

@import url(../../../../css/generic.css); EUR-Lex - 61991J0112 - EL

Avis juridique important

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61991J0112

?????? ??? ??????????? ??? 26?? ?????????? 1993. - HANS WERNER ??? FINANZAMT
AACHEN-INNENSTADT. - ?????? ??? ??? ?????? ?????????????? ??????????
FINANZGERICHT KOELN - ??????. - ????? - ???????? ??? ??????????????. - ?????? C-
112/91.

?????? ??? ?????????? ??? ?????????? 1993 ?????? I-00429
??????? ?????? ?????? ?????? I-00007
????????? ?????? ?????? ?????? I-00007

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* ?????????? ??? ?????? ?????????? * ??????? ?????? ?????? ????? ?? ?????????????? ??? ???
?????? ?????? ??? ??????? ?????? ??? ?????? ?????? ?????????????? * ??? ??????? *
????????? ?? ??? ?????? ?????? * ??? ??? ??????

(?????? ???, ???? 52)

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????????? ??????? ?????????? ?????????????? ????? ?? ??????? ?????? ? ?????????? ???
?????? ??? ??????? ??? ?????????? ?????? ?????????????? ???, ????, ? ?????????? ??? ???
??? ?????????? ??? ?????????? ???, ?????????? ?? ?????????? ?? ?????? 52 ??? ??????
??? ??? ?????? ??? ??? ?????????? ??? ?????? ????? ?? ?????????? ?????? ??? ??????????
??, ?? ??????, ??? ?????????? ?????? ?????????????? ?????????? ??? ?????????????? ?????? ??? ??
???? ??????, ?????? ?????????????? ?????????????? ??? ?????? ???, ??? ??????????????
?? ?????? ? ?????? ?? ?????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ?? ?????? ??? ??
????? ??? ?????? ?????????????? ?????? ?????????? ???, ??? ?????? ??? ?????????? ??? ?????? ??? ??
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???? ??????? C-112/91,

??? ??? ?? ?????????? ??? Finanzgericht Koeln (????????????? ?????????? ??? ??????????) ??? ?? ??????????, ???' ?????????? ??? ?????? 177 ??? ????????? ???, ?? ??? ?????? ??????, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ???

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Hans Werner

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Finanzamt Aachen-Innenstadt,

? ?????? ?????????? ??? ?????? ?? ??? ?????? ??? ?????? ??? ?????? 7 ??? 52 ???
????????? ???,

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

????????? ??? ??? O. Due, ???????, ?. N. ???????, G. C. Rodriguez Iglesias, M. Zuleeg, J. L. Murray, ???????, G. F. Mancini, R. Joliet, F. A. Schockweiler, J. C. Moitinho de Almeida, F. Grevisse, M. Diez de Velasco, P. J. G. Kapteyn ??? D. A. O. Edward, ????????,

????????? ??????????: M. Darmon

?????????: H. A. Ruehl, ?????? ?????????? ????????????,

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

* ? Hans Werner, ?????????????? ??? ??? ?????????? ?????????? Wolfgang Kaefer,

* ?? Finanzamt Aachen-Innenstadt, ?????????????? ??? ??? Hermann Kersten,
Regierungsdirektor,

* ? ??????? ????????, ?????????????? ??? ??? R. Verhoeven, ?????? ?????????? ???
????????? ????????????,

* ? ??????? ????????, ?????????????? ??? ??? Ernst Roeder, Ministerialrat ???
????????????? ?????????? ????????????, ??? ??? Joachim Karl, Regierungsdirektor ??? ???
???????????,

* ? ??????? ????????, ?????????????? ??? ??? Edwige Belliard, directeur-adjoint ???????
????????? ??? ??????? ?????????? ????????????, ??? ??? Geraud De Bergues, secretaire
adjoint principal ??? ??? ????????,

* ? ??????? ????????, ?????????????? ??? ??? Luigi Ferrari Bravo, ?????????? ???
Servizio del contenzioso diplomatico ??? ??????? ?????????? ????????????, ??????????????
??? ??? Pier Giorgio Ferri, avvocato dello Stato,

* ? ??????????? ????????, ?????????????? ??? ?? Luis Inez Fernandes, ?????????? ???
Servico de Assuntos Juridicos da Direccao Geral das Comunidades Europeias, ??? Antonio
Goucha Soares, ??? ?? Servico de Assuntos Juridicos da Direccao Geral das Comunidades
Europeias, ??? ?? Maria Margarita Mesquita Palha, ?????? ??? Centro de Estudos fiscais ???
?????????? ????????????

