

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

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

??? 19?? ?????????? 2018 (\*)

«????????????? ?????????? – ?????????? ?????????? – ????? 107, ?????????? 1, ??? – ???  
????????????? ?????????? – ?????????? – ?????????????? ??? ?????????? ?????????? ??? ??????  
???? ?????????? ?????????? ??? ?????????????? ????? ?????????? ?????? ?????????? – ??????  
??? “????????? ??????????” – ?????????? ??? ?????????? ?????????? – ??????????»

???? ??????? C-374/17,

? ? ?????????? ?????? ?????????????? ?????????? ?????? ??? ?????? 267 ????, ??  
?????? ?? Bundesfinanzhof (????????????? ?????????? ??????????, ?????????) ?? ???????  
?? 30?? ????? 2017, ? ????? ?????? ??? ?????????? ??? 21 ??????? 2017, ??? ???????  
??? ????

## **Finanzamt B**

????

**A-Brauerei,**

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

**Bundesministerium der Finanzen,**

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

????????? ??? ??? K. Lenaerts, ???????, R. Silva de Lapuerta, ???????????, J.-C. Bonichot,  
A. Arabadjiev, A. Prechal (??????????), ?. ???????, F. Biltgen, K. Jürimäe ??? ?. ???????,  
????????? ???????, M. Ileši?, J. Malenovský, E. Levits, L. Bay Larsen, C. G. Fernlund ??? S.  
Rodin, ???????,

?????? ??????????: H. Saugmandsgaard Øe

?????????: K. Malacek, ?????????? ??????????,

?????? ????? ??? ?????? ?????????? ??? ?????? ??? ??' ?????????? ?????????? ???  
11?? ??????? 2018,

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

– ? A-Brauerei, ?????????? ??? ??? K. Naeve ??? B. Pignot, Rechtsanwälte, ??? ???  
??? K. Seiferth ??? C. Tillmann, ??? ??? ??? ??? A. Linn, Steuerberater,

– ? ?????????? ???????, ?????????? ??? ??? T. Henze,

– ? ?????????? ???????, ?????????? ??? ??? K. Blanck-Putz ????? ??? ??? ??? B.  
Stromsky ??? T. Maxian Rusche,

????? ?????? ??? ?????? ??????????? ??? ??????? ??? ?????????? ??? ?????? ?? ???????????  
??? 19?? ??????????? 2018,

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

???????

1 ? ?????? ?????????????? ?????????? ?????? ??? ?????????? ??? ?????? 107, ???????????  
1, ???.

2 ? ?????? ??? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ?????? ??? Finanzamt B  
(?????????? ??? B, ???????) (??? ????: Finanzamt) ??? ??? A-Brauerei ??????? ??  
??? ?????? ??? ?? ??? ?????? ?? ?????????? ??? ?? ??? ?????? ??? ?????????? ??? ?????????? ??? ??  
???? ?????????? ?????? ??? ?????? ?????? ?? ?????? ???????, ??? ?????????? ??????????????,  
????? ??? ?????????? ?????? ??? ???????, ?? ?????????? ??? ?????????? ?????????????? ???  
????????? ??? ???????, ??? ?????? ?????? ?????????? ??? ?????????? ??? ?????????????? ???  
????????? ??? ???????.

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

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

3 ?? ??? 1, ?????????? 1, ??? Umwandlungsgesetz (????? ??? ??????????? ???  
?????????), ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? (??? ????: UmwG),  
?????:

«?? ?????????? ??? ?????? ?????????? ?????????? ?????????? ?????????? ??????????»

1. ??? ???????????????

2. ??? ?????????? (????????? ?? ??? ??? ?????? ?????????? ??? ?? ?????????? ??? ?????? ???  
??????????, ?????????? ??? ?????? ??? ?????? ?????? ??? ?? ?????? ?????????? ??? ???????????,  
????????? ?? ????????????????)

3. ??? ?????????????? ??? ????????????

[...]».

4 ?? ??? 2 ??? UmwG ??????????:

«?? ?????????? ??? ?????? ?????????? ?? ?????????? ??? ?????? ??? ?????????? ???

1. ??? ?????????????? ??? ?????????????? ??? ?????? ??? ?????????? ??? ?????? ???  
??????????, ?????????? ??? ?????? ??? ?????? ?????? (????????? ??? ?????????? ???) ?? ??????????  
????? ?????????? ??? (????????? ??? ?????????? ???) [...]».

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

5 ?? ??? 1 ??? Grunderwerbsteuergesetz (????? ??? ?????? ?????????????? ???),  
????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? (??? ????: GrEStG), ?????? ??  
????:

«(1) ????? ??????? ??????? ??? ?????????? ??? ????? ?? ???????, ?? ??????? ??????? ??????? ???????  
?????????? ?? ??? ????? ??????????? ??????:

1. ??????? ??????? ???? ??????????? ??? ??????????? ??? ??????? ??????? ??? ?? ???????  
??? ????????

2. ? ??????? ??? ??????????? ??? ???????????, ?? ??? ????? ??????? ??????? ???????  
??? ????? ??????????? ??? ??????? ??? ?? ??????????? ??? ???????????

3. ? ??????????? ??? ???????????, ?? ??? ??? ????? ??????????? ??????????? ??? ???????????  
????????? ??? ?? ??????????? ??? ??????????? ??? ??? ??????????? ??????????? ??? ??  
?????????? ??? ??????????? [...]

