

???????? C-498/03

# Kingscrest Associates Ltd

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# Montecello Ltd

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# **Commissioners of Customs & Excise**

(?????? VAT and Duties Tribunal, London,

???? ???? ??????? ?????????????????? ??????????)

«???? ??????? ??? — ?????? 13, A, ??????????? 1, ?????????? ?? ??? ?? — ??????????????????  
????????????????? — ??????? ?????????????? ?????? ?? ??? ?????????????? ??????? ?? ?????? —  
?????? ?????????????? ?????? ?? ??? ?????????????? ??? ?????? ??? ?????? ??? ??? — ??????  
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????? ?? “?????????? ??????????” — ??????? ?????????? ?????????????? ?????????? —  
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???????????? ???? ?????????? ?????????????? D. Ruiz-Jarabo Colomer ??? 22?? ?????????????? 2005

????????? ??? ?????????????? (?????? ?????) ??? 26?? ????? 2005

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1. ?????????? ?????? — ?????????? ??? ?????????? — ????? ?????? ?????? —  
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??? ??? ?????? ??? ?????????? ?? ??? ?????????? ??? ?????????? ??? ??? ???, ?? ??????  
????????????????? ??? ?????????? ?????? ?????? ?????? ? ?????? ?????????? ??? ??  
????????????? ?????? ?????? ?????????? ?? ?????????? ?????? — ??? «charitable»  
?? ?????? ??? ?????? ?????? — ?????????? ?????? — ?????????? ??? ??  
????????? ?????? ??????

(?????? 77/388 ??? ??????????, ????? 13, ?, § 1, ??????. ?? ??? ??)

2. ?????????? ?????? — ?????????? ??? ?????????? — ????? ?????? ?????? —  
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????? — ?????????? ??? ?????? ??? ?????????? ?? ??? ?????????? ?????????? ??? ??????  
??? ??? ?????? ??? ?????????? ?? ??? ?????????? ??? ?????? ??? ???, ?? ????  
????????????????? ??? ?????????? ?????? ?????? ?????? ? ?????? ?????????? ??? ??  
????????????? ?????? ??? ?????? ?????????? ?? ??? ?????????? ?????????? — ?????? ???  
«????????? ??? ?? ?????????? ?????? ?????? ?????? ?????? ??? ?????????? ??? ??????????»  
— ?????????? ?????? ?????????? ?????? — ?????????? ??????

(?????? 77/388 ??? ??????????, ????? 13, ?, § 1, ??????. ?? ??? ??)

3. ?????????? ?????? — ?????????? ??? ?????????? — ?????? ?????? ?????? —  
????? ?????? ?????? ?????? ?????????????? ?????? — ?????????? ?????????????? ??? ???? ????  
????? — ?????????? ??? ?????? ??? ?????????? ?? ??? ?????????? ?????????? ??? ???? ????  
??? ??? ?????? ??? ?????????? ?? ??? ?????????? ??? ?????? ?????? ??? ???? ?, ?? ??????  
????????????????? ??? ?????????? ?????? ?????????? ?????? ?????? ? ?????? ?????????? ??? ??  
????????????? ?????? ?????? ?????? ??? ?????????? ??? ?????????? ?????? ?????? — ??????????  
????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? — ??????  
?? ?? ?????? ?????????? — ????

(?????? 77/388 ??? ??????????, ????? 13, ?, § 1, ??????. ?? ??? ??)

1. ? ??? «charitable» ??? ?????? ??? ?????? ?????? ??? ?????? 13, A, ?????????? 1,  
????????? ?? ??? ?, ??? ?????? ?????? 77/388, ??? ?????? ??? ?????? ??? ?????? ??? ???? ????  
????????????? ??? ?????? ??? ?????? ??? ?????????? ?? ??? ?????? ?????? ??? ?????? ??? ??????  
??? ??? ?????? ??? ?????????? ?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ???? ?, ??????  
????????? ??? ?????? ??? ?????????? ??????, ? ?????? ?????? ?? ?????????? ?????????? ??????????  
????? ??? ?????????? ??? ?? ??? ?????? ?? ??? ?????? ??? ?????? . ??????????????, ? ??????  
???? ?????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?? ??? ?????? ??? ?????? ??? ????  
??? ?????? ?? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ???? ????  
????? - ??????, ? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ??????????  
?? ?????????? ??????????, ?? ?????? ?????????? ?????? ?????? ?? ??? ?????? ??? ?????? ??? ??????????  
??' ?????????? ?????? ?? ?????????? ??? ?? ?????????? ??? ?? ?????? ??? ?????? ??? ??????????  
?? ??? ?????? ?????? ??????.

(?. ?????? 25-27, ??????. 1)

2. ? ?????? 13, A, ?????????? 1, ?????????? ?? ??? ?, ??? ?????? ?????? 77/388, ???  
????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ?? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ????  
????? ??? ??? ???, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? «????????? ??? ??  
????????????? ?????? ?????? ?????? ?????????? ?? ?????????? ??????????», ??? ??????????  
??? ?????? 13, A, ?????????? 1, ?????????? ?? ??? ?, ??? ?????? ?????? 77/388, ???  
????????? ?? ??? ?????????? ?????? ?????????? ?????????? ??????????.

??????, ??? ?????????? ??? ?????? ?????? ? ?????????? ?????????? ??? ?????? ??? ?????? ???  
????????? ??? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????????? ??? ??????????,  
????? ??? ?????? 1, ?????????? ?? ??? ?, ??? ?? ??? ?????? 13, ?, ? ?????? ??? ??  
????? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????.  
????????, ? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????? ???, ?????? ? ??????  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?? ??? ?????? ??? ?? ???  
????????? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?? ?? ??? 13, ?,  
????????? 2, ?????? ??, ??? ?????? ?????? ??? ?????? ??? ?????? ??, ?? ?????? ?????? ??? ??????  
?? ?????????? 1, ?????? ?? ??? ?, ??? ?? ??? ?????? 13, ?, ??????, ???' ??' ???,  
????????? ?????????? ??????????, ??? ?????? ??? ?????? ?????? ?????? ???, ?????? ??? ?????? ??? ??  
?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??????.

