

Citations for Session 1 of ILW.com Seminar: Asylum for Experts

Provided by:

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Economic Harm:

Gormley v. Ashcroft, 364 F.3d 1172 (9<sup>th</sup> Cir. 2004) (economic disadvantage alone does rise to the level of persecution)

Baballah v. Ashcroft, 367 F.3d 1067 (9<sup>th</sup> Cir. 2004)(substantial economic deprivation may constitute persecution)

Social Harm & Ostracization

Lolong v. Gonzales, 484 F.3d 1173 (9<sup>th</sup> Cir. 2007)

Sael v. Ashcroft, 386 F.3d 922 (9<sup>th</sup> Cir. 2004)

Both involve 'disfavored group' analysis for ethnic Chinese from Indonesia.

Nexus

Parussimova v. Mukasey, 533 F.3d 1128 (9<sup>th</sup> Cir. 2008)

Zhi Qiang Hu v. Holder, 652 F.3d 1128 (9<sup>th</sup> Cir. 2011)

Ndayshimiye v. Holder, 557 F.3d 124 (3<sup>rd</sup> Cir. 2009)

Whistle-Blowers, Anti-corruption

Matter of N-M-, 25 I&N Dec. 526 (BIA 2011) (retaliation is not sufficient to establish nexus post REAL-ID Act)

Grava v. INS, 205 F.3d 1177 (9<sup>th</sup> Cir. 2000) (pre-REAL ID Act nexus for whistle-blowers, retaliation demonstrates nexus)