[...]

(2) ??????????? ??? ????? ?? ??? ??????????? ??????????? ?? ??????? ??????? ??  
??????, ??? ?? ??????????? ??????????? ??????????? ??? ???????????, ??????? ??  
??????????, ??????? ? ???????????, ?? ??? ????? ??????? ?? ??????????????? ??? ??????????? ??  
?????????? ??? ??????????? ??? ???????????.

(2a) ?? ??????? ??? ??????????? ??? ??????????? ??????????? ?? ??????????? ???????????  
?????????? ??? ?? ??? ????? ??????????? ??????????? ??????????? ?? ??????????? ??  
?????????? ??? ??????????? ??? ??????????? ??????????? ?? 95 % ?? ???????????  
?????????? ?? ??????????? ?? ???????????, ??????????? ??? ??????????? ??? ??????????? ??  
?????????? ?? ??????????? ??? ??????????? ?? ??????????? ??? ??????????? ??? ??????????? ??  
?????????? ?? ??????????? ??? ??????????? ?? ??????????? ??? ??????????? [...]

(3) ?? ??????? ??? ??????????? ??? ??????????? ??????????? ??? ??????????? ??????????? ??  
?????? ??? ????? ??????????? ??? ????? ??? ??????????? 2a, ??? ??? ????? ??????????? ??? ??????? ??  
?????????? ??????? ??????:

1. ??????????? ???? ??????????? ??????????? ??????????? ??????????? ?? ??????? ?? ???????????  
?????????? ???????, ??? ??????? ??? ??????????? ??????????? ??????????? ?? 95 % ?? ???????????  
?????????? ??????? ???????????, ?? ??????? ???? ???????, ??? ??? ??????????? ?? ???  
?????????? ??? ??????????? ??????????? ?? ??? ??????????? ???????, ???? ??? ???  
?????????? ??? ??????????? ???? ??????????? ???????????

2. ? ?????? ? ?????? ??????????? ??????????? ?? 95 % ?? ??????????? ???????????, ?? ???  
???? ?????????? ?????? ??????????? ??? ??? ??? ?????? ??? ?????? ??? ?????? 1?

3. ??????????? ???? ??????????? ??????????? ??????????? ???????????, ??? ??? ??? ??? ??  
??????, ??????????? ??? 95 % ?? ??????????? ???????????

4. ? ?????? ? ?????? ??????????? ??????????? ?? 95 % ?? ??????????? ???????????, ?? ???  
???? ?????????? ?????? ??????????? ??? ??? ??? ?????? ??? ?????? 3.»

6 ?? ??? 6a ??? GrEStG, ?? ??? ??????????? ??? ?????? ??? ?????? ?? ?? ??? ?? 7 ???  
Wachstumsbeschleunigungsgesetz (????? ??? ??? ??????????? ??? ??????????? ???????????),  
??? 22?? ??????????? 2009 (BGBI. 2009 I, ?, 3950), ??? ??? ????? «?????????? ???????????  
???? ??? ??????????????? ?????? ?????? ???????», ??? ?????? ??? ??? ??? ????? ??  
?????????? ??? ?????? ??????, ??????????? ?? ???:

«???? ??????????? ??? ??????????? ?????? ?????? ??? ??? 1, ??????????? 1, ??????? 3,  
??? ??? ?? ??? 1, ??????????? 2a ? 3, ? ????? ??????????? ??? ??? ??? ????? ??

?????? 1, ?????????? 1, ?????? 1 ??? 3, ??? [UmwG], ??? ?????????????? ?????? [...] ? ?????  
????????? ??? ?????????? ?????? ??? ?????????? ?????????????? ??? ?????????????? ??? ?? ??????  
????????? ?????? ??? ?????????? ?????? ? ?????? ??? ?????? ??? ?????? ?????? ??????  
????????? ??? ?????? ?????????? ?????????? ?????.. ? ????? ?????? ?????? ??? ?????????? ?????? ??????  
???? ?????? ?????????? ?????????? ?????????? ?????? ??? ?????????? ?????? ?????????? ??? ??? ?  
????????????? ?????????? ?????????? ??? ?? ?????????? ?????? ?????????? ?????????? ??????????  
????????????? ?????????? ?????????? ??? ??? ?????????? ?????? ?????????? . ????? ??? ?????? ???  
????????? „?????????“ ?????? ??? ?????? ??? ?????? ?? ?????????? ?? ?????????? ?? ??????????  
????????? ?????????? ?????????? ??? ??? ?????????? ??????, ?????? ? ?????? ? ?????? ? ?? ??????  
????? ??? ?? ?????? ??????, ??? ?????? ?????? ?????????? 95 %, ??? ?????? ??? ?????? ??? ?? ??  
????? ??? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ??????.»

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

7 ? A-Brauerei, ??????? ? ??? ?????? ?????? ?????????? ???????????????, ??????? ?? 100 % ??  
????????? ?????????? ??? T-GmbH, ??????? ?? ??? ?????? ??? ?????????? ?????????? ??????????  
??? ? ?????????? ??????? ??? ?????? ?????.

8 ?? ??????? ??? 1?? ?????????? 2012, ? T-GmbH ?????????? ??? A-Brauerei ?? ??????  
?? ?????????? ???, ?????????????????? ??? ?? ??? ???????, ?? ??? ?? ????????  
????????? ??? ??? ?????????? ??? ?????????? ?????? ??? ?????????? ??  
????????? ??? ??? ?????? 1, ?????????? 1, ?????? 1, ??? ??? ?????? 2, ?????? 1, ???  
UmwG, ??? ?????? ?????????? ??? ?? ??? ?????? ???????.

