

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

**Y?????? C-235/18 ????? ?????????????? ????? (???) - ??????
2006/112/?? - ??? 135, ?????????? 1, ?????????? ?? - ??????????
?????? - ?????????? ????? ?????????????? - ?????????? ??
????????????? ????? - ?????? ??????????**

?????? ??? ?????????? (????? ????) ??? 15?? ????? 2019 «????????????? ?????????? – ?????????? – ?????
????????????? ??? (???) – ?????? 2006/112/?? – ??? 135, ?????????? 1, ?????????? ?? – ?????????? ?????? –
????????? ??? ?????????????? – ?????????? ??? ?????????????? ?????????? – ?????? ??????»

???? ?????? C?235/18,

?? ?????????? ?????? ?????????????? ?????? ??? 267 ????, ??? ??????? ?? Naczelnego S?d
Administracyjnego (????????? ??????????? ???????????, ???????) ?? ??????? ??? 23?? ?????????? 2017, ? ??????
????????? ??? ?????????? ??? 28 ?????? 2018, ??? ??????? ??? ??????

Vega International Car Transport and Logistic – Trading GmbH

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Dyrektor Izby Skarbowej w Warszawie,

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

????????? ??? ??? F. Biltgen, ?????? ???????, C. G. Fernlund ??? L. S. Rossi (??????????), ????????,

?????? ??????????: E. Tanchev

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

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

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

– ? Vega International Car Transport and Logistic – Trading GmbH, ?????????????? ??? ??? J. Pomorska-Por?bska, ?????????? ????????,

– ? ??????? ????????, ?????????? ??? ??? B. Majczyna,

– ? ??????? ????????, ?????????? ??? ??? R. Lyal ??? ??? J. Hottiaux,

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

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

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1 ? ?????? ?????????????? ?????????? ??? ?????? ??? ???????? ??? ?????? 135, ?????????? 1, ??????? ??, ??? ?????? 2006/112/?? ??? ??????????, ??? 28?? ?????????? 2006, ??????? ?? ?? ????? ?????? ?????? ?????? ?????? ?????? (?? 2006, L 347, ?. 1).

2 ? ?????? ??? ?????????? ??? ?????? ???????? ?????? Vega International Car Transport and Logistic – Trading GmbH ?? ??? ?????? (??? ????: Vega International) ??? ??? Dyrektor Izby Skarbowej w Warszawie (????????????? ??? ?????????? ?????? ??? ?????????, ??????), ?? ?????????? ??? ?????? ??? ?????? ??? ?????????? ?? ?????????? ??? Vega International ??? ??? ?????????????? ?????? (???) ?????? ?? ?????? ??? ?????? ??? ?????? ?? ?? ?????? ?????? ??????.

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

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

3 ?? ?????? 2, ?????????? 1, ??????? ?? ??, ??? ?????? 2006/112 ?????? ?? ????????:

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

?) ?? ?????????? ?????? ??? ?????????????????? ?? ?????????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????????? ??? ??? ??? ?????? ??? ?????? ??? ?????? ??? ??? ?????? ??? ???, [...]

?) ?? ?????????? ?????? ??? ?????????????????? ?? ?????????? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????????? ??? ??? ??? ?????? ??? ?????? ??? ?????? ??? ???,»

4 ?? ?????? 14, ?????????? 1 ?? 2, ??? ?????? ?????? ?????? ?????? ??????? ?? ????:

«1. ?? “????????? ??????” ?????????? ? ?????? ?????????? ??? ?????????? ??? ?????????? ?????? ??? ??????, ?? ??????, ??????? ????.

2. ?????? ??? ??? ?????? ??? ?????????? 1, ?? ?????? ?????? ?????? ?????? ??? ?????? ????????:

[...]

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

5 ?? ?????? 24, ?????????? 1, ??? ?? ??? ?????? ?????? ??? ?? ????:

«?? “?????? ??????” ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ..»

6 ???? ?? ???? 135, ?????????? 1, ??????? ??, ??? ?????? ??????:

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

[...]

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

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

7 ? ?????? 2006/112 ?????????? ??? ?????? ?????? ?? ??? ustawa z dnia 11 marca 2004r. o podatku od towaru i us?ug (????? ???? ?????????? ??? ?????? ??? ??????), ??? 11?? ?????? 2004 (Dz. U. de 2011, ????. 177, ??? 1054), ??? ?????????? (??? ????: ?????? ???? ???).

