

JURISPRUDENTIAL DEVELOPMENTS ON THE REASONING OF THE ADMINISTRATIVE ACT

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Abstract

The activity of public authorities is subject to the control of legality performed by the administrative courts, according to the law. On the basis of art. 52 of the Constitution, persons aggrieved in their legitimate rights and interests often complain before the courts that the administration fails to give reasoning on the administrative acts. At EU level, the Charter of Fundamental Rights of the European Union stipulates that giving reasons for administrative acts is a component of the right to good administration. In this context, the aim of this paper is to analyze the relevant case law in order to be able to observe the national administrative contentious judge's opinion on the reasoning of administrative acts, in the sense of whether this formality is mandatory or not for the issuing public authority. In terms of the research methodology, the structure of the paper has two main components, a theoretical one, namely it will describe the state of the legislation applicable to the reasoning of administrative acts, then it will focus on the practical component, in order to understand what problems arise in the work of public administration in this aspect. The proposed subject is topical, practical and of general interest. Using specific legal methods, the conclusion of the paper will be emphasized, namely that the reasoning is a condition for the legality of the administrative act, without which the proper functioning of public administration would be questioned.

Keywords: *legality, reasoning, administrative, contentious administrative, case law.*

1. Introduction

The research hypothesis of the paper starts from the idea that the activity of public authorities is carried out under the protection of the principle of legality, fundamental principle¹ underlying the theory of administrative acts. It is not conceivable that decision-makers who take measures for citizens break the law, otherwise the rule of law and European values could be defeated.

Yet "the state is the main political institution of society²". Exceptionally, when damage occurs, those affected seek justice in the courts, because no one can seek justice alone. From this perspective, we consider that public authorities³ have a permanent duty to ensure respect for fundamental human rights through fair, transparent and public interest-oriented conduct.

In national law, the principle of legality prevails both as regards the conduct

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¹ For further details on the principles of law, see Elena Anghel, *General principles of law*, in "LESIJ - Lex ET Scientia International Journal", No. XXIII, vol. 2/2016, p. 120 - 130, https://lexetscientia.univnt.ro/download/580_LESIJ_XXIII_2_2016_art.011.pdf, visited on 02.01.2025.

² Emilia Lucia Cătană, *Drept administrativ (Administrative Law)*, 2nd edition, C.H. Beck Publishing House, Bucharest, 2021, p. 1.

³ For further details on public authorities, see Marta Claudia Cliza, *Administrative Law, Part I (Drept administrativ Partea I)*, Pro Universitaria Publishing House, Bucharest, 2011, p. 12-20.

of public administration⁴ and in the conduct of the administered persons. According to art. 1 para. (5) of the Constitution: “In Romania, the observance of the Constitution, its supremacy and the laws shall be mandatory”. Furthermore, “public authorities and institutions must comply with the principle of the hierarchy of normative acts, observing both the legal force of each normative act and the competence enshrined in the legal rules of each public authority and institution, which also implies not deviating from the procedure established to be followed for the adoption of any such normative act⁵”. From this perspective, “the legal norm requires the acceptance and observance of the prescribed conduct⁶”.

This study analyzes the situations where, before a specialized judge⁷ as that of contentious administrative⁸, a conflict may

at some point arise, where an aggrieved person complains that an administrative act has not been given reasons for⁹ by an authority or because of unclear legislation. Yet, the legislation is not always clear, it “gives rise to interpretations with consequences that affect (...) the way in which disputes are settled¹⁰”.

2. The reasoning of administrative acts - theoretical and practical guidelines

2.1. The legal framework on the reasoning of the administrative acts

Art. 41 of the Charter of the European Union - “right to good administration” provides “the obligation of the administration to give reasons for its decisions” [para. 2, letter c)]. Therefore, at Union level¹¹, the obligation of public

⁴ From a conceptual perspective, see Roxana Maria Popescu, *ECJ case-law on the concept of “public administration” used in article 45 paragraph (4) TFEU*, in “CKS eBook 2017”, p. 528-532, https://cks.univnt.ro/cks_2017/CKS_2017_Articles.html, visited on 07.01.2025.

⁵ Silviu Gabriel Barbu, Alexandru Domșa, Oana Șaramet, *Organization of government administrative control in Romania, the European Union and the United States of America (Organizarea controlului administrativ guvernamental în România, Uniunea Europeană și Statele Unite ale Americii)*, C. H. Beck Publishing House, Bucharest, 2024, p. 14.