9 ? ?????????? ?????? ?? ??? ?? ??? ?????????? ??? ?? ?????????? ??????? ??? 24  
????????? 2012, ?????????? ??? ?? ??? ?????? ??? ?????? ?? ?????????? ? T?GmbH, ? ???  
????? ??? 100 % ??? A-Brauerei ??? ?????? ??? ?????? ??? ?????? ??? ??? ?? ???.  
?????????.

10 ?? ?????? ??????? ??? 7?? ?????? 2013, ? Finanzamt ?????? ??? ?????????? ???  
????? ?????????? ??? ?????? ??? ?????? ? A-Brauerei, ?????????? ??? ? ?????????? ???  
?????, ?? ?????????? ??? ??????, ??? ?????? ??? ?????? ??? ?????? ??? T-GmbH, ?? ??????????????  
??????, ??? ??? ?????????? ??? ??? ?????? ??? ?????? ?????????? ??? ??? ?????? ??????????  
????????? ?????????? ??? ?????????? ??? ?????????? ?????? ?????????? ?????? ??? ??????????  
????????? ?????????? ??? ?????????? ???, ?????? ??? ?????? ??? ?????? 1, ?????????? 1, ??? 3,  
??? GrEStG ??? ??? ?????? ??? ?????? ??? ?????? 6a ??? GrEStG.

11 ?? ?????? ??? 19?? ?????? 2013, ? Finanzamt ?????? ??? ?????????? ???????  
??? A-Brauerei ??? ?? ??? ?????? ?????????? ???, ?? ?? ?????????? ??? ? T-GmbH  
??? ??? «????????? ???», ??? ??? ?????? ??? ?? ??? ?????? 6a, ?????? ? ??????  
????? ??? ?? ?????????? ??? ?? ?????????? ??? ?????? ??? ?????????? ??? ??????????  
????????? ??? ?? ??? ?????? 6a ?????????? ??? ?????? ?????????? ???, ???  
????????? 95 %, ??? ?????????? ??? ?? ??? ?????? ??????????.

12 ?? ?????? ??? 14?? ?????? 2014, ?? Finanzgericht Nürnberg (?????????)  
????????? ??????????, ??????) ?????? ??? ?????? ?????????? ??? ?????? ? A?Brauerei  
??? ??? ?????????? ???, ?? ?? ?????????? ???, ?? ?????????? ???, ?????????? ?? ??????????  
????? ??? ?????? ??? ?? ?????????? ??? ?????????? ??? ?????? 6a ??? GrEStG.

13 ? Finanzamt ?????? ?????? ??? ?????? ??? ?????????? ?????? ?????? ??? Bundesfinanzhof  
(????????????? ?????????? ?????????? ??????????).

14 ?? ?????????? ??? 25?? ?????? 2015, ?? ?? ??? ??????????

?????????? ??? ??????? ??? ?????? 6a ??? GrEStG ??? ????? ?????? ????????????, ?? ???  
?????????? ??? ? ?????????? ??? ?????? ?? ?? ?????? ?????? ????? ?????? ?????? ???  
????????? ?? ??? ????? ?????? ?? ?????? ??? ?? ?????????? ?????? ?????? ???????????, ??????  
??? ??? ??????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???????????,  
????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???????????  
????????.

15 ?? ??? ?? ??? ??????????? ??? ??????, ?? ?????? ?????????? ?????? ???????????  
????? ?????? ?????? ?? ?????? ?????????? ?? ?????? 6a ??? GrEStG, ??? ??? ??? ??? ??  
????????? ?????????? ??? ?????? ?? ?????? ??? ?????? ?? ?????????? ?? «??????»  
????????», ??? ??? ?????? ??? ?????? 107 ?????????? 1, ????, ??? ?????? ?? ??????????  
?? ?????????? ?????? ??? ?????????? ?????? ?????????? ??? ?????? ?????? standstill ???  
????????? ?? ??? 108, ?????????? 3, ????.

16 ??????, ?? Bundesministerium der Finanzen (?????????? ?????????? ???????????,  
?????????), ?? ?????? ??????? ?? ?????????? ?????? ?????? ?? ?????????? ???????????,  
????????? ?? ?????? ?????????? ?????? ?????? ?? ?????? 6a ??? GrEStG ??  
????????? ?????? ?? ?????? ?????? ??, ??????, ? ?????? ?? ?????? ?????? ??????  
????????? ?????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
????????, ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
??? 7?? ??????? 2014, Autogrill España ??? ?????? (T-219/10, EU:T:2014:939), ??? ??  
????????? ?????????? ?? ?????? «?????? ??????», ??? ??? ?????? ?? ?????? 107,  
????????? 1, ????, ????, ??? ?????? ?? ?????????? ?? ?????????? ?? ?????????? ?????? ???  
????????? ?? ?? ??? ?????? ?????????? ?? ?????? ?? ?????????? ?? ?????????? ?????? ???  
????????? ?????? ???, ??? ??? ??? ?????? ?????? ?? ?????????? ?? ?????????? ?????? ???  
????????? ??? ?????? ??? ?????? ??????;»

