

RESEARCH ARTICLE

Completion of International Disputes Between Nicaragua and United States in International Law Perspective

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Abstract

Various international disputes that have occurred in this world have been recorded in an international law that applies to the entire international community. So, to resolve various international disputes that have occurred, usually, the countries involved make a peace agreement as one way to resolve these international disputes and prevent a war between nations. This shows that to resolve international disputes that have occurred, an agreement among countries is needed as a solution. The problem written by the author in this journal is the settlement of international disputes that have taken place between the country of Nicaragua and USA. In this journal, the author uses a normative and juridical research method, which is legal writing which is carried out by analyzing secondary legal materials or library materials to find a solution to a legal problem that arises and uses a problem approach based on the law. Law or general legal rules regarding the resolution of international disputes that occur among Nicaragua and USA and approach for problems based on a conceptual basis. The results of research conducted indicate that in this case is an international legal dispute which is neither the authority from International Court of Justice in which Nicaragua have to implemented ways from resolving international disputes by international legal procedures, but USA rejected this decision issued to International Court of Justice.

Keywords: *International Court, International Disputes Resolution, Nicaragua, United States of America*

1. INTRODUCTION

A case from an international dispute that occurred among Nicaragua and USA can be called Nicaragua Case. This case was tried and resolved for International Court of Justice Year 1986. On this international dispute case, the International Court of Justice gave a decision to support Nicaragua in terms of taking a stand with USA and giving punishment to the USA to pay compensation and reparations for the state of Nicaragua. International Court of Justice gave a decision that USA had violated provisions of International Law in terms of providing support to the guerrillas or the rebels to take the fight against the government of the country of Nicaragua (Putra, 2003).

At first, this international dispute occurred because of problems in the field of internal government in the country of Nicaragua. However, it turns out that USA was actively involved on problems in the field of internal government that are internal. So that the country of Nicaragua finally considered that USA had intervened and worsened conditions and situation of the government of the country of Nicaragua. Also, the country of Nicaragua considers that the actions taken by the USA are contrary for provisions from existing International Law (Justice, 2019).

Some actions that can be classified as violations of International Law that have been carried out by USA to State from Nicaragua, include: process from destroying military facilities and public facilities in the country of Nicaragua, carrying out the process of planting mines in the deep sea areas of Nicaragua that can cause ships that pass through the inland sea to be destroyed, and carry out the process of assistance to the guerrillas or the rebels who want to destroy and bring down the government of Nicaragua at that time led by President Sandinista (Putra, 2003).

International Court of Justice discovered a new fact that in 1983-1984, that President from USA gave an order for the USA Government to carry out a process of planting

mines in ports in the country of Nicaragua. In 1984, these mines already existed and were embedded around *Corinto Harbor*, *El Bluff Harbor*, and *Puerto Sandino Harbor*. Even though the three ports are still in the territorial control of the country of Nicaragua. Before the minefield planting process, USA had given warning for entire international community and all international companies about the presence of mines in the *Corinto Port*, *El Bluff Port*, and *Puerto Sandino Port* areas. Landmines that have been planted around the ports can cause damage as a result of the explosion of the mines (Putra, 2003).

In 1981 September 30th, 1984, the International Court of Justice discovered a new fact that USA Government had been proven to give a certain amount of money to the military to carry out various military activities in the territories of the country of Nicaragua. The various military activities funded to USA Government have aim of providing humanitarian assistance to the Nicaraguan state which is experiencing problems in the field of domestic administration. However, the Nicaraguan state considers that the various activities funded to USA Government have aim to worsen conditions and situation of the Government of Nicaragua.

Also, in 1983, the International Court of Justice discovered a new fact that the agency of USA Government had provided assistance and support to guerrillas or rebels so that they could carry out various acts of violence against civil society illegally. Otherwise, the agency of USA Government also provided a book called *Contras*, which explains the ways to use the services of professional killers to carry out certain confidential tasks and uses print and electronic media as a means of provocation against demonstrators who has the goal to form a martyr.

