

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

??? 18?? ??????? 2015 (*)

«????????????? ?????????? — ?????????? ?????????? ??? ?????????? — ??????????
????????? — ????? ?????????? — ?????????? ?????????? ??? ?????? ?????? ?????? ??????
— ?????????? ?????? ?????? — ?????????? ??? ?????? ?????? ?????? ?????????? —
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???? ??????? C?9/14,

??. ?????????? ?????? ?????????????? ?????????? ??? ?????? 267 ????, ???
?????? ?? Hoge Raad der Nederlanden (????? ?????) ?? ??????? ??? 13?? ?????????? 2013,
? ??? ?????? ??? 13 ?????????? 2014, ??? ??????? ??? ????

Staatssecretaris van Financiën

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D. G. Kieback,

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

????????? ??? ??? R. Silva de Lapuerta, ??????? ???????, J.?C. Bonichot (?????????), A.
Arabadjieva, J. L. da Cruz Vilaça ??? ?. ???????, ???????,

?????? ??????????: E. Sharpston

?????????: A. Calot Escobar

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

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

- ? D. G. Kieback, ?????????????? ??? ??? S. Douma, G. Boulogne ??? N. Schipper,
belastingadviseurs,
- ? ?????????? ????????, ?????????????? ??? ??? M. Bulterman ??? B. Koopman,
- ? ?????????? ????????, ?????????????? ??? ??? T. Henze ??? K. Petersen,
- ? ?????????? ????????, ?????????????? ??? ??? L. Inez Fernandes, M. Rebelo ???
J. Martins da Silva,
- ? ?????????? ????????, ?????????????? ??? ??? A. Falk, C. Meyer?Seitz, U. Persson,
??? L. Swedenborg, E. Karlsson ??? ??? K. Sparrman,
- ? ?????????? ????????, ?????????????? ??? ??? A. Cordewener ??? W. Roels,
???? ?????? ?? ?????? ?????????? ??? ??????? ??? ?????????? ??? ??? ?? ??????????
?? 5?? ?????? 2015,

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1 ? ??????? ?????????????? ?????????? ?????? ??? ???????? ??? ?????? 39 ?? (?? ?????
45 ????).

2 ? ??????? ??? ?????????? ??? ??????? ?????????? ?????????? ?????????? ??? Staatssecretaris
van Financiën (????????? ??????????) ??? ??? D. G. Kieback ??? ????? ??? ?????? ???
????????????? ??? ????? ??? ?????? ??? ?????????? ??? ?? ?????????? ??? ?????? ???
????????????? ??? ?? ?????????? ??? ?????????? ??? ?? ?????????? ??? ?????? ???, ????, ????
??? 1? ?????????? ??? ??? 31 ??????? 2005, ??? ?????? ??? ??? ?????????? ??? ???
????????? ??? ??? ?????????? ?????????????? ??? ?????????? ??? ?????? ??? ??? ?????? ???
??? ?????? ?????????? ??? ??????????.

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

3 ??? ??? ???? 2.3 ??? ????? ??? ?????????? ?????????????? ??? 2001 (Wet
Inkomstenbelasting 2001, ??? ????: ????? ??? 2001) ??????:

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

a) ?? ?????????? ?????????? ??? ??????? ? ???????????????,

b) ?? ?????????? ?????????? ??? ??????? ? ?????????? ??? ?????????? ?? ???????, ???

c) ?? ?????????? ?????????? ??? ??????? ???? ?????????? ??? ??????????..»

4 ?? ????? 2.4 ??? ????? ??? 2001 ??????????:

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

a) ??? ??? ?????????? ???????????????: ?? ?????????? ??? ?????????? ??? ?????????? ??? 3,

b) ??? ??? ?????????? ???????????????: ?? ?????????? ??? ?????????? ??? ?????????? ???
7.2 [...].».

5 ??? ?? ????? 2.5 ??? ????? ??? 2001:

«1. ?? ?????? ?????????????? ?? ?????? ??? ?????? ??? ?????????? ??? ?????????? ???' ??? ??
????????????? ??? ?? ?????????? ?????????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????? ??? ?????????? ??? ?? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????? ?? ?????????? ??? ?? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
??? ?? ??? ?????? ??? ?? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????? ???
????????? ?? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? ???
????????? ?????????? [...]».

[...]».