17 ??? ??? ???????, ?? Bundesfinanzhof (?????????? ?????????? ????????????)  
????????? ?? ?????????? ??? ??????? ??? ?????? ??? ?? ?????????? ?? ?????????? ??  
???? ?????????? ???:

«???? ?? ??? 107, ?????????? 1, ???? ??? ?????? ??? ?????????? ?????????????? ??????  
???? ?? ?????? ???, ?????? ?? ?????? ??? ?????? ??? ?????? ?? ?????? ?????? ???, ???  
????????? ??? ?????? ?????????? ?????? ??? ?????? ?????? ?????? ?????? ??????  
????????? (?????????), ?? ??? ?????? ?????? ?????? ?????? ?????? ?????????? ??????  
????????? ?????? (????????? ?????????? ??? ?????? ?????? ?????? ?????? ??????) ??? ? ??????  
?? ?????????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? 100 %  
?? ??? ??? ??? ??? ??? ??? ??? ??? ??? ??? ??? ??? ???;»

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

18 ?? ?? ?????????? ???, ?? ?????? ?????????? ???, ???' ??????, ??? ?? ???  
107, ?????????? 1, ???? ??? ??? ?????? ??? ?????????? ??? ???????????, ??? ?? ???  
????? ???, ?? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????????? ???  
????????? ??? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ??????????  
????????? ??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ???  
????????? ??? ?????? ?????? 95 % ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ???  
????? ??? ??? ??? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????????? ??? ?????????? ??? ?????????????? ??? ?????? ??? ?????? ???.

19 ??? ??? ?????? ???????, ??? ?????? ?????????? ??? ?????? ?????? ???  
«????????? ??????», ??? ??? ?????? ??? ?????? 107, ?????????? 1, ????, ??? ??????  
????????? ??? ?? ?????????? ?????????? ???, ??? ?????? ?? ?????????? ??? ?????? ???.

?????????? ? ?????????? ??? ?????????? ????. ????????, ? ?????????? ??? ?????? ???  
?????? ?? ??????? ?? ?????? ??? ?????? ??? ??????. ??????, ? ?????????? ??? ?????? ??  
????????? ?????????? ?????????? ??? ?????? ??? ??????????. ????????, ?????? ?? ?????? ??  
?????? ?? ??????? ??? ?????????? (?????? ?? 21?? ?????????? 2016, ??????? ??  
World Duty Free Group ?.??., C-20/15 P ??? C-21/15 P, EU:C:2016:981, ??? 53 ??? ??  
?????????? ???????)).

20 ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ???????????????, ???  
????????? ?????????? ?????????? ??? ???' ??? 107, ?????????? 1, ??? ?????? ???  
«?????? ??????», ?????? ?? ?????????? ?????????? ???, ??? ?????????? ???  
????????? ??????????, ?? ?????????? ?????????? ??? ??????? ?? ?????? 6a ??? GrEStG  
?????? ?? ?????????? ?? ?????????? ?? «????? ?????? ??????» ??? ??????, ???  
????????, ?? ??? ?????????? ??? ?????? ?????????? ??? ?????? 107, ?????????? 1, ???, ??  
??? ?????????? ? ?????????? ??? ?????????? ?????????? ??? ?????? ??? ?????? ???.

21 ??????, ??? ?????, ??????????, ?? ?????? ?????? ??? ?????? ??? ?????????? ??????????  
??????????, ?????????????? ??? ?????? ?????? ??? ?????, ?????????? ???  
?????????? ?????? ???, ?????? ??? ?????? ?????? ?????????????? ?? ??????????????  
?????????? ?????? ?? ?????? ?? ?????? ?????? ???????????????, ?????? ?????? ??  
?????????? ?????????? ?????????? ?????? ?????? ?????????? ???, ?? ?? ??????, ??????  
????????? ?????? ??? ?????? ??? ?????? 107, ?????????? 1, ??? (?????? ?? 21??  
????????? 2016, ??????? ??? World Duty Free Group ?.??., C-20/15 P ??? C-21/15 P,  
EU:C:2016:981, ??? 56 ??? ?????? ??? ?????????? ???????)).

22 ??? ?????? ???, ?? ?????????? ?????? ??? ?????? ??? ?????????? ??? ?????????? ?  
????????? ?????????? ?????????? ?????? ?? ?????????? ?? ?????? ??? ?? ?????????? ?  
????????? ?????????? ??? ?????????? ???, ?????? ?? ?????? ?????????? ??? ??????????  
????????? ?????????? ?????????? ?????????? ?????? ??? ?????, ??? ?? ?????? ???  
????????? ??? ?? ?? ?????? ?????????? ?????? ??????, ?? ?????????? ?????????? ???  
????????? ??? ??????, ?? ?? ??????, ?????? ?????? ?????????? ??? ?????? ???  
????????? ??? ?????????? ??? ?????? ??? ?????? ?????????? (?????? ?? 21?? ??????????  
2016, ??????? ??? World Duty Free Group ?.??., C-20/15 P ??? C-21/15 P, EU:C:2016:981,  
????? 86).

23 ????????, ?????????? ??? ?????? ?????? ???, ??? ?????? ?????????? ?????????? ???  
?????????, ?? ?????? ??? ?????? ?????? ?????????? ?????????? ??? ?????? ??? ??????????  
?? ?????????? ?????? (??., ??? ??? ?????? ???, ?????????? ??? 29??  
?????? 2012, 3M Italia, C-417/10, EU:C:2012:184, ??? 39, ??? ?? 21?? ?????????? 2016,  
????????? ??? World Duty Free Group ?.??., C-20/15 P ??? C-21/15 P, EU:C:2016:981, ???  
56 ??? ?????? ??? ?????????? ??????????)).