USA has actively participated to give a large influence in the process of funding, the process of providing supplies of armed equipment, the process of forming a military organization, the process of providing military training, the

process of providing plans for various military actions carried out, and the process the election of the military and semi-military troops. So based on various evidence in the International Court of Justice, various actions taken to USA Government have aim from carrying out military or semi-military operation in the country of Nicaragua. Therefore, the various actions taken to USA Government are considered actions classified as crimes and contrary to human rights, the law of are, and the provisions contained in International Law. The various reasons are also the arguments of the lawsuit filed by the state of Nicaragua for International Court of Justice to be tried and resolved.

USA has main reason for carrying out various military and semi-military actions and actions. The main reason is to intervene in matters of internal government in the country of Nicaragua, as the country of Nicaragua did to the El Salvador country which has very good diplomatic relations with USA. However, statement from USA was denied and rejected by the Nicaraguan state expressly and vice versa The Nicaraguan state considered that the actions and acts of interference in the domestic administration sector that had been carried out to USA were manifested from a form very dangerous military intervention.

Based on the background described above, the authors formulated various problems, are as follows: (1) What is the diplomatic and legal international dispute resolution regarding the Nicaragua Case that occurred among the country of Nicaragua and USA? (2) What is the legal basis used to International Court of Justice to resolve international disputes regarding the Nicaragua Case that occurred among country from Nicaragua and USA?

2. METHOD

In writing this journal, a research method that is normative and juridical is used. Legal materials that can be used are legislation that can be used as main legal materials or main basic materials as well as in other legal materials,

such as literature and also scientific works in the scope of International Law. By way of secondary legal materials or supporting legal materials that have a function as a compliment and to supplement a journal, legal dictionaries, and also public dictionaries can provide explanations regarding various international dispute resolution relating to what is in this journal. Legal materials that have been collected and then analyzed descriptively and juridical which have the aim to provide a general description of an existing problem and then will be explained in detail and conclude an existing explanation that is expected to answer the formulation of the problems in this journal (Soekanto, 2006).

3. RESULT AND DISCUSSION

A. The Diplomatic and Legal International Dispute Resolution Regarding The Nicaragua Case That Occurred Between The Country of Nicaragua and USA

In 1982, for resolve international dispute that occurred among the country of Nicaragua and USA in case from Nicaragua, the country from Nicaragua has taken several ways and resolved to resolve the international dispute as a solution. Related to this year, the country of Nicaragua has conducted a conciliation and mediation process with USA. The way carried out by the state of Nicaragua is to create a *Contadora* Group whose aim is to resolve international disputes in the Nicaragua case. The task of the *Contadora* Group is to carry out a conciliation and mediation process by making an *Ad Hoc* Arbitration. This *Ad Hoc* Arbitration is an arbitration created specifically and voluntarily to try and complete an international agreement that occurs between certain countries. Regarding the status of the arbitration, it only has the aim of resolving the international ratification (Gunawan, 2017).

The conciliation process is a method carried out to resolve international disputes peacefully through an organ that was previously created or an organ that was created

based on the deal of parties for the international conflict. The case of international dispute resolution, an organ that has been formed has the task to propose ways of resolving international disputes to the parties to conflict. So the conciliation process was a method that has been arranged in a convention (Mauna, 2015).

The mediation process is a way to amicably resolve international disputes through a negotiation process with the help of neutral and impartial third parties who are parties to the dispute and can cooperate with the parties to the dispute so that an agreement can be obtained binding and final (Djafar, 2011).

Article 3 paragraph (1) from UN Charter stipulates: Parties involved in ongoing disputes that could jeopardize the preserve of international security and peace, if a peaceful manner cannot resolve an international dispute, then must find a solution through international arbitration, international tribunals, or by way of legal independent election Based on the UN Charter above, international dispute resolution can be legally divided into two resolutions, are as follows (Kusumaatmadja & Agoes, 2003):

a. International Arbitration

Arbitration is a method of resolving international disputes that have been known since the past. Legal arrangements regarding international arbitration began to be regulated and carried out in 1794 to be exact when an international agreement called the Jay Agreement was made among UK and USA. International arbitration is a way of resolving international disputes through the submission of international disputes to certain people who are experts in their respective fields and are selected freely by the parties experiencing the dispute to resolve an international dispute that has occurred (Istanto, 2002). International arbitration bases the results of its decisions on a legal provision based on the principle of appropriateness and propriety (*ex aquo et bono*). Party given this trust to settle international

disputes is referred to as the arbitrator who must form a special agreement from the parties experiencing international dispute through an arbitration agreement that has been carried out. Special approval resulted in the process of international arbitration can be referred to as compromise (Istanto, 2002).

b. International Court

An international court is a way of resolving international disputes with use rules and legal provisions made by court body international programs regularly. The international judicial process can be conducted to International Court of Justice which also acts as one permanent court institution that can be used to resolve international disputes that have occurred. An international tribunal may also be held by other legal entities on the condition that it is by the agreement of the parties to an international dispute (Arumnadi, 2001).

