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????: ?????????? ??? ??????? ?????? ??? ?????????????????? ?????????????? ??? ?????????? ?????????? ??????????????
??? ?????? ??????, ??? ?????? 29 ??? ?. 3986/2011 ??? ?????? ?????? ?????? ??? ??????????

?????. ????.: ?12? 1146045/?? - 25/10/2011 - ?????????? ??? ???????
???? ???. ?????????????????? ?????????????? ??? ?????????? ??????????
????????????? ??? ?????? ????????, ??? ?????? 29 ??? ?. 3986/2011
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?????? ??????? ?????????? ??? ???????, ??? ?????? 29 ??? ?.
3986/2011 ??? ?????? ??????? ??? ?????? ??? ?????????? ??????????

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

1. ??? ?????????? ?????????????? ??? ?????????????? ?????????????? ?????????? ??? ?????? ?????????????? ?.
3986/2011, ? ?????????????? ?????? ?? ??????? ?????? ??? ?????? ?????????????? ??????, ??? ?????????? ?????? ???
????????? ?????????? ??????????????, ??? ?????? ??? ? ?????????? ? ?????????? ??? ?????????? ?????? ?????????? ????.

2. ??????? ?? ??? ??????. ?' ??? ??? .4 ??? ?????? 29 ??? ?. 3986/2011, ? ?????????? ?????????? ??? ?????????? ?
????????? ?????????? ??? ?????????????? ?????????? ??? ??????????, ??? ?????? ??? ? ?????????? ??? ?????????? ??? ?????????? ???
????????? ?????????????? ??????????????, ??? ?????????? ?? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ??????????
??? ??? ?????????? ??? ?????????? ??????????.

3. ?????? ??????? ?? ??? ?????????? ??? ??????. 2 ??? ?????? 66 ??? ??? (?.. 2238/1994), ?? ?????????? ???
????????? ?????????? ?? ??? ?????????? ??? ?????? ??????????, ?????? ?? ?????????? ??? ??
????????? ?? ??? ?????????? ???, ?????? ?? ?????????? ??? ?????? ?????????? ??? ???. ? ??? ?????????? ??? ?????????? ???,
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4. ????? ???? ???? ?????????????? ??? ?????, ?????????? ??? ?????????????? ??? ????? ?????? ??? ?????? ?????????????? ???
????????? ??? ?.?.? ??? ????? ???????, ??????? ??????????????, ???????, ???????, ??? ?????????? ??????? ?????? ??????????.

5. ??????, ??? ?????????????? ??????????? ???, ??? ?????????? ?????? ?? ??? ?????????? ??? ?????????? ???, ?????? ??? ?????????????? ???, ?????? ???

??????????, ??????????? ?? ???? ?? ???? ?? ??????? 78 ????. 2 ??? ?????????????? ??? ?? ???? ?? ?????????? ?????????????? ????

????????????? ? ??????? ?????? ??? ? ?????????????? ?????????????? ?????????? ?????? ?????????????? ??? ????
????????????? ??? ?????????? ?????? ??? ??? ?????? ?????????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ?????????? ?????????????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????????? ??? ?????????????? ???
????????? ?????? ?????????????? ??????, ?????? ??? ??? ?????????? ??? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? .
????????? ?????? ??? ?? ?????????? ??? ??? 428/1986, 1865/1985.

? ????? ? ? ?????? 29 ??? ?. 3986/2011 ??????? ?? ?????????? ?????????????? ??????????????, ?????????????? ?? ??????
????????? ??????????????, ??????? ??????? ?? ??? ?????????????? ?????? ??? ?? ??? ??????, ? ??????? ?????? ?????? ??????
????????? ??? ?? ??? ?????????????? ??? ?????????? ??? ?????????? ?????? ??? ?????? ??? ?????? ?????? ??????????????
????????? ?????? ??? ?????? ??? ?????????? ??? ??????? ?, ?? ??????? ?????????????? ?????????? ??? ?? ?????????? ??????
?????. ???????, ? ?????? ??? ?? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?? ?????????? ??? ?????????? ??????????
????? ??????? ??? ?? ??????????, ?????????? ??? ??????????, ?? ??????? ?????????? ??????????????.

??? ?? ????, ???. 3986/2011 ??????? ?? ??????? ?? ?? ?? ?????????????? ?????????? ?????????? ?? ?? ?????????? (???. ???. 1317,1318/1979).