24 ?? ?????? ??? ?????? ?? ?????????????? ??? ?????? ??? ?????????? ??? ?????????? ???  
???? ?????? ?????? ?? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ??' ?????? ??  
????????? ??? ?? ?????? ?????? ?????????? (?????? ?? 21?? ?????????? 2016,  
????????? ??? World Duty Free Group ?.??., C-20/15 P ??? C-21/15 P, EU:C:2016:981, ???  
59).

25 ??????, ?????????? ???????, ??? ??? ?????? ??? ?????????? ??? ?????????? ?? «?????  
????????? ??????», ?? ?????? ??? ?? ?????? ?????? ??? ?????? ?????????? ??? ?? ??  
??? ?????????? ??? ?????? ?????????? (??., ??? ??? ?????? ???, ?????? ??? 21??  
????????? 2016, ??????? ??? World Duty Free Group ?.??., C-20/15 P ??? C-21/15 P,  
EU:C:2016:981, ?????? 82 ??? 84).

26 ????????????, ? a priori ?????????? ??? ????? ?????? ??? ?????? ?????????? ?????????? ???  
????? ???' ?????? ?? ?????????? ?? ?????????? ?????????? ??? ?????? ??? ?????????? ?? ???  
????? ??? ?????? ?????? ?????????????????? ??? ?????????? ??? ?????? ??? ?????????? ?? ???  
????? ?????????? ???, ??? ?????? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? (??., ??? ??? ??? ??????  
????, ?????? ??? 10?? ?????? 2006, Cassa di Risparmio di Firenze ?.??., C-222/04,  
EU:C:2006:8, ????? 136).

27 ????????, ????????, ????????, ????????, ????????, ??? ?????? ????????, ??? ?????? ???  
????????????? ?? «????? ?????? ??????», ?? ?????? ??? ?????? ?? ?????? ?????? a  
priori ? ????????, ?? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ?? ?????? ??????  
????????????? ??? ?????????????? ?????????? ?????????? ?? ?????? ??? ?????? ?? ???  
??? ?????????? ??? ?? ?????? ?????? ??? ?????? ?? ?????????? ?????? ??? ?????? ??? ??????  
???? ?????????? ??? ?????????? ?????? (??., ??? ??? ?????? ???, ?????? ???  
21?? ?????????? 2016, ?????? ??? World Duty Free Group ?.??., C-20/15 P ??? C-21/15 P,  
EU:C:2016:981, ?????? 69 ??? 71).

28 ?? ????????, ??? ????????, ??? ????????, ??? ?? ?????????? ??? ?????? ??? ?????? ???  
????????? ?, ?? ????????, ?? ??? ?????? ?????? ?????????? ???, ??? ?????????? ??? ??  
????? 6a ??? GrEStG, ?????? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? 22?? ?????? 2009, ?? ?????? «????????? ?????????? ???, ??? ?????????? ???  
?? ?????????? ?????? ??? ?????? ?????? ??????», ?? ?????? ??? ?????? ??? ?????? ???  
????? 1, ????????, 1, ?????? 3, ??? ?????? 2a ??? 3, ??? GrEStG.

29 ??????, ? ????????, ??? ????????, ??? ?????????? ??? ?????? ?????????? ?????? ???  
????????? ??? ?????? ?????????? ???, ?????????? ???' ?????? ??? ?????????? ???  
????????? ??? ?????? ?????? ???, ?????????? ??? ?????? ?????? ??? ?????????? ???  
????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????????? ???  
????? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???  
????????? ??? ?? 2008.

30 ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ?? ????????, ?? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ???  
?? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
«?????» ???/? ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
???????, ?? ?????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? 95 % ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

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

32 ??????, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
?????????, ??? ??? ?????? ???, ??? ?????? ??? ?????? ??? ?????? ??? 101 ??? ?????? ???  
15?? ?????? 2011, ?????? ??? ?????? ??? Government of Gibraltar ??? ??????

?????????? (C-106/09 P ??? C?107/09 P, EU:C:2011:732), ????? ???? ???? ?????? ??? ???.  
????????? ??? ?????????? ??? ?????????? ?? ?????????? ??? ?????? ??' ?????? ?????? ?????? ??????  
?????? ?? ?????? ?????????? ?????????? ??? ???????, ??? ?????, ?????????? ??????  
????????? ??? ?????????? ?? ?????????? ?????????? ?? ?????? ??? ?????????? ??? ??  
?????????? ?????????? ??????? ??????.

