

UNITED STATES TAX COURT
WASHINGTON, DC 20217

PA

FRANK M. DARTEE,)
)
 Petitioner,)
)
 v.) Docket No. 3972-19.
)
 COMMISSIONER OF INTERNAL REVENUE,)
)
 Respondent)

ORDER

The petition in this case was filed on February 22, 2019. Petitioner seeks review of purported notices of deficiency and notices of determination concerning collection action allegedly issued to petitioner for taxable years 2000 through 2018. On April 11, 2019, respondent filed a Motion for More Definite Statement Pursuant to Rule 51. On August 5, 2019, petitioner filed an Amended Petition seeking review of purported notices of deficiency and notices of determination concerning collection action issued to petitioner for taxable years 1979 through 2018.

Upon due consideration, it is

ORDERED that respondent's Motion for More Definite Statement, filed April 11, 2019, is denied. It is further

ORDERED that, on or before September 17, 2019, respondent shall file an appropriate jurisdictional motion. In that motion, based upon a diligent search conducted of respondent's records, respondent shall set forth and discuss fully respondent's position as to: (1) whether any notices of deficiency were issued to petitioner for taxable years 1979 through 2018 that would confer jurisdiction upon the Court in this case and (2) whether any notices of determination concerning collection action were issued to petitioner for taxable years 1979 through 2018 that would confer jurisdiction upon the Court in this case.

(Signed) Maurice B. Foley
Chief Judge

Dated: Washington, D.C.
August 26, 2019

SERVED Aug 27 2019