???????, ?? ????. ???????????, ??? ?????????? ?? ?? ???????, ? ??????? ?? ??????? ?? ??????????????
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?????????????? ?? ?? ?????? (?.. ???????????, ??????????? ?? ?????? ?? ??????????????? ?? ???????, ??????????
1991, ????. 25-26).

??????????, ? ??????? ??????? ?? ???? ??????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????????? ??? ???????
78 ????. 2 ??? ??????????????. ???????????, ? ??????? ??????? ??????? ??????? ??????? ?????????? ?????????? ?????????? ???
????????????? ??????? ?? ??? ?????????? (?????????) ?????????? ??? ?????????? ?? ???, ??? ??? ?????? ?? ??
????????????? ??? ?????? ??????? ??? ??? (????. ??? 1317/1979, 357/1984 ??? ?.?. ???????????, ???????
????????????? ???????, ??? 1966, ??? 254 ?.). ??? ??????, ?????? ?????? ? ?????????????? ???????
????????? ?? ??????????? ?????, ??? ?? ?????????????? ??? ?????????? ??? ?????????? ???????, ?????? ???
??? ??????? ??? ?????????? ??? ?????????? ?????? ?????? ?????? ?????? ?????? ?????????? ??????? ???
????????? ??? ??? ?????????????? ?????? 2010-2014, ?? ??????? ?? ?? ??? ??? ?????????????? ???
????????? ??????? ? ?????????? (?. ?. ???????, ?????????? ?????????? ???????, ??? 180 ??., ???
????, ?????????? ?????????? ??? ???????, ??? 299, ??? ?????, ?? ?????????? ???????, ??? 215 ??).
??????, ??? ?????????? ??? ??????? ???????, ? ??????? ??? ?????? ???, ??? ?????????? ??? ???????
????????? ???????, ?? ??? ??????? ??????? ???????, ??????? ?? ?????? ?????? ?????? ???????, ?????????????? ???
????????? ??????? ?????????????? ??????. ??????? ?? ?????? ?????? ?????? ?????????? ??? ?????????? ???
????????? ??????? ?????????????? ?????? ?????????????? ?????????? ?????? ?????? ?????? ?????? ???
ratio, ??????? ??? ??????? ??? ?????? ??? ?????? ??? ?????? ?????????? ?????? ?????? ??? ?????? ?????? ???
?? ???????, ?? ??? ???????, ?????? ?????????? ??? ?? ?????? ?????? ?????????? ??? ?????? 78 ????. 2
?? ?????????? ??? ??????? ??? ?????????? ??? ?????????? ??? ??????? ???.

???????, ?????????? ?????????? ??? ?? ?????????? ??? ?????? 29 ??? ?.3986/2011 ??? ?????????? ???
????????? ??? ??.2 ??? ?????? 78 ??? ??????????, ??? ??? ?????? ??? ??? ??? ??? ??? ??? ??? ??? ??? ???
????????? ?? ?????????????? ??? ????? ?????????? ?????????? ??? ?????????? ??? ?????? ??? ?????? ???
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) ??? ????? 4 ????. 5 ??? ?????????? ??????: «?? ?????? ?????? ?????????????? ?????? ?????? ?????????? ???
????? ????, ?????? ?? ??? ?????? ????.». ??? ? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ???
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?????????, ??? ??? ??????? ?????????? ??? ?????????? ?????????????? ?????? ?? ?????????? ?????? ??????????, ?????????????? ? ??????????,
????????????? ? ?????????????? ??? ?????????? ?????????? ? ??? ?????????? ?????????? ?????????? ?????? ?????????? ??????????
????????? ??? ?????????? ?????????? 2011. ??????? ?? ?? ?????? ???, ?? ??? ?????????? ?????? ?? ?????????????? ??? ??? ?????? ???
????????? ?????????? ?????????? ?? ?????????? ?????? ??????????, ?????????? ?????? ?? ?????????????? ??? ??? ?????? ????.
?? ?????? 9 ??? ?. 2238/1994 ? ?????????? ? ???'?????? ?????? ?? ??? ?????? ?????????????? ???.

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

Source

URL:<https://taxexperts.gr/????/??????????-??????/????-????-?12?-1146045??-25102011-??????????-???-????????-????-??>