Bulletin of the *Transilvania* University of Braşov
Series VII: Social Sciences • Law • Vol. 18(67) Special Issue – 2025
https://doi.org/10.31926/but.ssl.2025.18.67.3.22

THE CRIMINAL LEGAL RELATIONSHIP – A FUNDAMENTAL CONCEPT IN SAFEGUARDING HUMAN DIGNITY

Cristinel GHIGHECI[1]

Abstract: *The criminal legal relationship is a construct developed within criminal law doctrine, rooted in the philosophical concept of the social contract. It is generally acknowledged that a "social contract" exists between the state and individuals, establishing reciprocal rights and obligations. Accordingly, a criminal legal relationship emerges upon the entry into force of a legal norm that criminalizes a particular act and becomes operational when an individual commits the offense defined by that norm.*

Key words: *criminal legal relationship, social contract, criminal offense, punishment*

1. Introduction

Transition from the will of the gods or God to the social contract took place after many centuries, when human society realised that the Kingdom of God "is not of this world" (Gospel of John, Chapter 18, verse 36) and that people must organise their social life according to the principles of equality, fairness and the common good for all members of society. For many centuries, it was believed that social hierarchies were ordained by God and could not be changed, and it was considered normal for different rules (including criminal law) to apply to members of society depending on their social class.

Over time, human experience accumulated over millennia has shown that justice, fairness and equity are necessary to ensure lasting peace both between members of the same community and between different tribes or states. For religious people, justice is one of the divine attributes and, at the same time, one of God's desires in the organisation of society. Thus, laws began to be drafted that took into account this desire for fairness, considering that it is above the laws and more important than the text drafted by a temporary legislator.

Justice/Fairness, in order to be effective, needs Truth; only if the facts of the case are accurately established can we speak of effective justice, because a just law applied to an unreal situation cannot lead to justice.

[1] *Transilvania* University of Braşov, ghigheci.costel@unitbv.ro

The judicial system, as the institution responsible for administering justice, cannot function without guarantees of the adoption of just laws and the independence and impartiality of judges. However, these are part of a democratic system and it is difficult to conceive of their implementation in a system that is not based on the principles of the rule of law.

There are other moral values that contribute to good coexistence in a society (such as compassion, diligence, etc.), but none of them have become an absolute necessity, as justice has. This is probably because they require a moral standard that is too high for most people, and a society can survive without them, but it could not do so without justice.

According to Aristotle (Nicomachean Ethics), justice necessarily implies a *relationship* between two or more people and cannot be conceived where there is only one person. Moreover, such a reality in which there is only one person could not even be conceived, since, from the dawn of known history, man has been a social being (zoon politicon). The relationship between man and God, which is possible even in absolute solitude, is of a different nature, even if the phrase "God's law" is often used. This relationship also presupposes the thought of the person living in solitude (the monk) towards others, through the cultivation of love and prayer for them. For this reason, the law speaks of social relationships regulated by law, which have given rise to legal relationships.

In Roman law, the concept of legal relationship, as we know it today, was not developed, but something similar was found in the notion of obligation. As stated in doctrine, "The entire structure, not only legal but also social, of the eras that followed the decline of Roman civilisation is indebted to the initial Quirite conception, which saw obligation as a legal relationship, a bond established between creditor and debtor. This bond (vinculum juris) was initially understood in the literal sense of the word, as the power that the creditor had over the debtor, and was later translated symbolically and abstractly into a legal nexus, which gave the creditor rights only over the debtor's property. The medieval rediscovery of Roman law meant that the obligation was no longer viewed primarily from the perspective of the relationship it describes. Facultas agendi, the invention of subjective law, the emphasis on the patrimonialisation of the claim, the breakdown of the obligation relationship into its elements (passive and active), were the major gains brought by Western canon law to the theory of obligation. This theory was now interested in the distinction between natural and positive obligation. The former was conceived in relation to the divine order (jus divinum), aiming at celestial perfection, as opposed to positive obligation, based on the human legal order (Vasilescu, 2024, p. 7). The Romans developed a theory of obligations, which presupposed mutual rights and obligations between parties as a result of legal acts or deeds.

Starting with the modern era, the theory of the social contract developed, according to which citizens ceded part of their natural rights to the state in exchange for the state ensuring their safety. This theory played an important role in the development of the concept of legal relationship, as its central idea is a contractualist vision, which implies the existence of mutual rights and obligations between citizens and the state or between different citizens of the same state.

