



Petition Filing Guide

Tips for Preparing Documents Before You File



1. Are you authorized to file on behalf of this taxpayer?

To file a case on behalf of another taxpayer, you must be authorized to litigate in this Court as provided by the Tax Court Rules of Practice and Procedure (Rule 60). Enrolled agents, certified public accountants, and powers of attorney who are not admitted to practice before the Court are not eligible to represent taxpayers.



2. Have the IRS Notice(s) You've Received Available to Submit

If you've received an IRS notice, such as a Notice of Deficiency or Notice of Determination, you'll need to include a copy with your Petition. The U.S. Tax Court must receive all Petitions in a timely manner. The IRS notice shows the last date to file or the number of days you have to file a Petition. **The Court must receive your electronically filed Petition no later than 11:59 pm Eastern Time on the last date to file.**



3. Fill Out the Required Forms

Petition Form

Complete the Petition form, USTC Form 2, or you can upload your own Petition that complies with the requirements of the Tax Court Rules of Practice and Procedure. **Do not** include personal information (such as Social Security Numbers, Taxpayer Identification Numbers, or Employer Identification Numbers, birthdates names of minor children, or financial account information) in your Petition.

Statement of Taxpayer Identification

Complete the Statement of Taxpayer Identification form, USTC Form 4. This is the only document that should contain your Social Security Number (SSN), Taxpayer Identification Number (TIN), or Employer Identification Number (EIN). This document is sent to the IRS to help identify you, but it's never viewed by the Court or stored as part of the public record.

Ownership Disclosure Statement

If you're filing for a business, you'll need to complete and submit the Ownership Disclosure Statement, USTC Form 6.



4. Remove Personal Information From Your Petition and IRS Notice(s)

If the IRS notice includes personal information (such as Social Security Numbers, Taxpayer Identification Numbers, or Employer Identification Numbers), remove or redact that information before including it with your Petition. You can remove this information by deleting it, marking through it so it's illegible, or any other method that will prevent it from being seen.



5. Combine Your Petition and IRS Notice(s) Into a Single PDF

Scan your Petition and IRS notice into one Petition PDF or combine them digitally. This is what you'll upload to the Court to start your case. Uploads are limited to 500MB.



6. Don't Submit Extra Documents With Your Petition

Do not include any additional documents with your Petition, except for the IRS notice. Documents that might be evidence can be submitted at a later time.