

Jurisdiction

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

MELCHIOR WATHELET

??? 18?? ??????? 2013 (1)

?????? C-300/12

Finanzamt Düsseldorf-Mitte

????

Ibero Tours GmbH

[?????? ?? Bundesfinanzhof (???????) ??? ?? ?????? ?????????????? ??????????]

„????? ?????????????? ??? — ??????? ?? ?????????? ?????? — ?????? ??????????
????? ??????????, ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? —
????????????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????????“

I – ????????

1.

? ??????? ?????????? ??????? ?????????????? ??????????, ??? ??????? ?? ??? ??????????
????????????? ?????????? ?? ?????? ??????? ??? ?????????? ??? ?????????? ??? 20 ??????? 2012,
????, ???' ?????, ?? ?????? ??, ??? ?????????? ??? ?????? ?????????? ??? ?????????? ??? ?????? ???
????????????? ??? ????? Elida Gibbs (2), ??????? ?? ??? ?????????? ??? ??????
????????????? ??? ?????? ?????? ?????? ?????????? ?????????, ?????????????? ?????? ??? ??????
????????? ?????? ?????? ?????? ?????? ?????? ??????????. ? ?????????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ?????? ?????????? ?????????, ?????????? ?? ?????? ?????? ???
????????? ?????? ??? ?????? ?????? ?????? ?????????? ?????????, ?????????? ??? ?????? ?????????? ???
??? ?????? ??? ?????? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????????? ??? (?? ????: ???) ??? ??? ??????.

II – ?? ?????? ???????

A – ?? ?????? ??? ??????

2.

???? ?? ????? 11, A, ?????????? 1, ??????? ?, ??? ?????? ?????? 77/388/??? ???
??????????, ??? 17?? ????? 1977, ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? ???,
??? ??????? ?? ??? ?????? ?????? ?????? — ?????? ?????? ?????? ?????? ??????????????
?????: ?????????? ?????????? ??? (?? ????. ???.. 09/001, ?. 49, ??? ????: ??? ?????? ????) (3):

«[...]

1. ????? ?????????? ??? ?????? ??????:

?)

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

3.

???? ?? ?????? 11, ?, ??????????? 3, ??? ????? ??????? ???:

«???? ???? ?????????? ??? ?????? ??? ??????????????????:

?)

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

?)

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

[...]]».

4.

?? ?????? 11, ?, ??? ?????? ??????? ?? ???? «????????? ??????????» ?????? ?? ????????,
???? ?????????? 1, ????? ??????:

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

5.

?? ?????? 26 ?? ?????? ??????? «?????? ?????????? ??? ?????????????? ??????????»
????????? ?? ????:

«1. ?? ?????? ????. ??????????? [??] ????. ?????? ????. ?????????????? ????. ?????????? ????. ?????????? ?? ??
?????, ????. ?? ???? ?? ?? ?????? ????. ?? ?????????? ????. ?????? ??????? ????. ?????? ?????? ????.
????????? ????. ?? ?????? ??????????????, ????. ?? ?????????????? ????. ?????? ???????, ??????????
????? ????. ??????? ?????????? ????. ?????? ?????????? ????. ?????? ????. ?? ?????? ?????? ????.
????????? ????. ?? ?????????? ????. ?? ???????, ?? ????. ?????? ?????? ?????????? ????. ?? ??????????
?? ?? ?? ?? ?????? ?????????? ?? ?? ????. 11, ??? ?, ?????????? 3, ?????????? ?? ?. ??????????,
?????, ????. ?? ?????? ????. ?? ?????? ????. ?? ???????, ?? ?????????? ????. ?? ?????? ?? ?? ???????,
?????????.

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

??? ?????? ??????? ?? ?????? ??? ??????????. ??? ??? ?? ??? ????? ?????? ?????????? ??????????
????????? ?? ??? ?????? ??? ?????? ??? ??? ?????? ??? ?????, ??? ??? ?????? ??? ??????
22, ?????????? 3, ?????????? ?, ?? ?????????? ?????? ??? ?????????? ??? ?????????? ??????, ??????
? ?????? ?????? ??? ?????? ?????? ?????????? ?????? ??? ?????? ?????? ?????? ?????? ??????
????????????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?
????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??????
????? ???, ??? ?? ?????? ??? ? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????.
????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????.

3. ?? ?? ??????, ??? ?????? ?? ?????????? ?????????? ?????????? ?? ?????? ?????????? ??????????
????? ???, ?????????????? ??? ?????? ?????????? ?????? ??? ?????? ??? ?????????? ?, ??????
????????? ??? ?????????? ?????? ?????????? ?????? ?????????? ?????? ?????????? ?????? ??????
????????????? ?????? ?? ?? ?????? 15, ?????????? 14. ?? ?? ?????? ?????? ?????? ??????????
????? ???, ??? ?? ?????? ??? ??????????, ?????? ?? ?????????? ?? ?????????? ?????? ?????? ???
????? ??? ?????? ?????? ?????? ??? ?????????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ???
????????? ?????? ??????.

4. ?? ??? ??? [??] ?? ?? ?????? ?????????? ?? ?????????? ?????????? ?? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? 2 ?????? ???
????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ????.»

? – ?? ?????? ??????

6.

?? ??? 17, ?????????? 1, ??? ??? ?????? ??? ?????? ?????? ?????? (Umsatzsteuergesetz, ???
????: UStG), ??? ?????? ??? 1?? ?????????? 2002 ??? 15 ?????????? 2004, ??? ??
?????????:

«?? ?????????? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ??? ??????
??? ?????? 1, ?????????? 1, ?????? 1 ??? 3, ?????? ?????? ???,

1)

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

2)

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

????? ?????????? ???' ?????? ??? ?????? ??? ?????? ??? ?????? 1, ?????????? 1, ?????? 5,
??? ??? ?????? 13b. ?????? ?????? ? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ??????
??? ??? ??????, ??? ??? ?????? ??? ? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ??????
????????? ??? ?? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????????? ???, ? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? [...]»

7.

?? ??? 17, ?????????? 1, ??? UStG ??? ?????? ??? 16 ?????????? 2004 ?????? ??
?????????:

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

??? ??? ?????? ??? ?????? 1, ?????????? 1, ?????? 1, ? ?????????????? ???
????????????? ??? ??? ?????? ?????? ?????? ?? ?????? ?? ??? ?????????? ????.
??????, ? ?????? ?????? ?????????????? ?????? ?? ?????? ?? ??? ?????? ???
????????? ?? ?????? ??? ?????? ?????.. ?????? ??? ?????? ?? ? ?????????? ????
????????? ?????????? ??? ??? ?????????? ??? ?????? ?????? ?????? ??? ??????. ??, ?? ???
????? ????????, ??? ?????? ?????????????? ?????? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ?????? ??? ?????, ?????? ?????? ?? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? 1 ??? 4 ??? ?????? ?????? ???' ?????? ???
????????? ??? ?????? 1, ?????????? 1, ?????? 5, ??? ??? ?????? 13b. ?????? ?????? ?
????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ??? ?????? ?????????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? [...]»

III – ? ?????? ??? ?????? ??? ?? ?????????? ????

8.

