

?????? C-436/06

Per Grønfeldt ??? Tatiana Grønfeldt

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**Finanzamt Hamburg — Am Tierpark**

(?????? ??? Finanzgericht Hamburg

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

«????????? ?????????? ??? ?????????— ?????????— ????? ??????????— ?????  
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????????? ??? ?????????? (?????? ????) ??? 18?? ?????????? 2007

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(????? 56 ??)

? ? ?????? 56 ?? ?????? ?? ?????????? ??? ??? ?????? ??? ?????????? ?????? ??????????????  
???????, ?? ??? ????? ?? ?????? ??? ?????????????????? ?? ??? ?????????????? ??? ??? ??? ???  
????? ?????? ?????? ?????????????? ?????? ?????? ?????????????? ?? ??? ?????? ?????? ?????  
????????????? ?????? ??? ??? ?????????? ??? ?????? ???, ??? ?? ?????????? ?????? ???, ?  
????? ??????, ?????? ??? ?????, ?? 1 % ??? ?????????? ??? ??????????, ???, ??????, ??  
????? ??? ?????????????? ??? ?????? ??? ?????? ??? ??????, ??? ?????? ?????? ???,  
????????? ?????????? ?????????????? ??????, ?????? ?????????? ??? ?????? ??? ??????????  
????????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ???,  
????????? ?????????? ??? 10 % ???.

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

? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ??????  
????????? ??? ?????? ??? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ??? ??????, ??? ??  
?????, ??? ?????? ?????????? ??? ?????? ??? ?????? ?????? ?????????? ?????????????? ??? ??  
????????????? ??? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ??  
????? ?????? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ??  
????? ??? ??? ?????? ?????? ??? ?????? ?????????? ??? ?????? ?????? ?????????? ??

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

(?. ?????? 14-15, 26-27, 32-33, 35 ??? ??????.)

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

??? 18?? ?????????? 2007 (\*)

«????????? ?????????? ??? ??????? – ?????????? – ?????? ?????????? – ??????  
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???? ?????? C-436/06,

??. ?????????? ??? ?????? ?????????? ?????????????? ?????????? ??? ?????? 234 ?,?  
??? ?????? ?? Finanzgericht Hamburg (???????) ?? ?????? ??? 20?? ?????????? 2006, ?  
????? ?????? ??? ?????????? ??? 23 ??????? 2006, ??? ?????? ??? ????

**Per Grønfeldt,**

**Tatiana Grønfeldt**

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**Finanzamt Hamburg – Am Tierpark,**

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

????????? ??? ??? C. W. A. Timmermans (???????), ?????? ???????, L. Bay Larsen, K.  
Schiemann, P. Kris ??? C. Toader, ???????,

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

?????????: M. Ferreira, ?????? ?????????? ???????????,

????????? ??? ??? ?????? ?????????? ??? ??????? ??? ??' ?????????? ?????????? ???  
27?? ?????????? 2007,

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

- ?? P. ?? T. Grønfeldt, ?????????????? ??? ??? A. Mutscher, conseiller fiscal,
- ?? Finanzamt Hamburg – Am Tierpark, ?????????????? ??? ??? B. Fiedler, conseiller,
- ? ?????????? ??????????, ?????????????? ??? ??? M. Lumma ??? C. Blaschke,
- ? ?????????? ??????????, ?????????????? ??? ??? K. ?????????? ????? ??? ??? ?.
- ? ?????????? ??? ?????????? ??????????, ?????????????? ??? ??? R. Lyal ??? G. Wilms,

????????? ??? ?????????? ??? ??????, ??? ?????? ??? ?????? ??????????????, ?? ?????????? ??? ?????? ??? ?????? ??????????,

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

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1 ? ??? ?????? ?????? ?????????? ?????????????? ?????????? ??? ?????? ??? ?????????? ???  
?????? 56 ??.

2 ? ?????? ??? ?????????? ??? ?????? ?????????? ?????????? ?????????? ??????, ??????, ??? P.  
??? ?. Grønfeldt ???, ???????, ??? Finanzamt Hamburg – Am Tierpark (??? ????: Finanzamt),  
?? ?????????? ?? ?????????? ??? ?????????? ?????????? ??? ?????? ??? ?????????????????? ??? ???  
?????? ??????? ??? ?????????????? ?????????? ?????????? ???????.