⁶ Nicoleta Elena Hegheș, *The non - retroactivity of new legal norms-fundamental principle of law. Exceptions*, in “International Journal of Legal and Social Order”, No. 1/2022, p. 153, <https://ijlso.ccdsara.ro/index.php/international-journal-of-legal-a/article/view/74/60>, visited on 06.01.2025.

⁷ On the role of the judge in restraining the excess of power of public administration, see Dana Apostol Tofan, *Discretionary power and excess of power of public authorities (Puterea discreționară și excesul de putere al autorităților publice)*, All Beck Publishing House, Bucharest, 1999, p. 359-368.

⁸ The paper does not explore the constitutionality control of laws, although the case law of the Constitutional Court is invoked in the context of the reasoning of administrative acts. Interesting developments in the first constitutional review of laws in Romania, in Cornelia Ene-Dinu, *History of Romanian State and Law (Istoria statului și dreptului românesc)*, Universul Juridic Publishing House, Bucharest, 2020, p. 265-266.

⁹ The present research focuses only on analyzing the reasoning of administrative acts and does not develop the procedural operations of issuing administrative acts. In this respect, see an interesting study, Vasilica Negruț, Ionela Alina Zorzoană, *Theory of endorsements: legislative and jurisprudential development in Romania and the European Union*, Laws, 2023, 12 (5) 83, <https://doi.org/10.3390/laws12050083>, visited on 07.01.2025.

¹⁰ Virginia Vedinaș, *Administrative Law*, 15th edition, revised and supplemented (*Drept administrativ*, ediția a XV-a, revăzută și adăugită), Universul Juridic Publishing House, Bucharest, 2024, p. 10.

¹¹ This study does not detail the legal order of the European Union or the policies of the European Union. See in this respect, Augustin Fuerea, *European Union Handbook*, 6th edition, revised and supplemented (*Manualul Uniunii Europene*, ediția a 6-a revăzută și adăugită), Universul Juridic Publishing House, Bucharest, 2016, p. 228-252 or Alina-Mihaela Conea, *Policies of the European Union. University course (Politicile Uniunii Europene. Curs universitar)*, Universul Juridic Publishing House, Bucharest, 2020, p. 10-20.

authorities to give reasons for administrative acts is expressly enshrined. Therefore, state administration cannot take discretionary, illegal decisions without giving reasons in fact and in law, because no one is above the law, as this is clear from art. 16 para. (2) of the Constitution. Yet, “the Constitution commands the whole of law by its content and its position in the legal system”¹². In this respect, the case law provided: “the absence of actual reasoning in fact and in law for the administrative act represents a violation of the principle of the rule of law and is in itself harmful”¹³.

The motivation is enshrined in the Constitution and is provided for in the case of emergency ordinances. According to art. 115 para. (4) of the Constitution: “The Government can only adopt emergency ordinances in exceptional cases, the regulation of which cannot be postponed, and has the obligation to give the reasons for the emergency status within their contents”. The Constitutional Court, in its case law, has held that the expression extraordinary situations refers to “the necessity and urgency of regulating a situation which, due to its exceptional circumstances, requires the adoption of a serious interference with the public interest”¹⁴.

The Administrative Code also refers to motivation, such as cases of termination of the mandate of a local or county councilor. Therefore, art. 304 para. (2) provides the following: “the office of local councilor or county councilor shall terminate automatically, before expiry of the normal term of office, in the following cases: absence without good reason from more than

3 consecutive ordinary and/or extraordinary meetings of the Council during a period of three calendar months (letter d.); absence without justification from 3 meetings of the Council convened within 3 calendar months, which makes it impossible to hold ordinary and/or extraordinary meetings in accordance with the law” (letter e).

Another example concerns a civil servant who is temporarily transferred to another vacant or temporarily vacant public office. In this case, art. 508 para. (8) provides that this measure shall be ordered, in the interests of the public authority or institution, by the head of the public authority or institution in a public office at the same level, with due regard for the category, grade and professional grade of the civil servant, for a maximum period of 6 months in any calendar year, stating the reasons on which it is based. The case regulated by 152 para. (5) of the Administrative Code is also interesting in terms of reasoning, as it concerns the dismissal of the deputy mayor. This may be done by the local council by a decision adopted by secret ballot by a two-thirds majority of the councilors in office, on a duly reasoned proposal by the mayor or by one-third of the local councilors in office.