(?. ?????? 40, 42, 47, ??????. 2)

3. ? ?????? 13, ?, ?????????? 1, ?????????? ?? ??? ?, ??? ?????? ?????? 77/388, ??? ???  
?? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
????? ??? ??? ???, ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ???

?????????? ?????????? ?? ?????????? ?????????????? ??? ?? ?????????? ??? ?? ???????  
?????. ????????, ??? ?????? ?????????? ?????????? ?? ????????, ??? ?? ??????, ?????,  
??? ?????? ??? ??? ?????????????? ??? ?? ?????????? ?????????????? ??? ??????????????  
????? ?? ?????????? ??? ?????????? ?????????? ?????????? ??? ?? ?????????? ???, ??? ?  
????????? ??? ?????????? ??? ?????????? ?????????? ?????????? ???, ??? ?? ?????? ??? ?  
????????? ??? ?????????? ?? ?? ??? ?????? ?????????, ?? ?????????? ?????????? ??????????????  
????????? ?????????? ?? ?? ??? ?????? ?????????? ?????????? ??? ?????????? ?? ??????????  
????? ??? ?????? ??? ??? ?????? ?????? ?????? ?????? ?????? ??????????????.

(???. ??????? 51, 58, ??????. 3)

?????? ?? ?????????? (????? ????)

?? 26?? ????? 2005 (\*)

«???? ?????? ?? – ??? 13, A, ?????????? 1, ???????? ?? ?? ?? – ??????????????  
????????????? – ?????? ?????????? ?????? ?? ?? ?????????? ?????? ?? ?????????? –  
????? ?????????? ?????? ?? ?? ?????????? ?????? ?? ?????????? ?? ?? ?????? – ??????  
????????????????? ?? ?? ?????????? ?????? ?? ?????????????? ?? ?? ?????????? ?? ?? ?????? ??????  
????? ?? “????????? ??????????” – ?????????? ?????????? ?????????????? ?????????? –  
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???? ?????? C-498/03,

??. ?????????? ?? ?????? ?????? ?????????? ?????????? ?????? ?? ?????? 234 ?,  
?? ?????? ?? VAT and Duties Tribunal, London (?????? ???????) ?? ?????? ?? 10??  
?????? 2003, ? ?????? ?????? ?? ?? ?????????? ??? 26 ??????? 2003, ??? ?????? ??  
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**Kingscrest Associates Ltd,**

**Montecello Ltd**

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**Commissioners of Customs & Excise,**

??. ?????????? (????? ????),

????????? ?? ?? A. Rosas, ?????? ??????, A. Borg Barthet, A. La Pergola, J.  
Malenovský ?? A. Ó Caoimh (??????), ???????,

????????? ??????????: D. Ruiz-Jarabo Colomer

?????????: L. Hewlett, ?????? ?????????? ??????????,

?????? ?? ?? ?????? ?????? ?????????? ?? ?? ??????? ?? ?? ?? ?????????? ?????????? ??  
27?? ?????????? 2005,

????????? ?????? ?? ?????????????? ?? ?? ??????????:

- ?? Kingscrest Associates Ltd ??? Montecello Ltd, ???????????????? ??? ?? A. Hitchmough, barrister, ???' ??????? ??? C. Mainprice, solicitor,
- ?? ??????? ????????, ?????????????? ??? ??? K. Manji ??? ??? C. White, ?????????????? ??? ??? N. Paines, QC, ??? P. Mantle, barrister,
- ? ??????? ??? ????????, ?????????? ??? ??? R. Lyal,  
???? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ??? ?? ??????????  
??? 22?? ?????????? 2005,  
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1 ? ??????? ???????? ?????????????? ?????????? ?????? ??? ??????? ??? ?????? 13, ?,  
?????????? 1, ??????? ?? ??? ?, ??? ????? ?????? 77/388/??? ??? ??????????, ??? 17??  
????? 1977, ??? ?????????????? ??? ?????????? ??? ?????? ???, ??? ?????????? ?? ???  
????? ?????? ??????? – ????. ?????? ?????? ????? ?????????????? ??????: ??????????  
????????? ??? (?? ????. ??? 09/001, ?. 1, ??? ????: ??? ??????).

2 ? ?? ??? ?????? ?????????? ??? ??????? ?????????? ???????, ??????, ??? Kingscrest  
Associates Ltd ??? Montecello Ltd ???, ???????, ??? Commissioners of Customs & Excise (???  
?????: Commissioners), ??? ??????? ??? ??????? ?????????? ??? ??????? ?????  
????????????? ??? (??? ????: ???), ??? ?????? ??? ??????? ??? ??? ??? ??? ??????????  
??? ??????? ? Kingscrest Residential Care Homes (??? ????: Kingscrest), ??????????  
(«partnership») ??? ?????????? ??? ??? ?????????????? ??? ??????? ?????? ?? ?????? ???  
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3     ?? ?????? 13, A, ??????????? 1, ??? ????? ?????? ??????? ?? ????:

[...]

?) ??? ??????? ?????????? ??? ??? ?????????? ???????, ?? ?????? ?????????? ?????? ??  
??? ??????? ?????? ??? ??????, ?????????????????? ??? ??? ?????????? ??? ??????  
?????????, ??? ?? ?????? ?????????????????? ??? ?????????????? ?????????? ?????? ? ??????  
????????????? ??? ?? ?????????????? ?????? ?????? ?????????????? ?? ?????????? ??????????.  
  
?) ??? ??????? ?????????? ??? ??? ?????????? ???????, ?? ?????? ?????????? ?????? ??  
??? ?????????? ??? ??????? ??? ??? ??? ??? ?????????????????? ??? ??????????????  
????????? ??????? ? ??? ?????????? ??? ?? ?????????????? ?????? ?????? ?????????????? ??  
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[...]».