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

3 ??? ?????????? ??? ??? ?????? ??? ?????????? ??? ?????????????, ?? ?????? 17 ??? ?????? ???  
????? ?????????? (Einkommensteuergesetz), ?? ??? ?????? ??? ?????????????? ??? ??? ???  
????? ??? 24?? ?????? 1999 (BGBI. 1999 I., ?. 402, ??? ????: EStG), ?????????? ???  
????????????? ??? ?????????? ??? ?????????? ?????????????? ?????????? ??? ?????? ???,  
?????? ??? ??? ?????? ?????? ?????????????? ?????????? ?????????? ??? ?????? ? ???????, ???  
????????? ?????? ???, ???, ?????? ? ??????, ?????????? ?????????? ??? ??????? ??? ??????? ???  
????????? ??? ?????? ?????????? ??? 10 % ???.

4 ??? ?? ?????? 17 ??? ?????? ??? ?????? ?????? ?????????????, ??? ?????????????? ???  
????? ??? ?????? 2001/2002 (Steuersenkungsgesetz 2001/2002), ??? 23??  
????????? 2000 (BGBI. 2000 I., ?. 1433, ??? ????: EStG), ?????????? ?????????? ???  
????????????? ?????????????? ??? ?? ?????? ??? ??? ?????? ?????? ?????? ?????????? ??????????????  
????????? ???????, ??? ?? ?????????? ?????? ???, ? ?????? ?????? ???????, ??? ?? ?????? ?  
????????? ?? 1 % ??? ??????? ??????????.

5 ??? ??? ?????????? ?????????? ??? ?????? 17 ??? ??? EStG, ??? ??? ?? ??? ???? 52,  
????????? 1, ??? ??? EStG ??? 52, ?????????? 34a, ??? ?????? ??? ??? ??? ???? ??  
????????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ??? ???? ??  
????? (Steuer-Euroglättungsgesetz), ??? 19?? ?????????? 2000 (BGBI. 2000 I., ?. 1790),  
????????? ??? ?? ?????? 17 ??? ??? EStG ?????? ??? ?????? ??? ?? ?????????? ???  
??? ??? ?????? ?????? ?????????? ?????????? ??? ??? ?????????? ?????? ??? ?????? ???  
????????? ???, ???????, ??? ?????? ??? ?????? ??? ?????? ?????? ?????????? ?????? ???

????????????????? ??????????. ????. ????? ?????? ??? ??????? ?????????? ?????????? ?????????? ??? ???????????  
?????? ????? ???. ??????, ????. ??????, ????? ???????, ?? ?????????? ?????????????? ??????????, ??  
????? 17 ??? ????? EStG ?????? ?? ?????? ??? ?????? ??? ???? ?????????? ??? 2002, ?????? ?? ??????  
??? ?????? ?????????????????? ??? ?????? ??????? ?????????? ?????? ?? 2001 ?????????? ???  
???? ?????? ?? ?????????? ??? ?? ??????? ?????????? ??? ?????? ??? ??????? ??? ??????? ??? ???????  
????????? ?????????? ?? 10 %.

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

6      ??? ??? ??????? ??? ??????????? ??? ???????? ??? ? P. Grønfeldt ??? ?????? ???  
???????, ??? Navision Software A/S ??? ??? WISEhouse Denmark A/S, ??  
??????, ??? ??????? ??? ???????, ??? ???????, ?? 2,1 % ??? 2,5 % ??? ??????? ???  
?????????.

7 ?? 2001, ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ????. ???' ?????? ??? ??????,  
?????????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? Navision Software A/S  
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? WISEhouse Denmark A/S.

8      ??? ?? 10 ?????? 2003 ?????? ?????????????? ?????? ??????????????, ?? Finanzamt  
????? ?????? ?? ??? ?????? ????????????, ??????? ?? ?? ?????? 17 ??? ????? EStG ??? ??? ??  
????????? ??? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ???????, ?? ??? ?? 2 021  
287 D?M (????????? ??????), ??? ?????????????? ??? ?????? ??? ?????? ??? ??????????????????  
??? ?????. ? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? Grønfeldt ??? ?? ??????  
????? ???????????.