We find in the Administrative Code the lack of motivation allowed by the legislator in certain substantiated cases: the appointment of a member of the Government by the President of Romania, in case of government reshaping or vacancy of office. Therefore, according to art. 47 para. (4) The President of Romania may refuse, by giving reasons, any proposal delivered by

¹² Ioan Muraru (coord.), Andrei Muraru, Valentina Bărbățeanu, Dumitru Big, *Constitutional law and political institutions. Seminar Booklet (Drept constitutional și instituții politice. Caiet de Seminar)*, C.H. Beck Publishing House, Bucharest, 2020, p. 60.

¹³ The Court of Appeal Timișoara, Administrative and Tax Litigation Chamber, Decision No. 424/2021, <https://www.iccj.ro/wp-content/uploads/2021/07/C-Ap-Timisoara-Trim-I-2021.pdf>, visited on 02.01.2025.

¹⁴ The Constitutional Court of Romania, Decision No. 65/1995, published in Official Gazette of Romania, No. 129/28 June 1995.

the Prime Minister to appoint a member of the Government, only once, if he/she considers that "the person proposed is not suitable for the office in question or, in respect of that person, the cases of termination of the office of member of the Government, loss of electoral rights following a final judgment, death and criminal conviction by a final judgment, have occurred. In this case, the Prime Minister shall submit to the President a new proposal for the appointment of a member of the Government within 5 days as of the date on which the President has informed him/her of the rejection of the previous proposal¹⁵".

2.2. Reasoning of administrative acts - examination of judicial practice

Doctrine has held that "the reasoning of the administrative act, the justification of the reasons in fact and in law on which it was based, is a guarantee of respect for the law and the protection of individual rights, a form of protection of the citizen against arbitrary public power (...)"¹⁶. At national level, disputes concerning the failure to give reasons for administrative acts are contentious administrative litigations. French doctrine outlines that "disputes most often place the administered persons against their administration" (...)¹⁷.

In the case law of the High Court of Cassation and Justice, we find actual situations analyzed by the division of contentious administrative and fiscal, which are based on a lack of reasoning, such as, for example, a case concerning an inspection protocol drawn up in relation to a building, which ordered the owner to take corrective measures due to the degradation of the building, a commercial company - a third party to the administrative act¹⁸.

The Constitutional Court, in its case law¹⁹, noted that the "the adoption by the Government of Emergency Ordinance No 136/2008 was not motivated by the need for regulation in an area in which the primary legislator did not intervene but, on the contrary, by the need to counter a legislative policy measure adopted by Parliament in the area of the salaries of education staff". On another occasion, the Court noted that "What produces legal effects is not the reason for the refusal or the justified nature of the reason for the refusal, but the refusal to countersign the decree. The Constitution does not provide, either expressly or implicitly, for the possibility for the President of Romania to oblige the Prime Minister to countersign a decree conferring

¹⁵ Elena Emilia. Ștefan, *Administrative Law, Part I, University course*, 4th edition, revised and supplemented (*Drept administrativ, Partea I, Curs universitar*, ediția a 4-a, revăzută și adăugită), Universul Juridic Publishing House, Bucharest, 2023, p. 164.

¹⁶ Ovidiu Podaru, *Administrative Law, vol. I, Administrative Act (I), Guidelines for a different theory (Drept administrativ, vol. I, Actul administrativ, Repere pentru o teorie altfel)*, Hamangiu Publishing House, Bucharest, 2010, p. 147.

¹⁷ Clémence Barry, Pierre-Xavier Boyer, *Droit du contentieux administratif*, Gualino Publishing House, Lextenso, 2024, Paris, p.15.

¹⁸ High Court of Cassation and Justice, Administrative and Tax Litigation Chamber, Decision No. 3116/28 September 2006, in *High Court of Cassation and Justice, Case law of the Administrative and Tax Litigation Chamber for 2006, semester II Jurisprudența Secției de contencios administrativ și fiscal pe anul 2006* (, Hamangiu Publishing House, Bucharest, 2007, pp. 20-24 apud Rodica Narcisa Petrescu, *Drept administrative (Administrative Law)*, Hamangiu Publishing House, Bucharest, 2009, p. 429-430.