In 1983, the *Contadora* Group held a meeting between countries in Central America to carry out the process of forming and drafting an agreement called the *Contadora* Act of Peace and Cooperation in Central of America. In 1984-1986, UN Security Council held a meeting relating to a protest carried out by the Nicaraguan state actively and continuously. A meeting discussing the Nicaragua case was also held by Secretary-General of various organizations in Central American countries, member countries of the *Contadora* Group, General Assembly of UN, and Secretary-General of UN (Primayanthi & Sarna, 2018).

However, methods employed by the *Contadora* Group in the context of resolving international disputes regarding the Nicaragua case have not yet been able to produce a binding and final agreement for the parties to the dispute and have failed to resolve the dispute. That caused the Nicaraguan state to submit a request for dispute resolution to the case of the Nicaraguan to the International Court in 1986. So that the case of Nicaragua was finally processed for International Court of Justice according on its jurisdiction in

Article 36 paragraph (1) Statute from International Court of Justice explaining that International Court of Justice has authority to settle all international disputes that have been submitted by the parties to the dispute or those that have been regulated and determined in the Charter of UN. The State from Nicaragua in its lawsuit assessed that USA had violated the rules and provisions contained in international law and violations committed by the United States of America had caused harm for country from Nicaragua. Therefore, country from Nicaragua demands that USA had to pay compensation of up to U\$ 370.200.000.

In the process of resolving international disputes conducted to International Court of Justice, USA considers that International Court of Justice does not have legal jurisdiction to resolve this Nicaragua case. This is because the Nicaraguan state has never participated actively in the process of ratifying the Protocol from Statute from Permanent Court of International Justice, which was a section contained on Introduction from Statute from International Court of Justice which regulates legal authority issues from International Court of Justice in terms from resolving dispute international happen. However, the International Court of Justice found new evidence Nicaraguan state had in fact, participated passively in the process of ratifying the Protocol from Permanent Court from International Court of Justice and had become permanent member of the new Statute from International Court of Justice. This was regulated in Article 36 from Statute from International Court of Justice which explains that although country from Nicaragua does not actively participate in making a binding declaration from legal authority from International Court, the State from Nicaragua once declared itself to be passively binding on the legal jurisdiction from Court Permanent International. The State of Nicaragua bases its various claims on the determinations from Statute from International Court of Justice and the Treaty of Friendship Year 1956. However, USA denies and rejects a

declaration made by the State from Nicaragua, this is because a declaration has expired and not by the provisions contained in Article 36 paragraph (5) from Statute from International Court of Justice. To resolve the international dispute regarding Nicaragua case, International Court of Justice stated that statement that had been found could not eliminate the legal authority from International Court of Justice to try and resolve an international dispute. This is also because if International Court of Justice does not have authority for try and resolve international disputes based on international treaties, the International Court of Justice still has authority to try and resolve international disputes based on international customs.

Based on the resolution from International Court which has been adjusted for decisions contained in Article 36 paragraph (2) and paragraph (5) from Statute from International Court of Justice explains that process from filing a lawsuit to State from Nicaragua with USA can be accepted by comparing the number of votes is 11 judges accepting the lawsuit and 5 judges rejected the lawsuit. Also, the International Court of Justice used Treaty of Friendship Year 1956 and Commerce and Navigation Year 1956 to accept claims made by the Nicaraguan state with a comparison of the number of votes of 14 judges accepting the lawsuit and 2 judges rejecting the lawsuit. Also, the International Court of Justice has legal authority in terms of hearing and resolving this Nicaragua case with a ratio of the number of votes of 15 judges accepting the lawsuit and 1 judge rejecting the lawsuit. Therefore, based on the results of an absolute vote, the International Court of Justice stated that lawsuit to State from Nicaraguan was acceptable and valid (Rahman, 2018).