6 ?????? ??? ?????? 3.120, ?????????? 1, ??? ????? ??? 2001, ? ?????????? ??? ?????
????? ?????????? ?????????? ??? «????????? ??????????» ??? ?????????????? ??????????

????????????? ??? ???? ?????.

7 ??? ?? ??? 7.1, ??????? a, ??? ??? ?? 2001, ? ??? ?????????????? ???
????????????? ?????????? ??? ??????? ? ??? ?????????????? ??? ?????? ???, ?? ???
????????????? ??? ?????? ??? ?????????? ?????? ???.

8 ??????? ??? ?????? 7.2, ?????????? 2, ??????? b ??? f, ??? ??? ?? 2001, ???
????????? ??? ?????????? ??? ??????? ? ??? ?????????? ?????????????? ??? ??
????????? ??? ??????? ??? ??????? ??? ?????? ???, ??????????, ?? ??????????
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? ??????? ??? ?????? ??? ?? ?????????? ?????? ??????

9 ? D. G. Kieback ??? ?????? ?????? ??????. ??? ?? ??????? ??? 1?? ??????????
????? 31 ?????? 2005, ?????????? ??? ?????? ?????? ?????????? ??? ?? ?????? ???
????????????? ??? ?????????? ?????? ?????? ?????? ?????? ?????, ?????????? ??? ??? ?????,
???? ?????????? ??? ?????? ?? ?????????? ??????.

10 ?? ? D. G. Kieback ?????????? ??? ?????? ???' ??? ?? ??????? ??? 2005, ??
????????, ?????? ?????? ?????????, ?? ?????? ??? ?? ?????????? ??? ??????
????????????? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ?? ?????? ?? ???
????????? ??? «????????? ?????????» ??? ?????????? ??? ??? ?????????????? ??? ??????
??? ?????? ??? ??? ?????? ??? ?????? ???, ??? ??? ?????????? ??? ?? ??????
????? ??? ?????????? ??? ??? ??? ??? ?????? ??? ?????????? ??? ?????? ???.

11 ?????????? ??? ? ?????????? ??? ?????? ??? ?????? ?????????? ??? ? D. G. Kieback
????????? ?? ?????????? ??? ?????? ??? ?????????? ??? ?? 2005 ??? ?, ??
????????? ?? ?? ?????????? ??? ?????? ??? ?????? ??? ?? ?????? ??? ?????? ?? ??????
????? ?? ?????? ?? ??? ?????? ?? «????????? ?????????».

12 ??? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????? ?????????? ???, ? D. G.
Kieback ?????????? ??? Rechtbank te Breda (????????????? Breda), ?? ?????? ??????
??? ?????? ???, ?? Gerechtshof te ?s-Hertogenbosch (????????? ??? Hertogenbosch) ??????????
??? ??????, ??? 23 ?????? 2012, ??? ?????????? ??????.

13 ? Staatssecretaris van Financiën ?????? ??????? ?????? ??? ?????????? ??????????
????????????? ???, ??? ?? ??????? ??? ?????????? ??? ?????????? ??? ?????? ??????
????????? ?????? ?????????? ??? ?????????? ??? ?????? ??? ?????? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?? 90 % ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ??????
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????????? ?? ?????? ??? ?????? ???.

14 ?? ?????? ?????????? ?????????? ???, ?? ?????????? ??? ?? ??? ?? ?????? ???,
????????? ?? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ?????? ??? ??????
????????? ?? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???,
????????? ??? ?? ?????? ??? ?????? 94/79/? 21? ?????? 1993,
????? ?? ?? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

????????? ??? ?????? ??? ?????????? ??? ?? ??? ?????? ?????? ?????? (?? 1994, L 39, ?. 22), ? ??????,
??? ?????? ??? 2, ?????????? 2, ?????????? ??? ?????? ??? ?????????????? ??????????????
????? ??? ?????? ?????????????? ??????.

«1) ??????? ?? ?????? 39 ?? ?? ??????????? ?? ?? ?? ?????? ?? ?? ??????? ?? ?? ??????? ?? ??, ?????? ??
?????? ?? ?? ??????????????? ?? ?? ?????? ?? ??????? ???????????????, ?????? ?? ?? ??????? ?? ??
?????? ?? ??????????? ?? ?? ?????? ?? ?????? ?? ?? ??????????? ?? ?? ??????????? ??????????? ?? ??
?????????????? ?? ??????? ?? ?? ??????????? ?? ?? ??????? ?? ?? ??????? ?? ?? ???????????????
?????????? ?? ?? ?? ?? ??????????? ?? ?? ??????? ?? ?? ??????? ?? ?? ?? ?? ?? ?? ??????? ?? ??
?? ?? ??????????? ?? ?? ?????? ?? ??, ?? ?? ?? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ??
????????? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ??
?? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ??
?????????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ??????? ?? ?? ???????