8 ???? ?? ???? 5, ?????????? 1, ?????? 1, ??? ?????? ????:

9 ?? ?????? 7, ??????????? 1 ??? 8, ??? ????? ?????? ?????? ?????????? ?? ????:

«1) ?????????? ?????? ?? ?????? 5, ??????????? 1, ?????? 1, ?????? ? ?????????? ?? ?????????????? ?? ?????????? ?????? ?? ?????????? ?? ?????? [...].

[...]

8) ????? ?????????? ??? ? ???????? ??? ????? ?????? ?????? ?????????????? ??? ?????????????? ??? ??????????????, ??? ?????
????? ? ?????? ??????????? ?? ?????????? ?? ?????? ??? ?????? ?????????? ??? ?????? ?????? ??????????, ? ?????????? ??? ?????
????????? ?? ?????????????? ??? ????? ?????????? ??? ????? ?????????? ?? ?????? »

10 ?? ?????? 8, ??????????? 1, ??? ?? ??? ????? ?????? ?????? ?? ????:

11 ?? ?????? 43, ??????????? 1, ?????? 38, ??? ?????? ??????, ?? ?????? ?????????? ?????? ?????????? ?????? ???? 135, ??????????? 1, ?????????? ??, ??? ??????? 2006/12, ?????? ?? ?????;

12 ????? ?? ?????? 86. ??????????? 1. ??? ?????? ??? ??? ???;

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

13 ??? ??? ?????????? ??? ?????????? ?????????? ??? ? Vega International ????? ?????????????? ??????????
????????????? ?????? ?????????? ?????????? ??????????????, ??? ?? ?????????? ??? ?????????????? ??? ???? ???? ??????. ?
????????? ??? ?????????? ??? ?????????? ?????????? ??? Vega International, ?? ?????? ??? ?????? ??? ??????????
???? ??? ?????? ??? ?????? ???, ?????? ??? ?????? ? ?????????? Vega Poland sp. z o.o., ??? ????
????????????? ??? ??????????.

?????????? ?? ??????? ??? 28?? ?????????? 2014.

16 ? Vega International ??????? ?????????? ??? ???? ??????? ?????????? ?????????? ??? Wojewódzki S?d Administracyjny w Warszawie (????????????? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???). ?? ??????? ??? 26? ??????? 2015, ?? ? ? ?????? ?????????? ??? ? ??????? ??? Vega International ??? ??????? ??? ??? ????????,

18 ????? ??? ?????? ???????????, ???' ?????????? ??? ?????????? ?????, ?? ??????? ?? ?????? ?????? ??? Vega International ??? ?????????????? «???????????? ??????», ?? ?????????? ?????????, ??? ?????? ?????? ??? ?????? 7, ?????????? 8, ??? ?????? ???, ??? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? Vega Poland ?????????????????? ?????????? ? ?????? ??? ?????????? ?? ?????? ?????????? ?????? ?????? ?????????? ?????????? ?????? ??? ?????? ?? ???? 43, ?????????? 1, ?????? 38, ??? ?? ?????? ??????.

19 ???????????, ?? ?????? ??????????? ??????????? ??? ? ?????? ??? 6?? ??????????? 2003, Auto Lease Holland (C185/01, EU:C:2003:73), ??? ??????? ?????? ??? ?????? 2006/112, ??? ??????? ??? ?????? ??? ?????? ?????????? ?????????? ??? ?????? 77/388/??? ??? ???????????, ??? 17?? ??? 1977, ??? ??????????? ??? ?????????? ??? ?????? ???????, ??? ?????? ???????, ??? ?????? ??? ??????? – ??? ?????? ??????? ??? ?????????? ?????? ??????: ?????????? ?????? (?? ????. ???.. 09/001, ?, 49, ??? ????: ???? ??????).