33   ??????, ??????? ??? ?? ?????????? ??? ?????????? ?????????????? ?????????? ??? ??????????????  
?????? ? ?????????????? ?????????? ??????? ??? ?????? ?????????????? ?????????? ???,  
?????????, ??? ?????? ??????? ?????????? ?? ?????? ??? ?????? ?? ?????????? ?????????? ??? ??  
????? ?????????? ???????, ?????????, ?? ?????? ??? ?????? ?????? ?????? ?????????? ??? ??  
????????? ??? ?????????? ??? ?????????? ?????? ?????? ??? ?????, ?????? ?????????? ??? ??  
?????, ??? ?? ?????? ?????????? ??? ?????????? ?????? ?????? ??? ?????? ??? ?????????? ??? ??  
????????????? ?? ?????? ?????????? a priori ?????????? ?????????? ?????????? ??? ?????? ??????  
????????? ??? ?? ?????? ?????????? ?? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ??  
?? ?????????? ??? ?????? ?????????? ???????, ??? ?? ??? ?? ??? ?? ??? ?????? ??????????  
????????? ?? ?????????? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?? ??  
????? ?????? [????????? ??? 21?? ?????????? 2016, ?????????? ??? World Duty Free Group  
?.., C?20/15 P ??? C-21/15 P, EU:C:2016:981, ??? 77, ??? ?? 28?? ?????? 2018, Andres  
(????????? Heitkamp BauHolding) ??? ??????????, C-203/16 P, EU:C:2018:505, ??? 93].

34   ????? ????????, ?? ?????????? ??? ?????????? ?????????????? ??? ?????????????? ???  
????? 20 ??? ??????? ?????????? ??? ?????? ??? ?? ?????????? ??? ?? ?????????? ??? ??????  
????? ?????? ??? ?????????? ??? ?????? ?????????? ??? ?????? 107, ?????????? 1, ????.

35   ????? ?????? ?????????? ??? ???????????, ??? ??? ?????????? ??? ?????????????? ???  
????????? ?????????? ??? ?????????? ?????????????? ?????????????? ?? ?????? ?????????? ??????????  
????????? ??? ??' ??? 107, ?????????? 1, ??? ?????? ??? «????????? ??????????», ???  
????????? ?? ?????????? ??? ?????? ??, ??? ?????? ?????????? ?????????? ?????????? ??????????, ??  
????????? ?????? ??? ?????? ?? ?????? «????????? ?????????? ?????????? ? ?????????? ??????????  
?????????» ?????? ?????? ?? ?????? ??????, ??? ?????? ??? ?????????? ??? ?????????????? ?? ?? ?? ??  
????????? ??????, ?? ?????????? ?????????? ??? ?????? ??? ?????????? ?????????? ??? ?? ?? ??  
????????? ?? ??????????, ?????????? ?????????? ??? ?????? ???' ?????? ??  
????????????? ?? ?????????? ?????????? ?????????? (?????? ??? 21?? ?????????? 2016,  
????????? ??? World Duty Free Group ?.., C-20/15 P ??? C?21/15 P, EU:C:2016:981, ???  
54 ?????? ??? ?????? ?????????? ??????????).

36   ?? ?????? ??? ?????????? ??????, ? ?????????????? ??? ?????? ?????????? ??????????????  
????? ?? «?????????» ??????????, ???????, ?? ?????????????? ?? ?????? ? «?????????»  
????????? ??????? ?? ?????? ?????????? ??? ?????? ?????? ?????? ???, ??? ??????????, ??  
????????? ??? ?? ?????? ?????????? ??? ?????? ?????????? ??? ?? ??? ?? ??? ?????? ??????????,  
????????? ?????? ?????????? ?????????? ?????? ?????? ?????????????? ?? ?????? ?????????? ??????????,  
?? ?? ?????? ??? ?????? ?? ?????????? ??? ?? ?? ??? ?????? ?????? ?????????? ?? ?????????? ??????????  
????????? ??? ?????? ?????????? (??., ??? ??? ?????? ???, ??????? ??? 21??  
????????? 2016, ?????????? ??? World Duty Free Group ?.., C-20/15 P ??? C-21/15 P,  
EU:C:2016:981, ??? 57).

37   ?? ??????????, ?????????? ? ?????????? ??????, ???????, ???, ??? ?????????? ??? ??  
????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?? ?????? ?????????? ??? ??  
????? ?? ?? ?????? ?????? ?? ?????????????? ? ?????? ??? ?????????? ?????? ?????????? ?????? ??  
????????? ??? ?????????? ?????? ?????? ?????? ?????????? ?????? ???????, ?? ???????, ??????????  
????????? ?????? ?????????? ??? ?????? ?????? ?????? ?????????? ???????, ?? ???????, ??????????

38   ??????, ??? ???????, ?? ?????? ?? ?????????? ?????????????? ??? ?????? 6a ???

GrEStG, ??????? ?????????? ??? ????? ???? ?????????????? ??? ????? ????? ???????????  
????????????? ?????????? ?????? ?????? ?????????? ??? ?????????? ?????? ?????? ?????? ???  
????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????, ?????? ?????????????? ?????? ?????? ???  
????? ?????????????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????  
?? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????  
????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????  
????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ???.

39    ???????, ??? ?????????? ??? ??? ?????? ?????? ?????? ???????????, ? ?????? ??? ???  
????????? ?? ?????????? ?????????? ??? ?????? ?????????? ?????? ?????????? ?????????? ???  
????? ?????? ?? ??? ?????? ?????? ??? ?????????? ??? ?????????? (Rechtsträgerwechsel)  
??? ??????? ?, ?? ??? ?????? ?????, ??? ?????????? ??? ?????????????? ??? ?????????? ???  
????????? ??? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???  
????????? ??? ?????? ?????? ??? ?????? ?????? ??????.

40    ???????, ? ?????? ?????? ?????? ?????????????? ?????? ??? ?????????????? ?????? ???  
????????? ?????? ??? ?????? ?????????? ?? ??? 6a ??? GrEStG. ????????????, ???  
????????? ?????? ?????????????? ???, ?????????? ?? ?????????? ? ?????????? ? ??????????????  
????????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????????? ???  
????????? ?????????? ?????????? ???, ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??????  
????? ?????? ?????? ?????????????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ??????  
????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ??????.

