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C 279/17

????????? ?????????????? ?????????? ??? ?????? ??????? ?? Tribunalul Bucure?ti (?????????)
????? 12 ???????????? 2020 — Wilo Salmson France SAS ??? Agen?ia Na?ional? de
Administrare Fiscal? — Direc?ia General? Regional? a Finan?elor Publice Bucure?ti, Agen?ia
Na?ional? de Administrare Fiscal? — Direc?ia General? Regional? a Finan?elor Publice Bucure?ti
— Administra?ia Fiscal? pentru Contribuabili Nereziden?i

(????????? C-80/20)

(2020/C 279/23)

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Tribunalul Bucure?ti

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

?????????????: Wilo Salmson France SAS

?????: Agen?ia Na?ional? de Administrare Fiscal? — Direc?ia General? Regional? a Finan?elor
Publice Bucure?ti, Agen?ia Na?ional? de Administrare Fiscal? — Direc?ia General? Regional? a
Finan?elor Publice Bucure?ti — Administra?ia Fiscal? pentru Contribuabili Nereziden?i

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1)

????? ?????? ??? ?????????? ??? ?????? 167, ?? ?????????? ?? ?? ?????? 178 ??? ??????
2006/112/?? (1), ??????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ??
?????? ??? ??? ?????? ?????????? ?? ?????????? ??????????, ?????????????? ??? ??? ??? ??????
????????????? ??? ?????????? ???;

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

2)

????? ?????? ??? ???????? ??? ?????? ?????????? ?? ?????????? ?? ??? ?????????? ??? ??????
14, ?????????? 1, ??????? ?', ?????? ??????????, ??? ?????? 2008/9/? (2), ??? ?????? ??
????????? ?????? ??? ?????????? ?? ?????? ?????????? ??? ?? ?????????? ? ?????????? ???
????? ??? ?????????? ?????? ???;

??? ??? ?????? ?????? ?????????????? ?? ?????????????? ?? ?????? ?????? ?? ??????????
????? ?????????? ??? ??? ? ?????? ?????? ?????????? ??? ??? ?? «???????
?????????», ??? ??? ??? ?????? ?????? ?????????? ??? ??? ?? ?????? ?????????? ??????.

3)

????? ?????? ??? ???????? ??? ?????? ?????????? ??? ?????? 14, ?????????? 1, ??????? ?',
????? ????????, ??? ?????? 2008/9?, ?? ?????????? ?? ?? ?????? 167 ?? ?? ?? ?????? 178
?? ?????? 2006/112/??, ??? ?????? ?? ?????????? ??? ?????????? ??? ??? ?????? ???
????????? ??? ??? ?????? ?????? ??? ?????????? ??? «????????? ??????????» ??? ???
????? ??? ?????????? ??? ?????????? ??? ??? ?????? ?? ??? ?? ??? ?????? ??????;

??? ??? ?????? ?????? ?????????????? ?? ?????????????? ?? ?????? ?????????? ?????????? ??
????? ??? ?????????? ?? ?????? ?????????? ?? ?????????? ??? ?????? ?????? ?????? ???
????????? ??? ?????????? ?? ?????????? ??? ?????????? ???, ? ?????? ??? ?????????? ???
????????? ??? ?????????? ?? ?????? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ???
????????? ??? ?????????? ??? ?????????? ???, ?????? ??? ?? ?????????? ??? ?????? ???
????? ?????? ??? ?????????? ??? ?????????? ???, ??? ?????????? ??? ?????? ?????????? ???
????? ?????? ??? ?????????? ???, ??? ?????????? ??? ?????? ?????????? ??? ?????? ???
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4)

????? ? ?????? ?????????? ?? ?????? ??? ?????????? ??? ?????? ?? ??? ?????? ?? ??? ??????
[2008/9/] ??? ??? ?????????? ??? ???????, ?? ?????????? ??? ?? ??? ?????? ?????????? ??????
????? ??? ?????? [?????????] ??? ??????;

(1) ?????? 2006/112/? ??? ??????????, ??? 28? ?????? 2006, ?????? ?? ?? ??? ??????
????? ??? ?????? ?????????? ??? (EE 2006, L 347, ?. 1).

(2) ?????? 2008/9/? ??? ??????????, ??? 12? ?????????? 2008, ??? ??? ??????????
????????? ??? ?????? ?? ??? ?????????? ??? ?????? ?????????????? ???, ???
????????? ??? ?????? 2006/112/? , ?? ?????????? ??? ?????? ?? ?????? ?????????????? ???
????? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ?????? (?? 2008, L 44, ?. 23).