

**NONPRECEDENTIAL DISPOSITION**

To be cited only in accordance with FED. R. APP. P. 32.1

**United States Court of Appeals**

**For the Seventh Circuit  
Chicago, Illinois 60604**

Argued February 26, 2026

Decided March 9, 2026

**Before**

FRANK H. EASTERBROOK, *Circuit Judge*

MICHAEL Y. SCUDDER, *Circuit Judge*

AMY J. ST. EVE, *Circuit Judge*

No. 25-1739

ISMAEL TORRIJOS-ZAMORA,  
*Petitioner,*

Petition for Review of an Order of the  
Board of Immigration Appeals.

*v.*

No. A215-641-188

PAMELA J. BONDI, Attorney General  
of the United States,  
*Respondent.*

**ORDER**

Ismael Torrijos-Zamora, a native and citizen of Mexico, challenges the denial of his claims for asylum, withholding of removal, and protection under the Convention Against Torture (“CAT”). He argues the Board of Immigration Appeals (“Board”) improperly rejected his showing of a nexus and ignored evidence justifying relief under CAT. We disagree and deny his petition for review.

Torrijos-Zamora based his applications for relief on his experiences from November 2017 to July 2018 in La Loma, Mexico, a town of about 1,000 people. At a hearing on his claims before an Immigration Judge (“IJ”), Torrijos-Zamora described his

leadership in various civic activities in La Loma. This leadership included working with adults to repaint and landscape public areas, rewarding children for picking up litter, and arranging meetings with community members to discuss the importance of voting thoughtfully. He also organized sports games for young boys with the hope of steering them away from gangs.

Torrijos-Zamora testified that members of one gang, the huachicoleros, began attending the sports games. They took boys from the games, told Torrijos-Zamora to “stop what [he] was doing,” and on several occasions threatened to kill him. In February 2018, gang members began intimidating Torrijos-Zamora by shooting their firearms into the sky outside his parents’ home every two or three days. As the gang’s death threats continued, he brought his concerns to the police. They offered a police patrol, but Torrijos-Zamora said officers began intimidating him by pretextually stopping him while driving. In one incident, an officer laughed after someone in an SUV almost collided with Torrijos-Zamora’s car. Torrijos-Zamora believes, from these experiences and the gang’s involvement in fuel theft, that police officers collaborate with the huachicoleros.

During the government’s examination, Torrijos-Zamora admitted he had never been physically harmed while in Mexico. He also confirmed that the gang was targeting him because “they felt that [he] was taking their local boys away from their gang” — boys that the gang relied upon for fuel theft.

In August 2018, after leaving La Loma the prior month, Torrijos-Zamora entered the United States on foot without authorization. Federal officers immediately apprehended Torrijos-Zamora and detained him. After his release on bond pending his removal proceedings, Torrijos-Zamora conceded removability but filed applications for asylum and withholding of removal. He claimed persecution on account of his political opinion and his membership in two particular social groups: “anti-corruption activists” and “community organizers who dissuade children from joining gangs.” He also sought protection under CAT.

The IJ found Torrijos-Zamora’s claims failed on a number of independent grounds. First, the IJ concluded Torrijos-Zamora did not show harm reaching past persecution or a well-founded fear of future persecution given weak evidence the gang would act upon its threats and Torrijos-Zamora’s physical safety in Mexico. Second, the IJ found that even if Torrijos-Zamora had shown the requisite harm, his evidence did not show a nexus between that harm and his political opinion or particular social groups; the IJ noted that, to the contrary, Torrijos-Zamora’s own testimony indicated

gang members targeted him to further the gang's enterprise—motivations untethered to a legally protected ground. Third, the IJ found Torrijos-Zamora failed to show he could not reasonably relocate within Mexico to avoid future harm. After denying his asylum claim on those bases, the IJ denied Torrijos-Zamora's claim for withholding of removal for the "same reasons." The IJ also denied Torrijos-Zamora's CAT claim because he did not show a requisite likelihood he would face torture upon return to Mexico or that generalized government corruption would manifest as acquiescence to his torture. The IJ therefore ordered Torrijos-Zamora's removal to Mexico.

The Board affirmed the IJ's ruling. It rested its decision regarding the claims for asylum and withholding of removal on Torrijos-Zamora's failure to meet the nexus requirement. Its analysis largely echoed the IJ's reasoning. The Board also summarily affirmed the IJ's denial of CAT relief. Torrijos-Zamora then petitioned for our review. *See* 8 U.S.C. § 1252(b)(2).

"We review the immigration judge's order as modified by the Board." *Martinez-Martinez v. Bondi*, 147 F.4th 831, 835 (7th Cir. 2025) (citing *Meza v. Garland*, 5 F.4th 732, 735 (7th Cir. 2021)). In doing so, "[w]e review legal determinations de novo and uphold factual findings so long as they are supported by substantial evidence." *Mateo-Mateo v. Garland*, 124 F.4th 470, 474 (7th Cir. 2024) (citing *Borjas Cruz v. Garland*, 96 F.4th 1000, 1004 (7th Cir. 2024)). When reviewing for substantial evidence, we only ask whether there is "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." *Urias-Orellana v. Bondi*, 607 U.S. ---- (2026), No. 24-777, 2026 WL 598435, at \*4 (U.S. Mar. 4, 2026) (quoting *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)). This review is deferential because the Immigration and Nationality Act provides that "administrative findings of fact are conclusive unless any reasonable adjudicator would be compelled to conclude to the contrary." 8 U.S.C. § 1252(b)(4)(B).