? ?????? ??? ???????, ?? ?????? ?????????? ?? ?????? ?????? ???
????????????? ??? ?????????? ?? ?????? ??????????, ??? ?? Bundesfinanzhof, ??? ?
????????? ?????? (4), ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ?????? ??????:

9.

? Ibero Tours GmbH (??? ????: Ibero Tours) ?????? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???
??? ? ???????, ? ?????? ??? ?????? ??? ?????? 2000 ????, ?????????????? ??? ??????
275,86 ????. ??? ?????? ??? ??????, ? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ???, ?? ????
???? ??? ?????? ??? 232 ????, ?? ??? ?????? ??? 32 ???? ?????? ????. ???.

10.

????????? ??? ?????? ??? ?????? ???, ? Ibero Tours ?????? ??? ?????? ???
????????? ??? ??? ?????? ??? ?????? ???, ?????????? ??? ?? ??????????
???? ?????? ?????? 3 % ??? ??? ?????? ??? ?????? ??? ?????? ??? 60 ????. ? ??????
??? ?????? ??? ?????? ??? ?????? ???, ??? ?? ?????? ??? ?????? ???.

11.

?? ??????? ??????????, ? ?????????? ?????????? ??? Ibero Tours ?? ???????????
????????? ???, ?????? 1940 ????. ? ?????????? ?????????? ??? ?????????? ??? ???????????
?????????? ??? ?????? ??? ?????????? ?????? ??? ?????? ??? ?????????? ??? ?????
??? ?????? (????? ??? ??????, ??? 2000 ????) ??? ?? ?????????? ?????????? ??? ?????
??? ??? ?????? ??? ?????? ??? ?????? (????????????????? ??? ???, ??? 232
????), ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ??????
????? (???? 1940 ???) ??? ?? ?????? ??? ?????? ??? ?????????? (???? 172 ???) ???
????????? ??? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ? Ibero Tours
(???? 60 ???, ?????????????? ??? ???). ??? ??????????, ?? ??? ?????? ?????????? ??
1768 ??? (???? 2000 – 232 = 1 768 ??? ? 1940 – 172 ??? = 1768 ???).

12.

?????? ?? ?? ?????? ??????? ??? ?????????? ??? ?? ?????????? ?????????? ?? ??? 26 ???
????? ??????? ???, ? ?????????? ?????? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ???
??? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ?? ?????????? ?????? ??? ?????????? ???
?????? ?? ?????????? ?????? ??? ??????, ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? (5).

13.

??????????, ? Ibero Tours ??? ?????? ??? ?????? ??? (32 ??? ???? ????????)
??? ?????????? ??? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ? ???????????
??????????, ??? 232 ??? ?????? ??? ??????????, ??? ?? ?????????? ??? ?????? ??? ???
8,28 ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ??? 60
???? ??? ??????????. ?? ?????????? ???, ?? ??? ?????? ???, ?????????????? ???
???? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???, ??? ???
????????? ?????? 8,28 ???, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ???
????????? ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ??? ??? ?????? (32 ???) ??? ??? ??? ?????????? ??? ??? ?????? ??? ?????? ???
????? ??? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? (23,72 ???).

14.

?? ?????? ???, ? Ibero Tours ?????? ??? ? Finanzamt Düsseldorf-Mitte (??????
????????? ???, ??? ???: Finanzamt) ?????????? ??? ??? ??? ??? ?????????? ??? ???
????????? ???, ??? ?? 2002 ?? 2005, ?? ??? ?????????? ??? ?? ?????????? ??? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ??????????, ???' ?????????? ??? ?????? 17 ??? UStG,
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??????????.

15.

? Finanzamt ?????? ?? ?????? ??? ?????? ?????? ?????? ? ?????? ?????????? ?? ?????? ???
????????? ?????? ?????????? ?????????? ?????? ??? ?????? ??? ?????? ?????????? ???
????????? ?? ?????? 26 ??? ?????? ?????? ???, ???????, ?????? ?? ?????????? ???
????????? ?? ?????????? ?????? ?????????? ?????????? ?????? ??? ?????? 26,
????????? 3, ??? ?????? ?????? ???, ?????? ?? ?????? ?? ?????????? ??? ?????? ???
????? ??? ??? Ibero Tours. ? Ibero Tours, ??? ?????? ?????? ? ?????? ??? ?????? ???
????? ?????? ??? ?????? ?????? ?? Finanzgericht (?????? ?????????? ??????????).

????? ?? Finanzamt ?????? ??????? ??? ?????? ??? Finanzgericht.

16.

??? ??? ??????? ????, ?? Bundesfinanzhof ?????????? ?? ?????????? ?? ?????????? ???

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

«1)

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

?????? ??? 24?? ?????????? 1996, C-317/94, Elida Gibbs (?????? 1996, ?. I-5339), ??????? ???

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

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

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

????????? (?? ?????????? ??? ?????????? ??? ?????????? ?????????????? ?????? ??? ??????

?????????) ??? ?????? ??? ?????????? ??? ?????? ???????;

2)

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

????? ??? ?????? ?? ?????? ??? ?????????? ??? ?????????? ?????? Elida Gibbs [...] ???

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

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

????????? ??? ?? ?????? 26 ??? ?????? ?????? 77/388/??? ??? ??????????, ??? 17?? ????

1977, ??? ?????????????? ??? ?????????? ??? ?????? ?????, ??? ?????????? ?? ?????? ??????

????????? ??????;

3)

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

?????, ?? ?????? ??? ?????? ?????????? ??? ?????????? ??? ?????? ?? ?????? 11, ?, ?????????? 1,

??? ?????? ?????? 77/388/??? ??? ??????????, ??? 17?? ??? 1977, ??? ????????????

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

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

????????? ?????? ???, ???' ?????? ??? ?????????????? ?' ??? ?? ?????? ??? ??????

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

?????;»

IV – ? ?????????? ?????? ??? ??????????

17.

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

2000 2012. ? Ibero Tours, ? ?????? ??????, ? ?????? ??? ?????????? ??? ?????????? ????

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

????????????? ??? ?????? ??? ??' ?????????? ?????????? ??? 5?? ?????? 2013.

V – ??????

? – ??? ??? ?????? ?????????? ??????

18.

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

????? ?????? ??? ??????? ??????????, ? ??????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??????
????? ??? ?????? ?????? ?? ??????? ??? ?????? ?????? ??????????????, ?? ?????? ???
????????????? ?????? Elida Gibbs, ???? ??? ??? ?????? ?????? ??? ?????? ??? ?????? ?
????????? ????.

19.

??? ?????? ??? ??????? ?????? ?? ??????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??????
????????? ?????? ??? ??? ?????? ?????? ?????? ?????? ?????????????, ??? ?????? ???
????? ? ?????????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ??????:

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

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

20.

????? ?? ??? ?????? ?? ?????????? ???, ??? ?? ?????? ???, ??? ?? ?????? ???, ? ??? ?????? ???
?? ??? ?????? ??? ?? ??? ?? ?????? ??? ?????? ??? ?????? ???, ??? ?????? ???
?? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? (6). ?? ?????? ???,
????????, ???????, ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

21.

