

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

????????? 2828/2015 ?????????? ?????????? - ?????????? ???? ????
????????? ???? - ?????????? ?????????? - ??????????
????????? ??? ?????? -

?????????? ?????????? - ?????????? ????? ????? ?????????? ?????? - ?????????? ?????????? - ??????????
?????????? ??? ?????????? -

????????? ????? ?? ??????????? ?????, ?? ?????? ????? ?????????? ?????????????? ?????????????? ????? ?? ?????????? ??????????????,
???? ?????? ?????? ?????????????? ?????????????? ????? ?? ??????, ?? ?????????? ??? ??????, ??? ?????????? ??? ?????? 3 ??? ??. 15 ??? ?. 3888/2010
??? ??????? ?? ?????? ?????? ?????? ?????? ?????? ?????? ???????, ?? ?????????, ?? ?????????? ??? ?????????? ??? ?????? «?????????»
?????????? ?? ?????? ?? ?????????? ??? ?? ?????????? ?????? ??? ?????? ?????????????? ?????????? ?????????? ??? ????????????????,
???? ???????, ?? ?????? ??????????, ?? ?????????????? ??? «?????????» ??????????. ?????????????? ??? ?????? ???
????????? ??? ?????????????? ??? ?????????? ??? ?????????? ?????? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??????? ??? ?????????? ?? ?????????? ??? ?????????? ?????? ?????????? ??? ?????? ??? ?????? ??? ?? ???,
?????????, ?????????, ??????? ?? 30-9-2010 ??? ??????, ??? ?? ?????? ??? ??? ?????? ?????????? ??? ?? ??????????
??????????, ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? 3 ??? ??. 15 ??? ?. 3888/2010,
???? ?????????? ??? ?????? ??? ?????? ?????????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?????????? ??? ?? ?????????????? ??? ?????????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ?????? ???
??????????, ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???, ???
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ???
29-9-2010 ??????? ?? ?????????????? ?????????? (????? ??????? ?? ?????????? ??? ?????? ??? ?????? ???
????????? ?????????? ??? ?????? ?????????? ??? ?????????? ?????? ??????????) ??? ??? ???????, ?????????? ???
?????????? ?? ?????????? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????????? ?????????? ??? ?????????? ??? 30-9-2010 ??? 31-12-2010 ??? ??? 1-1-2011 ???
24-3-2011, ??? ?? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?? ?????? ??? ?????? ??? ?? ??????????,
??????????, ?????????? ????. ?????? ??????????

????????? ??????? 2828/2015

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

????? 2? ????????

????????????? ??? ???: ??????? ????????? - ??????????, ?????? ?????? ?????????????? ??????????????,
????? ?????????? ??? ?????????? ?????????? (??????????), ?????? ?????????????? ?????????????? ??? ?????????? ???
?????????????????, ?????????? ??????????,

????? ??? ???? ?????? ??? ?????????? ???, ??? 3 ?????? 2015, ??? ???? ?????? ??? ?? 29 ?????? 2014
(????. ?????. ??? 1366/30.10.2014) ????????,

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

????? ??? ?????????? ?????????, ??? ?????????????? ??? ??? ?????????????? ??? ?????????? ?????????? ?????????? ???
????????? ?????????? ?????????? ?????? ??? ?????????? ?????????? ?????????? ??? ?????????? ??? ?? ??? ??????????
????????? ??? ??? ?????????? ??????, ?????? ?? ??? 2-3-2015 ?????? ?????? ??? ?????? 133 ????. 2 ???,
??? ?????? ?????????? ??? ?????????? ??? ??????????.

M??? ?? ?????????? ?? ?????????? ?????? ?? ???????.

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

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

1. ??????, ?? ??? ??????? ????????, ??? ??? ?????? ??? ?????? ?????????????? ?????????? 3.000 ??? (?? ??
7480991/27-10-2014 ??? 7947496/26-2-2015 ?????? ?? ?????????? ?????????? ??? ?? .?.? ??????), ?? ??????
????????? ??? ?????????????? ?????????? ??? 10.000 ??? ??? ?????????? ?? ?? ??? 27-10-2014 ??????
????????? ?????????? ??? ?????????????? ??? ?????? ?????????? ?????????? ?????????? ?????????? ??????
(.?.?.?.?.?), ??? ?????????? ??? ?????? 277 ????. 3 ?????? ?? ??? ?????? ?????????? ?????????? ???
????????????? ??? ?? ?????? 45 ??? ?. 3900/2010 (?? 213 ??), ????????, ??????????, ?? ?????????? ? ??????
????????? ??? ?? ?????????? ?????????? ??? ?????? ?????????? ?????????? ?????????? ??? ??????????
????????????, ??? ?? ????. ?????. 14272/4-7-2014 ?????????? ??? ?????????? ??? ?????????? ??? ?? ???
680/12-5-2014 ?????????? ?????? ?????????? ?????????? ?????????? ??? ?????????? ??? ?????????? 2012
(????????? ??? ?????????? ??? 1-1-2011 ??? 31-12-2011), ??? ?????????? ??? ?? ?? ??? ??????. ?? ??
????????? ?????????????? ?? ?????? ??? ?????? ?????? ?????? 663.851,29 ????, ?????????? ??????, ??? ??????????
????????? ??????, ?????? 305.371,59 ????, ?????? ?????? ?????????? ??? ?????? 29 ??? ?.3986/2011
????? 53.760,01 ??? ???? ??? ?????? ??????, ??? ?????? ?????????? ?????????? ??????, ??? 24.729,60 ???.