* ? ?????????? ??? ??????? ??????????, ?????????????? ??? ?? Christopher Vajda, barrister,
??? John Collins, ??? Treasury Solicitor's Department,

* ? ?????????? ??? ?????????? ??????????, ?????????????? ??? ?? Henri Etienne, ???
????? ????????,

????? ?????? ??? ?????????? ?????????? ??? Werner, ?????????????? ??? ?? Kaefer
??? ?? ??????? ??? Sass, ??? Finanzamt Aachen-Innenstadt, ??? ??????????
??????????, ??? ??????? ???????????, ??? ??????? ???????????, ??? ???????????, ??? ???????????
??????????, ??? ??????????? ??? ??????? ??????????? ??? ??? ???????????, ??? ??
?????????? ??? 19?? ??? 1992,

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??? 6?? ??????? 1992,

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1 ?? ??????? ??? 10?? ?????????? 1991, ? ?????? ??????? ??? ?????????? ??? ?? 15
?????? 1991, ?? Finanzgericht Koeln ???????, ???' ??????? ??? ?????? 177 ?? ???????
??, ??? ??????? ?? ??? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??
?????? ??????????? ??? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??
?????????? ?? ??????? ??? ??????? ??????????? ??? ?? ??????? ??? ??????? ??? ??????? ??
?????????? ??????? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??? ??????? ??? ???????
??????????, ?? ?????? ?????????????? ?????????? ??? ??????? ??? ??????? ???????????, ? ?? ??????? ??
??????????, ?? ?????? ?????????????? ?????????? ??? ??????? ??? ?????????????? ??? ???????
?? ?? ?? ??????? ?? ??? ?????? ??? ??????? ???.

2 ?? ?????????? ??? ??????? ??? ??????? ??? ??????? ??????? ??? ?? Werner ??? ?? Finanzamt
Aachen-Innenstadt (????????? ??? Aachen) ??????? ?? ??? ????? ??????????????
?? ???????????, ?????? ??, ??? Einkommensteuergesetz (????? ??? ????? ???????????
??????????), ??????? ??, ??? Vermoegensteuergesetz (????? ??? ????? ???????????
??????????).

3 ??????? ??? ?????? 1, ?????????? 1, ??????? 1, ??? Einkommensteuergesetz, ?? ??????
?????? ??? ?????? ??? ??????? ??? ?????? ??? ?????????????? ?????????? ??? ??????????? ?
????????? ??? ?????? ??? ?????? ??? ?????????????? ?? ??? ??? ?????? ??? ?????????? ??? ??????????? ?
???. ???????, ??? ??? ??????? 4 ??? ?????? ??????, ?? ?????? ?????? ??? ??? ??????????? ??
??? ??????? ??? ??? ??????? ??? ??????? ?????? ??? ?????? ??? ?????????????? ??
???? ??? ?? ??? ?? ??? ?????? ??? ?????????? ??? ?????? ??? ?????????????? ??? ???????????.
???? ?? ??? 49, ?????????? 1, ?????? 3, ??? ?? ?????????? ?????????? ??????????? ??? ??????????
????? ??? ?????? ??? ??????? ??? ??????? ?? ??????? ?????????????? ??? ??????????? ?
????????? ??? ??????? ??? ??????? ??? ??????? ?????????????? ??????????? ??? ???????????

