

Quinn v. Robinson, 783 F.2d 776 (9th Cir 1986) ~~131~~ +31

Quinn was linked to 6 IRA bombings in England in 1974-75.

Court (per Reinhardt) reaffirms "incidence test" but says it applies only to struggles for self-determination -- which must already have reached a certain level of violence. And the event must have occurred in the country in which the uprising is taking place. WHY? Not even in the homeland of the oppressor nation.

Admitted error on Artukovic ~~131~~ +31 B

Said "crimes against humanity" can never be viewed as political crimes.

Discuss magistrate's holding ~~131~~
Affirmed or modified?

Doherty (SDNY 1984) 815

Doherty killed British Army officers & was a member of the IRA. & he escaped from prison.

US court refused to extradite him.