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17 ???????????, ???????????, ??????, ?? ??????????? ???? ?? ?????? ??????????
 ?????????? ?? ?????????? ????? ?? ?????? ?????? ?????????? ?????? ?????? ??? ??????????????
 ???, ??????? ?? ??? ?????? ?????????, ????? ? D. G. Kieback, ??? ??????????????
 ??????? ??????? ?????????? ? ?????????? ?????????????? ??? ?????????? ??????????
 ??? ??? ?????????? ?????? ? ?????? ?????????? ?????? ??? ?????, ????? ??? ?? ??? ??????
 ??? ??? ??????, ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ?????????? ? ??????
 ?????????? ?? ?????????? ??? ?????? ?????.

18 ????????????????? ????????, ?? ??????????, ??? ? ??????????, ?????? ???
 ??????? ?????? ???????, ??? ?????????????? ??????? ?????????? ?????? ??????????
 ?? ?????? ?? ??? ?????????????????? ?????????? ???????.

19 ???. ????????????????, ????????, ??? ? ????????????????, ??? «????????? ???????????»
 ??? ????????, ??? ????????????, ??? ???????, ??? ???????, ??? ???????, ??? ????????

???????????????? ???????, ??? ?????????? ? ?????? ?????????????? ?????? ?????? 29 ???
????????? ???, ?????????? ?????????????? ?????? ?? ??? ?????????? ?????????? ???
????????????????? ? ?????? ?????????? ?????? ??? ??? ?????????? ??? ?????????? ??????????????
????????? ??? (??., ??? ??? ?????? ???, ?????????? Lakebrink ??? Peters-Lakebrink,
C?182/06, EU:C:2007:452, ????? 34, ????? ??? Renneberg, C?527/06, EU:C:2008:566,
?????? 65 ??? 67).

20 ??? ??????? ???, ?????? ?? ??????????, ??? ?????? ?? ?????????????? ??????????????
????????????? ??? ?????????? ?? ?????????????? ?????? ?????? ??? ?????? ??????????
????????? ???, ???, ??? ?? ????? 39, ?????????? 2, ??, ? ?????????? ?????????? ???
????????????? ?????????????? ??? ?????????? ?????? ?????????????? ??? ?????????????? ?????? ???
????????????? ??? ?????? ?????, ??? ?????? ??? ??????????, ??? ?????????? ??? ?????? ???
????? ?????????? ??????????, ?? ?????????? ?????? ?????? ??? ?????? ??? ? ???? ??? ???
????????????? ??? ?????? ??? ?????? ?? ?????? ????? ?????????????? ?? ?????????????? ???
????? ?????????? ?????????? ?????? ??? ?????? ??? ?????? ?????????????? ?? ?????????????? ???
(??., ?????? ???, ?????????? Schumacker, C?279/93, EU:C:1995:31, ????? 23, ??? Sopora,
C?512/13, EU:C:2015:108, ????? 22).

21 ???, ??????? ?????????? ??????? ?? ?????????? ??? ?????? ??? ?????????? ??????????????
?????? ?? ?????????? ?????????? ?????????? ?? ??? ?????? ??? ?????? ??? ?????? ?? ??????????????
????????? (??., ?????? ???, ?????????? Schumacker, C?279/93, EU:C:1995:31, ????? 30,
??? Talotta, C?383/05, EU:C:2007:181, ????? 18).

22 ?? ?????? ?????? ??????????, ? ?????????? ??? ?????????? ?????????? ??? ?????? ???
?????? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?????????? ??????????, ??????? ??
????????? ??? ?????? ?????? ?????? ??? ?????????? ??? ?????? ??? ?????? ?????????? ??????
????????? ??? ?????? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? ?????????? ???
????? ??? ?????????? ???, ?? ?????????? ?????????? ?????????? ??? ?????????? ??? ?????????? ???, ?
????? ?????????? ??? ?? ?????? ??? ?????????? ??? ?????? ??? ??? ?????? ?????????? ???
????????????? ??? ??????????, ?????? ?? ?????????? ?????????????? ??? ?????? ??? ?????? ???
????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ???
????? ??? ?????? ??? ?????????? ?????? ??? (??., ?????? ???, ?????????? Schumacker,
C?279/93, EU:C:1995:31, ?????? 31 ??? 32, ?????? ??? Grünwald, C?559/13, EU:C:2015:109,
????? 25).

