cancellation – good moral character	Caring for a child and steady employment do not rebut the GMC presumption arising from two DWI convictions.	Restrict
4150	29 I&N Dec. 358 (BIA 2025)	Matter of Rodriguez Pena	Bond – dangerousness	A death threat, hostile reaction to police, and alias use establish dangerousness barring release.	Restrict
4151	29 I&N Dec. 362 (BIA 2025)	Matter of L-T-A-	Asylum – firm resettlement bar	A legal right to enter, live, work, and own property indefinitely constitutes permanent resettlement.	Restrict
4152	29 I&N Dec. 371 (BIA 2025)	Matter of Tepec-Garcia	Termination	Where neither party appears and DHS offers no evidence, terminating without prejudice is not error.	Neutral
4153	29 I&N Dec. 376 (BIA 2025)	Matter of Ghanbari	Mandatory detention – material support	Distributing MEK propaganda was material support, making the respondent subject to mandatory detention.	Restrict
4154	29 I&N Dec. 379 (BIA 2026)	Matter of E-M-F-S-	Asylum – persecution standard	Death threats alone rarely constitute persecution and only do so if credible and issued by someone able to carry them out.	Restrict
4155	29 I&N Dec. 389 (BIA 2026)	Matter of Laparra-Deleon	In absentia removal / notice	A compliant notice of hearing supplies sufficient notice for in absentia removal even after a defective NTA.	Restrict
4156	29 I&N Dec. 392 (BIA 2026)	Matter of D-G-B-L-	Asylum – serious nonpolitical crime bar	The serious nonpolitical crime bar contains no duress exception.	Restrict
4157	29 I&N Dec. 401 (BIA 2026)	Matter of M-C-C-	Removability – fraud waiver	Omitting military service was a material misrepresentation, and the fraud waiver is denied in discretion.	Restrict
4158	29 I&N Dec. 412 (BIA 2026)	Matter of S-M-H-	Asylum – frivolous-application bar	The written I-589 warning is sufficient notice, withdrawal does not preclude a frivolousness finding, and there is no limitations period.	Restrict
4159	29 I&N Dec. 419 (BIA 2026)	Matter of Laurent Castro	In absentia removal / continuances	Where notice was proper and removability shown, the IJ was required to enter an in absentia order rather than continue.	Restrict

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4160	29 I&N Dec. 422 (BIA 2026)	Matter of E-A-S-O-	Asylum/withholding – particularly serious crime	The N-A-M- framework governs and there is no presumption that a single misdemeanor is not a PSC (overruling Juarez).	Restrict
4161	29 I&N Dec. 431 (BIA 2026)	Matter of G-M-I-	CAT – expert evidence	An expert's opinions lose reliability when based on anecdotal or inaccurate facts, so heavy reliance is error.	Restrict
4162	29 I&N Dec. 438 (BIA 2026)	Matter of Yadav	Sua sponte reopening / adjustment	A valid marriage entered after a removal order is not an exceptional situation warranting sua sponte reopening.	Restrict
4163	29 I&N Dec. 441 (BIA 2026)	Matter of Jin	Visa petition – marriage fraud	Given fraud allegations, the Board returns the record to USCIS because it cannot conduct factfinding on appeal.	Neutral
4164	29 I&N Dec. 451 (BIA 2026)	Matter of L-S-C-R-	Background-check remand scope	A background-check remand is limited to the checks and underlying relief; new relief requires a separate motion.	Restrict
4165	29 I&N Dec. 456 (BIA 2026)	Matter of F-B-A-	Asylum – relocation / childhood harm	Reporting barriers faced by children do not extend to adults harmed as children, and relocation was reasonable.	Restrict
4166	29 I&N Dec. 463 (BIA 2026)	Matter of Forjoe	Fraud waiver – 237(a)(1)(H)	'At the time of admission' means lawful entry, so fraud at adjustment cannot be waived (overruling Agour).	Restrict
4167	29 I&N Dec. 476 (BIA 2026)	Matter of Ibarra-Vega	Administrative closure / U visa	Closure is inappropriate when a U visa is not available in the reasonably near future; over 6 months is presumptively unreasonable.	Restrict