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

11   ?? ??????? ???????????? ?????????????? ??? ?????????????? ??? ?????????????? ??  
Bundesfinanzhof ?? ?? ??????? VIII B 107/04, ??? 14?? ???????????? 2006, ?? ??? ??  
?????? ?? ?? ??????? 17 ??? ??? EStG ?? ??? ??? ??? ?????????? ?????????????? ???  
?????????.

????????? ????????, ?????????? ??????????? ?? 10 % ????:»

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

13 ??? ????? ?????????? ??? ??? ?????? ????? ??????????, ?? ??? ????? ??? ??? ?????? ?????? ??????  
????????? ?????????????? ?????????? ?????????????? ??? ??? ?????????? ??? ??? ?????? ??? ??  
????????? ?????????? ??? ?????? ?????? ?????????? ??? 1 %. ??????????, ??? ?? ???  
????, ?? ??? ??? ??? ?????? ?????????????? ??? ??? ??????, ??? ?? ??? ?????? ??? ??  
????? ????, ?????? ?????? ?????????? ?????????? ?????????? ?????????? ?????? ?????? ??  
????????? ?????????? ??? ?????? ?????????? ?????????? ?? 10 %.

14 ??? ?????? ?????????? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ?????????? ??? ??????????  
????? ?? ?????????? ?? ?????????? ??? ?????? ??? ?? ??? ?????? ?? ?????????? ??? ?????????? ??? ??  
????????? ?????????? ?? ??? ?????? ?????? ??? ???, ??????, ?????????? ?????? ??????????  
????? ??? ?????????? ?? ??? ?????? ?????? ??????????, ?????? ??? ?????????? ??  
????????? ?????? ??? ?????? (??., ??' ??? ??? ??? ??????, ?????? ??? 12?  
????????? 2006, C-446/04, Test Claimants in the FII Group Litigation, ?????? 2006, ?. I-  
11753, ??? 166).

15 ??? ?????? ????, ??????, ?? ??? ? ?????????? ??? ?????? ?????????? ?????? ?????????? ???  
????????? ????, ?????? ?????? ??????. ??????, ? ?????? ??? ?????? ?????? ?????? ??? ??????????  
????? ?? ?????????? ?? ??? ?????? ?????????? ?????????? ?????????? ?????????? ??? ??????????  
????????? ?????? ??? ?? ?????????? ?????????? ??? ?????? ?????? ?????, ???, ??????, ??????, ???  
????????? ?????? ?????????? ?????????? ??? ?????? ?????? ?????? ?????? ??? ?????????? ??? ??????????.

16 ? ?????????? ??? ??????????, ?? ??? ?????? ?????? ?? ??? ?????? ?????? ???  
????????? ?? ??? ?????? ?????? ?????????? ??? ??????????, ?????? ??? ?? ???  
????????? ??? ??? ?????? ?????????? ?????????? ??? ?????????? ??? ?? ?????????? ???  
????????? ??? ?????? ?????? ?????????? (????????? ?????? Test Claimants in the FII  
Group Litigation, ??? 167).

17 ??? ??? ?????? ??? Finanzamt ??? ??? ?????????? ???????????, ? ?????? ???  
????????? ??? ?????????? ??? ?????? ?????? ?????????? ?????????? ?????????? ???  
????????? ?????????? ??????????, ??? ??? ?????? ??? ?????? ?? ?????? ??? ?????? ?????? ?????? ??  
????????? ?????? ?????????? ?????????? ?????????? ?? ?????? ?? ??? ?? ??????????  
????????? ??????, ??? ?????? ?? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ?????????? ??  
????????? ??? ?? ?????????? ?????? ?????? ?????????? ?????????? ??? ?????????? ??? ??  
????????? ??? ?? ?????????? ??? ?????? ?????????? ?????????? ??? ?????????? ?????????? ???  
????? ?????????? ??? ?????? ??? ?????? ?????? ?????????? ?????????? ??? ??????????, ?  
????????? ?????????? ?????????? ???, ??? ?????? ??? ?????? ?????? ?????????? ??? ?????????? ???  
?????????, ?? ?????? ??? ?????? ?????? [?? ?????? ??????] ?? ?????? ???  
????????? ??? 50 % ??? ?????????? [?? ??????].