2. Legal Relationship. Definition. Elements

Of the multitude of relationships between people, legal relationships are limited only to those that are regulated by rules adopted by the legislator. The legal relationship has been defined in doctrine as "that social bond, regulated by legal norms, containing a system of mutual interaction between specific participants, a bond that is susceptible to being defended by means of state coercion" (Popa, 2014, p. 218). In another opinion, "the legal relationship is a social, concrete-historical, volitional relationship, regulated by legal norms, within which the participants manifest themselves as holders of rights and obligations, through the exercise of which the purpose of the legal norm is achieved" (Craiovan, 2015, p. 498). As previously indicated, the essence of the concept of legal relationship is that "it represents the social relationship regulated by legal norms" (Puț, 2024, p. 223).

These definitions show that, at least at the current stage of human society's development, only natural or legal persons can be subjects of a legal relationship. As has been pointed out, "from a legal point of view, objects, things, living beings, nature, the environment, etc. are not subjects of legal relationships but rather existences or phenomena in relation to which people must behave in a certain way and have certain rights or obligations established by legal norms" (Sida, 2004, p. 198).

In the future, we do not know whether society will consider it necessary to include other entities, such as those developed with artificial intelligence, among the subjects of legal relations. It is not unusual for changes to occur in the content of legal relationships in different historical periods, because "Legal relationships are historically determined and influenced social relationships, in the sense that they are formally and substantially marked by the historical period or era in which they were formed" (Puț, 2024, p. 227).

For example, the Soviet Civil Code stipulated that "Civil rights are protected by law, except in cases where their exercise is contrary to their socio-economic purpose". This shows that under the Soviet regime, the legal relationship was not similar to the one we have today in a democratic regime, because it did not contain mutually correlative rights and obligations, but provided for the possibility that certain civil rights might not have correlative obligations on the part of the state if their exercise was considered to be contrary to the socio-economic purpose as defined in a communist regime.

Under the Nazi dictatorship, attempts were made to avoid the notion of subjective rights (of the individual), because Nazi legal theory denied the very notion of subjective rights and even that of the subject of rights, replacing them with that of "position-as-member-of-the-community". Only this "position" would have had rights, which, strictly speaking, were nothing more than powers exercised to achieve the goals of the national community (Bercea, 2022, p. 144). This idea is the exact opposite of the liberal theory of a just society, which essentially argues that "a basic freedom can only be limited or denied in order to protect one or more basic freedoms and never [...] [only] in the name of the public good or perfectionist values" (Bercea, 2022, p. 145).

The legal relationship exists both when the subjects comply with the obligations imposed on each of them and when one of them violates these obligations. The difference between the two situations is that in the first case we are dealing with a legal

relationship of conformity, while in the second case we are dealing with a legal relationship of conflict. In this regard, legal doctrine has shown that "The meeting of the two wills can take the form of either collaboration, which is what happens in most cases when we discuss legal relationships through which the provision of the legal norm is implemented, or in the form of a confrontation of wills, when the subjects of law do not comply with the prescribed conduct, when we discuss legal relationships through which the sanction of legal norms is implemented" (Puț, 2024, p. 226).

The creation of a legal relationship presupposes the pre-existence of certain premises or conditions: 1) a general-abstract condition represented by the legal norm and 2) a special-concrete condition represented by legal facts (Puț, 2024, p. 227). Although the author cited refers to legal facts, these must be interpreted broadly, including both legal acts and legal facts *stricto sensu,* i.e. those legal facts that are regulated by a norm. Therefore, a legal relationship can only be spoken of in the case of social relationships regulated by a legal norm. Not all social relations between individuals are legal relationships, because not all of them are regulated by a norm. For example, relationships governed only by norms of politeness cannot be considered legal relationships, because they are not governed by any legal norm (e.g., giving priority to enter a door or responding to a greeting).