????? ?? ?????? ???????, ?? ?????? ?????????? ??? ? ?????????? ?????? ?????? ???
????????? ??? ?????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????? ?? ??? ?????????????? ??? Elida Gibbs, ?????? ?? ?????????? ??? ?????? ???
??? ?????????????? ??? «?????? ??????» ??? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

22.

?????????, ? ?????????? ?????????? ??? ?????? ??? ?????? ???, ?? ?????????? ?, ??? ?????? ???
????? ? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???, ??? ? ?????? ??
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ???' ????, ? Ibero Tours ????

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

23.

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

24.

???? ?? ???? ?? ???? ?????????? ???????????, ??? ?????????? ???' ??????????
?????????, ??? ?????? ?? ?????????? ??? ?????????? ?? ?????????? ??? ??????? ??????????
?? ? ? ?????? ?? ?????????? ?????????? ??? ?????? ?????? ?????????? ?? ? ? ?????? ?????? ??
?? ?????? ?????? ? ?????????? ?????? Elida Gibbs. ???' ????, ?? ??????????, ??
????????? ?????? ?????? ??? ?????? ?????????? ?????????? ?????????? ? ?????? ?????? ??
????????? ??? ?????? ???, ??? ? ?????????? ?????????? ??? ?????? ?????? ?????????? ? ?????????? ??????????
????????????? ??? ?????? ??? ?????? ??? ? ?????? ?? ???? ?????????? ?????????? ??? ??????????
?? ?????????? ?????? ??? ?????? ?????????? ?????????? . ??????????, ?????????? ??? ??
????????? ???????, ? ?????? ??? ???? ?????? ?????? ?????????? ? ?????????????? ?????? Elida
Gibbs, ??????? ??? ?????? ?????? ?????????? ?????????? ?? ???? ?????? ?????????? ?????????? ??
????????? ??? ??? ?????? ?????? ??? ???? ?????????? ?????? ?????????? ??? ?????? ?????????? ??? ??
????????? ??? ?????? ??????????.

25.

?? ??????? ?? ???? ???. ??? ?????????? ? ???????, ?? ??????? ??????? ?? ? ??
?? ?????????? ? ??????? ?? ???? ?????? ?? ???? ?????? ?? ???? ?????????? ???????
Elida Gibbs ??, ???????, ??? ?? ?????????? ? ??????? ?????? ??? ?????? ??????????, ??
?????? ?? ?????????? ??? ?????? ?????? ?????????? ?????????? ? ??????? ?????????? ??????????
?????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????????? ??????.

26.

? ? ?????????? ?? ???? ? Ibero Tours ?? ??????? ?????? ?? ???? ??????? ???????,
?? ?????? ?? ???? ? ?????? ?????????? ?????????? ?????? ?????? ?????????? ??????? ??,
?? ?????? ?????? ?? ???? ?????????? . ??? ? ??, ?????????? ??????, ?? ??????????
??????, ??? ? Ibero Tours, ?????? ?????? ?????????? ?????? ?????? ?? ???? ??????????
????????? ?????? ??????????, ?? ?????????? ?????? ?????? ?? ???? ?????? ?????? ??
?????? ?? ?????? ?????????? ?? ???? ?????????? ?????? ?????? ?? ???? ?????? ???.

27.

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

? ?????????????? ??????????? ???? ???????????, ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ???
?????????? ????' ?????? ?? ??? ?????? ??? ??????????? ????. ?? ??????? ???????????, ?
????? ??? ?? ?????????? ??? ??????????? ?????? ?????? ?? ??????????
????????, ??? ??????????? ?????? ???????????, ?? ?????????? ?????? 1940 ??? ?????? 232 ???,
???? 1708 ????, ?????? ?? ?????? ??? ?????????????? ?????? ?? ?????????? ??? ?????? ???
????????, ??? ?????????? ??? ?????? ?????, ?? ?????????? ?????? ?????????? ?????????? ??? ??????
????????? ?? ??? ?????????????? ??? ?????????????? ?????? Elida Gibbs.

28.

???? ??????? ?? ?????????? ?? ??? ?????? ???, «??? ? ?????????? ???? ???? ???? ???? ???? ????
??? ???????????, ??????, ??? ?????? ?????????? ??? ?????? ?????????? ??? ???, ??
????????? ?????? ?????? ?????????? ??? ?????????? ??? ?????? ???????, ?????????? ???
????????? ?????????? ??? ?????? ?????? ???????, ??? ?????????? ??? ?????? ?????? ???
????????? ?????????? ??? ?????? ?????? ?' ?????, ??? ?????? ???????, ??? ?????? ??? ??????
????????, ? ??? ?????????? ??' ?????? ??? ?????? ??? ?????? ???????, ??? ?????? ??? ??????
????????, ? ?????????? ??? ?? ?????????? ?? ??? ?????? ?????? ?????? ??? ?????? ??? ??????
????????? ? ?????? ???????, ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? » (7).

29.

? ? ?????????? ???????????, ???????, ??? ?????????? ??? ?????? ??? ???? «????? ?????? ???
????????? ??????????», ?????, ???, ??? ?????? ?????????? ?????????????? ??? ??????????
??? ??? ?????? ?????? ? ?????????? ?????? Elida Gibbs, ??? ? ?????????? ??? ????
????????? ?????? ??? ?????? ??? ?????? ?????? ?????????? ?????????? ??? ?????? ??? ??????
????????? ???????????, ??? ??? ?? ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ??????
?????.

30.

? ???????, ?? ??????? ?????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ??????????
??????????, ?? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
????? ??? ?????? ???????, ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? Ibero
Tours, ??? ? ?????????? ?? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ??? ??????
????? ?????? ?????????? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? (8).

31.

? ? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ?????????? . ???????,
? ? ?????????? ??? ?????? ??? ?????? ?????????? ?????? Elida Gibbs, ???, «?????????????
????, ?? ??? ?????? ???????, ?? ?????????? ??? ???, ??? ?????????? ??? ?????? ??? ?????? ???
????????? ???????, ? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ???
????????? ??? ??? ?????? ??? ?????? ?????? ?????» (9).

32.

? ?????????? ?? ?????????? ?? ?????????? ???, ??? ?????? ?? ?????????? , ? ????
????????? ??? ??? ?????? ?? ?????????? ??? ?????? ?? ?????? ??? ?????? ??? ?????????? ??? ????
???????: «????????? ? ?????????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ????
????????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ? ?????????? ?????? ??? ?????? ???
?? ?????????? ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ???

?????????? ????????, ???' ??????? ?? ???? ???? ?????????????? ??? ???, ?? ???
?????????? ??? ??? ??? ??? ??? » (10).

33.

???????, ??? ??? ?????????????? ??????? ???? ???? ? ??????? ??? ?? ??????? ???
????????? ??? ?????? ?????????? ??? ?????? ?? ?????????? ?????????????? ??? ??????
?????? ??? ?????? ??? ?????????? ??? ?????? ?? ?????????? ?????????? ???????, ???
????? ?????????????? ?? ??? ?????????? ?????? Elida Gibbs, ??????? ??????? ??
????????? ?????????? (?? ????????, ?????????? ??????) ??? ???????, ?? ??? ??? ??
?????????, ??????? ??? ??? ??? ?????? ?????? (?? ?????????? ??? ?????? ?????? ??????)
??? ?????? ?????? ??? ?????? ?????? ?????????? ? ?? ??? ?????? (?? ????????, ??????
????????? ??? ??? ?????????? ??????????).