2. ??????, ? ??????? ?????????? ?????????? (?2238/1994, ?.?. 151 ??) ?????? ??? ?????? 4 ???.1 ??? ???.2
???: «1. ??????? ??? ?????? ?????????? ? ??? ?????? ?????? ?? ?????? ??? ?????? ?????? ?????? ??? ?????? ???
??? ??????? ??? ?????? ??? ??? ?????? ???, ??? ?????? ?????????? ?????? ?????? 20 ?? 51...2.
?? ??????? ?????? ?? ??? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?? ????: ?-?.
????????? ??? ??????. ?. ?????? ??? ?????? ?????? ????. ?. ?????? ??? ?????? ?????? ?????? ?. ?. ?????? ???
????????? ???????????. ?? . ?????? ??? ?????? ?????? ?????? ?. ?????? ??? ?????? ?????? ??????.

????????????? ??? ?? ?????? ???», ??? ?????? 3 ???: 1. ? ?????? ?????????????? ??? ?????????????? ??? ?????? ???
????????? ??? ?????????? ??? ?????? ?????????????? ??? ?????????????? ???, ??? ?????????? ??? ?????? ??? ?????? ???
?????. 2. ? ?????????? ??? ?????? ??? ?????????????? ??? ?????? ?????? 1? ?????????? ??? ?????? ??? 31?
????????? ??? ?????? ?????????????? ???» ??? ?????? 48 ??? 3, ??? ?????? ??? ?????? ??? ?????? ???
????????? ?? ?? ?????? 15 ??? 3 ??? ????/2010 (??.?. 175 ??/30.9.2010) ??? ??????, ?????? ?? ?? ?????? 20
?? ?? ?? ?????? ???, ??? ?? ?????????? ??? ?????? ?????????? ??? ?????? ???: «?? ?????? ??? ?????? ???
????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ??? ?? ??? ??? 2 ??? ?????? 4. ?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ? ???, ? ?????????????? ??? ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? ??? ?????? »..

3. ??????, ??? ?? ?????????? ??? ?????? 4 ??? ????/1994 ??? ?????????? ??? ?????? ??? ?? ??
????????? ??? ?????? «?????», ?????????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????????? ?? ??? ?? ??? ??? 2, ??? ?????? ?? ?????????? ?? ?????????? ??? ?????? ??? ?????? ???
?? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? (????? ??? ? ??????), ??? ?????? ???
????? ?????? ??? (?.?. ??. 3872/2013). ??????, ??? ?????????? ???, ?? ?????? ??? ?????? ???, ?? ??????
?? ??????????, ?? ??? ?? ??? ?? ??? ??????, ?????????? ??? ?????? ??? ?? ??? ?????????????? ???
????????? ? ?????? 15 ??? 3 ??? ????/2010 ??? ?????? ??? ?????? ??? ?????? ??? 3 ??? ?????? 48
??? ????/1994, ??? ? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????, ?? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? «?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? 4». ??? ?? ?????? ?? ??? ?????? ??? ??????, ?????????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
(????? ??? ?????? ??? ?????? ???) ??????, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????? ??? (????? ??? ?????? ???) ??????, ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? 30-9-2010 ???
????????? ? ????/2010 ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ???.

4. ??????, ??? ?????????? ??? ?????? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? 12-5-2014
????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???
????? 48 ??? 3, ?? ??. ??. ????/1994, ?????? 2010, 2011 ?? 2012 (????? 2009, 2010 ??
2011) ?? ?????? ?? ?.?.?.?.?. ..., ?????? ?? ?????? ?? ?????: ?? ?? 246/3-2-2014 ?????? ?????? ???
????????? ?????? ???, ?????????? ??? ?????? ??? ?????? ?????? ?????? ???, ?????? ??? ?????? ???
????? ?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? (????? ??? ??? ?????? ???) ?????? ???
????????? ?????? ??? (?.?. ...), ??? ?? ??? ?????, ?????????? ??? 3.000.000 ??? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? (?.?. ...) ??? ?? ??? ?????? ??? ??? ?????? ??? ?????? ???
?????, ??? 24-3-2011 ?????? ?????? ??? ?????? ??? ?????? ??? ?????? (?????) ?????? ??? ?? ??? ??????
?????, ?? ?????? ??? ?????? ??? ?????? ??? ?????, ??????, ?????? ??? ?????? ???, ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? 48 ??? 3 ??? ????/1994 ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????? ??? ?????? ??? (????? ??? ???) ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ???, ??? ?? ??? ?????? ??? ?????? ??? 3.000.000 ???.

