



“Real knowledge, like everything else of value, is not obtained easily; it must be worked for, studied for, thought for and more than all, must be prayed for.” – Thomas Arnold

1.0. INTRODUCTION In order to understand why a State (i.e. country) seeks to tax persons (both individuals and juridical persons) on the basis of their “residence”, one has to first appreciate certain principles of public international law. The term “State jurisdiction” under public international law means the legal competence which a State enjoys (as an attribute of its sovereignty) over its territory and all persons and things within its territory. The expression “competence” is a wide term, and it includes legislative, administrative and judicial competence. It therefore involves the power to make laws/rules