In the case of Nicaragua that occurred among country from Nicaragua and USA, international customs and international treaties have a role to protect the interests of one country so that their interests are not violated by other

countries. This is because the various countries are member countries in the same international agreement.

International customs are origin from International Law. This is explained in Article 38 paragraph (1) from Statute from International Court of Justice that behavior, practices, and actions carried out by all countries in the world in international relations can be recognized and accepted as section from International Law in common. For international customs to become section from International Law, legal experts classify these international customs into two parts commonly referred to as the two elements theory. These various theories consider that an international custom can become an International Law if it has fulfilled two conditions, are as follows (Rahman, 2018):

- a. The behavior and actions taken by these countries must be facts of the practice of the behavior and practice of actions taken by these countries in general.
- b. The behavior and actions taken by these countries must be recognized and accepted as values of international law which can technically be referred to as *opinion juris* *necessitatis*.

International Law in form from international custom is considered more favorable than International Law in the form from international treaties. This is because international customs are more flexible, whereas international agreements are more inflexible and rigid. Also, international customs are subject to change by the progress and development of the times, whereas international treaties are more difficult to change because to carry out a process of change that is by the progress and development of the times, international treaties require long and complicated steps and procedures (Mauna, 2015).

B. The Legal Basis Used to International Court of Justice to Resolve International Disputes Regarding The Nicaragua Case That Occurred Among Country from Nicaragua and USA

Based on decisions made and issued to International Court of Justice on Nicaragua case that occurred among country from Nicaragua and USA, final and binding decision is based on various international customary laws and various general principles of International Law, which consist of:

a. Non-Intervention Principle

The meaning of an intervention is an act of intervention carried out by one country to another country to change the actual condition and situation of the country which has been a victim of an intervention action. An act of interference is usually carried out by a country in matters concerning the external territory of another country and all external regions, in general, have an important role for the country in international relations and international law. Thus, it can be concluded that intervention is an act of intervention carried out by a dictatorial state on domestic government affairs in another country that has the objective to change an actual condition and situation of a country that has been a victim of an intervention action. Intervention can be done by using violence or not. Interventions are also generally carried out by various superpowers to various weak countries (Mandagi & Wagiman, 2016).

The term intervention is different from the term non-interference. Non-interference is a general principle in international relations that provides a prohibition to intervene in any form of domestic government affairs of another country which in general has become a legal jurisdiction of a country, both directly and indirectly. Whereas intervention is a general principle in international relations governing acts of interference in domestic government affairs from other countries that are coercive so

that countries that are victims of such intervention must act by the wishes of the state which intervenes (Sefriani, 2016).

One of the basic obligations in international law is the obligation for every country in the world not to intervene in domestic government affairs from another country by force (Sefriani, 2016). However, in international law itself, there is still often an opportunity to intervene in a country against another country. Although it is indeed in particular and specific international disputes, acts of interference in the affairs of domestic government from other countries are justified by international law itself (Mandagi & Wagiman, 2016). International law that applies to the international community is based on general principles, one of which is the principle of non-intervention, but that does not mean the principle of non-intervention applies absolutely in international law. Various exceptions can make this intervention true in international law (Sefriani, 2016). Some of the interventions justified in international law, are as follows (Mandagi & Wagiman, 2016):

- a. Interventions that aim to protect the responsibility of the state for humanitarian activities for the people.
- b. Interventions that have a purpose to defend themselves. This intervention is needed when there is an attack from other countries that use armed tools physically and directly.
- c. Interventions conducted to protect the rights, safety, and interests of citizens of a country that are in the territory of another country.
- d. Interventions that are collective and regulated in UN Charter.

Various forms of interference taken by one country in terms of domestic government affairs to other countries, are as follows (Sefriani, 2016):

- a. Internal interventions. An intervention is carried out by a country in terms of domestic government affairs in another country. An internal intervention is most common in international legal disputes.

- b. External interventions. An intervention is carried out by a country in terms of foreign government affairs in other countries.
- c. Penalty interventions. An intervention is preceded by a violation of the provisions in international law by one of the disputed countries and then only intervention is carried out by a country in terms of domestic and foreign government affairs in another country.

