

## **International Court of Justice**

Case concerning Military and Paramilitary Activities In and Against Nicaragua,  
(Nicaragua v. United States of America), Merits, Judgment of 27 June 1986

Para. 218: Article 3 which is common to all four Geneva Conventions of 12 August 1949 defines certain rules to be applied in the armed conflicts of a non-international character. There is no doubt that, in the event of international armed conflicts, these rules also constitute a minimum yardstick, in addition to the more elaborate rules which are also to apply to international conflicts ;