3. Criminal Law Legal Relationship

The theory of criminal legal relations tends to shift punishment from the realm of revenge to that of the offender's violation of a supposed contract between him and society, so that his punishment would be nothing more than the application of what was agreed in the social contract. In reality, from the dawn of humanity to the modern era, punishment for committing a crime has come as revenge. Crimes generally affected private individuals, and they demanded revenge ("Justice! Tearful eyes beg to see you./ Why do you forget us? Are you no longer alive, fairy?..." - Panait Cerna). Even in the case of crimes against the state (crimes of lèse-majesté) or religion, it was still private individuals who considered themselves harmed and demanded revenge, so as not to be harmed by the weakening of the state or the vengeance of the gods. Of course, the theory of criminal legal relations humanised this essence of punishment and made it more morally acceptable, because it would have been too brutal to reduce the essence of punishment to simple revenge.

In addition, a distinction must also be made between Western civilisations, which emphasise the individual and the need for remorse for reprehensible acts (followed by reparations on the part of the individual), and countries that are part of Eastern civilisation, which focus on the community and the shame that the accusation of committing a crime causes them in front of others (especially when it is committed against a member of the same community). It is not difficult to understand why the theory of criminal legal relations has taken root more easily in Western countries and less easily in countries that have long been under the influence of Eastern civilisation, which Romania was part of for a long time.

Unlike the civil legal relationship, which involves two or more private individuals (natural or legal persons), the criminal legal relationship involves a private individual (natural or legal person) and the state. The state, through the legislature, decides which acts harm society as a whole and criminalises them. Thus, if X steals property from Y, this is not a private matter concerning only the two of them, but rather one that concerns society itself (Currier and Eimermann, 2013, p. 53).

However, civil legal relationships are not exclusively private either, but also require recognition by third parties, i.e. they are opposable *erga omnes*. The valid transfer of a property right from one person to another is recognised by society as a whole and is opposable to others, even if it is in principle a private act between the two parties.

In these circumstances, it must be clarified how the criminal legal relationship differs from the private law legal relationship.

We talk about the legal relationship in criminal law in connection with the commission of crimes, in which case a legal relationship of conflict arises between the person who committed the crime and the state. According to this legal relationship of conflict, the state has the right (or rather the obligation) to hold the perpetrator criminally liable and to impose a punishment on them, and the latter has the obligation to submit to this punishment. An interesting view of punishment can be found in the philosopher Hegel, who argues that punishment is “a true right” (Gubici, 2025, p. 93) of the offender. To reach this paradoxical conclusion, Hegel shows that the offender is a free person who accepts the consequences of his actions and, implicitly, the application of a punishment. For Hegel, through punishment, society respects the offender as a moral subject, does not treat him as an animal to be trained or a mere natural cause, thus recognising his “right” to punishment.

Criminal liability is a legal relationship of coercion, arising as a result of the commission of a crime, a relationship established between the state and the offender, the content of which is formed by the state's right to hold the offender accountable, as well as the offender's obligation to answer for his or her actions and to submit to the sanction applied (Popa et al. 2023, p. 246).

The injured party is not a party to the criminal legal relationship, which involves the state (through the state) and the defendant. However, the injured party has been given the opportunity to support the prosecution in the criminal proceedings, arguing that the purpose of its activity is, first and foremost, to obtain recognition of the defendant's guilt. In the case of offences prosecuted on the basis of a prior complaint, the injured party has an even more important role, being able to decide to terminate the criminal proceedings by withdrawing the prior complaint. This does not mean that they are a party to the criminal legal relationship, but only that the state gives them the possibility to decide on the criminal liability of the defendant, for reasons of criminal policy (such as, for example, the existence of close relations between the victim and the perpetrator or the injured party's desire not to be 'revictimised' by participating in criminal proceedings).

The criminal legal relationship is a fiction, but, as has been stated, “Nothing is 'real' in law and in his life. He knows only a vast interweaving, tending towards infinity, of symbols, metaphysical and hermeneutical, more or less codified, for whose decryption schools, doctrines, and philosophical works have been created, whether sporadic,

ephemeral, or with a vocation for universality and equity, such as to attract their perpetuation, or the illusion of permanence" (Bercea, 2022, p. 23).

The CCR's decision on the statute of limitations for criminal liability led to the removal of criminal liability for a large number of defendants, who at the time of the offence did not even dream of such a "loophole", because the cases of interruption of criminal liability were very clearly regulated, and in their case these cases were applicable. It is possible that the judges wanted to remove this inequity and order convictions for acts that clearly constituted offences, some of them quite serious. The defendants invoked with great conviction the application of the more favourable criminal law, and the question arises as to what could be the basis for their conviction that the state has no right to hold them accountable. The answer is still the same, referring to an alleged criminal legal relationship between the offender and the state, according to which the state has no right to hold an offender criminally liable except within the limits conferred upon it by law. However unfair the law may be, the criminal legal relationship obliges the state to hold the offender criminally liable and to apply the punishment strictly within the limits provided for in this "contractual relationship" between the state and the offender, i.e. within the limits of the law.