4     ?? ?????? 13, A, ??????????? 2, ??? ?????? ??????? ?????? ?? ????:

«2. ?) ?? ?????? ????, ??????????? ?? ????????, ??????? ?? ???? ???????????, ??? ? ?????????? ??  
??????????, ????? ?? ???? ?????????? ??????? ???????, ????? ?? ???? ?? ???? ?????????? ??  
??????????, ??? ?????? ?????????? 1 ??????????? ?, ), ?, ), ?, ), ??), ??), ??), ??), ??), ??);  
?? ???? ???? ???? ? ?????????????? ??? ???? ?????? ??????????????:

– ?? ?? ????? ??????????? ?? ?? ?????? ?? ?????? ?? ?????? ?? ?????? ?????????????? ?????????? ?? ?? ???????, ?? ??????????? ?? ?? ?????? ?? ?? ?????? ?? ?? ?????? ?? ?? ?????? ??????????? ?? ?? ???????????, ?? ?? ??????????? ?? ?? ?????? ?? ?? ?????? ?? ?? ?????? ?? ?? ?????? ?? ?? ??????????? ?? ?? ???????,

[...]».

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5      ????. ????. ????. 1? ????????. 2002, ? ??????????. ????. ????. ??????. ??????. ??????. ????.  
?????. ??????. ????. ??????. ????. ??????. ??????. ????. ??????. ????. ??????. ????. ??????. ??????.  
????. ????. ??????. ????. 1984 ????. ??????????. ????. ??????. ??????. (Registered Homes Act  
1984) ????. ????. 1989 ????. ??????. ????. ??????. (Children Act 1989). ????. 1?. ??????.  
2002, ? ??????. ????. ????. ????. ?? National Care Standards Commission (?????.  
?????. ????. ??????. ??????.) ????. ??????. ? ??????. ????. ??????. ????. ??????. ??????. ????.  
?????. ????. ??????. ????. ????. ????. 2000 ????. ??????. ????. ??????. (Care Standards Act 2000).

6 Care Standards Act 2000 «?????? ?????????? ??? ?????????? ??????????» ???????  
?? ?????????? ??? ??????? ?????????? ??? ?????? ?? ?????????? ? ?????? ?? ??????. ??  
«?????? ?????????? ??? ??????????» ??????? ?? ?????? ??? ?????? ?????, ?????????? ???  
????????? ??????? ?? ?????? ??? ?????? ??????????, ?????? ?? ?????? ???  
????????? ?????????? ??????????, ?????? ?? ?????? ?????? ??? ?????? ?? ?????? ???  
????????? ?????????? ? ??????????.

7 Care Standards Act, National Care Standards Commission, Care Standards Act 2000, Registered Homes Act 1984, Children Act 1989, Care Standards Act 2000.

8 ? National Care Standards Commission ?????? ?? ??????? ??? ??? ??????  
?????????? ?? ?????? ?????? ? ?? ?????????????? ??????? ??????, ?? ??????? ?? ??  
????????? ?? ?????? ?????? ?????? ?? ??????? ?? ?????????? ?? ?? ???' ?? ??  
?????????? ?? ?? ?????????? ?? ?? ??? ???????, ??????, ??????, ?? ?? ??????????  
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9 ? Care Standards Act ??????? ???? ??????? ?????? ??? ?????????? ?????? ??? ?????? ??? ??

????????? ??????? ?????????? ?? ?????????????? ?????????? ?????????????? ???? ?? ???????????  
?? ?????????? ??????? ?????????????? ??? ?????? ?? ?????? ?? ???? ?? ???????????.

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10 ??? ?????? ??? ???? 1994 ??? ??? (Value Added Tax Act 1994, ??? ????: VAT Act), ??  
????????? ?????????? ?????????? ?????????? ?????????????? ??? ?????? ??

11 ??? ??? ??? 21? ??????? 2002, ??????? ?? ?????????? 9, ????? 7, ?????? 9, ??? VAT  
Act, ?????????????? ??? ??? ????? ?? ?????? ?????????? ?????????? ?????????? ?????????? ???  
????????????? ?????? ????? ?? ?????? ??? «charities» ? ??? ?????????? ??????????  
???????, ??? ?? ?????????? ?? ??? ?????? ?????? ?????? ?????????? ??????.

12 ??? ?? ?????? ??????, ?? «charities» ?????? ?? ?????? ?????????? ?????????????? ???  
????????????? ?????? ???, ?? ?? ??????, ??? ?????? ?? ?????? ?????? ??? ??????.

13 ?? ?????????? 9, ????? 7, ?????? 9, ??? VAT Act, ??? ?????????????? ??? ??  
????????? ??? ????? ?????????????? ??? ?????? ??? ?????????? ?????? ?????? ???  
????????? ?????????? ??? ?????? [Value Added Tax (Health and Welfare) Order 2002 (SI  
2002/762), ??? ????: ?????????? VAT Act], ?????????? «??? ?????? ??????????  
????????? ?????????? ??? ??? ?????????? ?????? ??? ?????????? ??? ?????? ??? ???  
????????? ????:

) charity [????????????? ???]

) ?????????? ??? ?? ?????? ?????? ?????? ?????????? ?????????? ?????????? ?

) ?????? ??????».

14 ??????? ?? ?? ?????????? 6 ??? ?????? 7 ??? ?????????? VAT Act, ??  
????????????? ?????????? ?????????? ?????????? ?????????? ?????????? ?? ?? ??????????  
?? ?????????? ??? ?? ??? ?????? ?????????? , ?????????? ? ?????????? ??? ??  
????????? ??? ?????????? ??? ?????????? ? ?????????? ?????? ?????????? , ???????,  
????????? ?????????? ? ?????????? ?????? , ?????? ??? ?? ??? ?????????? ?????? ?  
????? ????.

? ??????? ??? ?????? ???? ?? ?????????????? ??????????

15 ?? ?????????? ??? ?????? ?????? ?????????? ??? ?????????? Kingscrest ?? ???  
?? ?????????? ??? ?????? ?????????? ??? ?????????? ??? ?????? ?????? . ? Kingscrest  
????? ???? ?? ?????? ???, ?? ?? ??????, ??? ?????? «charity» ??? ?? ?????? ???  
????????? ???????. ?????????????? ?????? ?????? ?????? , ?? ?????? ??????????????  
?? ?? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? Registered Homes Act ?  
?? Children Act ???, ???????, ?????? ??? Care Standards Act.