20 ??? ???? ?????????? ??????, ?? ?????? ??????????? ????? ?????????????? ????? ?????? ??? ??????????, ??? ?? ?????? ???
?? ??? ??????????, ??? ???? ?????????? ??? ?????? 135, ?????????? 1, ?????????? ?, ??? ?????? 2006/112, ? ??????
????????? ?? ?????? ??? ?????? ??? ?????? ?? ?????????? ??? ?????????? ?????? ??? ?????? ??? ?????????? ???
????????? ??? ?????? ??? ?????? ??????. ?????????, ?????????, ?? ?????? ?? ???? ?????? ??? ?????????? ? Vega
International ??? ??????, ??????? ?? ?? ?????? ??? ?????????? ??? ?????? ?????????? ???
????????????????? ??? ??? ?????? ?????????? ??? ??? ?????????? ??? ?????? ?????????? ??? ??????, ?????? ?????? ??
????????? ??????? ??????. ???????, ?? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????????? ???
????? ?????????? ??? ??? ?????? ?????? ??? ?????? ?? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ??????
?? ?????? ??? ?????????? ??? ?????? ?????????? ??? ?????? ?? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??? ??????

21 ??? ????????, ?? ?????? ??????????? ??????? ???, ??????????? ?? ??????????? ??? ??? ??????? ?????????? ???
?????? ? Vega International, ????? ??????????? ?? ??????????? ?? ??????? ?? ??????? ??? ??????? 135, ??????????
1, ??????? ?, ??? ?????? 2006/112.

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

??????????, ?? ??????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ? ?????????? ?????????? ???, ??? ???????????, ?
????????? ?????? ??? ?????? ?????? ??? ?????? 14, ?????????? 1, ??? ?? ??? ?????? ??????, ??? ?? ??? ?????? ?????? ??
????????? ? ??? ?? ?????????????? ??? ?????? ??????.

24 ?????????????? ?????????????? ??? ?? ?????????? ??? ?????? 2006/112 ??? ?????? ?????????? ??? ?????? ???
????????? ??? ?????? ?????? ?????????? ???' ?????? ?? ??? ?????????? ?????????? ??? ?????? ?????? ??? ?????? ???
????????? ???, ? ?????????? ??? ?????? ?? ??? ?????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ???
????????? ??? ?????????? ?????? 2006/112 (??., ?????? ???, ?????? ??? 28?? ?????? 2016,
Astone, C?332/15, EU:C:2016:614, ??? 27).

25 ?????????? ?? ?????? ?????????? ??? ?????????????? ?????? ??? ?????????? ?????????????? ?????????????? ???,
????????? ?? ?? ?????? 2, ?????????? 1, ?????????? ??, ??? ?????? 2006/112, ??? ?? ?????????? ?? ??????????
????? ?? ?????????????????? ?? ?????????? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????????? ??? ?????? ???
????? ?? ?? ?????????? ???.

26 ?????? ?? ?????? 14, ?????????? 1, ??? ?????? ???, ?? ?????? ?????? ?????? ?????? ?????? ?????? ???
????????? ?? ?????? ???, ?? ??????, ?????? ???.

27 ??????, ??? ?????? ??????, ? ?????????????? ??? 5, ?????????? 1, ??? ?????? ?????? ??? 14,
????????? 1, ??? ?????? 2006/112 ??? «????????? ??????» ??? ?????????? ??? ?????????? ??? ?????????? ???
??? ?????? ??? ?????????? ??? ?????? ?????? ??????, ??? ?????? ?????? ?????? ?????? ?????????? ???
????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???
????? ??? ?????? ?????? ??? ?????? (???. ?????????? ??? 8?? ?????????? 1990, Shipping and Forwarding Enterprise
Safe, C?320/88, EU:C:1990:61, ??? 7, ??? 14?? ?????? 2005, British American Tobacco ??? Newman Shipping,
C?435/03, EU:C:2005:464, ??? 35, ??? 21?? ?????? 2006, Halifax ??., C?255/02, EU:C:2006:121, ???
51, ??? 3?? ?????? 2010, De Fruytier, C?237/09, EU:C:2010:316, ??? 24, ??? 2?? 18?? ?????? 2013,
Evita-K, C?78/12, EU:C:2013:486, ??? 33).

28 ?? ?????????? ??? ?????? ?????? ?????? ??? ? ?? ?????? ?????? ??? ?????? ?????????? ?????? ???
????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ?????? (????? ??? 21?? ?????? 2013, Dixons Retail, C?494/12,
EU:C:2013:758, ??? 21 ??? ?????? ?????????? ??????).