The situation is similar to that of judges in Romania who retire at an age considered by public opinion to be too young, who would meet the legal conditions for retirement, but whose decrees the President of Romania refuses to sign because he considers it unfair for them to retire at such a young age. In such cases, the interests of judges, resulting from the legal relationship under labour law, to exercise their rights guaranteed by this relationship must also be taken into account.

4. The legal Relationship in the Case Law of the Constitutional Court of Romania

There have been several decisions of the Constitutional Court of Romania in which the concept of legal relationship has been invoked. In this regard, in a decision related to the principle of legal certainty, the constitutional court held that «although the principle of stability/security of legal relations is not expressly enshrined in the Romanian Constitution, this principle can be inferred both from the provisions of Article 1(3) thereof, according to which Romania is a democratic and social state governed by the rule of law, and from the preamble to the Convention for the Protection of Human Rights and Fundamental Freedoms, as interpreted by the European Court of Human Rights in its case law. In relation to this principle, the Strasbourg court held that "one of the fundamental elements of the rule of law is the principle of legal certainty" (Judgment of 6 June 2005, delivered in the case of Androne v. Romania, Judgment of 7 October 2009, delivered in the case of Stanca Popescu v. Romania). The European Court has also ruled that "once the State has adopted a solution, it must be implemented with reasonable clarity and consistency in order to avoid, as far as possible, legal uncertainty and uncertainty for the subjects of law affected by the measures implementing that solution" (Judgment of 1 December 2005, delivered in the case of Păduraru v. Romania, Judgment of 6 December 2007, delivered in the case of Beian v. Romania). The Constitutional Court, through its case law, as well as the European Court of Human

Rights, in its established case law (Judgment of 5 January 2000, delivered in the case of Beyeler v. Italy, Judgment of 23 November 2000, delivered in the case of the Former King of Greece and Others v. Greece, and the judgment of 8 July 2008, delivered in the case of Fener Rum Patrikligi v. Turkey), have ruled that the principle of legality presupposes the existence of domestic legal rules that are sufficiently accessible, precise and predictable in their application, leading to the lex certa character of the rule (see, for example, Decision No. 189 of 2 March 2006, published in the Official Gazette of Romania, Part I, No. 307 of 5 April 2006, or Decision No. 26 of 18 January 2012, published in the Official Gazette of Romania, Part I, No. 116 of 15 February 2012). In the same vein, the European Court of Human Rights has ruled that the law must indeed be accessible to the litigant and predictable in its effects. In order for the law to satisfy the requirement of predictability, it must specify with sufficient clarity the scope and methods of exercising the discretion of the authorities in the field in question, taking into account the legitimate aim pursued, in order to provide the individual with adequate protection against arbitrariness (see also Decision No. 900 of 15 December 2020, published in the Official Gazette of Romania, Part I, No. 1274 of 22 December 2020, paragraph 88).» (CCR, Decision No. 49/2025, Published in The Official Journal of Romania, Part I, no. 237 from 18 March 2025)

The Constitutional Court of Romania accepts the existence of legal relationships even in the sphere of public international law between the signatory states of international conventions. In this regard, the constitutional court states the following in a decision: "63. The Court notes that the concept of “transfer of authority” is not new in national legislation, since Law No. 291/2007 - the general regulatory framework in force concerning the conditions under which foreign armed forces may enter, station, conduct operations or transit through the territory of Romania provides, in Article 8(5), that “the structures of the Ministry of National Defence may take command of and order missions for foreign armed forces stationed on Romanian territory, under the conditions set out in Articles 4 and 5, within the limits established by the transfer of authority and the agreements concluded by the Ministry of National Defence with the authorised representatives of the sending party”. Technical agreements are defined in Article 2(h) of the same legislative act as bilateral or multilateral documents which, without creating or modifying legal relations under public international law, establish the specific conditions under which foreign armed forces enter, station, pre-position military products, equipment and materials, conduct operations or transit through the territory of Romania, the procedure for their conclusion being approved by Government decision, in accordance with Article 8(2) of the same legislative act. Moreover, the “transfer of authority” is also regulated in Article 11 of Law No. 121/2011 on the participation of the armed forces in missions and operations outside the territory of the Romanian state. (CCR, Decision No. 157/2025, Published in The Official Journal of Romania, Part I, no. 458 from 16 May 2025)