16 ??????? ?? ?? ?????? ?????? ?????? ?????????? , ??? ?????????????? ??? ?? ??????? ???  
Kingscrest ?????? «?????? ?????? ?????????? ?????????? ??????» ??? ?? ?????? ???  
????????? 9, ????? 7, ?????? 9, ??? ?????????? VAT Act ??? ?? ?? ?????? ???  
????? «????????????? ??? ?? ?????? ?????? ?????? ??????» ??? ?? ?? ?????? ???  
????? ???????.

17 ??? ?? 21 ?????? 2002, ?? ?????????? ??? ?????? ? Kingscrest ?????????? ??  
???. ??? ?? ?? ??? ?????????? ??? ?????, ?? ?????? ??? Commissioners, ?? ??????????  
????? ?????????? ??? ?? ??, ?? ?? ?????????? ???, ??? ?? ?????????? ???, ? ? ?? ???

?????? ?????? ?? ?????????????? ?????????????? ??? ?????? ??????, ??????? ?? ?? ?? ??  
?????? 9.

18 ?? ?????????????? ??? ?????? ?????? ?????? ?????????? ??? ?????? ??? ?????????? ???,  
????????????? ??? ?? ?????? 9, ??? 7, ??? 9, ??? ?????????? VAT Act ???  
???? ?????? ?? ?? ??? 13, A, ?????????? 1, ?????????? ?? ??? ??, ??? ?????? ??????.  
????????? ???, ?????????? ??? ?????? «????????????? ??? ?? ?????? ?????? ?????? ???,  
????????? ???», ? ?????? ?????? ?????? ??? ?????? ?? ??? ?? ?????? ?????? ??????  
????????? ??? ?????? ? ??? ??????.

19 ? Commissioners ?????? ??? ? ??? «charitable» ??? ?????????????? ??? ?? ???  
13, ?, ?????????? 1, ???????? ?? ??, ?????????? ?? ?????? ??? ?????????? ??????, ?  
????? ??? ?????????? ?? ??? ?????? ??? ?????? «charitable» ??? ?????? ??????.  
????????? ??? ?? «????????? ??? ?? ?????????? ?????? ?????? ?????? ?????????? ??  
????????? ?????? (“recognized as charitable”), ??? ?? ?????? ??? ?????????? ???,  
?????? ?? ?????????? ?????? ?????????? ?????? ??? Registered Homes Act  
1984, ??? Children Act 1989 ? ??? Care Standards Act 2000.

20 ??' ?????? ??? ????????, ?? VAT and Duties Tribunal ??? ???????, ?????????? ??  
????????? ??? ???????, ?? ?????????? ??? ?????????? ?? ?? ???????, ?? ?????????? ??  
????????? ??? ???????:

«1) ?????????? ? ?????????? ?? ?????? ?????????? ?????????? ??? ?????? ?????? [...]  
????????? ?? ?????????? ??? ?????? «????????? ?????????? ?????????? ??????»  
[???? ?????? ?????? “charitable”] ??? ?????????? ?? ?????? 13, ?, ?????????? 1, ??????  
?? ?? ??, ? ?????? ?? ?????????? ??? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???  
?????? ??????;

2) ?? ??? ?????? ?? ?????? ?? 13, ?, ?????????? 1, ?????????? ?? ?? ??, ??  
????????? ?? ?????????? ??? ?????? ?????????? ?? ?? ?????????? ?? ?? ?????????? ??  
????????? ???????, ?????? ?? ?????? ??? ?? ?????? ?????? ?????? ?????????? ?????????? Kingscrest  
Residential Care Homes;

3) ?????? ?? ?????????? ?? ?????? 13, ?, ?????????? 1, ?????????? ?? ?? ??, ??? [?????]  
?????? ?? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????????? ?????????? ?? ?????????? ???  
????? ?? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????????? ???  
????? ??? Care Standards Act 2000 (? ??? Registered Homes Act 1984 ? ??? Children Act  
1989), ??? ?? ?????? ?? ?????? ??? ?????? ?????? ?????? ??? ?? ??? ?? ?????? ??? ?????? ???  
????????? ?????????? ?????? [charity] ?? ??? ?? ?????? ?????? ??? ?????? ??? ?????? ???  
????? ??? ?????????? ??? ?????? ??????;»

??? ??? ?????????????? ??????????

??? ??? ?????? ?????????????? ??????????

21 ?? ?? ?????? ?????????? ??? ??????, ?? ?????? ?????????? ?????? ???' ?????? ??? ??  
??? «charitable» ??? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? 13, ?, ?????????? 1,  
????????? ?? ?? ??, ??? ?????? ?????? ??? ?????? ?? ?????? ?????? ?????????? ??? ??????  
?? ?????? ?? ?????? ??? ?????? ?????? ???, ?? ?????? ?????? ?????? ??? ?????? ?????????? ???  
????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?? ?????? ?????? ??? ?????? ???  
????????? ??? ?????? ??????.

22 ???????????, ???????, ? ??????? ???, ??? ????? ??????????, ?? ?????????????? ???  
????? 13 ??? ????? ??????? ?????????? ?????????? ?????????? ?????? ??? ??????????  
?????? ???, ?? ?? ??????, ?????????? ? ?????????? ?????? ??? (??. ?????????? ???  
12?? ?????????? 2000, C-358/97, ??????? ??? ?????????, ?????? 2000, ?. I?6301, ???  
51, ??? 12?? ?????? 2003, C-275/01, Sinclair Collis, ?????? 2003, ?. I?5965, ??? 22, ???  
??? 18?? ?????? 2004, C-284/03, Temco Europe, ??? ??? ?????????? ??? ???  
??????, ??? 16).

23 ?? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ??????? ?????????????? ??? ??????????????  
??? ?? ??????? ??? ?????? ??? ??????? ???, ???????, ??? ?????????? ??? ?????????? ???  
????????? ? ??? ?????????? ??? ?????????????? ??? ? ?????? ?????????? ??? ?????? ???  
??? ?????????? ??? ??? ?????? (?????? ??? 11?? ?????? 1995, C-453/93, Bulthuis-  
Griffioen, ?????? 1995, ?. ?-2341, ??? 18).