¹⁹ The Constitutional Court of Romania, Decision No. 1221/2008, published in Official Gazette of Romania, No. 804/2 December 2008.

a decoration in the event of an initial refusal by the Prime Minister²⁰”.

With regard to the conditions for giving reasons for an administrative act, the High Court of Cassation and Justice ruled in a case that: “the extent and detail of the reasoning depend on the nature of the act adopted, and the requirements which the reasoning must meet depend on the circumstances of each case. Therefore, giving reasons is a general obligation applicable to any administrative act (...)”²¹.

Furthermore, the Court of Appeal of Suceava noted that: “Without denying the need to give reasons for any administrative act issued by a public authority, as set out extensively by the appellants, it is found that the challenged tax decisions in the present case were reasoned in a manner sufficient to enable their legality to be reviewed, with a brief statement of the facts and legal bases”²². In another case, the Court of Appeal of Suceava noted: “The statements of reasons in fact and in law for the tax administrative act are mandatory statements, the mandatory nature of which derives, on the one hand, from the imperative tone of the regulation and, on the other hand, from the principle that the statement of reasons is a condition of the external legality of the act, which is subject to an assessment in

concreto, according to its nature and the context of its adoption.”²³.

As to whether or not the public authorities are bound to give reasons for their decisions, Timisoara Court of Appeal rules as follows: “the obligation of the issuing authority to give reasons for the administrative act represents a guarantee against the arbitrary action performed by the public administration and is particularly necessary in the case of acts modifying or abolishing individual and subjective rights or legal situations”²⁴. The supreme court considered that “The reasoning of an administrative act serves a dual purpose, namely it fulfills a function of transparency for the advantage of the beneficiaries of the act, who will thus be able to verify whether or not the act is justified and it allows the court to carry out its jurisdictional review, thus ultimately allowing the reconstruction of the reasoning carried out by the author of the act in order to reach its adoption. It must be included in the content of the act and must be performed by its author”²⁵.

3. Conclusions

This paper analyzes the issue of reasoning of administrative acts. On this occasion, the documentation of the topic covered: doctrine, legislation and case law.

²⁰ The Constitutional Court of Romania, Decision No. 285/2014, published in Official Gazette of Romania, No. 478/28 June 2014.

²¹ The High Court of Cassation and Justice, Administrative and Tax Litigation Chamber, Decision No. 1442/2020, <http://www.scj.ro>, visited on 28.12.2021 *apud* Elena Emilia Ștefan, *Drept administrativ Partea a II-a, Curs universitar (Administrative Law Part II, University course)*, 4th edition, revised and supplemented, Universul Juridic Publishing House, Bucharest, 2022, p. 51.

²² The Court of Appeal Suceava, Administrative and Tax Litigation Chamber, Decision No. 621/2022, in *Jurisprudence 2022 (Buletinul jurisprudenței 2022)*, p. 165, <https://www.iccj.ro/wp-content/uploads/2023/03/CA-Suceava-Buletinul-jurisprudenței-SCAF-2022.pdf>, visited on 15.07.2024.

²³ The Court of Appeal of Suceava, Administrative and Tax Litigation Chamber, Decision No. 349/2022, *op.cit.*, p. 70.

²⁴ The Court of Appeal of Timisoara, Administrative and Tax Litigation Chamber, Decision No. 424/2021, p. 89, <https://www.iccj.ro/wp-content/uploads/2021/07/C-Ap-Timisoara-Trim-I-2021.pdf>, visited on 02.01.2025.

²⁵ The High Court of Cassation and Justice, Administrative and Tax Litigation Chamber, Decision No. 6152/2023, <https://www.scj.ro/1093/Detail-jurisprudenta?customQuery%5B0%5D.Key=id&customQuery%5B0%5D.Value=212035#highlight=##%20motivare%20act%20administrativ>, visited on 12.09.2024.

For the cases, data were collected using the computerized method, by studying the websites of the Romanian courts, Constitutional Court and High Court of Cassation and Justice.

From the selected case law, settled by the supreme court or other national courts, the divisions of contentious administrative and fiscal, we note that, in interpreting²⁶ the law, the contentious administrative judge considers that it is mandatory to give reasons for administrative acts.