4168	29 I&N Dec. 485 (BIA 2026)	Matter of D-J-L-	CAT – expert evidence	An IJ errs in weighting an expert whose testimony reflects advocacy bias and inability to assess a country impartially.	Restrict
4169	29 I&N Dec. 491 (AAO 2026)	Matter of Texperits, Inc.	Visa petition – fraud after withdrawal	An officer may make fraud findings even after a petition is withdrawn, if specifically supported.	Restrict
4170	29 I&N Dec. 499 (BIA 2026)	Matter of R-B-E-	Withholding – changed circumstances	A past-persecution presumption is rebutted by fundamental change, and access-device-fraud conspiracy is a PSC.	Restrict
4171	29 I&N Dec. 507 (BIA 2026)	Matter of Pinzon Rozo	Continuances – SIJ	A continuance to await an SIJ visa was error where the priority date is current only after an uncertain, lengthy wait.	Restrict
4172	29 I&N Dec. 511 (BIA 2026)	Matter of Z-N-L-	Bond – flight risk	Unresolved discrepancies about the respondent's residence establish flight risk warranting denial of bond.	Restrict
4173	29 I&N Dec. 514 (BIA 2026)	Matter of Medina Madrid	Administrative closure / recalendarng	After 13 years of closure, continued closure is unwarranted based on intent to seek a provisional waiver.	Restrict
4174	29 I&N Dec. 519 (BIA 2026)	Matter of Arevalo-Vargas	Cancellation – hardship	Aged-out children are no longer qualifying relatives, and the remaining hardship does not meet the standard.	Restrict
4175	29 I&N Dec. 523 (BIA 2026)	Matter of Z-R-C-N-	Motion to reopen – ineffective assistance	An IAC claim fails where the person was not an attorney, and SIJ adjustment is speculative given the backlog.	Restrict
4176	29 I&N Dec. 529 (BIA 2026)	Matter of Mercado-Martinez	Alienage / Form I-213	An IJ finding an I-213 unreliable must point to specific record evidence rebutting its presumed reliability.	Restrict
4177	29 I&N Dec. 533 (BIA 2026)	Matter of Lopez-Orellana	NTA defect / in absentia removal	An NTA objection is forfeited if untimely, and the IJ should proceed in absentia rather than terminate.	Restrict
4178	29 I&N Dec. 536 (BIA 2026)	Matter of Valenzuela Gallardo	Aggravated felony – obstruction	Obstruction needs no pending proceeding, and Cal. accessory-to-a-felony is categorically an aggravated felony.	Restrict

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4179	29 I&N Dec. 542 (BIA 2026)	Matter of Pelagio Mendoza	Cancellation – hardship evidence	Testimony about a medical condition is generally insufficient for hardship where expert/medical evidence was available.	Restrict
4180	29 I&N Dec. 548 (BIA 2026)	Matter of Bolivar-Bolivar	In absentia removal / termination	Where the respondent is charged with entry without admission and alienage is shown, the IJ errs by terminating.	Restrict
4181	29 I&N Dec. 551 (BIA 2026)	Matter of A-M-Z-F-	Due process – closing argument	Parties have no right to closing argument unless denial would amount to a due process violation.	Restrict
4182	29 I&N Dec. 556 (BIA 2026)	Matter of M-K- (Khalil)	Removability – foreign-policy ground	The Secretary of State's foreign-policy letter is presumptive, sufficient evidence of removability; waiver and asylum denied.	Restrict
4183	29 I&N Dec. 570 (BIA 2026)	Matter of D-G-E-A-	Asylum – political opinion	Opposition to criminal gangs is not a political opinion; it must be tied to a government, including a de facto one.	Restrict
4184	29 I&N Dec. 582 (BIA 2026)	Matter of R-A-U-	Asylum – credibility	Based on inconsistencies and omissions, the IJ clearly erred in finding the asylum applicant credible.	Restrict
4185	29 I&N Dec. 586 (BIA 2026)	Matter of E-N-N-	Withholding – credibility / pattern-or-practice	The IJ clearly erred in finding the respondent credible and in finding an unsupported pattern or practice.	Restrict