24 ???????, ??? ?????? ??? ?????? ?? ???????????, ?????? ??? ?????????? ??????? ???  
????? 13, ?, ??????? 1, ??? ??? ?????? ???, ?? ??? ?????? ??? ?????????? ??? ???  
????????? ??? ?????????? ??? ?? ?????????? ??? ?????? ??? ??? ?????? ??? ??? ??? ??  
????????? ?????????? ???????????, ?????????? ??? ?????????, ?????? ??  
????????? ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ???  
????????? ?????? (?????? ??? 20?? ?????? 2002, C-287/00, ??????? ???  
??????, ?????? 2002, ?. ?-5811, ??? 50).

25 ??? ?? ?????? ???, ? ??????? ??? ?????????????? ??????? ??? ??? ? ? ???????  
??? ??? ?????? ??? ??????? ?? ?????????? ??? ??? ?????????? ??? ?????? ??? ???  
?? ?????? ?????? (?. ?????????? ??? 11?? ?????? 2001, C-76/99, ??????? ???  
??????, ?????? 2001, ?. ?-249, ??? 56, ??? ??? 16?? ?????? 2003, C-315/00,  
Maierhofer, ?????? 2003, ?. ?-563, ??? 26).

26 ???????, ??? ?????? ??????????, ? ?????? ?????????? ??????? ??? ??????????  
?????? ??? ???????, ?? ??????? ???????, ?? ?????????? ??????? ??? ?????????? ??????? ??  
?????? ??? ???????, ???' ??????? ??????? ?? ?????????? ??? ?? ?????????? ??? ??  
?? ?????? ??? ??????? ??? ??? ?????? ?????? ?????? (????????? ??? 2?? ???????  
1998, C-296/95, EMU Tabac ?.?. , ?????? 1998, ?. ?-1605, ??? 36, ??? ??? 17?? ???????  
1998, C-321/96, Mecklenburg, ?????? 1998, ?. ?-3809, ??? 29).

27 ?????? ??? ??????, ??? ?????? ?????????? ??????? ??? ?????? ?? ?????? ? ???????  
?? ? ??? «charitable» ??? ?????? ??? ?????? ?????? ??? ?????? 13, A, ?????????? 1,  
????????? ?? ??? ??, ??? ?????? ?????? ?????? ?????? ??? ?????? ??? ??????????  
??????, ? ?????? ?????? ?? ?????????? ?????????? ?????? ??? ?????????? ??? ??  
?????? ?? ??? ??? ??????.

?? ?? ?????? ??????

28 ?? ?? ??????? ???????, ?? ?????? ?????????? ?????? ???' ?????? ??? ? ?????? ???  
«????????? ??? ?? ?????????? ?????? ?????? ?????? ?????? ?????????? ?? ?????????? ??????????»,  
? ?????? ?????????? ??? ??? 13, A, ?????????? 1, ?????????? ?? ??? ??, ??? ?????? ??????,  
?????? ?? ?????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ??????????  
?????????.

29 ?????????? ? ??????? ???, ??? ?? ?????????? ??? ?????????? ?? ?????????? ??  
????????????? ??? ?? ?????????? ??? ?????? ??? ?????? 13 ??? ?????? ??????  
?????? ?? ?????????? ???, ??????? ??? ?? ?????????? ??? ?????? ??????????

? ?????????????? ??? ?? ?????? ????? ??????? ?? ??? ?????? ???? ?????????????? ?? ??? ?????? ??????  
????????? ??? ?????????????????? ?? ?????????? ?????? ??? ?????????? ??? ?????? ??? (??.,  
????? ?????, ?????????? ?????????? ??? ?????? ??????????, ????????????????, ??? 43, ??? 20??  
????????? 2003, C?8/01, Taksatorringen, ?????? 2003, ?. ?-13711, ????? 36, ??? Temco  
Europe, ??????????????, ??? 17). ?????????, ? ?????????? ??? ??? ?????? ??????????????????  
????? ?? ??? ?????? ?????????? ?? ?????? ?????????? ?? ??? ?????? ?????????????????? ??? ??? ??????????  
????? ?????????? ??? ?? ?????????? ??? ?????????? ??? ?????? ??? ?????????????? ??? ??????????????  
??? ?????????? ?????????????? ??? ?????? ??? ?????? ?????????? ??? (????????? ??? 6?? ??????????  
2003, C-45/01, Dornier, ?????? 2003, ?. ?-12911, ????? 42).

30 ???????, ??? ?????, ???' ?????, ???? ?????? ?????? ?????? ?????????????? ?? ??? ??????????  
?? ?????? 13, ?, ?????????? 1, ?????????? ?? ??? ?, ??? ?????? ??????, ?????????? ??? ??  
????????? ??? ?? ?? ?? ?????? ??????????, ?????????????? ?????????????? ??????????????, ???  
????? ??? ???, ?????????? ?????????? ?????????? ?????????? ?????????????? ??? ?????? ???  
????????? ??????, ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ?????? ???  
????????? ??? ?????? ??? ?????????? ?? ?????? ??? ?????? ??? ?????????? ?????? ??????????.

31 ?????????? ??? ?????? ??? ?????? ???, ?????????? ???? ?????????? ???, ??????, ?  
????????? ?????????? ??? ?????????????? ??? ?????????? ??? ?????????? ??? ?????? 13, ?,  
??? ?????? ??????, ??? ?? ?????????????? ??? ?????? ??? ?????????? ?????????????? ??????  
????????? (????????? ??? 3?? ?????? 2003, C-144/00, Hoffmann, ?????? 2003, ?. I?2921,  
????? 38).

32 ???????, ?????? ?? ?????? ?????? ??? ? ?????? ??? «????????? ??? ??  
????????? ??? ?????? ??? ?????????? ??? ?????? ?????????? », ? ??????  
????????? ??? ?????? 13, ?, ?????????? 1, ?????????? ?? ??? ?, ??? ?????? ??????, ???  
????????? ?????? ?????? ?????? (??., ??' ??? ?????? ??????, ?????????????? ??????  
Dornier, ????? 48).

33 ??????????, ??????, ? ?????? ???, ?????, ?????????? ???, ??? ???? ?????? ??? ??  
????????? ?????? ??? ?????????? ???, ?? ?????? ?????????? ???, ???' ??????, ???  
????????? ??? ?????? ?????????? ???, ?????? ??? ?????? ?????? ??? ??? ?????? ??????  
??? ?????????? ?? ?????? ??? ?????? ?? ?????????? ?????? ?????????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ?????? ???.