Furthermore, the reasoning shall include both a detailed statement of the factual reasons which gave rise to the administrative act and a statement of the legal grounds on which it is based, indicating the applicable legal basis. Persons aggrieved by an unjustified administrative act shall be entitled to ask the administrative judge to review the legality of the respective act. In

this respect, French doctrine noted that: “when the conduct of public authorities becomes unlawful or harmful, it must be followed as soon as possible by appropriate measures of annulment or remediation under penalty of its legitimacy, being open to doubt and challenge²⁷”. Doctrine unanimously considers that the reasoning is a substantive condition of the administrative act and the lack of it leads to the annulment of the act and in the case of emergency ordinances of the Government, the Romanian Constitution expressly requires that the reasons be stated.

The final conclusion of the present scientific research is that, in accordance with the provisions of the Charter of Fundamental Rights of the European Union, the reasoning of administrative acts is a component of the right to good administration, which is also reflected in national legislation.

References

- Anghel Elena, General principles of law, "LESIJ - Lex ET Scientia International Journal", No. XXIII, vol. 2/2016, pp. 120-130, https://lexetscientia.univnt.ro/download/580_LESIJ_XXIII_2_2016_art.011.pdf, visited on 02.01.2025.
- Apostol Tofan Dana, *Discretionary power and excess of power of public authorities (Puterea discreționară și excesul de putere al autorităților publice)*, All Beck Publishing House, Bucharest, 1999.
- Barray Clémence, Boyer Pierre-Xavier, *Droit du contentieux administratif*, Gualino Publishing House, Lextenso, 2024, Paris.
- Barbu Silviu Gabriel, Domșa Alexandru, Șaramet Oana, *Organization of government administrative control in Romania, the European Union and the United States of America (Organizarea controlului administrativ guvernamental în România, Uniunea Europeană și Statele Unite ale Americii)*, C. H. Beck Publishing House, Bucharest, 2024.
- Bădescu Mihai, *General theory of law (Teoria generală a dreptului)*, Sitech Publishing House, Craiova, 2018.

²⁶ On methods of interpreting the law, see Nicolae Popa (coord.), Elena Anghel, Cornelia Ene-Dinu, Laura-Cristiana Spătaru-Negură, *General Theory of Law. Seminar booklet (Teoria generală a dreptului. Caiet de seminar)*, 3rd edition, C.H. Beck Publishing House, Bucharest, 2017, p. 197-202; Mihai Bădescu, *General theory of law (Teoria generală a dreptului)*, Sitech Publishing House, Craiova, 2018, p.167-187; Iulia Boghirnea, *The interpretation – obligation for the judge imposed by the application of the law*, in "Legal and Administrative Studies", No. 2 (19)/2018, p. 50-57, https://www.upit.ro/_document/31012/jlas_2_2018_r.pdf, visited on 15.01.2025.

²⁷ René Chapus, *Droit du contentieux administratif*, 13th edition, Montchrestien Publishing House, Paris, 2008, p. 769.