29 ??? ?????? ?????? ??????, ??? ?? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ??? Vega International
????? ?????? ??? ?????? ??? ?????? ??? Vega Poland, ?????????? ??? ?????? ??? ?????? ???
????? ?? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??? Vega International ?? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? Vega
International ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???.

30 ??? ??? ?????? ???, ?????????? ?? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ???
????????? ??, ??? ?????? ??? ?????? ???, ?? ?????? ?????? ?????? ??? ?????? ??? Vega
International ? ?? Vega Poland ?? ?????? ?? ?????? ?? ?????? ?? ?????? (???. ?????? ?? 6??
????????? 2003, Auto Lease Holland, C?185/01, EU:C:2003:73, ??? 33).

31 ??????, ?????? ?? ?????????? ???, ??? ?????? ??? 6?? ?????????? 2003, Auto Lease Holland (C?185/01,
EU:C:2003:73), ?? ?????????? ?????? ?? ?????? ??? ?????, ??? ?????? ?????? leasing ??? ??????????
?????, ?????????? ?????? ??????, ?????????? ?????? ??????, ??? ?????? ?????? ?????? ?????? leasing, ???
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???
?????, ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?????.

32 ?? ??? ?? ?????? ?????? ?? ?????????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ???
????????? ?? ?????? ??? ?????? ??? ?????? ???, ??? ?????? ?????? ?????? ?? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? (???. ?????? ??? 6?? ?????????? 2003, Auto Lease Holland, C?185/01,
EU:C:2003:73, ??? 34).

33 ????????, ??? ???? ???????????, ?? ??? ?????? ???????????, ?? ?????????????? ?????? ?????????????????? ?? ?????? ???
???????? leasing ??? ??????????????. ??????????????, ?????? ??, ?? ????????? ?????????? ??? ?? ?????????????? ?????? ???
????????? ?????? ??????????????, ????????? ??, ??? ?????????? ?????????? ??? ?????????? ??? ?????? ??? ?????? ???
????????? ?????????? ?? ????????, ??? ??????, ?? ?? ??????, ?????????? ?? ?????????? ?? ?????? ??? ?????????? ???
????????? (?????? ?? 6?? ??????????? 2003, Auto Lease Holland, C185/01, EU:C:2003:73, ????? 35).

35 ??????? ?? ?? ?????????? ?? ?? ?????????? ?? ?? ?????? 24 ?? ?????????? ??????????, ?? ??????? ??????????, ?? ?????? ?????????? ?? ?? ?????? ?????????? ?? ?? ?????????? ?? ?? ?????? ?? ?? ?????????? ?? ?? ?????????? ?? ?? ?????? ?? ?? ?????????? ?? ?? ?????????? ?? ?? «????????? ??????» ?? ?? ?????? 14, ?????????? 1, ??? ?????? 2006/112.

37 ????????, ??? ?????????????? ??? ? Vega Poland ?????????? ?? ?? ?????? ??? ?????? ??? ?? ???
????????????, ??? ?????? ??? ? Vega International ??? ??????? ?? ??? ???? ?????? ????. ?? ????????, ? ????????
????????? ?????? ??? ???? ?????????? ?? ?????????? ??? ?????????? ??? ?? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???

[40](#) ??????? ????????????, ?????????????? ???, ??????? ?? ???? 24, ??????????? 1, ??? ??????? 2006/112, ????

41 ??? ?????????????? ??? ? ?????? ??? ?????????????? ? Vega International ??? ?? ?????????? ?????????? ???,
? ?????? ?????????? ??? ??????? ?????? ?????? ?????? ??? ?????, ????, ?????, ?????????? ?? ?????? ??? ??????
??? ?????? ?? ??????? ?????????? ? ???????, ??? ?????? «????????? ?????» ???? ??? ?????? ??? ?????? 14,
????????? 1, ??? ?????? 2006/112. ??? ???????, ?????? «?????? ??????» ???? ??? ?????? ??? ??????
24, ?????????? 1, ??? ?????? ??????.

42 ?? ?? ?? ???????, ?????????????? ?? ?? ?????? ??????? ?????????? ?? ?? ?????? ???????????, ?????? ?????? ?????????? ?? ?? ??????? ?? ?? ?? ???? ?? ??????? ??????? ?? ?? ??????? ??????? ?? ?? ??????? ??????? ?? ?? ??????? ??????? ?? ?? ???????.