23 ???????, ??? ??? 34 ??? ?????????? Schumacker (C?279/93, EU:C:1995:31), ??
????????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ?? ??????????
????????? ?????????? ?????????????? ??? ?????? ??? ?????? ??? ?????????? ?? ?????? ???
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????????????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ???
????????? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
????????? ?????? (??., ??????, ?????? Grünwald, C?559/13, EU:C:2015:109, ????? 26).

24 ?? ?????????? ?? ?????????? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??
????????? ?????????? ?????????? ??? ?????? ??? ?????????? ?????? ???, ??? ?? ?????? ???
????????? ?? ?????????? ?????? ??? ?????? ??? ?????? ???, ?????? ??? ?????????? ?????????? ???
??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
????? ?? ?????????? ?????? (??, ?????? Gschwind, C?391/97, EU:C:1999:409, ?????
26).

25 ??? ??????????, ?????? ???, ??? ?????????? ?????????????? ??? ??????
????????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????

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??? ?????? ??? ?????? ?????? ?????? ??????????????, ??? ?????? ?? ?????? ?????? ??? ?????? ???
????? ?? ??? ???? ?? ??? ?????????? ?? ?????????????? ??? ?????????? ??? ??? ?????????? ???
????????????? ?????????? ??? (??., ?????? ???, ?????? Schumacker, C?279/93,
EU:C:1995:31, ??? 36? Lakebrink ??? Peters?Lakebrink, C?182/06, EU:C:2007:452, ??? 30,
????? ??? Renneberg, C?527/06, EU:C:2008:566, ??? 61).

26 ??? ?????????? ???, ? ??????? ?????????? ?????????? ??? ??? ? ?????????? ???
????????????? ?????????? ??? ?????????? ?????????? ? ?????? ?????? ?? ?????? ???
????????? ??? ??? ?????? ?? ?????? ??? ?????????? ?????????? ?????????? ??? ?? ???
????? ?????????? ??? ?? ?????? ??? ?????????? ??? ??? ?????????? ?????? ??? ???
????? ?????? ?????????? ??? ??? ?????? ??? ?????? ?????? ?????? (????????? Schumacker,
C?279/93, EU:C:1995:31, ??? 38? Lakebrink ??? Peters?Lakebrink, C?182/06, EU:C:2007:452,
????? 31, ??? ??? Renneberg, C?527/06, EU:C:2008:566, ??? 62).

27 ??? ?????? 34 ??? ?????????? Lakebrink ??? Peters-Lakebrink (C?182/06, EU:C:2007:452),
?? ?????????? ?????????? ??? ? ?????????? ??? ?????????? ??? ??? ?????? Schumacker
????? ?? ?????? ??? ?????????? ?????????? ??? ?????????? ?? ?? ??????????
????????? ??? ?????????? ?????????? ??? ??? ?????????? ??? ??? ?????? ??? ?????? ?????? ??????
????? ??? ?????? ??? ?????? ?????? (????? Renneberg, C?527/06, EU:C:2008:566, ???
63).

28 ??????, ?? ?????? ?? ?? ??? ????? ?????????? ?????????????? ??? ?????????? ?? ??
????????? ?????????? ??? ??????????????, ?? ?????? ?????? ??? ? ?????? ???
????????, ??? ?????? ??????????????, ?????????? ??? ??? ?????? ?????????? ?? ?????? ???
????????? ?????????? ??? ?????? ??? ?? ?????? ??? ?????????? ??? ?????????????? ?????????? ??
??? ?????????? ??? ?????? ?????? ???????. ???????, ??? ?? ?????????? ??? ?? ???
????????????? ??????????????, ??????, ??? ??? ??? ? ?????????? ?????????? ?????? ??
????????? ??? ??? ?????????? ??? ??? ?????? ?????? ?????? ?????????? ??, ?? ??? ??? ???
??? ?? ?????? ??? ?????? ?????????? ?? ??? ??? ?????? ?? ?????????? ?????? ??? ?????????? ??
????????? ??? ?????? ?????????? ??? ??? ??? ?????? ?? ?????????? ??? ?????? ??? ?????????? ??
????????? ??? ??? ??? ??????.