? ???????????, ?? ??? ? ? ?????? ????, ?????????????? ??????? ??? ?????????? splitting tarif.
??????, ??????????? ???? ?????????????? ?????? ?????????????? ?? ?????????? ??? ?? ??????????
?????????? ???? ?????????? ???????, ??? ?????? ??? ?????????? ??? ?? ??????? ??????????
??????, ?????????? ??? ???????, ??? ?????????? ?? ??? ?????? ?????? ?????????? ??????????
?????? ? ?? ??? ?????? ?????????? ???????, ??? ?????????? ?????? ??? ?????????? ???????,
?????????????? ?? ??? ?????? ??? ?????????? ???????, ??? ?????? ??? ?????????? ???????,
????? ??? ?????????? ??????? ?????????? ?????????? ?????????? ??????. ?? ?????????? ??? ??
????????? ?? ??? ?????? ??????? ?????????? ?????????? ?????????? ??????. ??????, ??? ???
????????? ??????? ?????????? ?????????? ?????????? ?????????? ???????.

4 A?????? ?????????? ?????????? ??? ? Vermoegensteuergesetz. ???????, ?? ??? ??? ??? ??
?????????? ??? ????? ?????????? ?????? ?????????? ?????? ?????? ?????? ???????????, ???
???? ?? ??????? ?????????????? ??? ?????? ??? ?????? ?? ??? ?????? ?????????????? ??? ??
???? ?? ??? ?????? ??????????. ?? ?????????????? ??? ?????? ??? ?????????? ?? ??? ?????? ??????
????????? ??????? ?????????? ???????.

5 ? Werner, ?????????? ???????????, ?????????? ?? ?? ?????? ??? ?????? ??? ?????? ??? ??
1961. '???? ??????? ??? ?? ??????????? ??? ?????? ?????????? ??? ???????????, ??? ??
????????? ??? ?? ??????????? ??????? ??? ?????????? ??? ??????????? ??? ?????? ??? ??????????
????????? ??? ?? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ???
1981 ??????? ?? ??????? ?????????? ?? ?????????? ??? ?????????? ??? Aachen (???????????)
????????? ??? ?????????). ?????? ?????????? ?? ?????????? ??? ?????????? ?????????? ???
???? ?? Aachen. ?? ?????????? ??? ?????????? ?????????? ??? ?????????? ??? ?? ?????????? ???
????.

6 ??? ?? ?????????? ??? ?????? ??? ?????? 1982, ?? Finanzamt Aachen-Innenstadt ?????? ??
? Werner ?????? ?? ??????? ?? ?????? ?????? ?????? ?????????? ?????? ???????????
?? ??????????, ?????? ?? ?????? ?????? ?????? ?????????? ???????.

7 ? Werner, ? ?????? ?????????? ?? ?????? ??? ?????????? ?????? ?????????? ?????? "splitting
tarif", ?? ??? ? ?? ?????? ?????? ??????????? ??? ?????? ?????????? ??? ???????????, ?? ??? ??
??????????, ?????? ?? Finanzamt Aachen-Innenstadt ?????????? ?????????? ??????????
?? ??? ?? ?????? ?????? ?????? ??????. ?????? ?????? ??? ?????????? ??? ?????????? ??? ? ??????????
????????? ?????????? ?????????? ??? ?????? 52 ??? ??????. ?? Finanzamt ???????
?? ?????????? ?????? ?????? ?????? ?????? ?????? Werner ??????? ?????? ???
Finanzgericht Koeln.

8 ?? ?????????? ??? ?????? ??????? ?? ?????? ??? ?????? ?????? ?????? ?????????? ?????????? ???????
?? ??? ??????? ?? ?????? 7 ??? 52 ??? ??????. ?? ?????????? ??? ?????? ?? ??????:

"1) ?????????? ?? ?????? 52 ??? ?????? ??? ?????? ?????? ??? ?????????? ??? ?????????? ??? ???????
???? ?????????? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????????? ?????????? ??? ???????
?? ??? ? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ??????????;
?????????????;

2) ??? ?????????? ??? ?????? ??? ?????? ?? ?????? 52 ??? ?????? ??? ?????????? ??? ?????????? ???
????????? ??? ?????????? ?????????? ??? ?????????? ??? ?????????? ?????????? ??? ??????? ?? ??????
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? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ??????????
(????????? ??? ??? ???) ???

????????????? ?? ??? ?????? ?????? (????????????? ?????????? ??? ??????)
????????????? ? ?????? ?????????? (???? ?????? ?????????? ??? 90 %) ??
????????? ?? ??? ?????? ?????????? ??? ?????? ?????????? ?????????? ?????????? ?? ???