In another decision, the Constitutional Court of Romania even took up the distinction between the criminal legal relationship of conformity and the criminal legal relationship of conflict, mentioning the following relevant aspects: «In this context, the Court notes that, by Decision No. 297 of 26 April 2018, published in the Official Gazette of Romania,

Part I, No. 518 of 25 June 2018, it found that criminal liability is a form of legal liability incurred as a result of a violation of a provision of criminal law, which gives rise to a legal relationship of coercion, arising as a result of the commission of the offence, a relationship between the state, on the one hand, and the person who commits the offence, on the other. The content of the legal relationship of coercion consists of the state's right to hold the person who committed the offence accountable by applying the appropriate penalty provided for by criminal law and the obligation of the person concerned to serve the penalty imposed. The Court also noted that, among the principles governing criminal liability, the principle of legality of criminalisation and punishment, provided for in Article 23(12) of the Constitution and Article 1 of the Criminal Code, according to which the acts constituting offences and the penalties applicable in the event of their commission are provided for by law, is relevant from the perspective of the present analysis of the Constitution and Article 1 of the Criminal Code, according to which the acts constituting offences and the penalties applicable in the event of their commission are provided for by criminal law. The same principle is also indirectly found in Article 15(2) of the Criminal Code, according to which the offence is the only basis for criminal liability. The principle of legality of criminal liability is complemented by the principle of its personal nature, according to which criminal liability can only be incurred by the person who committed the offence and those who participated in its commission. Based on its previous case law (Decision No. 682 of 30 September 2020, published in the Official Gazette of Romania, Part I, No. 971 of 21 October 2020, Decision No. 297 of 26 April 2018, published in the Official Gazette of Romania, Part I, No. 518 of 25 June 2018), the Court finds that the regulation of criminal liability and the system of penalties consisting of principal or additional penalties are matters relating to the criminal policy of the state. It is the exclusive prerogative of the legislator to determine the penalties applicable in the case of the commission of offences in relation to the degree of social danger of the act/perpetrator, the severity of the penalty provided for by law for the offence committed, and in relation to the severity of the penalty imposed. In this regard, an important role is played by the judicial authorities, which, in the process of applying the law, will impose complementary penalties for periods appropriate to the achievement of their purpose and depending on the seriousness of the offence committed, by means of final decisions, resulting from a fair trial, with respect for all the procedural rights and guarantees of criminal justice. Therefore, without ruling out the possibility of exercising constitutional review over any legislative solution in criminal matters, the Court held that it did not have the competence to intervene in the field of legislation and criminal policy of the state, any contrary attitude constituting an interference in the competence of this constitutional authority (see Decision No. 629 of 4 November 2014, published in the Official Gazette of Romania, Part I, No. 932 of 21 December 2014, paragraph 26, and Decision No. 682 of 30 September 2020, cited above, paragraph 29). Thus, the Court recognised that, in this area, the legislature enjoys a fairly wide margin of appreciation, given that it is in a position to assess, on the basis of a number of criteria, the need for a particular criminal policy.» (CCR, Decision No. 355/2025, published in in The Official Journal of Romania, Part I, no. 694 from 24 July 2025)

5. The Legal Relationship in the Case Law of the European Courts

The concept of "legal relationship" is also found in the case law of the European Court of Human Rights, which has held, for example, that «In 2013, the tax authority carried out a tax inspection of the applicant for the 2008-2010 tax years with a view to verifying his income tax liabilities. By a decision of 3 July 2013, the tax authority found that the applicant had a debt of HUF 290,738,542 (approximately EUR 800,000), which was classified as tax arrears. It was established that between 5 January and 29 December 2010, the claimant had withdrawn HUF 715,025,000 (approximately EUR 2,018,000) from the bank account of a limited liability company of which he had previously been the founder and managing director, but with which he no longer had any legal relationship at the time of the events. There was no trace of these financial transactions in the company's tax records, and the claimant had not paid income tax on the amount in question. The tax authority fined the claimant HUF 219,948,110 (approximately EUR 603,000) and ordered him to pay an additional HUF 67,531,880 (approximately EUR 185,000) in interest. On appeal, the higher tax authority found that the claimant's tax arrears amounted to HUF 227,985,686 (approximately EUR 625,000) and reduced the amount of the fine to HUF 170,883,486 (approximately EUR 490,000) and the interest to HUF 52,999,572 (approximately EUR 145,000).» (CCR, Decision No. 355/2025, published in in The Official Journal of Romania, Part I, no. 694 from 24 July 2025)

