Developments in Domestic Violence Asylum Timeline (1985-2010)

**Matter of Acosta:** Board of Immigration Appeals (BIA) decides *Matter of Acosta*, which requires fundamental and immutable characteristics to form a cognizable particular social group.

**Matter of R-A:** BIA decides *Matter of R-A*, reversing a grant of asylum in the case of a Guatemalan woman who had suffered years of domestic violence. BIA ruled there had been no showing of cognizable PSG, or political opinion (PO), and no nexus.

**Matter of R-A- Vacated:** Attorney General (AG) Janet Reno vacated *Matter of R-A*, with order of remand to the BIA to decide the case when the DOJ regulations are finalized.

**R-A- Remand to BIA:** AG John Ashcroft remands the case to BIA, with order to decide when asylum regulations are finalized.

**Proposed regulations:** Department of Justice (DOJ) issued proposed regulations regarding asylum/withholding, including guidance on gender claims.

**R-A- DHS Brief:** After AG John Ashcroft certified *Matter of R-A*- to himself again, the Department of Homeland Security (DHS) filed a brief urging asylum for Rody Alvarado, explaining, among other things, how domestic violence related PSG meets the Acosta test.

**R-A- Remand to IJ:** AG Michael Mukasey certifies *R-A-* to himself, with order to not wait for the finalization of regulations, but to decide the case pursuant to BIA, and other relevant precedent. The Board remanded the case back to the IJ.

**L-R- Grant:** In July, an immigration judge in San Francisco grants asylum to L.R.