41    ?????????? ?????? ??? ?????? ??? ?????????? ??? ?????? 6a ??? GrEStG, ??? ? ????  
????????? ??? ? ?????? ??? ?????????? ??? ?????? ??? ???? ?????? ?????????? ?????? ???  
????? ?????? ?????? ?????????????? ??? ?????? ??? ?????? 1, ?????????? 1, ?????? 3, ???  
????????? 2a ??? 3, ??? GrEStG, ?????????? ??? ? ?????? ??? ?????????????? ??? ???  
????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? 35 ???  
????????? ?????? ??? ?????? ??? ?????????????? ??? ?????? ?????? ?????? ??? ?????? ???  
????????? ??? ? ???? ?????? ??? ???? ?????? ???, ? ?????? ?????? ?????? ??? ?????? ???  
????????? ??? ?????????? ??? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ???, ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? 1 ??? GrEStG, ??  
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? 37 ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????  
?? ?????? ?? ?? ?????? ?????? ?? ?????????????? ?? ??? ?????? ?????? ??? ?????? ?????? ???.

42    ?? ????? 6a ??? GrEStG ?????? ??? ???? ?????????? ?????????? ??????, ?????,  
??? ?????? ??? ?????????? ?? ?????? ?????????? ?????? ??? ?????? ??????, ??? ?????? ???  
????? ?????? ?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???  
????????? ?????? ???, ?????? ???, ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???  
????? ?? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ???  
??? ??? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? ?????? ? ?????? ??????.

43    ???????, ? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???

????? ?????? ??? ??????????? ?? ?????? ?????????? ??? ?????? ?????? ?????????????? 95 %  
?????????? ??? ?? ??????? ?? ?????????? ??? ?????????????? ??? ?? ??????????, ??? ?? ??? ?? ???? ?  
?? ??? ?????????? ??? ?????? ?? ?????????? ??? ?????????? ??? ?????? ?????????? ??? ?????? ???  
????? ??? ??? ?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????.

44 ?????????????? ????, ??? ???????, ???, ??? ?????? ?????????? ??? ?????????????? ??? ??????????????  
? ?????? ??? «????????? ??????» ??? ??????? ?? ?????? ??? ?????????? ??????????????  
????????????? ??? ?????????? ?????????? ?????????? ???, ??? ?? ?????? ??? ?????? ??? ??????  
????????????? ?? ?? ??????? ?????? ?????????, ?? ?????????? ?????????? ??? ?????? ???  
????????? ??? ??????, ?? ?? ??????, a priori ?????????? ?????????, ??? ?? ?????? ??? ??????  
????? ?????????? ?? ?????????? ??? ?????????? ?????? ?????????? ?????????? ??? ?? ??? ?  
??? ?????????? ??? ?????????? ??? ?????? ?????? ?????? ?????? (????????? ??? 21??  
????????? 2016, ?????????? ??? World Duty Free Group ?.??., C?20/15 P ??? C?21/15 P,  
EU:C:2016:981, ????? 58 ????? ??? ????? ?????????? ??????????).

45 ?? ??????????, ?????????? ? ?????????? ???, ??? ?????????? ?? ??????  
????????? ??? ?????????????? ??? ?????? ??? ?????? ?????????? ?????????????? ???  
????????? ??? ?????????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ?????? ????  
????????? ??? ??????, ? ?????? ??? ?????????? ?? ?????? 6a ??? GrEStG ??? ?? ???  
?? ?????????? ?????? ??? ?????????? ?????????? ?????????? ?? ??????????.

46 ??????????, ? ??????? ??? ?????????? ?????? ?????????? ??? ?????????? ??? ?????????? ??? ??????????  
????????? ??? ?????????????? ??? ?????? ?????? ?????????? ??? ?????????????? ??? ??????????  
?? ?????????? ??? ?????? ??????, ?????????? ??? ?????? 95 %, ?????????? ??????????,  
??????, ?????? ??? ?????? 1, ?????????? 2a ??? 3, ??? GrEStG, ? ?????????? ???  
????????? ??? ??????, ???' ????, ??? ?????????? «????? ??? ??????», ?????? ??  
????? ??? ? ?????? ??? ?????? ??? ?????????? ??? ?????? ?????????? ??? ??????  
????? ??? ?????? ??????. ???, ??? ???????, ? ?????????? ??? ?? ??? ?????? ??????  
????????? ?? ???, ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???, ???,  
????? ?? ??????????, ?? ?????????? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ???  
????????? ??? 100 % ??? ??? ??? ?????????? ??? ?????? ?????????? ???, ??? ?? ??? ??  
????????? ?? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????????? ??? ??????????  
??????, ???, ??? ?????? ???, ??? ?? ?????????? ??? ?????? ?????????? ??? ?????? ??????????  
?? ?????????? ?? ??? ?????? ???, ??? ?????? ??????, ??? ?????? ?????????? ??? ?????? 95 %  
?? ?????????? ?? ??? ?????? ?????? ?????????? ??? ?????????? ??? ?????? ???, ??? ??????  
??, ??? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????.