B – ??? ??? ??????? ?????????????? ????????????

34.

? ? ? ?????? ?????????????? ??????? ??? ?? ?????? ?????????? ?????? ??? ?? ??????????
?? ?????????? ?? ? ?????????? ?????? Elida Gibbs ??? ??? ???????,
????????? ??? ?????? ?????? ?????????? ??? ?????? 26, ?????????? 2, ??? ???
?????? ???, ??? ??? ??? ??? ?????????? ??? ?????? ?????? ??? ?????? ?? ??? ???
????????? ??? ??? «?? ?????? ?????? ??? ?????? ??? ?????????? ??????» (???: ????: ????)
??? ?????????? ??????), ?????????? ??? ?? ?????? 11, A, ?????????? 1, ?????????? ??, ???
?? ??? ??????, ??? ?????? ??? ?????? ?????? ??? ?????? «?? ??????????, ??? ?????? ????
[...] ??? ??? ?????? ?????? ??? ?????????? ? ? ?????? ??? ?????????? ??? ??? ??????»
(???: ????: ????) (????? 1 ??????), ??? ?????? ?? ??????????
?????????, ??????????, ?????????? ?????? (?????) ?????????? ?????????? ???
????????????? ?????? ?????? ?????? (????? 2 ??????).

1. ??? ?????? ?????? ?????? ?????? ?????????? ??? ?????? 26, ?????????? 2, ??? ???
?????? ??? ?? ?????? «????? ?????? ??? ?????????? ??? ?????????? ??????»

35.

???? ?????? ??? ?? ?????? ?????????? ? ?????????????? ?????? Elida Gibbs, ? ???
????????? ??? ?????? ?????????? ???' ?????????? ??? ?????? 11, A, ?????????? 1,
????????? ??, ??? ?????? ?????? ??, ?????? ?????? ??? ?????????? ??? ???????????.
?????????, ? ??? ?????? ?????? ?????? ??? ?????? ?????????? ??? ?????? 26 ??? ?? ???
????????, ??? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ????. ??
????? ?????????? ?????????? ?? ? ?????????? ?????? Elida Gibbs ?????????? ??
???? ?????????? ?? ??????????, ??????, ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ??
????? ?? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ???.

36.

???? ?? ?????? ??????????, ??? ? ?????? ?????? ??? ?????? ??? ?????????? ??? ???????,
? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? 11, A, ??????????
1, ??????? ??, ??? ?????? ?????? ??? ??? ?????? ?????? ?????? ??????, ?????? ? ??? ??????
??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????????? ??? ?????????? ??? ?????? ??? ??
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ??? ??
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ??? ??

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

37.

???? ? ?????????? ? ????????, ? ?????????????? ??? ?????? ??? ???? ?????? ??? ???? ????
????????? ??????. ??? ???? ?????? ?? ??????????, «[?]????????????? ??? ???? ???? ????
????????? ??? ?????? ??? ?????????? ?????? ?? ?????? ?????????? ??? ???? ???? ???? ????
????????? ??? ?????????? ?????? ??? ?????? ?????????? ?????? ?? ?????? ??? ???? ???? ????
??? “????????? ?????????? ??? ??? ?????????? ?????” ?????? ??? ??? ??? ??????????
??????, ?????????????? ??? ???, ??? ?????? ?? ?????????? ?????????? ??? ???? ???? ????
????????? ??? ??? ?????? ?????????? ??? ?????? ?????????? ?????? ??? ???, ?? ??? 26,
????????? 2, ??? ??? ?????? [??] ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ???
????????????? ??? ?????? ??? ?????????? ??? ?????? ?????? ?????? ??? ?????????? ???
????????? ??? ?????? ??? ??????????» (12).

38.

? ? ??????????, ????, ?????? ?????? ?? ??????:

«26.

? ?????????? ??? ?????? ?????? ?????? ?????? ?????????? ??? ???? ?????? ?????? ???
?????? 11, ?, ?????????? 1, ??????? ??, ??? ?????? ?????? [??], ? ?????, ??? ???
????????? ??? ?????? ?????? ??? ?????, ?????????? ??? ?????? ?????? ??? “????????? ???
????? ??? ? ?????????? ?? ?????? [...] ? ?????? ??? ?????????? ??? [...] ??? ??? ???? ????
?????”.
?????.

27.

? “?????????” ??? ?????????????? ??? ?????? ?????????? ?????? ?? ?? ?????????????? ???
????? 26, ?????????? 2, ??? ?????? ?????? [??] “????????? ?????????? ??? ???? ???? ???? ????
????”. ??? ?????? ??? ??? ?????? ??? ??? ??? ?????? ?????????? ??? ?????????? ??? ???? ???? ????
????????? ?? ??? ??? ??? ?????????? ??? ?????? ??? ?????????? . ?????????? ??? ??? ????
????????? ?? ?? ??? ??? ??? 26, ?????????? 2, ????, ? ?? ??? ?????? ??? ??? ?????.
????????? ??? ??? ?????? ?????? ??? ??? ??? ??????????» (13)

39.

? ???????, ?????? ?? ?????????? ??? ? ?????????????? ?????? First Choice Holidays,
????????? ?????????? ?????????? ??? ?????? ??? ???? ???? ???? ???? ???? ???? ???? ???? ????
?????. ? First Choice Holidays ?????????? ?????? ???????, ?????????????? ??????????
????????? ?????? ??? ?????? ??????. ?????? ?? ?????????? ???????, ??? ??????
????????? ???????, ?? ??? ??? ?????? ??? ?????? ?????? ?????????? ?????? ?????? ??????????
????? ?? ??????????, ? ?????? ??? ?????? ?????????? ?????? ?????????? ??? ?? ??????????
??????.

40.

? ? ?????? ??? ?????????? ??? ?????? ?????????? , ? ?????? ?????????? A. Tizzano ???
????????? ??? «[?] ? ?????? ??? ?? ?????? ?????????? ??? ?????? ?????????? ??? ???

????????? ??? ?? ??? ???????? ??? ??? ?????? ?????????? ??? ??? ?????????? ??????? ??? ??
????? ???????? ??? ??? ?????? ?? ?????? ??? ??? ??? ?????????? ??? » (14).

41.

??????, ?? ??????? ??? ?? ??? ?????????? ?????????????? ??? ?????? ?????????? ??? ???
????? ?????????????? ??? ?????????? ??? ?????? ?? ?????????????? ? ?????????? ??? ?????? ???
?????? ? ?????????????? ?????? Elida Gibbs ??? ???????, ??? ?? ??????????, ???
????? ??? ??????? ??? ?????? ?????????? ??? ?????? 26 ??? ??? ?????? ??????? ???.

42.

?????? ????????, ???????, ?? ??????? ??? ?????????? ??? ?????????? ??? ?????? ??????????, ???
????????? ?????? ??????? ?? ?? ??????? ??? ?????????? ??? ?????????? ??? ?????? ??????? ??
????? ??? ??????????. ????? ?????????????? ?????? ??? ?? ?????????? ???
????????? ??? ?????? 8 ??? ??????? ??????????.