34 ?????? ?? ?????????? ??? ?????? ??? ???? ?????? ??? ?????? ?????? ?????????? ??????????  
?? ?????? 13, ?, ?????????? 1, ?????????? ?? ??? ?, ??? ?????? ??????, ??? ?? ??????  
??? ?????????? ??? ?? ?????????? ??? ?????????? ???, ???, ????, ???, ?? ?????????? ???  
????????? ?????????? ??? ?? ??? ?????? ?????? ??? ?????????? ??? ?????? ??? ?? ??????????  
??? ?????? ??? ???, ???, ??????, ?? ?? ??? ?????? ?????? ?? ?????????????? ???  
????????? ?????? ??? ?????? ??? ?????? ?????????? ??? ?? ?????????? ??? ??????  
????? ?????????? ???, ???' ??????, ?? ?????????? ??????.

35 ??????, ? ??? «?????????» ?????? ???' ?????? ?????????? ?????? ??? ?? ??????????  
????????? ?????? ?????????? ?????? (??., ??????, ?????????? ??? 7??  
????????? 1999, C-216/97, Gregg, ?????? 1999, ?. I?4947, ????? 17, ??? ??????????  
Hoffmann, ????? 24).

36 ???, ?????? ?? ?????????? ???, ??? ?????? ?? ?????????? ?? ?????? ???  
????????? ?????? ??? ?????? ?????????? ???, ??? ?????? «????????? ??? ??  
????????? ??? ?????? ?????? ?????????? ?? ?????????? ?????????? » ??? ?????? ???  
????? 13, ?, ?????????? 1, ?????? ???, ??? ?????? ??????, ??? ?????????? ??? ?? ??????  
??? ?????????? ??? ?????? ?????? ??? ?????? ?????????? ??? ?????????? ???

«??????????» (????????????????? ?????? Gregg, ???? 21).

37 ???????, ?????????? ? ?????????? ???, ??? ????? ?????????????? ? ?????????? ???  
????????? ?????????? ??? ?? ?????? ???????, ??? ?????????????? ??? ? ??????????  
????????? ?????? ?? ?????????? ?? ??????? ??? ?????????? ??? ?????? 13, ?, ??????????  
1, ??????? ?? ??, ??? ????? ?????? ?? ??????? ?? ?????????? ??? ?????????????? ? ?? ??????????  
?????????, ?? ?????????? ?????, ??? ?????????? ??? ??? ????? ??????, ??? ?? ??????????  
??, ??? ?? ??? ???.

38 ???, ?????????? ? ?????????? ??? ?? ?????? 13, ?, ?????????? 2, ?????????? ?,  
????? ??????????, ??? ?????? ??????, ?? ?????? ?????? ?????????? ?????????? ???  
????? ?? ?????? ??? ?????? ?????? ?? ?????????? ?? ?????????? ?????????? ??? ??  
????????? ?????????? ?????????? ??? ?? ?????????? ?????????? 13, A, ?????????? 1,  
?? ?????? ?????? (??., ??????, ?????? ??? 21?? ?????? 2002, C-267/00, Zoological  
Society, ?????? 2002, ?. I?3353, ????? 16), ???????, ??? ??? ?????????? ??? ?????? ???  
?? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ?????? ?????? ???, ??? ??  
???? ?????????? 1, ??????? ?? ??, ??? ????? ??????????, ??? ??? ??? ?????????? ??????  
??????, ?? ?????? ??? ????? ?? ?????? ?????????? ?????????? ??????????  
(????????????? ?????? Hoffmann, ???? 38).

39 ???, ??? ?????? ?? ??????????, ? ?????????? ??? ?????? 13, A, ?????????? 2,  
???????, ??, ??? ?????? ???????, ??? ?????? ?????? ??? ?? ?????????? ??????????  
?????? ?????????? ??? ?????? ?? ?? ?????????? ??? ?????????? ?? ??????????????  
????????? ??? ?????????? ??? ?????? 13, ?, ?????????? 1, ?????????? ???, ??? ??????  
????? (?????? ??? 21?? ?????? 2002, C-174/00, Kennemer Golf, ?????? 2002, ?. I?3293,  
????? 33).

40 ??' ?????? ?? ???????, ?????? ?? ?????? ???' ?????? ?????? ???, ??? ??????????  
???? ?????? ? ?????????? ?????????? ??? ?????? ??? ?????? ?? ?????????? ??? ??????????????  
??? ?????????? ??? ??? ?????? ?????????? ??????????, ??? ??? ?????? ?????? 1,  
????????? ?? ??? ??, ??? ?????? 13, ?, ? ?????? ??? ?????? ??? ?????? ?? ?????????? ??  
????????? ??? ?????????? ??? ?????? ??? ?????? 13, ?, ?????????? 2,  
????????? ??, ??? ?????? ???????, ??? ?????? ?????? ?? ?????????? ??? ?????????????? (??.,  
??????, ?????????????? ?????? Kennemer Golf, ???? 34, ?? Hoffmann, ???? 38).

41 ???????, ??? ?????? ?? ?????? ??? ?????????? ??????????????, ?????????? ?  
????????? ??? ? ??? ?????? ?????????? ?????? ??? ?????????? ??????????????, ?? ???  
?? ???, ?????????? ?????? ???????, ?? ??????, ?? ?? ??????, ??? ?????? ??????????????  
????? ??? (??., ??????, ?????? ??? 10?? ?????? 2002, C-141/00, Kügler,  
????? 2002, ?. I?6833, ???? 30, ??? ??? 23?? ?????? 2003, C-109/02, ?????? ???  
????????, ?????? 2003, ?. I?12691, ???? 20).

42 ??????????, ??????, ? ?????????? ???, ??? ?????????? ? ?????? ?????????? ???  
????? 29 ??? ?????????? ???, ? ??? ?????? ?? ?????????? ???, ?????? ? ??????  
????????? ??? ?????? ??? ??????? ??? ??? ?????????? ??? ?????? 13, ?, ?????????? 2,  
????????? ??, ??? ?????? ???????, ??? ?????? ??????, ?? ?????????? ?????? ??? ??????????  
1, ?????????? ?? ??, ??? ?????? 13 ??????, ???' ??' ???, ??????????  
?????????????, ??? ?????? ??? ???, ?????????? ??? ?? ?????? ??? ?????????? ??? ?????? ?  
?? ?????????????? ??????????.