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

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

???? ????????, ??????? ?? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ? ?????????????? ??????
?? ??????? ?????????? ??? ?? ??? ?????????????? ??? ?????????? ?????? ?? ???????;

3) ?????????? ? ?????????? ?? ?? ?????? 7 ??? ?????? ??? ?????????? ??? ?????????? ??? ??????
????????? ???, ?????? ??? ?????????? ??? ?????????? ?????????? ?????? ?????????????? ?????
????????? ?????? ??????, ?????? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????? 2 ?????????? ?????????? ?????????? ??? ?????????? ?? ?????????? ?????????? ?????? ??
????????? ?? ?????????? ?????? ?????? ??? ?????? ?????????? ?????????? ?????????? ???
????????? ?????????? ?????????? ?????? ??? ?????? ?????????? ?????????? ?????????? ??? ??????";

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

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10 '????? ?????????? ?? ?? ??????????, ?? ?? ?????? ??? ?????? ?????? ?????? ??? ??
Finanzgericht Koeln ?????? ??? ?????? ?? ?????? ?? ?? ?????? 52 ??? ?????????? ?????????? ??
????? ??? ?????? ?? ?????????? ??? ?????? ?????? ???, ?? ?????? ?????? ??? ?????????? ??
????????????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????????????? ?? ?????? ??
????? ??? ?????????? ??? ?????? ??? ?????? ?? ?????? ? ?????? ?? ?????? ??? ?????????? ??
????? ??????, ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ???
????????? ??? ?????? ???.

11 ?? ?????? ?????????? ?????????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????????? ?????????? ?? ?? ??? ?? ?????? ?????? ?????????? ??? ?? ?????? 52 ? ??????????
????????? ?????????? ?? ?? ?????? ?????? ??? ?? ?????? ?????? ??? ?????????? ??? ?????????? ?
Einkommensteuergesetz ??? ? Vermoegensteuergesetz. ??????????, ???????, ??? ??????
??? 7? ?????????? 1979, 115/78, Knoors (?????? ???? 1979/?, ?, 169), ??? ?? ??? ??
????????? ??? ?? ?????? ??? ? Werner ?????????? ?? ??? ?????? ?????????? ???
????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? 8? ?????? 1990, C-175/88, Biehl (?????? 1990, ?, ?-1779), ?????? ??? ? ?????? ???
????????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????????? ??? ?????? 52.
????, ?????????? ??? ?????? ?? ??? ?????? ??? 28? ?????????? 1986, 270/83,
????????? ??? ?????? (?????? 1986, ?, 273), ?????????? ?????????? ??? ?????? ??? ?? ??
????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ??
????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ??
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ??? ?????????? ??? ?????? ???
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ??? ?????? ??? ?????? ???
????? 16? ?????? 1959, ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? (G?I. 1960, ?, 1781).

12 E?????????, ???????, ?? ?????????? ?? ?????????? ?????? ?????? ???
????????? ?????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?? ??
????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

13 ??????, ??????????? ?? ??????? ??? ???????? ???? ??? Knoors, ?????? ??????, ?
????? ?????????? ?? ??????????? ??? ?????? ?????? ?????????????? ??????????????
????? ??? ??? ?????? ??????? ?? ??? ?????? ?????? ?????, ?????????????? ??? ??????, ? Werner
????? ??????? ?????? ?????????????? ??? ?????? ?????????? ??? ?????? ??????????????
????? ??? ?????? ??? ??????? ??? ?????? ??? ?????.

14 ??????, ? ??????? ?? ?????? ??? ?????? ?????? ?????? ?????????? ??? ?? ??????????
?? ?????? ?? ?????????? ??? ?????????????? ?????? Biehl. ??????, ? iehl ???
????? ??????, ?????????? ?? ?????????? ?????? ?????? ??? ?????????? ??? ?????? ??? ??????
? ?????? ?????????? ?????????? ??? ?????? ?????? ?? ?? ?????? ??? ?????? ??? ?????? ??????
?? ?????? ??? ?????? ?????? ??? ?????????? ?????? ?????????? ?? ?????????? ??? ?????????? ???
????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????????? ?????? ?????? ?????? ???, ???
Werner ?????? ??????, ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
?? ??????.