43.

?? ?????????? ?????????? ??? ?????????? ??? ???????????, ?? ?????????? ?????????? ???
?????? ??? ?????????? ??? 60 ??? ??? ??? ?????? ??? ???????, ??? ??? ???
????????? ?? ??? Ibero Tours, ?? ?????? ?? ?????????? ??? ?????????? ??? ?????????? ???
1940 ??? (????????????? 267,58 ???). ? ????? ?????????? ??? ??? ?????????? ???
????? ??? ??? 232 ??? ?? 172 ??? (??? ??????????????), ????? ? ?????? ??? 60
???? ?????? ?? ?????????? ??? ??? ?????????? ??? ??????????.

44.

????? ??? ?? ?????????? ?? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????????????? ???
200 ??? ?? 148,28 ??? ?? ??? ??? ??? 32 ??? ?? 23,72 ????. ??? ?????????? ???,
?????? ?????? ??? ?????? ??? ??? ?????? ?? ?????? ?? ?? ??? ?????? ?????????? ?? 8,28
???, ??? 32 ??? -23,72 ??? = 8,28 ???.

45.

?? ??? ?????? ?????????? ??? ?????? ??? ?????? ?? ?????? ??? ?????? ??? ??? ?????????? ???
?? ?????? ??? ?????? ??? ?????? ??? ?????? ?? ?????????? ? ?????????? ??? ?????? ??? ??????
?? ??? ?????? ?? ?????????? ??? ?????????? ??? ?????? ??? ?????? ?? ?????????? ??? ?????? ???
??????, ??? 275,86 ??? -267,58 ??? = 8,28 ???.

46.

?? ?????????? ??? ?? ??? ?????? ??? ?????????? ?? ?????? ??? ?????????? ??? ?????????? ??
????????? ???, ??? ?????? ??? ?????????, ? ?????????? ?????????? ?????? ??? ??????????
?? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? 1000 ????. ? ?????? ??? 1000 ??? ??????
?? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ?????????? ??? ??? ??? ???
?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? 862,07 ??? ??? ??? ???
?? ??? ?????????? 16 % ??? ??? ?????? ???, ??? 137,93 ???.

47.

?? ?? ?????????? ?? ??????? ?? ?????? ?? ?????? ?? ?????? ?? ?????? 60 ?? ?? ?? ???????????, ?
?????????? ?? ?? ?????? ?? ?? ?????? ?? ?????? ?? ?????? ?? 1940 ?? ?? ??????????? ?? ?? «??????????
?????» 1000 ??, ?? «????????? ?? ??????» 810,35 ?? ?? ?? ?? 129,65 ?? ?? ??.

48.

49.

????? ??????? ? ????????, ??? ??? ?? ???????????, ?? ??????? ?????? ??? ?????? ?????? ?????? ?????? ???
?? ??????? ??? ?? 60 ??? ?? ?????????? ??? ????? ?????? ??????? ?? ?????? ?????????? ?????? ??????????
????????????? ?????????? ??? ?????? ??? 8,28 ????. ??? ????????, ??? ?? ????????, ??? ?? ????????
????? ??????? ??? ?? ??? ?????? ?? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ???
????? ??????? ??? ?? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? Elida Gibbs.

50.

????? ??? ??' ?????????????? ?????????? ? ?????????? ?????????? ?????????? ?????? ?????????????? ??
????????????? ??? ?????????????? ??? ?????????????? ? ??????????, ??? ??????????
????????? ??? ?????? ??? ?????????????? ??? ?????????? ?????????? ?????? ?? ?????????????? ??
????????? ??? 8,28 ????. ??????????, ??? ?????????? ? Ibero Tours ??? ?
????????? ?? ??? ?????????? ?????????? ???, ? ?????? ??? ?????? ?????????? ???
????????? ?? ?????????? ?????????? ??? ?????? ??? ?? ?????? ??? ?????????? ??? ??? ??? ?????? ???
?????????, ??? ??????? ??? ?????????? ???, ?????????? ??? ? ?????????? ??? ?????????? ???
??? ??? ??? ??? ?????????? ??? ?????? ??? ?????? ?????????? ?????????? ? ??????????.

51.

?????????, ?? ?????????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? 243,86 ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? (275,86
?????) ??? ??? ?????????? ??? ?????????? ??? ?????????? ???, ??? ?????????? ??? ?????? ???
????????? ??? ?????????? (32 ???), ??? ??? ??? 23,72 ??? ??? ??? ?????????? ??? ?????????? ???, ??? ?????????? ???
267,58 ????. ?? ??? ??? ??? ???, ? ??? ??? ?????????? ? ?????????? ??? ?????????? ??? ?????????? ???
????????? ??? ??? ??? ??? ??? ?????????? ??? ?????????? ??? ?????????? ??? 1940 ??? ??? ???
?????????.

52.

???????, ?? ?????????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????
??????????, ? ?????????? ??? ?????????? ?? ?????? ??? ?????? ???, ?????? 267,58 ???, ???
137,93 ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ? ?????????? ??? ??????????
??? ?? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? ?????????? ??????????, 105,93 ??? ???
?????? ? ?????? ? ?????????? ???????????, ??? ? ?????? ?????????? ??? ???? ?? ??????
?????? ??? ??? ??? ?????????? ??? ??? ?????????? ??? ?????? ??? ?????????? (137,93

????) ??? ??? ??? ??? ?????? ???????? ??? ?????????? ?????????? ??? ??? ?????????? ???
??? ?? ??????? ??????? (32 ???), ??? ?? 23,72 ??? ?? ?????????? ??? ??? ??
????? ?? ?????????? ??????? ??? ?? ?????????? ??? ?? ?????????? ??? ?? ?????????? ???
??? ?????????? ?????????? ??? ?? ???????.

53.

???? ???????, ?? ??? ??? ?????????? ??? ?????????? ?????? Elida Gibbs ???
?????????? ??? ?? ?????? ?? ??????? ???, ??? ?????????? ??? ?? ?????? ??????? ???
?? ?? 26, ?????????? 2, ??? ??? ?????? ??????? ???, ??? ?????????? ?? ?????????? ?? ??
????????? ?? ??? ???, ??? ?? ??????? ?????????? ??????. ?????? ?????????? ????, ???
????????? ?? ??????????, «??? ??? ?????? ?????????? ?? ?????????????? ? ??? ?????????? ???
????? ?? ??? ?????????? ?????????? [...] ???, ??? ?????? ??? ?????????? ???, ?
????????? ?? ??? ?????? ??? ?????????? ?????????? ??? ?? ?????????? ??? ?? ??????????
????????? ?? ?????? XI ??? ?????? ?????? [??], ?? ?????? ?????????? ??? ?? ??????????
????????? ?? ?????????? ?????????, ??? ?????? ?? ?????????? ?????????? ? ??????????, ??
????????? ?? ?? ??? ??? ?????? ??? ?????????? ?? ??? ?????? ?? ?????????? ?????????? ???
??? ?????????? ?? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????????? ?? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????????? ?? ?????????? ??? ?????? ??? ?????????? ??? (15).

54.