29 ??? ?????????? ??? ? ?????????? ?????????? ?????????? ??? ??? ?????? ??? ??
????????? ??? ?????????????? ??? ?????????????? ?? ??? ??? ???, ?????? ?????????? ???
????????????? ??? ??? ???, ??? ??? ??? ?????? ??? ???, ?? ?????? ?????????? ??? ??
????? ?? ??? ?? ?????????????? ?? ?????????? ?????????? ??? ??? ?????????? ??? ??
????????????? ??? ?????????? ??? ?????????????? ?. ???????, ?????, ??? ?? ?????????? ?, ?
????????????? ?????????? ?????????????? ?????????? ?? ??? ?????????? ?? ?????????? ?????? ??
????????????? ?? ??? ?????? ?????? ??? ?????????? ??? ?????????? ?????????? ??? ?? ??? ?? ??
??? ?? ??? ???, ??? ?????????? ??? ?? ??? ?????? ??? ?????? ?????? ?????? ??? ??
????????????? ??? ?????????????? ??? ??? ?????????? ??? ?????? ??? ?????? ?? ??????????
????????????? ??? ?????????? ??? ??? ??? ?????? ?, ?????????? ??, ?? ??? ??? ??? ??
????????? ??? ??? ??? ??????.

30 ?? ?????????? ?? ??? ?????? ?????? ??? ?????? ?? ?????????? ??? ? ?????????????? ??????????
??? ?????? ??????????????, ??? ?? ?????? ?????????? ??? ?? ??? ??? ???, ?? ??????????
????? ??? ?????????? ??? ??? ?????? ?? ?????? ??? ?????????? ?????????? ?????????? ???
????? ???, ??? ?? ??? ?????? ?????????? ??? ?? ?????? ??? ?????? ?? ??? ?????? ??? ??
????????????? ??? ?????????? ??? ?? ?????????? ??? ?????????? ??? ?????????? ?????????? ??? ??
??? ?????????? ??? ?????????????? ??? ?????? ???.

31 ?????????? ?? ?????????? ?? ??? ?????? ?????, ?????? ?? ?????????? ??? ?? ??????????

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

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

33 ? ??????? ??, ????????????, ???????, ??? ???? ?????? ??? ?????????? 94/79, ??? ?????
2, ?????????? 2, ??? ?????? ?????????? ??? ???? ?????? ??? ?????? ??? ?????? ?? ?????????? ???
??? ?????????? ??? ?????? ?????? ?????????? ?????????? ?????????? ?????????? ?????????? ???
????? ??? ?????????? ??? ?????? ?????????? ???????, ??? ???? ?????????? ?????????? ???
????? ??? ?????? ??? ?????? ??? ?????????? ?? ?????? ?????? ?????????? ?????????? ?????????? ?? 75 %
??? ?????????? ?????????? ??? ?????????? ??? ?????? ?????? ?????? ??? ?????? ??? ??????
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34 ????????, ? ?????????????? ?????? ?????????? ? ?????? ??? ?????????? ??? ??????
????????????? ?????? ? ?????? ?????? ?? ?????????? ?????? ?????? ??? ?????????? ???
????? ??? ?????????? ?? ?????????? ?????????? ?? ?????? ??? ?????????? ?????? ??? ??
????? ??????, ???? ?? ?????? ?? ?????? ?????? ? ?????? ?????????? ??? ??????????, ??? ??????
????, ?????? ??? ?????????? ????. ?? ?????? ?????? ??? ?????? ? ?????????????? ??????
????? ?????? ??? ?????????????? ?????????? ??? ?????? ?? ?????? ??? ?????? ??? ?????????????? ??????
??? ??????????, ???????, ?? ??? ?????? ?? ?????????????? ??? ?????? ??? ?????? ??????
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35 ? ?????????? ??? ?? ??? ???????????????? ??? ?????????????? ??? ?? ?????????? ??? ?
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36 ??????? ?? ????????????????, ??? ?????????????? ?????????? ?????? ?? ?????? ? ???????
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