International Court of Justice discovered new evidence on court that USA had carried out a process of supplying armed equipment for military needs to carry out the process of minefields in the *Corinto Harbor, El Bluff Harbor, and Puerto Sandino Harbor* areas. Thus, the actions were taken from USA to State from Nicaragua clearly and have been contrary to the general principles from International Law, especially principle of non-interference. The principle of non-interference is based on the existence of a prohibition to intervene in domestic government affairs from other countries.

b. The Principle of Self Defense and Not Using Violence

The establishment of UN Charter, entire international community must resolve international disputes that occur through peaceful means and it is recommended to take defense against their respective countries so as not to use methods in the form of violence and forced to resolve the international dispute (Sefriani, 2016).

There are various reasons for a country to use methods in the form of violence and force in conducting international relations, are as follows (Primayanthi & Sarna, 2018):

- a. A country uses methods that are violent and coercive in terms of legally protecting and defending its rights.
- b. A country uses methods that are violent and coercive in the case when its rights are disturbed and violated by another country. Violations of rights held by other countries are actually justified by decisions in International Court of Justice, as long as violations from

these rights do not conflict with contents from UN Charter, do not conflict with the integrity and independence that exists in a country, and does not conflict with the decisions loaded in Article 2 paragraph 4 from UN Charter.

The use from methods on the form of force and force is only permitted for specific and specific actions that have been previously regulated in Article 51 of UN Charter including various self-defense measures and are regulated in the authority made from UN Security Council concerning the Implementation from Chapter 7 from UN Charter (Primayanthi & Sarna, 2018).

Various acts from self-defense carried out by one country against another country can be judged to be legally valid according to international custom, if the self-defense measures have fulfilled various requirements, are as follows:

- a. Self-defense actions were taken by a country to prevent and stop the existence of violations of rights committed by another country.
- b. Self-defense measures are taken by one country in terms of preventing and stopping acts of violation of rights committed by another country.
- c. Self-defense measures are taken by a country in stipulations of defending rights from state if there is a violation of the rights committed by another country.

Various self-defense measures constitute a form of exception to acts that are fundamental in the form of violence and force so that these self-defense measures do not need to be preceded by a permit and authorization made by the UN Security Council. Also, various measures of self-defense must be carried out by existing provisions in existing International Law (Primayanthi & Sarna, 2018).

A country can take self-defense measures to another country without obtaining a permit or approval from the United Nations Security Council. This is because the self-defense action only requires a permit or approval from

various countries that have veto rights and does not require a permit or approval from the United Nations Security Council. So if a country that will take this self-defense action has already obtained a permit or approval from various countries that have veto rights, then the self-defense action taken by that country is legal internationally and legally. Although on the other hand, the UN Security Council does not provide a permit or approval regarding these self-defense measures (Primayanthi & Sarna, 2018).

Various acts of self-defense are a general right that can be done by a country to protect its legal rights that have been disturbed and violated by other countries. Based on Article 2 paragraph 4 from Statute from International Court of Justice, several conditions that can make service from self-defense to be implemented by a country freely and legally, are as follows (Primayanthi & Sarna, 2018):

- a. Self-defense measures taken by one country have a purpose to help other countries in getting or getting independence.
- b. Self-defense measures taken by a country have a purpose to prevent and resolve an international dispute in the field of humanity that has violated international human rights provisions.
- c. Self-defense actions taken by a country have a goal to restore part or all of the territory of the country that has been occupied and controlled by another country.
- d. The act of self-defense carried out by a country has a purpose to protect and defend the legal rights possessed by a country from interference by another country.
- e. Self-defense measures taken by a country have received support and permission from a legitimate government. This is referred to as intervention on the invitation.

Based on new facts that emerged during the trial, the International Court of Justice discovered new evidence that USA had carried out process from minefields around the inland sea areas in the country of Nicaragua. Such actions can cause various ships that pass through these areas can

become destroyed and damaged. Also, the International Court of Justice discovered new evidence USA had carried out process from damaging existing military and civilian facilities in the country of Nicaragua and provided assistance to the guerrillas or the rebels in order to destroy and bring down President Sandinista who at the time it became the head of state and head of government of Nicaragua. The various actions taken from USA have violated general principles of International Law, especially principle from self-defense and principle of not using violence. USA in carrying out coercive self-defense measures are also not used as a form of self-defense allowed by Statute from International Court of Justice. Therefore, it can be concluded that the self-defense measures carried out by USA are only aimed to protecting interests from their allies and interests from their political fields which clearly and violate the provisions contained in the Statute from International Court of Justice.