4186	29 I&N Dec. 589 (BIA 2026)	Matter of Santiago-Santiago	Termination / DACA	The IJ erred in terminating based solely on DACA status without weighing DHS's opposition.	Restrict
4187	29 I&N Dec. 593 (BIA 2026)	Matter of Arana Castillo	Termination / pleadings	Where respondents appear but DHS does not, the IJ errs in terminating without taking pleadings.	Restrict
4188	29 I&N Dec. 595 (BIA 2026)	Matter of Shentu	Bond – national security	An FBI Letterhead Memorandum indicating a national-security risk warrants significant weight in bond proceedings.	Restrict
4189	29 I&N Dec. 600 (BIA 2026)	Matter of Orozco Becerra	In absentia removal (minors)	When notice and removability are established, the IJ must order removal in absentia, even for minors.	Restrict
4190	29 I&N Dec. 605 (BIA 2026)	Matter of J-E-L-	CAT	The respondent did not show a clear probability of torture by gangs/cartels or the requisite state acquiescence.	Restrict
4191	29 I&N Dec. 610 (BIA 2026)	Matter of C-P-Y-	Serious nonpolitical crime bar	'Arrival' refers to the most recent arrival, extending the crime bar to crimes preceding a later re-entry.	Restrict
4192	29 I&N Dec. 621 (BIA 2026)	Matter of V-A-B-	Withholding – PSG	'Married Mexican women unable to leave their relationship' is not cognizable, and marriage cannot be presumed from cohabitation.	Restrict
4193	29 I&N Dec. 628 (BIA 2026)	Matter of I-B-M-S-	Change of venue / record / neutrality	Late venue requests are less likely to show good cause; off-the-record dialogue must be summarized; IJs must be neutral.	Neutral
4194	29 I&N Dec. 634 (BIA 2026)	Matter of L-A-D-	Asylum – PSG / well-founded fear	A group defined only by a diagnosis is not cognizable, and a chain of speculative events cannot show well-founded fear.	Restrict
4195	29 I&N Dec. 642 (BIA 2026)	Matter of A-H-D-	Withholding – persecution / protection	A 3-day detention with a single beating is not persecution, and deferring to tribal resolution does not show state failure.	Restrict

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4196	29 I&N Dec. 648 (BIA 2026)	Matter of Germain	Cancellation – discretion	Criminal history (including non-conviction charges) plus failure to accept responsibility outweighs favorable equities.	Restrict
4197	29 I&N Dec. 651 (BIA 2026)	Matter of Nwagwu	Visa petition revocation – marriage fraud	Good and sufficient cause existed to revoke the petition given substantial evidence of prior marriage fraud.	Restrict
4198	29 I&N Dec. 656 (BIA 2026)	Matter of Martinez-Rodriguez	Bond – dangerousness	A false-imprisonment conviction plus other arrests show the respondent is a danger and ineligible for bond.	Restrict
4199	29 I&N Dec. 658 (BIA 2026)	Matter of Richards	Cancellation – discretion / candor	A lack of candor about criminal history is a significant adverse discretionary factor.	Restrict
4200	29 I&N Dec. 662 (BIA 2026)	Matter of N-A-G-C-	Bond – detention authority (UAC/SIJ)	Neither a prior UAC designation nor an approved SIJ petition gives an IJ authority to redetermine custody.	Restrict
4201	29 I&N Dec. 668 (BIA 2026)	Matter of Mills	Cancellation – discretion	The IJ erred in granting cancellation because the respondent's extensive criminal history outweighed his equities.	Restrict
4202	29 I&N Dec. 672 (BIA 2026)	Matter of J-O-A-	Particularly serious crime bar	Health care fraud is a particularly serious crime, and fraud offenses generally fall within a PSC analysis.	Restrict
4203	29 I&N Dec. 680 (BIA 2026)	Matter of S-E-M-Z-	Asylum – PSG social distinction	The 'social distinction' element of a PSG must generally be measured countrywide, not from a limited locale.	Restrict