18 ??? ?? ?????????? ??????????, ?? ?? ?????? ?????? ??? ?????? ?????????? ??? ?????????? ??  
????????? ??? ?????? ?????????? ??? ?????????? ???' ????, ?? ?????????? 40 %. ?? ??? ??  
????????? ??? ?????? ?????? ?????? ?????? ?????????? ?? ?????????? 30 %. ? ?????? ??? ?????? ??  
????????? ?? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??????  
?? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
?? ??? ?????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??????  
????????? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??????  
????????? ??? ??????.

19 ? ?????????? ?????????? ???, ??????????, ?? ?? ??? ?????? ??? ?????????? ??? ?????????? ???

50 % ??? ????????????, ?? ?????????????? ???????? ?????????????? ??? ?? ?????? ???  
????????????? ??? ?? ??? 31 ?????????? 2000 ?????????? ??? ?? ??????  
????????? 25 %, ?????????? ??? ?? ??? ?????????? ????? ?????????? ????. ? ??????? ???  
????????? ??? ?? ??? ?????? ?? ?????????? ?????? ?????? ?? ?????? ??? ?????????? ???  
????????? ??? ?? ?????????? ?????? ??? ?? ?????? ?? ?????? ??? ?????????? ???  
????????? ??? ?? ?????????? ?????? ??? ?? ?????? ?? ?????? ??? ?????????? ???  
????????? ??? ?? ?????????? ?????? ??? ?? ?????? ?? ?????? ??? ?????????? ???.

20 ??? ?? ?????????? ??????????, ?? ?? ??????? ??? ?????????? ??? 50 % ???  
???????????, ?? ??? ?? ?????????? ?????????? ?????????? ??? ?????????? ??? ??????????  
???? ?? ?? ?????????? ?????????? ??? ??????, ??? ?????? ??? ?????????, ??? ??  
?????? ??? ?????????? ??? ?????? ??? ??????, ?????????? ??? ?? ?????? ??? ?????????? ???  
?????? ??? ?????????? ??? ?????? ?? ?????????? ?????????????? ??? ?????? ???.

21 ??? ?? ?????????? ??? ??, ??? ?? ?????????? ??? ?????? ??? ?????????? ??? ??  
????????? ?? ?????????? ??? ?? ?????? ??? ?????????? ??? ?? ?????????? ??? ??????????  
??? ?????????? ??? ?????????? ??? ?????????? ?? ?????????? ??? ?????????? ??? ??????????  
?????? ??? 10 %, ??? ?? ?????? ??????????. ??? ?????????? ???, ? ??????? ??? ??????  
?????? ?????????? ??? ?????? ??? ?????????? ?????????? ?? ?????? ??? ?????????? ??? 10 %  
?? ???????, ???????????, ??? ?? ?????? ?? ?????????? ??? ?????? ??? ?????????????? ???  
??? ??, ??? ?? ?????? ?? ?????? ??? ?????????????? ??? ?????? ??? ?? ??????????????  
?????.

22 ????, ?? Finanzamt ??? ?? ?????????? ?????????? ?????????????? ??? ?? ???  
?????? ?? ?????????? ??? 50 % ??? ?????????? ???, ???' ????, ?? ???, ??? ??  
????????????? ??? ?????????? ??? ?????????? ???, ?? ?????? ??? ?? 2001. ????, ??? ??  
????????? ??? ?????????? ?? ?????? ??? ?? 2001 ?? ?????? ?????? ??? ??????  
?????????, ??? ?? ?????????? ??? ?????????? ??? ?????????? ?????????? ??? ??????  
?????? ??? ?? ?????????? ??? ?????????? ?????????? ?????????? ??? ?????? ??? 2000.  
?????????, ??? ?? ?????????? ??? ?????????? ?????????? ?????????? ??? ?????? ???  
????????? ??? 50 % ??? ?????????? ??? ?????? ??? ?????????? ??? ??????, ??? ?????? ???  
??? ?????????? ??? ?????? ?? ??? ?????????? ??? ??????, ??? ?????????? ??? ??????  
?????????.