43    ??? ??? ?? ??????? ?????????? ??? ? ???????? ??? ??????? ??? ??????? ?? ??????? ?? ??????????  
?? ??????? ?? ?????????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? 13, ?,  
????????? 1, ??????? ?? ??? ?, ??? ????? ??????.

45      ????????????, ?????? ?? ??????????????? ????? ?????? ?????? ?????? ??? ?????????? ??  
?????????? ?????? ?? ??????????????? ?????? ?????? ??????????? ?? ?????????? ?????? ???????????,  
????? ??? ?????? ??? ?????? 13, ?, ??????????? 1, ?????????? ?? ??? ??, ??? ?????? ???????,  
????????? ??? ?????? ??? ??????????? ??? ??????? ?????, ??? ?? ??????? ??? ???  
?????????? ?????? ???, ?? ?? ??????, ??? ?????? ?? ?????????? ??? «charity» ??????  
?? ??????? ???????.

46 ????????????, ???????, ? ????????????, ???, ????? ??? ??' ????????????, ????????, ??  
????? ?? ?????????????? ??, ?????? ?????? ?????? ?????? ?????????????? ??, ? ?????????? ??, ????????,  
????? ?????????? ????????, ??? ???????, ?? ????????????, ?????? ?????? ??? ????????, ??? ??, ???  
???????????, ??? ?????????? ?????????? ??, ??? ???????, ?? ?????? ??? ??, ??? ????????????, ???  
???????????, ?? ???, ??? ????????????, ??? ???????, ?????????? ????????????, ???.

47 ????????, ??? ?????? ?????????????? ??????? ?????? ?? ?????? ? ??????? ?????? ??? ??  
??? ?????? ??? «?????????? ??? ?? ?????????????? ?????? ?????? ?????? ??????????? ??  
?????????? ??????????» ??? ?????????? ??? ?????? 13, A, ?????????? 1, ?????????? ?? ???  
??, ??? ??????????? ?? ?????????? ?????? ?????? ?????????????? ??????????.

??? ??? ?????? ?????????????? ??????????

48    ?? ?? ?????? ??????????? ???????, ?? ?????? ??????????? ?????? ???' ?????? ?? ?  
????? ?? ???? ?????????? ?? ?????????? ??????? ?? ?????????? ?????????? ??????????,  
????? ?? ???? ?????? ?? ???? 13 A, ?????????? 1, ?????????? ?? ?? ?? ?, ??? ?????? ???????, ??  
????????? ?? ???? ??????????? ???????, ? ?????? ?? ?? ?? ?? ??????? ?? «charity»  
????????? ?? ???? ??????? ???????.

49      ???????????, ???????, ? ?????????? ?? ?? ???? 13, A, ?????????? 1, ??????? ??  
 ??? ??, ??? ?????? ??????? ?? ?????????????? ?? ?????????????? ?? ?????? ??????????????  
 ?????????????? ?????????? ?????????? ?? ?????? ?????????? ?? ?????? ?????? ?? ??????  
 ??????. ???????, ??????? ??' ?????? ?? ?????? ?????? ?????? ?????? ?? ?????? ??  
 ?????? ?????? ?? ?????? ?????? ?????? ?? ?????????????? ?? ?????????? ?????? ??  
 ?????? ?????????? (??., ???????, ?????????????? ?????? Dornier, ??? 64).

50 ???????, ? ??????? ?????????? ??????? ?????????? ?????????? ?????????????? ??? ?? ?????? 13, A,  
?????????? 2, ??????? ??, ??? ????? ??????, ??????? ?? ?? ????? «[?]?? ????? ??  
????????? ?? ???????, ??????? ?? ????? ??????????, ??? ? ?????????? ?? ???????????, ???  
??? ?????????? ??????? ???????, ??? ??? ?? ??? ?????????? ??? ?????????????? ???  
????????? 1, ?????????? [...] ??, ??, [...] ?????????? ??? ??? ?????? ??? ? ??????????»  
??? ?? ?????????? ??? ?????????? ??? ?????????? ??? ?? ????? ?????? (?)

????????????????? ??????? Dornier, ????? 65).

51    ??? ?? ??????? ?????????? ??? ?? ??? 13, A, ?????????? 1, ?????????? ?? ??? ??, ???  
????? ???????, ??? ?? ?????? ?? ?????? ?? ?????????? ??? ?? ?????? ?? ?????? ?? ?????? ?? ?????? ??, ???  
????? (?? . ?????????????? ?????? Kögler, ??? 54), ??????? ?? ?????? ?? ?????? ?? ??????????  
????????? ?? ?????????? ?????? ?????????? ?? ?????????? ?? ?????????? ?????????? ?? ?????????? ??  
????????? ?? ?????????? ?????? ?????????? ??????????.

52 ??????????, ??? ?? ?????????? ?????????? ?????? ???, ??? ????? ?????????????? ???  
 ????? ?????????? ??? ?????????? ??? ?????????? ?????????? ?????????? ?????????? ??????????  
 ?????????? ??? ?????? ?????????? ??? ?????????? ??? ?? ?????????? ?????? ?????????? ???  
 ??? ?????? ??? ?????????? ?????????? ??? ??????? ?? ?????? 13, A, ?????????? 1, ??????????  
 ?? ??? ?, ??? ????? ??????, ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????????? ???  
 ????? ??? ?????? ??? ????? ?????????? (??., ??????, ?????????????? ??????)  
 K ugler, ??? 56, ??? Dornier, ??? 69).

54 ????????, ?????????? ? ????????, ??? ? ??? ? ??? ?????????????? ?????????? ?????  
 ????? ? ? ?????????? ??????????, ?? ??? ? ?? ?, ?????????? ?????? ??????????, ??  
 ??????, ?? ?? ??????, ????? ?????????????? ?????? ??? (??., ??????, ??????????????  
 ?????????? Kübler, ??? 30, ??? ?????? ??? ??????????, ??? 20).