4. CONCLUSION

International dispute resolution regarding the Nicaragua Case that occurred among state of Nicaragua and USA uses dispute resolution diplomatically and legally. Diplomatic dispute resolution uses the conciliation and mediation process. Conciliation process is a method carried out to resolve international disputes peacefully through an organ that was previously created or an organ that was created based on the deal of parties for the international conflict, while mediation process is way to amicably resolve international disputes through a negotiation process with the help of neutral and impartial third parties who are parties to the dispute and can cooperate with the parties to the dispute so that an agreement can be obtained binding and final. Also, the country of Nicaragua formed the *Contadora* Group whose task was to carry out the conciliation and mediation process. Settlement of disputes legally using international arbitration and international

courts. Arbitration court is a way of resolving international disputes through the submission of international disputes to certain people who are experts in their respective fields and are selected freely by the parties experiencing the dispute to resolve an international dispute that has occurred, while international court is a way of resolving international disputes with use rules and legal provisions made by court body international programs regularly. The International Court which is trusted by the State of Nicaragua to resolve this dispute is the International Court of Justice. On its final ruling, International Court of Justice expressed support to nation of Nicaragua against USA and stated that USA had violated international law by providing support to guerrillas or rebels who wanted to worsen the state of Nicaragua's internal government. Final and binding stipulations issued to International Court of Justice are based in various international customary laws and various common principles from International Law, consisting from principle of non-intervention, and self-defense and not using the principle of violence.

5. DECLARATION OF CONFLICTING INTERESTS

The Authors declare that there is no potential conflict of interest in the research, authorship, and/or publication of this article

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8. REFERENCES

- Arumnadi, B. (2001). *Hukum Internasional*. IKIP Semarang.
- Djafar, A. B. (2011). *Penyelesaian Sengketa Bisnis Melalui Mediasi*. Pusat Kajian Ilmu Hukum Fakultas Hukum Universitas Pancasila.
- Istanto, S. (2002). *Hukum Internasional*. Universitas Atmadjaya Yogyakarta.

- Kusumaatmadja, M., & Agoes, E. R. (2003). *Dasar Hukum Internasional*. Alumni.
- Mandagi, A. S., & Wagiman. (2016). *Terminologi Hukum Internasional*. Sinar Grafika.
- Mauna, B. (2015). *Hukum Internasional: Fungsi, Pengertian, dan Peranan dalam Era Dinamika Global*. Alumni.
- Sefriani. (2016). *Peran Hukum Internasional Dalam Hubungan Internasional Konvensional*. Raja Grafindo Persada.
- Soekanto, S. (2006). *Pengantar Penelitian Hukum*. Universitas Indonesia Press.

Journal Articles:

- Gunawan, Y. (2017). Arbitration Award of ICSID on The Investment Disputes of Churchill Mining PLC vs. Republic of Indonesia. *Journal Hasanuddin Law Review*, 3(1), 4. <https://doi.org/http://dx.doi.org/10.20956/halrev.v3i1.948>.
- Primayanthi, I., & Sarna, K. (2018). Mekanisme Penyelesaian Sengketa Internasional (Studi Kasus Nikaragua dan Amerika Serikat). *Jurnal Kertha Negara*, 1(1), 5, 45, 47, 48, dan 58.
- Rahman, W. (2018). Analisa Putusan Mahkamah Internasional dalam Penanganan Kasus Aktivitas Militer dan Paramiliter oleh Amerika Serikat di Nikaragua Tahun 1986. *Journal Fatwa Law*, 1(2), 10 dan 64.

Online Sources:

- Justice, I. C. of. (2019). *Summaries of Judgments and Orders, Case Concerning The Military and Paramilitary Activities in and Against Nicaragua*. International Court of Justice. <https://www.icj-cij.org/en/case/70/judgments>.
- Putra, I. B. W. (2003). Bahan Kuliah Umum Penyelesaian Sengketa Internasional. *Prosiding Seminar Nasional*, 3–4.