? ??????? ??? ??? ?????? ??? ?????????????? ?????????? Elida Gibbs ?????????? ?? ??
????????? ?? 26, ?????????? 2, ??? ??? ?????? ??????? ???, ???, ???????, ? ??????????
???? ?? ??? ?????? ??? ?? ?????????? ?? ?????????? ? ??? ?????????? ??? ?? ??? ??
????????, ?? ?????????? ??? ?? ???, ? ?????????? ??? ?? ?????? ?????????? ??? ?? ??? ??
????? ?????? ?????????? (16). ??? ?????? ?????????? ??? ?? ??? ?????? ?????? ??? ??
??? ?????????? ???, ??? ?? ?????????? ??? ?? ?????????? (17).

55.

? ?????? ?????????? ?????????? ??? ?????? ??? ?????????? ?????????? ?????????? ??????????
????????. ??? ?? ??? ?? ???, ??? ?? ?????? ???, ?????? ?????????? ?? ???????
??????????, ???????, ??? ?? ???????, ??? ?? ???????, ??? ? ?????? ??? ?????????? ??????????
??? ??????? ?????? ?????? ?? ??????? ??? ?????????? ??? ?? ?????? ??? ?? ?????? ??
????????? ??? ?????? ?????????? ??? ?????????? ??? ?????????? ?????????? ?????????? ???
????????? ?????????? ? Ibero Tours. ???????, ???????, ??? ?????????? ??? ?? ?????? ???
??? ??? ?????? ??? ?? ??????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ???

2. ??? ?????????? ????????

56.

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

57.

??? ????????, ?? ?????? ?????????? ?????????? ?? ? ?????????????? ?????? ?????? ?????????
????? ?????????? ?????????? ?? ??? ?????????? ?? ?????? ??? ?????? ?????? ?? ???
????????????? ?????? Elida Gibbs ??? ? ?????????? ?????? ??? ?????? ?????? ?????????
????????????? ??? ??? ??? ???' ?????????? ??? ?????? 26, ?????????? 3, ??? ???
????? ???.

58.

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

59.

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

60.

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

61.

??? ?????? ???, ?? ?????? ?????????? ??? ? ?????????? ?????????? ?????????? ?? ???
????? ? ?????? ???, ?? ?????????? ??? ? ?????????? ??? ? ?????? ??? ???? . ?????????? ???
????????? ??? ???? ?? ?????????? ??? ?????? ?????????? ?????? ??? ???? ?????????? ???
????? ?????????? ??? ???? ?????? ??? ?????????? ???? ?????????? ?????????? . ??? ???? ?????????? ???
?????????, ?? ?????? ??? ?????????????? ?????? Elida Gibbs ??? ?????? ?? ?????? ???
????? ??? ?????? ??????.

62.

??? ?????? ??? ?? ?????????? ????. ?????? ?? ?????????? ???, ??? ?????????? ? Ibero
Tours ??? ? ?????? ?? ?? ?????????? ???, ?? ?????? ?????? ??? ?????????? ??? ????
?????????, ??? ??? ?????? ??? ?????? 11, A, ?????????? 1, ?????????? ?, ??? ???
????? ???, ??? ?????? ??? ?????????? ??? ?????? ?????? ???, ??? ??? ?????? ???
????? 26, ?????????? 2, ??? ?????? ?????? ???, ????? ?????? ?????? ?????????? ??? ????
????? ??? ?????? ?????? ?? ??? ?????????????? ?????? Elida Gibbs.

63.

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

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

64.

????? ??????, ??? ????????, ??? ?????? ?????????????? ?????????? ??? ?????? ??????????
????????? ?????????? ??? ?????? ??? ?????????? ?????? ?????? ??? ?????? ??? ?????? 26,
????????? 2, ??? ?????? ????????, ??? ?????? ?????????????? ??? ?????? ??? ?????? ?????? ???
????????? 3 ??? ?????? ??????, ??? ?????? ?????? ?????? ?? «?????????». ????????, ??????
?? ?????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ???
????????????? ?????? Elida Gibbs ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???
????????? 2 ??? ?? ??? ??????, ??? ?????? ??? ?????????? ?????? ??? ?????????? ?? ?? ?????????? ???
????????? ??? ?? ??? ?????? ?????????? ?????? ??? ?????? ??? ?????????? ?????????? ???
????????? ??? ?? ?????? «?????????» ??? ??????, ?????????? ??? ?? ??????
????????? ??? ?? ??????????????.

65.

?????? ??????? ???? ??, ??? ??????? ???? ?? ???? ?????? ?????????????? ???.
 ??????? ?? ????????, ??? ??????? ?? ???????????, ??? ?????? 26, ?????????? 3, ??? ?? ???.
 ???????, ??????????? ?? ??????????? ?? ??????????? ?? ??????????? ?? ?????????? ?? ??????? ?? ???.
 ??????? ?? ?? ???????, ??? ?? ??????? ?? ??????????? ?????????? (? ?? ??????? ???????).
 ???????, ??? ??????????????? ?? ?? ??????????? ??????? ?? ??????? ???????
 ??????????? a priori ??? ??????? ?? ??????? ??????? ?? ??.

66.

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

67.

?? ????? ???????????, ???? ??????????? ? Ibero Tours ???? ??? ??' ??????????? ????????, ??
?????????? ??????????? ???? ??? ?????? ?????? ???? ?? ?????? ???????????, ? ??????????
?????????? ???? ? ?????????? ???? ?????????? ?????????? ???? ?????????????? ?????????? ????
????? ??? ?????? ? ?????????????? ?????? Elida Gibbs.

68.

? ???????, ??? ??????? ???????????? ??????? ?????? ?? ?????? ? ???????? ???, ????
?????????? ??? ? ?????? ?????? ??? ?????????? ?????????? ??????????????
????????????? ???????????, ?? ?????? ??? ?????????????? ?????????? Elida Gibbs
????????? ??? ?????????? ?? ?????? ?????? ??? ?????? ?????????? ??? ??? ??? ???
????????? ??? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????????? ?????? ??????????
??? ?????????? ??? ? ?????? ?????? ??? ?????? ??? ? ?????? ?????? ?????? ?????? ???
????????? ??????? ?? ?????? ?????????? ?? ?????? 26, ?????????? 2, ??? ?????? ?????? ???.

? – ??? ??? ?????? ?????????????? ??????????

69.

?? ?? ?????? ??????????? ??????? ??? ?? ?????? ?????????? ?????? ?? ?????????????? ?,
?? ??????? ??? ?????? ?????????? ??? ?????? ??????, ??? ?????? ?????? ??? ??? ??????
????????? ??? ?????? ?????? ??? ?? ?????? 11, ?, ?????????? 1, ??? ?????? ??????
??? ?????? ?????? ?? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ???
????????? ?????????????? ?????????????? ??? ?? ?????? ??? ?????? ?????? ??? ?????? ???
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

70.