?????????, ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????????? ??? ?????? ???, ??? ?? ??? ?????? ??? ?????? ??? ?????? (1.500.000 ???), ?????? ?? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

5. ???????, ? ?????????? ?????????? ?? ??????? ??? ?????????? (??????), ? ?????? ?????????? ?????????????? ??????????
??????????, ??????????? ?? ?????? ?????????? ?????????? ???????????, ????????, ?????????? ?? ?????? ??????????
????????????? ?? ??????????? ?? ?????????? ?????????? ?????????????? ????????????. ???????, ?? ?????????????? ????, ??? ????????
?????????? ?? ?????????? ?????? ?????????? ?????? ???????????, ?????? ?? ?????????? ??????????? ??? ?????????? ???
????????? ?? ?? ?????????? ?????? ??? ?????? ?????????? ???????????, ??? ??? ?? ?????????? ?????? ??? ?????????? ???
????????? ?? ???????????, ??? ?????????? ?????, ???????, ?????????? ??? ?????????? ?????? ??? ?????????? ?????
????????? ?????????? (??..?? ??? 66 ??? .1 ??? ?.2238/1994, ??? ?????? ?????? ??? ?????????? ??? ??????????
??? ??? 15 ??? .3 ??? ?.3880/2010, ??? ??? ?? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? 8 ??? .2 ???
.3943/2011, ??? 66 ??, ?? ??? 82 ??? .2 ??? ?.2238/1994, ??? ?????????????? ??? ?? ??? ?????? 32 ??? .3 ???
.3986/2011. ??? 152 ?? ??? ??? ?? ?????? 15 ??? .3 ??? ?????? ?????????? ?????????? ??? ?????????? ??? ?????? ???

????????? ??????). ???????, ?? ?????????? ?????, ?? ?????? ??? ?????? ?????????? ?????????????? ??????? ???? ?
?????? ??????????, ??? ?????? ?????? ?????? ?????????? ?????? ??? ??????, ?? ?????? ??? ??????, ??? ?????????? ???
?????? ?????? ??? ?????? ??? ?????? ?????? ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ?????? 15 ??? .3888/2010 ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? «????????» ?????????? ??? ?????? ?? ?????????? ??? ?? ??? ?????????? ?????? ???
????????? ?????????? ??? ?????????? ?????? ??? ???????, ?? ?????? ?????????? ?? ?????????? «????????»
?????????. ?????????? ??? ?????? ?? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????????? ???
????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? ??? ?????? ??? ?? ???, ???????, ???????, ?????? 30-9-2010 ??? ??????, ??? ?? ?????? ???
????????? ??? ?? ??? ?????????? ?????????? ?????????? ?????? ?????? ?????? ??? ?????? ???
????????? 3 ??? ?????? 15 ??? .3888/2010, ??? ?????????? ?????? ?????? ??? ?????? ??? ?????? ?????????? ???
??????, ??? ?????? ??? ?????? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???
??????, ?? ?? ??? ?????????? ??? ?????????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????????? ??? ?????? ??? ?????? ???, ??? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????????? ??? ?????? 29-9-2010 ??????? ??? ?????????? ??? ?????????? ???
(????? ?????? ??? ?????????? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
?????????) ??? ??? ??????, ?????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
????? ????, ?? ??????, ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
30-9-2010 ??? 31-12-2010 ??? ??? 1-1-2011 ??? 24-3-2011, ??? ?????? ?????? ??? ?????????? ???
????????? ??? ?? ??? ?????????? ?? ?? ?????????? ?????????? ?????????? ??? ??????.

6. ??????, ??? ?????, ? 680/12-5-2014 ??????? ?????? ?????????? ?????? ?????????? ??? ??????, ??? ?
??? ?????????? ?? ?? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???, ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???
14272/4-7-2014 ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? ???, ? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ???, ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? 15 ??? .3 ??? .3888/2010,
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
7. ??????, ??? ?????, ?????? ?? ?????? ?????? ?????? ?????????? ?????? ??? ?????????? ? ?????? ?????? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ????. ????. 14272/4-7-2014 ?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
680/2014 ?????????? ???, ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? 3.000 ??? ??? ??????
(?? .277 ??? .9 ??? ?.?), ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? (?? .275 ??? .1 ??????. ??? ?.?).

??? ????

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

????????? ??? ??????? ?????????? ??? ?? ?????????? ?????????? ?????????? ??? ??????? ?????????????? ?????????? ??????? ??? ??????????????, ??? ?? ?????. ?????. 14272/4-7-2014 ?????????????? ?????????? ??? ?????????????? ??? ?? 680/2014 ?????????????? ???????.

????????? ??? ?????????????? ?? ?????????? ??? ?????? ?????????? (3.000) ??? ?? ???????.

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

????????? ??? ?????????????? ??? ?????? ??? 19 ?????? 2015 ??? ?????????????? ??? ??????? ???, ??? ?????????????? ??? ??????????????, ?? ??????? ??????? ?????????? ??? 9 ?????? 2015.

? ????????

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

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

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

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

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

Source

URL:[https://taxexperts.gr/???/?????????-?????/?????-28282015-????????-?????????-????????-?????-????-?????????-?????/](https://taxexperts.gr/???/?????????-?????/?????-28282015-????????-?????????-????????-?????-????-?????????-?????)