4204	29 I&N Dec. 691 (BIA 2026)	Matter of Herrera-Nunez	Stay of removal procedure	A noncitizen with a final order should first request a stay from DHS before the Board will consider one.	Neutral
4205	29 I&N Dec. 695 (BIA 2026)	Matter of Herrera-Nunez	Sua sponte reopening	Equities acquired years after a removal order do not present an exceptional situation warranting reopening.	Restrict
4206	29 I&N Dec. 698 (BIA 2026)	Matter of Y-H-L-	Asylum – corroboration / IAC	An IJ may require corroboration of credible-but-unpersuasive testimony, and counsel may rely on a certified translation.	Restrict
4207	29 I&N Dec. 703 (BIA 2026)	Matter of A-C-M-	Asylum – safe third country bar	Where an ACA applies and no individualized risk is shown, no evidentiary hearing is needed to apply the bar.	Restrict
4208	29 I&N Dec. 708 (BIA 2026)	Matter of P-A-C-	Asylum – discretionary denial	A grant of withholding is an important factor permitting discretionary denial of asylum.	Restrict
4209	29 I&N Dec. 715 (BIA 2026)	Matter of T-A-G-	Pretermission of asylum	An IJ may not deny a motion to pretermitt asylum based on the respondent's potential eligibility for collateral relief.	Restrict
4210	29 I&N Dec. 717 (BIA 2026)	Matter of G-L-C-	Particularly serious crime / CAT	A Pennsylvania PWID conviction is a PSC, and privately inflicted anti-LGBT harm without acquiescence is not CAT torture.	Restrict
4211	29 I&N Dec. 723 (BIA 2026)	Matter of Best	Extreme hardship / 212(h) waiver	Emotional and financial difficulties are not extreme hardship, and the waiver was properly denied given criminal history.	Restrict
4212	29 I&N Dec. 726 (BIA 2026)	Matter of C-L-R-	Competency safeguards / withholding & CAT	An incompetent applicant given a qualified representative received adequate safeguards; a mental-health PSG claim failed.	Restrict
4213	29 I&N Dec. 732 (BIA 2026)	Matter of T-D-E-	Asylum – credibility	An IJ may not find a respondent credible solely because he admitted previously lying to obtain benefits.	Restrict

Dec. #	Citation	Case Name	Issue / Relief Area	Holding	Direction
4214	29 I&N Dec. 736 (BIA 2026)	Matter of Vizcaino Aybar	Bond venue	Proper venue for a bond redetermination is the court with jurisdiction over the place of detention.	Neutral
4215	29 I&N Dec. 739 (BIA 2026)	Matter of R-A-N-	Asylum – conscription	Conscription is not a standalone asylum basis, and the 'inhuman conduct' exception must be tied to a protected ground.	Restrict
—	29 I&N Dec. 253 (BIA 2025)	Matter of J-A-	CAT deferral	Terrorism prosecution, likely detention, and isolated torture do not show a likelihood of torture absent illegitimate prosecution.	Restrict
—	29 I&N Dec. 240 (BIA 2025)	Matter of Landers	Attorney discipline	Circumstantial evidence can be clear and convincing proof that suspended counsel practiced law unlawfully.	Neutral
—	29 I&N Dec. 201 (A.G. 2025)	Matter of R-E-R-M- (referral)	A.G. referral / remand	The A.G. directs referral and remands the case to the Board for further proceedings.	Neutral
—	29 I&N Dec. 202 (A.G. 2025)	Matter of R-E-R-M-	Family-based PSG asylum	Overrules L-E-A- III and reinstates L-E-A- II, requiring a family group to be particular and socially distinct.	Restrict
—	29 I&N Dec. 206 (A.G. 2025)	Matter of S-S-F-M- (referral)	A.G. referral / remand	The A.G. directs referral and remands the case to the Board for further proceedings.	Neutral
—	29 I&N Dec. 207 (A.G. 2025)	Matter of S-S-F-M-	Private-actor persecution / asylum	Overrules A-B- III and reinstates A-B- I/II (and overrules A-R-C-G-), reviving stricter private-actor standards.	Restrict
—	29 I&N Dec. 216 (BIA 2025)	Matter of Yajure Hurtado	Bond / mandatory detention	Under INA 235(b)(2)(A), IJs lack authority to hear bond requests or grant bond to those present without admission.	Restrict