?? ?????? ????, ???????, ?? ?? ?????? ?????? ?????? ??? ?????? ?????? ??? ??????
????????? ??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ? ??????????????
????????? ?????? ??? ?????????? ??? ?? ?????? ?? ?????? ?????????? ??????????????
?????????????. ?? ??? ?? ??? ?????? ?? ?????????? ?????? ??? «? ??????????????
????????????? ??? ??????????, ?? ?????????? ??? ?????? ??? ?????? ??????????, ??? ??????????
????????????? ??????????, ?? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ???
????????????? ??? ?????????? ??? ?????? ?????? ?????? ?????????? ???, ?????? ??? ??????????
??? ?????? ??? ?? ?????? 11 ??? ?????? ?????? [???]» (18), ?????????? ?????? ???
????????????? ?????? Elida Gibbs.

71.

???? ?? ??? ??????, ? ?????? ?????? ?????????? ??? ? ?????????? ??? ?????????? ??????????
????? ?????????? ??? ?????????? ??? ?????? ?? ?????? ??? ?????????? ?????????? ????
????? ?????????? ?????????????? ???, ?????? ?????????????? ??? ?????????? ??????????
??? ??? ?????? ??? ?????? ??? ?????????? ?????? ??? ?????? ??? ?????????? ??????????
????? ?? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????????? ???
????????? ??? ??? ?????? ??? ?????????? (19).

72.

?? ?????????? ??????? ???, «???? ?????????? ???, ??? ?????? ?????????? ??????, ?
????????????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ?????? ??? ?????? ??????
??? ?? ?????? ?????????? ?? ???????, ?? ?????? ??? ?????? ??? ?????? ??????????
????????? ?' ??? ?? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ???
????????????????? ???, ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ??????, ?????? ???, ?? ?????????????? ??? ?????? ??? ??? ??? ???
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ???

73.

?? ?????????? ??????? ???, «????????? ??? ?????? ?????????? ??? ?????? ?????????? ???

? ??????? ? ?????? ??????????????? ??? ?? ?????? ??????????????? ??????, ?? ??????????????
????? ????????, ??????? ?????? ??? ??????????? ??? ??? ??????????? ??? ?? ?????? 11, ?,
?????????? 1, ??? ?????? ?????? [??], ?? ??????????? ??? ??????????????? ?? ??????? ???
??? ??????????? ?? ??????????????? ?????? ??? ??? ?? ??? ??????????????? ??? » (21).

74.

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

75.

? ?????, ?? ?????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ?????? ??? ?? ???
????? 11, ?, ?????????? 1, ??? ?????? ??????? ??? ?????? ?? ?????????? ?????????? ???
????????? ??? ?? ?????????? ?? ?????? ??? ?????? ?????????? ?????????? ??? ?????? ??????
????????? ?????????? ??? ?????? ?????????? ?????????, ??? ? ?????????? ?????? ???
????? ?????????? ?????????? ??? ??? ??? ???.

76.

? ???????, ? ??????????????? ??? ??? 65 ??? ?????????????? ?????????? ?????????? ???
????????? ?????? «????????? ??? ?????? ??? ?????????? ??? ?????? ?????????? ??? ?? ??? 11,
?, ?????????? 1, ??? ?????? ?????? [??]» ?????? ?????? ?? ?????????? ??? ??? ??? ??????
??, ??? ?? ?????? ?? ?????? ??? ?????? ?????????? ??? ?????? ?? ??????????
????????????? ??? ?????????? ??? ?????????? ??? ?????? ?????????, ??? ?????? ???
?? ??? ?????? ?????? ?????????? ?????????? ??? ?????? ???.

77.

???? ?? Ibero Tours, ?????? ? ?????????? ?????? ??? ?????? ?????????? ??? ?????????? ???
????????? ?????????? ??? ?????? ?? ?????????? ??? ?????? ?????????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ??? ??? ?????? ??? ?????????? ??? ??? ?????? ???
????? 11, ?, ?????????? 1, ??? ?????? ?????? ???, ??? ?????? ?????? ?? ?????????? ???
????? ?????? ??? ?????? ??? ?????? ???.

78.

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

79.

???? ?? ?????????? ???, ?? «????????????? ??? ?????????? ??? ?????? ??? ?? ?????? ???», ??? ??
????? ?????? ??? ?????? ??? ?????? 11, ?, ?????????? 1, ??? ?????? ?????? ??? ??? ??????
??? ?????? ?????????? ? ??? ?????? ?????? ??? ?????, ?????? ??? ?? ?????????? ??????????
??? ?????? ?????? ??? ?????, ??? ?????????? ??? ?????? ??? ?????? ?????????? ???
?? ?????????? ??? ?? ?????? ? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????????? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ?????? ?????????? ??? ??? ??? ??
????? ??? ?????????? ??? ?????? ??? ?? ?????? ??? ?????? ?????? ?????????? ??? ??? ??? ??

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

80.

???? ??? ????? ???? ?????? ?? ???????????, «?? ??? 11, ?, ?????????? 1, ?????? ??????, ??? ??????
???????? [??] ?????????? ??? ?????????? ??? ?????? ??? ?????? ?? ?????? ??? ?????? ???
????????? ?? ?????????? ??? ?????? ?????????? ??? ?????????? ?? ?????, ?? ??????
?????? ??? ????? ?????? ??? ??????. ????, ? ?????? ?????? ??? ?????????? ?? ?????? ????
????????? ?? ??? ????? ?????? ??? ????? ???, ???????, ?? ??? ????? ??? ??? ?????? ???
????????? ??? ????? ???, ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ???? ?????? ???
???? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ???? ?????? ???» (22).

81.

????????, ??? ?? ????? ??? ?????????? ??? ?????? ??? ?? ?????? ???, ?????? ??? ??????????
????????????? ??? ?????????? ??? ?????????? ??? ?????? ?????????? ?? ?????? ??? ?????? ??? ?? ???
????? (?????? ?? ?????? ??? ?????????? ?? ??????????), ?????????? ?? ?????????? ??? ?????? ????
??? ?????? ?????? ??? ?????? ??? ?????? ?????????? ?? ?????????? ??? ?????? ??? ?????? ???.
????????, ?????? ??? ?????????? ?????????? ?????????? ??? ?? «????????????? ???
????????????? ??? ?? ?????? ???» ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????????
????????? ??? ?????????? ??? ??? ?????? ??? ?????????? ??? ?????? ??? (23).

82.

????????, ? ??? 65 ??? ?????????????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ???
????????? ??? ?? ?????? ????. ???????, ??? ?????? ? ???????, ?? ??????????,
??????????, ??? ????? 64 ??? ??????? ???, «????? ?????????? ??? ?????? ???
????????? ???, ? ?????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ???
??? ?????? ??? ?????? ??? ?? ?????? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ???
????????? ?????? ?' ??? ?? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ???
????????????? ???, ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???
????????? ??? ?????? ??? ??????, ?????? ???, ?? ?????????????? ??? ?????? ??? ?????? ???
??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

83.

????????? ??? ????? 65 ??? ?? ?????? ??? ?????????? ?? ?????????? ??? ?????????? ???
????????? «?????????» ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ?????? ???, ???????, ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?? ?????????? ??? ?????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
??? ?????? ??? ?????????? ??? ?????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
?????, ??? ?????? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

84.