- Boghirnea Iulia, *The interpretation – obligation for the judge imposed by the application of the law*, in "Legal and Administrative Studies", No. 2 (19)/2018, pp.50-57, https://www.upit.ro/_document/31012/jlas_2_2018_r.pdf, accesat la 15.01.2025
- Cliza Marta Claudia, *Administrative Law, Part I (Drept administrativ Partea I)*, Pro Universitaria Publishing House, Bucharest, 2011.
- Conea Alina-Mihaela, *Policies of the European Union. University course (Politicile Uniunii Europene. Curs universitar)*, Universul Juridic Publishing House, Bucharest, 2020.
- Chapus René, *Droit du contentieux administratif*, 13th edition, Montchrestien Publishing House, Paris, 2008.
- Cătană Emilia Lucia, *Administrative Law*, 2nd edition (*Drept administrative*, ediția a 2-a), C.H. Beck Publishing House, Bucharest, 2021.
- Ene-Dinu Cornelia, *History of Romanian state and law (Istoria statului și dreptului românesc)*, Universul Juridic Publishing House, Bucharest, 2020.
- Fuerea Augustin, *European Union Handbook*, 6th edition, revised and supplemented (*Manualul Uniunii Europene*, ediția a 6-a, revăzută și adăugită), Universul Juridic Publishing House, Bucharest, 2016.
- Hegheș Nicoleta Elena, *The non - retroactivity of new legal norms-fundamental principle of law. Exceptions*, in "International Journal Of Legal And Social Order", No. 1/2022, online at <https://ijlso.ccdsara.ro/index.php/international-journal-of-legal-a/article/view/74/60>, visited on 06.01.2025.
- Muraru Ioan (coord.), Muraru Andrei, Bărbățeanu Valentina, Big Dumitru, *Constitutional law and political institutions. Seminar Booklet (Drept constituțional și instituții politice. Caiet de Seminar)*, C.H. Beck Publishing House, Bucharest, 2020.
- Negruț Vasilica, Zorzoană Ionela Alina, *Theory of endorsements: legislative and jurisprudential development in Romania and the European Union*, Laws, 2023, 12(5)83, <https://doi.org/10.3390/laws12050083>, visited on 07.01.2025.
- Petrescu Rodica Narcisa, *Administrative Law (Drept administrativ)*, Hamangiu Publishing House, Bucharest, 2009.
- Podaru Ovidiu, *Administrative Law, vol. I, Administrative Act (I), Guidelines for a different theory (Drept administrativ, vol. I, Actul administrativ (I), Repere pentru o teorie altfel)*, Hamangiu Publishing House, Bucharest, 2010.
- Popa Nicolae (coord.), Anghel Elena, Ene-Dinu Cornelia, Spătaru-Negură Laura-Cristiana, *General Theory of Law. Seminar booklet*, 3rd edition, (*Teoria generală a dreptului. Caiet de seminar*, ediția a 3-a), C.H. Beck Publishing House, Bucharest, 2017.
- Popescu Roxana Maria, *ECJ case-law on the concept of 'public administration' used in article 45 para. (4) TFEU*, in "CKS eBook 2017", p. 528-532, https://cks.univnt.ro/cks_2017/CKS_2017_Articles.html, visited 07.01.2025.
- Ștefan Elena Emilia, *Administrative Law, Part I, University course*, 4th edition, revised and supplemented (*Drept administrativ, Partea I, Curs universitar*, ediția a 4-a, revăzută și adăugită), Universul Juridic Publishing House, Bucharest, 2023.
- Ștefan Elena Emilia, *Administrative Law, Part II, University course*, 4th edition, revised and supplemented (*Drept administrativ Partea a II-a, Curs universitar*, ediția a 4-a, revizuită și actualizată), Universul Juridic Publishing House, Bucharest, 2022.
- Vedinaș Virginia, *Administrative law*, 15th edition, revised and supplemented (*Drept administrative*, ediția a 15-a), Universul Juridic Publishing House, Bucharest, 2024.
- The Constitutional Court of Romania, Decision No. 65/1995, published in Official Gazette of Romania, No. 129/28 June 1995.

- The Constitutional Court of Romania, Decision No. 1221/2008, published in Official Gazette of Romania, No. 804/2 December 2008.
- The Constitutional Court of Romania, Decision No. 285/2014, published in Official Gazette of Romania, No. 478/28 June 2014.
- High Court of Cassation and Justice, Administrative and Tax Litigation Chamber, Decision No. 3116 of 28 September 2006, in *High Court of Cassation and Justice, Case law of the Administrative and Tax Litigation Chamber for 2006, semester II (Înalta Curte de Casație și Justiție, Jurisprudența Secției de contencios administrativ și fiscal pe anul 2006, semestrul II)*, Hamangiu Publishing House, Bucharest, 2007.
- High Court of Cassation and Justice, Administrative and Tax Litigation Chamber, <https://www.scj.ro/1093/Detalii-jurisprudenta?customQuery%5B0%5D.Key=id&customQuery%5B0%5D.Value=212035#highlight=##%20motivare%20act%20administrativ>, visited on 12.09.2024.
- The Court of Appeal of Timișoara, Administrative and Tax Litigation Chamber, <https://www.iccj.ro/wp-content/uploads/2021/07/C-Ap-Timisoara-Trim-I-2021.pdf>, visited on 02.01.2025.
- The Court of Appeal of Suceava, Administrative and Tax Litigation Chamber, <https://www.iccj.ro/wp-content/uploads/2023/03/CA-Suceava-Buletinul-jurisprudentei-SCAF-2022.pdf>, visited on 15.07.2024.
- <http://www.scj.ro>, visited on 28.12.2021