

Penafiel-Peralta v. Garland, No. 23-1959 (1st Cir. Aug. 12, 2024)

Mixed motive; nexus; land dispute; family membership; Ecuador

- IJ denied asylum & BIA affirmed.
- Personal disputes must be analyzed under mixed motive, so that protected role will be considered also.
- Family membership as PSG – must be at the root of the persecution (nexus).
- Threats started bcz land dispute, not family membership, which was tangential.