

UNITED STATES COURT OF APPEALS FOR THE FIRST CIRCUIT

Argueta Castillo v. Blanche

Argueta Castillo v. Blanche · No. 25-1297 · Decided May 27, 2026

SUMMARY

The United States Court of Appeals for the First Circuit denied Norberto Leonardo Argueta Castillo's petition for review of the Board of Immigration Appeals' denial of his application for cancellation of removal. The court held that the agency properly considered the asserted aggregate hardship to Castillo's two U.S. citizen daughters and that the record did not establish exceptional and extremely unusual hardship under 8 U.S.C. § 1229b(b)(1)(D).

CASE DETAILS

COURT	United States Court of Appeals for the First Circuit
WRITING FOR THE COURT	Lynch; Montecalvo; Dunlap
JURISDICTION	United States Court of Appeals for the First Circuit
DECIDED	May 27, 2026
DOCKET	25-1297
DISPOSITION	denied
PROCEDURAL POSTURE	Petition for review of a Board of Immigration Appeals decision dismissing an appeal from an Immigration Judge's denial of an application for cancellation of removal.
STANDARD OF REVIEW	Under <i>Wilkinson v. Garland</i> , the court may not review the facts underlying an agency determination on cancellation of removal. It may review the agency's application of the exceptional-and-extremely-unusual-hardship standard to the facts, but that review is deferential. The court stated that it need not choose between substantial-evidence and clear-error formulations because the petition failed under either standard.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Norberto Leonardo Argueta Castillo v. Todd W. Blanche, Acting Attorney General

TOPICS

cancellation of removal

removal proceedings

judicial review of agency action

standard of review

appellate procedure

PRACTICE AREAS

Immigration law

Administrative law

Appellate procedure

QUESTIONS PRESENTED

1. Whether the agency committed legal error by failing to consider relevant evidence and hardship factors in adjudicating cancellation of removal.
2. Whether the agency's explanation was insufficient because it did not expressly discuss every circumstance and piece of evidence identified by the petitioner.
3. Whether the agency erred in determining that the aggregate hardship to the petitioner's daughters would not be exceptional and extremely unusual.

HOLDINGS

1. Under *Wilkinson v. Garland*, the court may not review the facts underlying an agency determination on cancellation of removal and may review only the agency's application of the exceptional-and-extremely-unusual-hardship standard to the given facts. Because the review is deferential, the court may not disturb the agency's factual findings concerning the daughters' medical conditions or the availability of medical care in Guatemala.
2. The agency is not required to provide commentary on every piece of evidence, address every factor identified in precedent, or dissect every contention in minute detail. The agency did not commit legal error because its decisions addressed the material categories of evidence and did not turn a blind eye to salient facts.
3. The agency properly determined that Argueta Castillo had not shown that removal would cause his daughters exceptional and extremely unusual hardship. The agency considered the relevant evidence in the aggregate, including the daughters' health, education, country conditions, access to treatment, family finances, and relocation prospects.

KEY QUOTATIONS

“Under Wilkinson v. Garland, we are precluded from reviewing “[t]he facts underlying any [agency] determination on cancellation of removal.”” (at 9)

“Our review is restricted to the agency's “application of the exceptional and extremely unusual hardship standard to a given set of facts.”” (at 10)

“We hold that the IJ and the BIA holdings are not based on any error of law, are not clearly erroneous, and are supported by substantial evidence.” (at 12)

“We cannot say the [a]gency turned a blind eye to the evidence available for its consideration, and therefore it did not commit legal error.” (at 14)

FACTUAL BACKGROUND

Argueta Castillo, a Guatemalan national who entered the United States without inspection in 2005, lived with his two minor U.S.-citizen daughters and their mother. He sought cancellation of removal based on alleged exceptional and extremely unusual hardship to his daughters if the family relocated to Guatemala. One daughter experienced anxiety and sleepwalking, while the other had amblyopia and astigmatism treated with corrective lenses. The record also contained evidence concerning Guatemala's medical-care, economic, and security conditions, as well as Argueta Castillo's savings and other assets.

PROCEDURAL HISTORY

The Department of Homeland Security charged Argueta Castillo with removability under 8 U.S.C. § 1182(a)(6)(A)(i). The Immigration Judge denied his application for cancellation of removal and ordered him removed to Guatemala. The BIA dismissed his appeal on February 26, 2025, and Argueta Castillo petitioned the First Circuit for review. The First Circuit denied the petition.

DISPOSITION

denied

CASES CITED

- *Wilkinson v. Garland*, 601 U.S. 209 (2024)
- *Maldonado-Ruiz v. Bondi*, 169 F.4th 315, 322 (1st Cir. 2026)
- *Martinez v. Bondi*, 132 F.4th 74, 78 (1st Cir. 2025)
- *Cano v. Bondi*, 152 F.4th 237, 244-45 (1st Cir. 2026)
- *Tacuri-Tacuri v. Garland*, 998 F.3d 466, 472-73 (1st Cir. 2021)
- *Samayoa v. Bondi*, 146 F.4th 128, 138-41 (1st Cir. 2026)
- *Leao v. Bondi*, 144 F.4th 43, 52, 54 (1st Cir. 2026)
- *Trejo v. Bondi*, 152 F.4th 248, 255 (1st Cir. 2026)
- *Contreras v. Bondi*, 134 F.4th 12, 20 (1st Cir. 2025)
- *Diaz-Valdez v. Garland*, 122 F.4th 436, 446 (1st Cir. 2024)
- *Djokro v. Garland*, 102 F.4th 39, 47 (1st Cir. 2024)
- *Xin Qiang Liu v. Lynch*, 802 F.3d 69, 77 (1st Cir. 2015)
- *In re Monreal-Aguinaga*, 23 I. & N. Dec. 56, 62-64 (BIA 2001)
- *In re Gonzalez Recinas*, 23 I. & N. Dec. 467, 468 (BIA 2002)
- *Figueroa v. Garland*, 119 F.4th 160, 165 (1st Cir. 2024)
- *In re J-J-G-*, 27 I. & N. Dec. 808, 811 (BIA 2020)
- *Cuenca-Arroyo v. Garland*, 123 F.4th 781, 784 n.1 (5th Cir. 2025)