Although other aspects of the theory of legal relationship are not detailed in this judgment, it is relevant that the European court specialising in the protection of human rights accepts the existence of this concept and applies it in a case where the existence of a legal relationship between the applicant and the company that had tax debts is relevant.

The concept of legal relationship is also mentioned in the case law of the CJEU in connection with the principle of stability of legal relationships, which has held, for example, that However, it is important to recall the importance of the principle of res judicata in both the legal order of the Union and in national legal orders. Thus, in order to ensure both the stability of the law and legal relationships and the proper administration of justice, it is necessary that judgments which have become final after the exhaustion of the available remedies or after the expiry of the time limits for exercising those remedies can no longer be challenged.» [CJEU, JUDGMENT OF THE COURT (Fourth Chamber) of 11 September 2019, Case C-676/17, Retrieved from https://curia.europa.eu/juris/document/document.jsf?text=&docid=217626&pageIndex=0&doclang=EN&mode=lst&dir=&occ=first&part=1&cid=11428470]

6. Conclusions

The concept of legal relationship in criminal matters is not purely theoretical, but also has practical relevance. For this reason, it is not without practical interest to explore this subject in depth, as it may be relevant to the limits of criminal liability of persons who have committed offences. It is clear that any person who has committed a crime is obliged to be held criminally liable, but they also have the right to be punished strictly in

accordance with the law for the crime committed. In the case of offences committed in ideal concurrence, the question of a violation of the criminal legal relationship could arise, because the offender is held criminally liable for two or more offences, even though he or she committed only one act or omission. In reality, this is not a violation of the criminal legal relationship of conflict, but rather criminal liability for harming several social values protected by criminal law through the same act. As stated in doctrine, if the act, together with all its consequences, is covered by a single rule, we are dealing with a concurrence of qualifications, and only the special rule is applicable. And if none of the applicable rules fully covers the facts, each of these texts must be applied in order to punish the act committed in all its aspects (Streteanu and Niţu, 2018, p. 102).

References

Bercea, L. (ed). (2022). *Imago Iuris. Imaginarul Dreptului* [Imago iuris. The Imaginary of Law]. Timişoara: West University Publishing House.

Craiovan, I. (2015). *Tratat de teoria generală a dreptului* [Treatise on the General Theory of Law]. Bucureşti: Universul Juridic.

Currier K.A., Eimermann, Th. E. (2013). *The Study of Law. A Critical Thinking Approach*, Third Edition. New York: Wolters Kluwer Law & Business.

Gubici, B. (2025). *Individualizarea judiciară a pedepsei. O analiză jurisprudenţială, doctrinară şi filozofică* [Judicial Individualisation of Criminal Punishment. A Jurisprudential, Doctrinal and Philosophical Analysis]. Bucureşti: Universul Juridic.

Popa, N. (2014). *Teoria generală a dreptului* [General Theory of Law]. Bucureşti: C.H. Beck.

Popa, N., Anghel, E., Ene-Dinu, C., Spătaru-Negură, L. (2023). *Teoria generală a dreptului. Caiet de seminar* [General Theory of Law. Seminar Notebook]. Bucureşti: C.H. Beck.

Puţ, S.I. (2024). *Teoria dreptului* [Theory of Law]. Bucureşti: Hamangiu.

Sida, A. (2004). *Teoria generală a dreptului* [General Theory of Law]. Arad: Vasile Goldiș University Press.

Streteanu, F., Niţu, D. (2018). *Drept penal. Partea generală* [Criminal Law. General Part]. Bucureşti: Universul Juridic Publishing House.

Vasilescu, P. (2024). *Drept civil. Obligaţii* [Civil Law. Obligations]. Bucureşti: Hamangiu.

Other information may be obtained from the address: ghigheci.costel@unitbv.ro