

Nestor Nestor Diculescu Kingston Petersen announces the official formation of the Center for Excellency in Fiscal Disputes (NNDKP CELF)



Nestor Nestor Diculescu Kingston Petersen announces the official formation of the "Center for Excellency in Fiscal Disputes" (in Romanian NNDKP CELF), an NNDKP initiative that is the reflection of the intensive professional and scientific collaboration of over 10 years between the company's dispute resolution and tax advisory teams.

The experience gained over time in assisting clients in over 300 fiscal disputes resulted organically in the consolidation of the professional skills and tightening of the cooperation between the firm's lawyers and tax consultants; thus turning a concept into a "Center of Excellency".

NNDKP CELF will provide integrated services to the company's clients from the initial stage of a fiscal dispute until the litigation stage before the Romanian courts by combining the experience, technical skills and perspective of the tax consultants and lawyers specialized in tax disputes. The activity of CELF is organized so as to ensure that clients benefit from the first moment from complete professional services covering both a technical perspective and the perspective offered by a potential tax dispute, an approach possible only due to the involvement *ab initio* of a team of mixed professionals in each project.

"In the age of BEPS¹, of the European anti-abuse directives in fiscal matters, of the more radical measures of the tax authorities both worldwide and in Romania, it is obvious that we are facing a paradigm shift with respect to the relationship between the taxpayer and the tax authority. From this perspective, the Romanian taxpayer must adapt, sometimes swiftly, to the new requirements. NNDKP CELF will provide our clients with integrated and unitary approaches throughout the entire tax dispute, whether we refer to tax audits, antifraud controls or potential ramifications in the criminal area", specified **Marius Ionescu**, Co-Managing Partner, NNDKP Tax Advisory.

NNDKP CELF is also designed to serve as a formal debate forum between NNDKP professionals and clients, which will promote ideas in the public space for improving the procedures and the administrative and judicial laws governing tax disputes. One of the first products to be promoted by NNDKP CELF is a comparative survey of the best practices implemented by the developed countries in the tax dispute field. This survey is currently conducted with the support of the lawyers and consultants from the international alliances where NNDKP represents Romania.

"Through NNDKP CELF we set out to also act as a think-tank, by relying on the technical-practical experience of the CELF members as well as that of our clients. Together we intend to propose ideas for improving the relationship between the taxpayer and the tax authority, to increase the degree of predictability for the taxpayers

involved in tax disputes, to promote mediation measures intended to decrease the number of tax dispute sand new solutions to prevent lengthy and difficult tax dispute and certainly, in case of need, to building step by step the arguments necessary to win the tax disputes”, specifies **Emil Bivolaru**, Partner in the NNDKP Dispute Resolution practice.

The NNDKP CELF team currently comprises 15 members with substantial and varied experience in tax disputes and will be coordinated by **Emil Bivolaru**, **Daniela Gramaticescu** and **Marius Ezer**, Partners in the Dispute Resolution practice and the tax consultants **Marius Ionescu** and **Alina Timofti**, Partners in the Tax Advisory Division. The Center also welcomes as a member **Adrian Luca**, the Managing Partner of Transfer Pricing Services SRL (TPS) with which NNDKP has concluded a strategic alliance in 2016.

1. **BEPS** is the acronym for *Base erosion and profit shifting relating to the measures against base erosion and profit shifting*