

Family Membership

Family Membership as Particular Social Group

Practice Advisories on the Topic

[PSG practice advisory final 7 19 21.pdf](#)

[Nexus - Particular Social Group PSG LP RAIO.pdf](#)

Case Law

Matter of M-R-M-S-, 28 I&N Dec. 757 (BIA 2023)

If a persecutor is targeting members of a certain family as a means of achieving some other ultimate goal unrelated to the protected ground, family membership is incidental or subordinate to that other ultimate goal and therefore not one central reason for the harm. Matter of L-E-A-, 27 I&N

Dec. 40 (BIA 2017), reaffirmed.

Nexus

Regardless of whether an asylum applicant seeks protection on account of race, religion, nationality, political opinion, or membership in a particular social group, he or she must establish that the protected ground is “at least one central reason” for the feared harm. Id. at 758; INA 208(b)(1)(B)(i).

For nexus in Family Membership cases go to [Family Membership Nexus & Matter of M-R-M-S \(BIA 2023\)](#).

Revision #3

Created 2025-03-24 21:07:06 UTC by Joseph

Updated 2025-05-14 17:43:16 UTC by Joseph