? ?????????? ??? ?????? ?????????? ??? ??? ?????? Becker (24), ??? ???? ????
??????, ??? ?????? ?? ????? 13 ??? ?????? ?????? ???, ?? ?????? «????????? ??? ?????? ???
??? ??????», ??? ?????? ???? B ?????????? «????? ?????? ???», ??? ???? «??? ???

????????????? ??? ??????? [?? ?????? ???] ??? ? ? ?????????????? ? ??? ? ??? ????
????????? ??? ?????????????? ?????????? ?????????» , ?????????? ? ??? «?????????????»,
????????? ?????????? «??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ???» (25)
??? ??? «[?]?? ?????? ??? ?????? ?? ?????????? ?? ??? ?????????? ??? ?????? ??
???? ? ?????????? ??? ?????????? ?????? ?????????? ??? ?????? ?? ??? ??? ??? ??????????
????? ??? ?????? ?????????? ?? ??? ??? ????? ?????? ??? ?????????? ??? ?????? ??????
?? ?????? ?? ?????????? ??? ?????????? ??? ??? ??? ????? ?????? ??? ?????? ??????» (26).

85.

????????????? ???' ??????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??????????
????? ?????????? ??? ? ?????? «????????????? ??? ?????????? ??? ???? ????» ???
?????? ?? ?????????? ??? ?????? ??? ?? ?????????? ?????????? ??? ?????? ???
????????????? ? ?????????? ?? ?????? ??? ?????? ?????????? ??? ?????? ??? ??????
????????? ??? ????? «[?] ?????? ?????? ?????????, ??????????, ??????, ?????? ? ?????? ??
????????? ? ?????? ??? ?????, ?????????? ??? ?????? ??? ?????????? ?????? ??? ??????» (27),
, ? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

86.

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

87.

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

VI – ??????

88.

?????? ??? ???????????, ??????? ??? ?????????? ?? ?????????? ??? ???????????
????????? ??? ?????? ?? Bundesfinanzhof ?? ???:

1)

? ? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ? ? ?????????? ?????????? ???
????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????????? ??? ?????????? ???
??????, ??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????????? ??? 24?? ??????????
1996, C-317/94, Elida Gibbs (?????? 1996, ?. I-5339) ?????? ?????? ?? ??????????
????????? (?? ???????, ?????????? ??????) ??? ??????, ?? ??? ??? ??????????
?????? ??? ??? ?????? ??? ?????? ?? ??? ?????? ?????? (?? ???????, ??? ??????)
?????? ??? ?????? ??? ?????? ?????????? ? ?? ??? ?????? ?????? (?? ???????, ??? ??????)
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2)

???? ??????????? ???? ? ?????? ?????? ??? ?????????????? ?????????????? ??????????????
????????????? ???????????, ?? ?????? ??? ?????????? ??? ?????????????? ??? 24?? ??????????
1996, C-317/94, Elida Gibbs (?????? 1996, ?. ?-5339) ?????????? ??? ?????????????? ?? ??????
?????? ??? ?????? ?????????? ??? ??? ??? ?????????? ??? ??? ?????? ??? ?????? ??? ??????
??? ?????????? ?????????? ??? ??????????????, ??? ?????????????? ??? ?? ?????? ??? ??????
??? ? ?????? ?????? ?????????? ??? ?????????? ??? ?????????? ?????? ??? ?????? ??????????
????? 26, ?????????? 2, ??? ?????? ?????? 77/388/??? ??? ???????????, ??? 17?? ???
1977, ??? ?????????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
?????? ?????????? – ??? ?????? ?????? ??? ?????????????? ????: ?????????? ??????????
????.

3)

??. ?????????? ?????????????? ??? ?????? ???????, ? ?????? ?? ?????? ??? ?????? ??????????
?????? ?? ?????? ?? ?????? ?????????? ??? ?????? ?????????????? ?????? ??? ??? ??????
????????? ?????????????? ?? ?????? ?????????? ?????? ?????????????? ??????????????
????? ?????? ?????????? ?????? ?????????? ??? ?????????? ??? ?????? ?????? 77/388.

(1) ?????? ??? ??????????: ? ??????.

(2) ?????? ??? 24?? ?????????? 1996, C-317/94 (?????? 1996, ?. I-5339).

(3) ? ??? ?????? ?????????????? ?????? ??? ?????? ??? ?????? ?????? 2002-2004,
????? ?? ?????????? ?? ??? ??? ?????? ?????????? ?????????????? ??? ??????????????. ??? ??????????
????? ?????????? ?????????? ?????????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??????????
?????? ??? 1?? ?????????? 2001 ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ??????
????? ? ??? ?????? ??????.

(4) ? ?????????????? ??? ?????? ?????? ?????????????? ?????????????? ?????????????? ??????????.

(5) ?. ?????? ??? 19?? ?????? 2003, C-149/01, First Choice Holidays (?????? 2003, ?. I-6289).

(6) ?. ?????????????? ?????? Elida Gibbs (?????? 34 ??? 35).

(7) ??. (????? 31).

(8) ??. (????? 24). ?, ?????, ?????? ??? 15?? ?????????? 2002, C-427/98, ??????????
????? ?????????? (?????? 2002, ?. I-8315, ??? 45).

(9) ?????????????? ?????? Elida Gibbs (????? 24).

(10) ?????????????? ?????? ?????????? ??? ?????? (????? 45).

(11) ??? ?????????????? ??? ?? ?????????? ?????????????? ??? ?????????? ?????????????? ???
?????? ??? ?????? ?????? ?????? ?? ??? ??? ?????? ???????????, ?? ??? ?????? ?????????? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????, ??? ??? ?????? ??? ?????????? ???
????????, ??? ??? ??? ?????? ??? ?????? ?????????? ?????????? ??? ?????????????? ??? ??????????????
?????, ?????????? ?? ?????? ?????? ?????? ??? ?????????? ?????????????? ?????????????? ??? ??????????
????????????? ??? (?. ?????????????? ?????? First Choice Holidays, ??? 24).

(12) ?. ?????????????? ?????? First Choice Holidays (????? 25).

- (13) ???. (?????? 26 ??? 27).
- (14) ?. ?????? 26 ??? ???????? ??? ?????? ?????????? ?. Tizzano ????
????????????? ?????? First Choice Holidays.
- (15) ?????????????? ?????? Elida Gibbs (????? 33).
- (16) ?. ?????? ??? 3?? ?????? 1997, C-330/95, Goldsmiths (?????? 1997, ?. I-3801,
????? 15).
- (17) ?. ?????????? ?????? Elida Gibbs (????? 28).
- (18) ?. ?????????????? ?????? ?????????? ??? ?????????? (????? 79).
- (19) ???. (????? 62).
- (20) ???. (????? 64).
- (21) ???. (????? 65).
- (22) ?????????????? ?????? Goldsmiths (????? 16). ? ?????????? ????
- (23) ??., ??' ????, ?????? 84 ??? 85 ??? ???????? ??? ?????? ?????????? F. G. Jacobs
???? ?????????? ?????? ?????? ??? ??????.
- (24) ?????? ??? 19?? ?????????? 1982, 8/81 (?????? 1982, ?. 53).
- (25) ???. (????? 32).
- (26) ???. (????? 33).
- (27) ??? 11, ?, ?????????? 1, ??? ?????? ?????? ???.