????????????????? ??? ??? ??? ????? ????? ????? ?????? 135, ?????????????? 1, ?????????? ?, ??? ?????????? 2006/112.

43 ???????, ?????????????? ?? ?? ?????????????? ?????? ??? ?????????? ?????? ?????? ?????? ?????????????? ??
????????? ?? ?? ??? ?????? ?????????? ?? ?? ?????????? ?? ?? ?????????? ?? ?? ?????? ?????? ?????? ?????? ?????? ? ??
????? ?? ????????, ?? ?????? ?? ?????????? ?? ?? ?????????? ?????? ?? ?? ?????????? ?? ?? ?????? ?????? ?????? ??????
????????? ?? ?? ???????, ?? ?????????? ?? ?????????? ?????? (?????. ?????????? ?? ?? 4?? ????? 2006, Abbey National, C?169/04,
EU:C:2006:289, ????? 66, ??? ?? 21?? ?????? 2007, Ludwig, C?453/05, EU:C:2007:369, ????? 25).

44 ?????????????????????? ?? ??? «?????????? ?? ?????????????????? ??????????», ??? ?????????????????? ??? ?? ??????????, ? ?????? ??? ?????? ?? ?????? ?? ?????????????? ?? ?????????????? ?????? ??? ?????????? ?? ?????????????? ??? ??? ?????? ?? ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? ?? ?????? ?????? [????. ?????????? ?? 27? ?????????? 1993, Muys' en De Winter's Bouw- en Aannemingsbedrijf, C?281/91, EU:C:1993:855, ????? 13, ??? 22? ?????????? 2015, Hedqvist, C?264/14, EU:C:2015:718, ????? 37, ??? ??? 18? ?????????? 2018, Volkswagen Financial Services (UK), C?153/17, EU:C:2018:845, ????? 35].

45 ?????????? ??? ??????????????? ??? ?? ?????? ??? ?????? ?????????? ?? ?????? ?????? ? ?????? ? ?????? ? ?????? 2006/112
???? ?? ?????? ??????????, ?????? ????, ??? ?? ?????????? ?????? ?????????????? ??? ?????? ??? ?????? (??.,
????? ????, ?????? ??? 27?? ??????? 1993, Muys' en De Winter's Bouw- en Aannemingsbedrijf, C?281/91,
EU:C:1993:855, ?????? 14).

49 ??? ?? Vega International ??? Vega Poland ??? 135, ??? 1, ??? 2006/112 [?].
??? 18?? 2018, Volkswagen Financial Services (UK), C?153/17, EU:C:2018:845, ??? 36].

50 ????? ??????????, ?????????? ??? ????? ???? ?????? ? Vega International ??? ?????? ??? Vega Poland ???????
?? ?????? ??? ?????????? ??? ?????????? ??? ?????? 135, ?????????? 1, ??????? ?, ?? ?????? 2006/112.

[51](#) ??????? ?? ???? ??????????????, ??? ?????????????? ??????? ??????? ?? ?????? ? ??????? ??? ?? ?????? 135,
????????? 1, ??????? ??, ??? ?????? 2006/112 ??? ?????? ??? ??????? ??, ??? ?????? ?????? ??? ?????? ??? ??????
????, ? ?????? ?? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????
????? ?? ?????????? ?? ?????? ?? ?????? ??? ?????? ??? ?????? ?????? ?????? ?? ?????? ?????? ?????? ??
????????? ?? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ???, ??? ?????? ?????? ??? ?? ???
?????.

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

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

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

?? ????? 135, ?????????? 1, ??????? ?, ?? ?????? 2006/112/?? ??? ??????????, ??? 28?? ?????????? 2000
?????? ?? ?? ????? ?????? ?????? ?????????????? ??? (??), ??? ?????? ???, ??? ?????????? ???, ??? ?????????? ???
????? ??? ?????? ????, ? ?????? ?? ?????? ?????????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ???
????? ?????????? ??? ?????????? ?? ?????????? ?? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ???
????? ?????? ??? ?????????? ??? ?????????? ?? ?????????? ?????????? ?????????? ??? ?????????? ??? ?????????? ???
????? ??? ?????? ??? ??????????.

(?????????)

Source

URL:<https://taxexperts.gr/??/??????????-?????/y?????-c-23518-?????-?????????-?????-??-?????-2006112??-?????-135>