23 ????, ??? ?? ?????? ?????????? ??? ??????? ?? ? ?????? ??? ?????????? ??? ??  
?????? ??? ?????????? ??? ?????????? ??? ?????? ?????????? ??? ?????????? ??? ??????????  
?????? ?? ?????????? ? ?????????? ??? ?????? ?????????, ?? 2001, ? ?????? ??? ??  
????????? ??? ?????????? ??? ?????????? ?????????? ?? ?????? ??? ?????? ??? ??????????  
???? ?? ??? ???, ? ?????? ??? ?????? ??? ??????. ??? ?????? ??? ??, ?? ??????????  
????????? ??? ???????, ?? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???  
????????? ??? ??????? ??? ?????? ?? 2001 ??? ?? ?????????? ?? ?????????? ???  
????????? ??? ?? 2001.

24 ????, ??? ?? ?????? ?? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????????? ??  
?????? ??? ?????????? ??? 50 % ??? ?????????? ??? ?????????? ??? ?????? ??? ??  
????????? ?? ?????????? ??? ?????? ??? ?????????? ?? ?????? ??? ?????????? ??? ??????????  
??? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ???  
????????? ??? ?????????? ??? ?????????? ???, ??? ?????? ??? ?????? ??? ?????????? ??? ??????  
????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

25 ????????, ??? ? ?????????? ??? ?????? ??? ?????? ??? ?????????????? ??????????????, ??? ?  
 ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????, ?????????????? ??? ??????????  
 ??? ?????? ??????????.

26 ??????, ?????????????? ??? ?? ?????????? ??? ????? ?? ??????? ?????????????? ???  
?????? ?????????? ??? ?????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???  
????? ?????? ??? ?????????? ??????????.

28 ????????, ?? ?????????? ??? ????? ???? ?????? ?????????? ?????????????????? ????????, ????????,  
??? ??? ?????? ??? ?????? ?? ??? ?????? ??? ?????? ??? ?????????? ??? 50 % ??? ?????????????? ??????  
?? ????, ??? ??? ????? ?????????? ?????????? ??????????, ?? 2002. ??????????, ??? ?? 2000, ?? ????  
????? ??? ?????????? ?????????????? ?? ?????????? ??? ?????? ??? ?? ?????? ?????? ?????? ???  
????????? ?????????? ???, ?? ?? ??????, ? «?????? ?????????????? ???», ??? ?????? ??????????????  
? ?????????? ??????????, ??? ?????????? ??? ?????? ?? ?????? ??? ?????????????? ?? 2001.  
?????????, ?? ?????????? ??? ?????? ?????????? ?????????????? ?? ?????????????? ??? ?????? ???,  
???? ?? 2001, ? ?????? ?????????? ??????????. ??? ?????????????? ???, ? «?????? ??????????»,  
??? ?????? ?????????????? ? ?????????? ??????????, ??? ?????? ?????? ?? ?????? ??????, ??????????  
?? ?? ?????? ?????????? ?????????? ?????????????? ?? ?????? ?????? ?????? ?????.

29 ? ?????????? ????. ??? ?????????????? ??? ???. ?????????? ??? ?????????????? ??? ?????????????? ???  
???? ? ?????????????? ????. ??? ???. ?????????? ??? ???. ?????????? ??? ???. ??? ???. ?????????? ???  
????????? ????. ????. ????. ????. ????. ?????????????? ????. ????. ????. ????. ????. ????. ????.  
?????????, ?????????? ????. ????. ?????????????? ????. ????. ??????, ? «?????? ??????????», ???  
?????. ?????????? ? ??????. ??????, ????. ??????. ??????, ??????. ??????. ??????. ????.  
?????. ??????. P. Grønfeldt.

30 ????????, ??? ?? ??????? ???? ?????????????? ?????????????? ??? ?????????? ??? ??  
?????????, ??? ?????????? ?????? ??? «????????? ??????????????», ?? ?????? ????, ??? ??  
2001, ?? ?????????? ?????????? ??? ?????????? ?????? ??? ?? ?????????? ??? ?????? ???????  
????????? ?????????? ? ?????????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????? 1 %, ??? ?? 10 %.