"To qualify for asylum, a petitioner must prove that he is 'unable or unwilling' to return to his home country 'because of persecution or a well-founded fear of persecution ...'" *Meraz-Saucedo v. Rosen*, 986 F.3d 676, 685 (7th Cir. 2021) (quoting 8 U.S.C. §§ 1101(a)(42)(A), 1158(b)(1)(A)). Additionally, "[a]n asylum applicant must show a nexus between ... [that] persecution and one of the five protected grounds: race, religion, nationality, membership in a particular social group, or political opinion." *Id.* (citing *Torres v. Mukasey*, 551 F.3d 616, 629 (7th Cir. 2008); 8 U.S.C. § 1101(a)(42)(A)). Under the nexus requirement, claiming harm and the protected ground independently is insufficient; "[t]he evidence must show that [the protected ground] was the motivation for the persecution." *Ferreyra v. Barr*, 962 F.3d 331, 337–38 (7th Cir. 2020).

Claims for withholding of removal share the same five protected grounds and nexus requirement but require a stronger showing of harm. *See Martinez-Martinez*, 147 F.4th at 836; *Granados Arias v. Garland*, 69 F.4th 454, 465 (7th Cir. 2023). To show eligibility “[f]or CAT protection, the applicant must show that it is ‘more likely than not that he or she will be tortured’ if returned.” *Singh v. Garland*, 89 F.4th 602, 605 (7th Cir. 2024) (quoting 8 C.F.R. § 1208.16(c)(2) (2025)). Finally, “[a]n applicant’s ability to relocate creates grounds to reject each of these forms of relief.” *Id.* (citation modified).

Torrijos-Zamora first claims we should remand because the Board ignored the possibility that gang members targeted him not only in order to further their enterprise but also because they opposed his political opinions. As Torrijos-Zamora notes, the Board may err by ignoring evidence of a valid nexus. *See Mohideen v. Gonzales*, 416 F.3d 567, 571 (7th Cir. 2005). Torrijos-Zamora does not show, however, that the Board erred in this case. In its nexus ruling, the Board acknowledged Torrijos-Zamora’s political activity but reasoned he failed to show the gang even cared about that activity, let alone persecuted him for it. Instead, the Board highlighted Torrijos-Zamora’s own testimony that the gang targeted him because he interfered with the gang’s recruitment of young boys. Harm motivated by a “gang’s recruitment and retaliation goals” does not show a valid nexus. *See de Paz-Peraza v. Bondi*, 140 F.4th 390, 394 (7th Cir. 2025) (collecting cases). Even on appeal, Torrijos-Zamora identifies no evidence that the gang’s conduct was motivated by his political opinions. He therefore cannot show that the Board ignored relevant evidence. For the same reason, and because the Board relied on his own testimony, Torrijos-Zamora does not show the record compels a contrary finding.

Second, Torrijos-Zamora argues the Board only considered the nexus requirement for his asylum claim, and thus failed to consider whether he showed a nexus for his withholding-of-removal claim. The record indicates otherwise. The Board consolidated its analysis of the nexus requirement on the premise that the requirement applies equally to his claims for asylum and withholding of removal. The Board’s premise accurately reflected the law. *See Granados Arias*, 69 F.4th at 465 (“The nexus requirement ... is the same for both asylum and withholding of removal.” (quoting *W.G.A. v. Sessions*, 900 F.3d 957, 965 (7th Cir. 2018))). Nor was the Board’s consolidated analysis impermissible: our own caselaw has adopted a similar approach. *See id.*; *de Paz-Peraza*, 140 F.4th at 395.

Last, Torrijos-Zamora challenges the ruling on his CAT claim by arguing the Board and IJ ignored country conditions reports demonstrating severe gang violence

across Mexico.\* Again, the record indicates otherwise. The IJ acknowledged the documentary evidence in its opinion but found that evidence did not establish Torrijos-Zamora's entitlement to CAT relief. Indeed, the IJ noted the reports showed that the gang Torrijos-Zamora feared was geographically limited to areas connected to its fuel theft enterprise.

Torrijos-Zamora's argument that the documentary evidence itself demonstrates he was entitled to protection under CAT fares no better. Under CAT's rigorous standards, Torrijos-Zamora had to prove it "more likely than not that he would be tortured if removed." See *Orellana-Arias v. Sessions*, 865 F.3d 476, 489 (7th Cir. 2017). Yet "evidence of generalized violence ... does not show risk that the petitioner will be targeted specifically." *Nyandwi v. Garland*, 15 F.4th 836, 842 (7th Cir. 2021) (citing *Barry v. Barr*, 916 F.3d 666, 671 (7th Cir. 2019)); see also *Mabuneza v. Garland*, 16 F.4th 1222, 1227 (7th Cir. 2021) ("[A CAT applicant] must show that he personally faces a substantial risk of torture."). We have therefore repeatedly rejected documentary evidence as sufficient to make out a CAT claim. See *Lozano-Zuniga v. Lynch*, 832 F.3d 822, 830–31 (7th Cir. 2016) (collecting cases).

For the reasons discussed, we DENY Torrijos-Zamora's petition for review.

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\* The Board affirmed the IJ's CAT ruling without modifying its reasoning. We therefore review the IJ's opinion concerning this claim. See *Orellana-Arias v. Sessions*, 865 F.3d 476, 489 (7th Cir. 2017).