15 ?????, ?? ?????????? ??????????, ?????? ?? ?????? ?????? ? ??????????????
????? ?????? ??? ??????, ?????? ?????? ?????????? ??????, ?????? ???
????? ?????? ??? ?????? ?????? ?? ?????? ??? ?????? ?????????? ?????????? ??????
????? ?? ?? ?? ?????? ??? ?????? ?????? ?????? ??? ?????? ?? ?? ?????? ?????? ???, ??
????? ??? ?? ?? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ??????????????
????? ??? ?? ?? ?????? ?????? ?????? ?????? ?????? ?????? 58 ??
????? ?? ?????? ??? ?????? ?????? ?????? ?????? ?? ?? ?????? ?????? ??? ?????? ?????? ??????
?? ?? ?????? ??? ?????? ?????? ?????? ???, ??? ?????? ??? ?????? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ??????
?? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???, ??? ?? ?????? ?????? ??? ??????
????? ??? ?????? ??? ?????? ??? ?????? ???, ??? ?????? ?????? ??? ?????? ??? ??????
????? ??? ??? (????? 18), ? ??? ??? ?????? ?????? ?????? ?????? ?????? ??? ???
????? ?????? ?????? ??? ?????? ??? ?? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???
????? ?????? Werner ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??????
?? ??????.

16 ?????????? ?? ?????? ??? ? Werner ?????? ?????? ??????, ? ?????? ?????? ???
????? ?? ?????????? ??? ?? ?????????? ??? ?????? ??????, ?????? ?????? ???
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ??????
????????? ??????. ?? ??? ?????? ??? ?????? ??? ?????? ??? ?? ?????? ?????? ?????? ??????
????? ?? ?????? ??? ? Werner ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ??????
????? ?????? ??? ?????? ?????? ??? ?????? ??????.

17 ??????, ?????????? ?? ???? ?? ?????? ??? ?????? ??? ?????? ?????????? ??? ?? ??? 52 ??
????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???
?? ?????? ?????????? ??? ?????? ???, ??? ?????? ?????? ??? ?????? ??? ??????
? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?? ?????? ??? ??????
????????? ??? ?????? ???, ??? ?? ?????? ??? ?????? ??? ?????? ??? ?? ??? ?????? ??? ??????
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

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18 ?? ??? ?????? ??? Finanzgericht Koeln ?????? ??? ?? ?? ?????? 7 ??? ??????
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

19 ??? ?????? 7 ????????, ???????????, ??? ?????? ??? ?????? ?????????? ?????????? ??? ?????? ???
?? ??? ?????????? ??? ?????? ?????????? ??? ?????????? ?????? ?????????? ??? ?????? ??? ?????? ???
?????????.

20 '????? ????. ??????????????? ?? ??????????? ???? ??????? ??? ?? 9?? ??????? 1977, 90/76,
Van Ameyde (?????? ?? 1977, ?. 333 ?? 27), ?????? ?? ????? 52 ??? ??????
??????????, ??? ????? ?? ??????????? ???????????, ??? ??????? ??? ????? ??
?????????? ?? ????? 7 ??? ?? ????? ???????, ????????? ??, ??? ??????????????
?????????? ?????? ?????? ????? ?? ????? 52, ??? ????? ?????? ?????? ??? ?? ??
????? 7.

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21 ?? ?????? ???. ?????? ??????????? ?? ??????????? ???. ????????, ??? ??????????, ???
???????, ??? ????????, ??? ??????????? ???. ??? ???. ????????, ????????, ??? ? ????????
??? ??????????? ???????????, ?? ?????? ????????, ??????????????? ???. ??? ???????????, ???
???????????. ?????????? ???. ? ??????????? ???. ???. ???. ???. ??????????? ???. ??? ?????? ????.
??? ?????????? ??????????????? ???. ??? ?????? ??????? ???. ?????????? ???????????????, ?' ????.
???????????. ???. ?????????? ???. ??? ???. ??????????? ???.

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

?????????? ??? ??? ?????????? ??? ??? ??????? ?? *Finanzgericht Koeln*, ?? ??????? ??? 10??
?????????? 1991. ??????????? ???: