

PARTNER - TAX - HEAD OF CROSS-BORDER TAX

Gaetano Pizzitola

I am Partner at Fieldfisher Italy with more than thirty years' experience focusing on cross-border inbound and outbound investments.

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📍 LOCATIONS

[Italy](#)



The main industries I focus on are energy and renewables, oil & gas, chemicals and infrastructure, but I also assist clients in a range of other manufacturing and commercial industries, including pharmaceutical, consumer, software and hi-tech, with respect to their financial transactions.

I regularly deal with M&A, private equity, venture capital and real estate transactions. I work predominantly on international, cross-border transactions. I advise on all aspects of taxation and related corporate law and accounting implications.

Structuring investments and intragroup reorganisations are amongst my main areas of focus, as well as coordinating foreign tax advice and the related domestic impact for Italian-based clients. This includes advising on: transfer pricing, Patent Box, R&D tax credit, withholding taxes, permanent establishments, CFC, blacklist, foreign tax credit and abuse of tax law doctrines are subjects of major experience, including assisting and representing clients during tax authorities' audits and negotiating tax settlements, or defending them before tax courts or for ruling requests and advance pricing agreements.

My experience and focus include BEPS, OECD, treaty and EU tax legislation and case law.

I am an Italian correspondent for Tax Analysts, publishing articles in their magazine frequently, and I also manage and participate at clients' workshops and roundtables on international taxation and news in Italy and abroad.

Before joining Fieldfisher, I was a tax lawyer at an international tax and law firm, an Italian tax inspector and a tax partner for a Big Four accountancy firm, including working for three years on the first Italian tax desk in New York in the late 1990s.

I hold an Italian law degree, a masters degree in Italian taxation and LL.M. (Tax) from Queen Mary & Westfield College in London with scholarship.

I advise my clients in Italian and English.