31    ??? ?? ??????? ?????????? ??? ?? ?????????????? ??? ???????????, ??? ? ??????? ??  
?????? ?? ?? ??????? ??? ?????? ???, ??? ?????? ?? ?????????????? ??? ?? ???????  
????????????? ??? ??????? ??? ?????????? ??? ???????????.

32 ????????, ??? ????? ?? ?????????? ???, ?????????? ?? ????????, ??????????????, ?? ?????????? ??  
?? ??????? ?? ??????? ?? ?? ?????????? ?????? ?????? ?????? ?????????? ?????????? ??  
????????? ?? ?????? ?????????? ?????? ?????????? ?????????? ??, ?? ?????? ?????? ?????? ??  
????????? ?????? ?????? ?????????? ?????? ?????? ?????? ?????????? ?????????? ?????? ??  
?? ?????????? ?? ?????? ?????? ?????? ?????? ?????????? ?????????? ?????? ?? ?????? ?????? ??  
????????? ??? ?????????? ?????????? ??? ?????????? ?????????? ?????? ?? ?????? ??? ?????? ??  
????? ???, ??? ?????????? ?????????? ??? ??????????.

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

34 ????????, ??? ??? ?????? ??? ?????????? ?????????? ?????????? ??? ?????? ???  
????????????? ?????????????, ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???,  
??? ?????????????? ??? ?????????? ??? ?????? ??????????.

35 ??? ????????, ??? ?????????? ?????????????? ?????????? ?????? ?? ?????? ? ?????????? ???  
?? ?????? 56 ?? ?????? ?? ?????????? ??? ??? ?????? ??? ?????????? ?????? ?? ?????? ??????????  
??????, ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ?? ??? ?????? ?? ?????? ??? ???  
??????, ??? ?? 2001, ?????? ?????????? ?????? ?????????? ?????????? ?????????? ?? ?????? ???  
????? ?????????? ?????? ??? ?????? ?????????? ??? ?????? ???, ??? ?? ?????????? ??? ?????? ???  
??, ? ?????? ??????, ??? ? ??????, ?? 1 % ??? ?????????? ??? ?????? ???, ??? ?? ?????????? ???  
????????? ?? ?????? ??? ?????????????? ???, ?? 2001 ??? ??? ??????, ??? ??? ?????? ???  
?????, ??? ?????? ?????????? ?????????????? ???????, ??? ?????? ?????????? ??? ??????  
????????, ?????????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????????? ??? ??????  
????????, ?????????????? ??? ?????? ?????? ??? 10 % ???.

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

36 ??? ????????, ??? ? ?????? ?????????? ??? ?? ?????? ??? ?????? ?????????? ??? ?????? ???  
??? ?????????? ?????????????? ??? ?????? ?????? ?????? ??? ?????? ?????????? ???, ?' ???  
????????? ?? ?????????? ??? ?????? ?????? ?????? ???, ?? ?????? ??? ?????? ??????????  
????? ?????????? ?????????????? ??? ?????? ?????? ???, ??? ?????? ??? ?????? ??????????.

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

?? ?????? 56 ?? ?????? ?? ?????????? ??? ?????? ?????? ??? ?????????? ??? ?????? ???  
?????????? ???????, ??? ? ?????? ??? ?????? ?????? ?????? ??? ?????? ???, ?? ??? ??? ???  
?? ?????? ??? ??????, ??? ?? 2001, ?????? ?????????? ?????? ??? ?????? ??? ?????? ???  
????????????? ?? ?????? ?????? ?????? ?????????? ?????? ??? ?????? ??? ?????? ???  
?? ?????? ???, ??? ?? ?????????? ???, ?? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
1 % ??? ?????????? ??? ?????? ???, ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
?? ?? 2001 ??? ??? ??????, ??? ?????? ?????? ???, ?????? ?????? ??? ?????? ???  
????????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???, ??? ??????  
????????? ??? ?????? ?????? ??? ?????? ?????? ??? 10 % ???.

(?????????)

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