



## PIETRA G. ZAFFRAM

Partner

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Pietra is a member of the firm's Real Estate & Finance Group, where she focuses her practice on federal and state tax law, with particular emphasis on tax-exempt financings and state and local finance law. In the area of public finance, Pietra has assisted with numerous tax-exempt bond financings and has experience conducting tax due diligence review and drafting tax documents required for tax-exempt bond closings.

As tax counsel, Pietra also provides tax advice relating to the structuring of financings to comply with state and federal tax law, addressing ongoing arbitrage and rebate issues, determining qualified versus unqualified costs, and reviewing reissuance questions.

Pietra assists companies in obtaining tax savings through transactions with Industrial Development Agencies and Local Development Corporations and provides counsel on the federal Opportunity Zones Program.

In the area of tax controversy, Pietra represents clients in federal and New York state tax disputes from the audit level through the appellate process with respect to controversies involving taxes such as business tax, personal income tax, and sales and use tax.

In connection with her economic development practice, Pietra has advised municipalities at all stages of the municipal annexation process, from planning and adoption, to defending against contested annexation actions.

### Honors

- Buffalo Business First – Legal Elite 2019
- Business First of Buffalo – Legal Elite 2018
- Business First of Buffalo “40 Under 40” – 2013

The Guaranty Building  
140 Pearl Street  
Suite 100  
Buffalo, NY 14202

### Practices & Industries

Bond Counsel  
Land Use & Economic Development  
Municipal  
Municipal Finance & Special Districts  
Public Authority

### Admissions

New York

### Education

University at Buffalo, B.S., cum laude  
University at Buffalo School of Law, J.D.

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- Business First of Buffalo “Who’s Who in Law” – Public Finance, 2013

## Experience

- Successfully represented taxpayers' claims for sales tax exemptions for purchases of medical supplies.
- Successfully represented taxpayer in defense of multi-million dollar sales and use tax assessment.
- Successfully represented S Corp shareholders' claims for certain New York QEZE tax credits.
- Successfully represented individual in defense of multi-million dollar residency audit assessment.
- *City Council of City of Jamestown v. Town Council of Town of Ellicott*, 175 A.D.3d 974, 105 N.Y.S.3d 321 (4<sup>th</sup> Dep’t 2019) – successfully secured dismissal of annexation petition as untimely.

## Press Releases

Pietra G. Zaffram Joins Hodgson Russ LLP  
April 24, 2024

## Presentations & Events

2024 Summer Tax Series  
605 3rd Ave., New York, New York, Tuesday, June 25 and Thursday, July 18

## Professional Affiliations

- Member, American Academy of Attorney-CPAs (AAA-CPA)
- Member, National Association of Bond Lawyers
- Board of Directors, University at Buffalo School of Management Alumni Association
- Past President, University at Buffalo School of Law Alumni Association

## Community & Pro Bono

- Sustainer Member, Junior League of Buffalo
- Volunteer, Kevin Guest House