55      ????? ??????? ???? ?????? ?????, ?????????? ???? ?????? ?????????? ???? ??????, ???  
????? ?????? ?? ?????? ??? ?????????? ?????, ?? ? ?????????? ??? Kingscrest ???  
????????? ??? ?????????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? 13, A,  
????????? 1, ??????? ?? ??? ?, ??? ?????? ??????, ??????? ???? ?????? ??? ?????? ??? ??????  
??? ??? ?????????????? ?? ??? ??? ?? ??? ?????? ?????????? ??? ?????? ??? ??????  
????????? ??? ?????????? ??????.

57 ??????????, ?? ?????? ???????????, ??????????? ?? ?????????? ?? ??? ?????????????  
????????? ?????????? ?????????? ??? ?????? ??? ??????????? ??????????, ?????? ?? ????  
????? ?????? ?? ??????? ???, ??????? ??? ?????????????? VAT Act, ?? ?????????? ??  
????????? ?? ?????? 13, A, ?????????? 1, ??????? ?? ??? ?, ??? ????? ??????,  
????????? ?? ?????? ??? ?????????????? ??? ?????? ?????????????? ??? ?????? ?????? ??????  
?? ??? Care Standards Act 2000, ?????? ??? ?? ??????? ??? ??? ? ?????? ?????? ??? ??? ?  
????????????? VAT Act ?????????? ?????????????? ?????????? ??? ??? ???  
????????????? ?? ?????????? ??? ?????????? ?????? ??? ?????? ?????? ?????????????? ?? ??????

????????? ?????????? ?????????? ?????????? ??? ?????? ?? ?????????????? ?????????? ??? ???  
?????? ??????, ??? ???? ?????? ??? ?????????????? ??? ?????? ??? ?????????? ??? ??????,  
????????????? ?????? ?????? ?????????????? ??? ??? ?????? ?????????????? ??? ?????????? ?? ??????  
??? ?????? ?????, ?? ?? ?????? ??? ?????????????, ??? ?????????????? ??? ?????????? ??? ?????? ???  
????????? ??? ???? ?????????????? ??? ??? ?? ?????? ??? ?????????? ??? ?????????? ??? ?? ??????????  
???? ??????.

58 ?? ?? ??????, ??? ???? ?????????????? ?????? ??? ?????? ?? ?????? ? ?????????? ??? ???  
?????? ?????????????? ?????????????? ?? ??????, ??? ?? ??????, ?????, ??? ?????? ??? ???  
????????????? ??? ??? ?????????????? ?????????????? ??? ?????? ?????????? ??? ?????? ??  
????????????? ??? ?????????????? ?????????????? ??? ?????? ?????? ?????????? ???, ??? ? ??????????????  
??? ?????????? ??? ?????????????? ?????????????? ??? ??????, ??? ??? ?????? ?????????? ??? ??????????  
??? ?????????? ?? ?????? 13, A, ?????????? 1, ?????????? ?? ??? ?, ??? ?????? ?????????? ??? ??????????  
????????? ?????????? ?????????????? ?????????????, ? ??????, ?? ?? ??????, ??? ?????? ?????? ??? ?????? ??  
????????? ??? «charity» ?????? ?? ?? ?????? ??????, ?????????? ??? ?????? ??? ?????? ??????????????  
????????? ??? ?????????? ?? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????????? ???  
????????? ??????????????.

??? ??? ?????????? ??????

59 ?????????? ??? ? ?????????? ??? ?? ?????? ??? ?????? ?????????? ??? ?????? ?????? ???  
????????? ?????????????? ??? ?????? ?????? ??? ?????? ?????? ?????????????? ???, ?' ???  
????????? ?? ?????????? ??? ??? ??????. ?? ?????? ??? ?????? ?????????????? ??? ??????????????  
????????? ??? ??????????, ??? ??? ?? ??? ??????, ??? ?????? ??????.

??? ??? ?????? ??????, ?? ?????????? (????? ????) ??????????:

- 1) ? ??? «charitable» ??? ?????? ??? ?????? ?????? ?????? ??? ?????? 13, A,  
????????? 1, ?????????? ?? ??? ?, ??? ?????? ?????? 77/388/??? ??? ??????????,  
??? 17?? ?????? 1977, ??? ?????????????? ??? ?????????? ??? ?????????? ??? ?????? ???  
????????? ?? ??? ?????? ?????? ?????? ?????????? – ??? ?????? ?????? ?????? ??????????????  
?????: ?????????? ?????????? ???, ?????????? ?????????? ?????? ??? ?????? ??? ??????????  
????????, ? ??? ?????? ?????? ?? ?????????? ?????? ?????????? ?????? ??? ?????? ??? ?????????? ???  
?? ??? ?????? ??? ?????? ??? ??????.
- 2) ??? ??? ?????? «????????? ??? «????????? ??? ?? ?????????????? ?????? ???  
????????? ?? ?????????? ??????», ??? ?????????? ??? ?????? 13, A,  
????????? 1, ?????????? ?? ??? ?, ??? ?????? ?????? 77/388, ??? ?????????????? ??  
????????? ?????? ?????????? ??????.
- 3) ??? ?????? ?????????? ?????????? ?? ??????, ??? ?? ??????, ?????, ??? ???  
??? ??? ?????????? ??? ??? ?????????? ?????????? ?????????? ??? ?????? ?????? ???  
????? ?? ?????????? ??? ?????????? ?????????? ??? ?????? ?????? ?????? ??? ?????? ???,  
??? ? ?????????? ??? ?????????? ??? ?????????? ?????????? ?????????? ??? ?????? ???  
????????? ??? ?????????? ??? ?????????? ??? ?????? 13, A, ?????????? 1, ?????????? ??  
?? ??, ??? ?????? ?????? 77/388, ?? ?????? ?????????? ?????????? ??????????????  
?????????, ? ??????, ?? ?? ??????, ??? ??? ?? ?????? ??? «charity» ?????? ?? ??  
????? ??????, ?????????? ?? ??? ?????? ?????????? ?????????? ??? ?????? ?????? ???  
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??????????.

(?????????)

\* ?????? ??????????: ? ??????.