47 ??????????, ??? ?????????? ??? ? ?????? ?????????? ??? ?????????? ??? ?????? 175 ???  
????????? ???, ? ?????? ??? ?????????? ?????????? ??? ?????? ?????????? ??? ?????? ??????????  
????????????? ??? ?????? ??? ?????????? ??? ?????????? ?? ?????? ?????????? ??????????  
?? 95 %. ??????????, ??? ?????????? ???, ? ???????, ??? ??? ?????????? ???????,  
????????? ?????????? ??? 95 % ??? ?????????? ??? ?????? ?????????? ?????????? ???  
????????? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? 1, ?????????? 2a ??? 3,  
??? GrEStG, ??? ??? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ?????? ???  
????? ?? ?????????? ? ?????? ??? ?????????? ??? ?????? ??? ??????.

48 ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ??? ??????  
????????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ??????  
?? ?? ??? ?????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???  
?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????????? ??? ?????? ??? ?????? ???, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ???

???????? ???? ?????????? ?????????? ??? ?????? ?????????????? ?????????? ??? ?? ?????? ?????  
?????????? ?? ?????? ??? ?????? ???, ????????, ??? ??????????? ??? ??????  
????????? ?? ?? ??? ?????? ?? ??????????? ??????? ??? ?? ?????? ?????? ?????? ??????????? ??? ???  
????????? ??? ?????? ?????? (????????? ??? 6?? ??????????? 2006, ?????????? ???  
?????????, C-88/03, EU:C:2006:511, ????? 81).

50 ?? ???????????, ? ?????? ??? ??????????? ?? ?? ??????????? ??? ??????????? ??? ???????????  
????? ??????? ??????????? ??????????? ??? ? ?????? ??????????? ??? ??????????? ??? ???????,  
??? ?? ?? ?????? ???????????, ??????????? ??????? ?? ??????????? ?? ??????????? ???  
?????????? ??????? ??? ?????? 6a ??? GrEStG ??? ??? ??????????? ??????????? ???  
?????????? ??? ?????? ??????? ??? ??????????? ?? ?????? ??????????? ??? ???????  
?????????? 95 % ??? ??????? ??? ?????? ??????????? ?????? ??? ?????? ??? ??? ?? ???  
????? ??? ?? ??? ?????? ??? ?????? ??? ?????? ??? ??????.

51 ???????, ??? ?????????? ??? ?? ?????? ??????????, ? ??????? ??????????  
????????? ?????? ??? ?????????? ?????? ?????????????? ??? ?? ??????? ??  
????????? ?? ?????????? ?????? ?????????? ?????? ?????????? ??? ?? ??????????  
????????? ?????? ???, ?? ?? ??????, ?? ?????????? ?? ??????????, ??? ??  
????????? ??? ?????????? ?????? ?????????? ?????? ?????? ??? ?????? ??????  
????????? ?? ?????????? ?????? ?? ?????? ??? ?? ??? ?????? ?????????? ???????, ?? ??????  
????? ??? ?? ?????????? ??? ?????????? ??? ??????????. ???????, ? ??????? ??? ?????????? ??? ?????????? ???  
?? ?????? ?????????? ??? ?????????? ?? ?? ?????? ? ??? ?????? ??? ?????????? ??? ??????????????  
????????? (??., ???' ???????, ??????? ??? 29?? ??????? 2004, GIL Insurance ??., C-  
308/01, EU:C:2004:252, ??? 74).

52      ????? ??????????, ????? ? ?? ? ?? ????? ?????????? ??????? ?????????????? ??????????????  
?????? ?????????????? ?? ???????????, ??? ? ? ?????? ?? ?????? ?? ?????????? ?? ? ?  
?????? ?????? ???????, ?? ?????????? ?????????? ?? ??????? ?????? ??????????, ?  
????????????? ?? ?? ??????????? ???????????????, ??????? ?????????? ?? ?? ??????? ??  
?????? ?????????? ?? ???????, ??? ?????? ???, ??? ? ? ??? ? ?? ?????????? ??  
????????? ?? ?????? ??????????.

53      ?????? ??? ??????? ????????, ??? ?????????? ??????? ??????? ?? ??? ???? ? ?????????? ???  
?? ??? 107, ?????????? 1, ??? ??? ?? ?????? ??? ?????? ??? ?????????? ?????????? ?????????? , ??? ??  
??? ?????? ????, ?? ??? ?????? ?????????? ??? ?????? ?????? ??? ?? ??? ?????? ?????????? ??????????  
??? ?????????? ??? ?????????? ?????? ??? ?????? ?????????? ?????? ??? ?????? ?????????? ??????  
????????? ?????????? ?????? ?????????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??????  
????????? ?? ??? ?????? ?????????? ??? ?????? ?????? ?????????? 95 % ??? ?????? ???  
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???  
????? , ??? ?????? ??? ?????????? ??? ?????????? ?????? ??? ?????????? ??? ?????????? , ???  
????? ? ?????? ???.

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

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

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

?? ??? 107, ?????????? 1, ??? ?????? ??? ?????? ??? ?????????? ??? ???????????,????? ??? ???? ?????? ??? ??????, ?? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ????  
????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????????? ???? ???? ????  
????????????????? ??? ?????? ?????? ?????????? ?????????????? ?????????????? ??????????????  
?????? ?????????? ??? ?????? ??????, ?????????? ??? ?????? ?????? ?????????? ??? ?????? ???  
????????? ?????????? 95 % ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ??????, ??? ?????? ???  
??? ??? ?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????, ??? ?????? ???  
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