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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING

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PA DEPT OF BANKING

COMMONWEALTH OF PENNSYLVANIA,  
DEPARTMENT OF BANKING, OFFICE OF  
CREDIT UNIONS,

Petitioner,

v.

JOHN GALANTE, CHIEF EXECUTIVE  
OFFICER, BOEING HELICOPTERS  
CREDIT UNION,

Respondent.

Docket No.: 090023 (ENF-ORD)

NOTICE OF RIGHT TO APPEAL

You, John Galante, are hereby notified that you have the right to appeal the attached Final Order (the "Order") issued by the Commonwealth of Pennsylvania Department of Banking.

If you wish to appeal the attached Order, you must file a petition for review with the Prothonotary of the Pennsylvania Commonwealth Court within 30 days of the date of mailing of the attached Order, in accordance with and pursuant to Title 65 P.S. § 66.4(a). If you file a petition for review with the Prothonotary of the Pennsylvania Commonwealth Court, the petition for review must comply with Pennsylvania Rules of Appellate Procedure 1511 *et seq.*

Please be advised that failure to file a petition for review with the Prothonotary of the Pennsylvania Commonwealth Court pursuant to the Pennsylvania Rules of Appellate Procedure will result in the attached Order becoming final and unappealable.

In addition, please be advised that this Notice of Right to Appeal is not intended to and does not constitute legal advice. You should consult an attorney regarding your legal rights including your right to appeal the attached Order or your right to file an application for rehearing or reconsideration.

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING

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Docket No.: 090023 (ENF-ORD)

FINAL ORDER

Upon consideration of the pleadings, the Proposed Report issued by Hearing Officer Jackie Wiest Lutz, Esquire, the Brief on Exceptions filed by the Respondent, John Galante ("Galante"), the reply brief filed by the Commonwealth of Pennsylvania Department of Banking, Office of Credit Unions (the "OCU"), and the record in this matter, the Adjudicator hereby affirms and adopts in its entirety the Proposed Report of Hearing Officer Jackie Wiest Lutz, Esquire, attached hereto.

I. Procedural History

The procedural history of this matter was succinctly summarized by the Hearing Officer in her Proposed Report and is reproduced below:

This matter originated on January 26, 2009 with the filing of an *Order for Immediate Suspension, Followed by Removal and Prohibition of John Galante* ("Order of Prohibition") by the Department of Banking, Office of Credit Unions ("Office of Credit Unions"). The Order of Prohibition suspended John Galante ("Galante") as Chief Executive Officer of Boeing Helicopters Credit Union ("BHCU"), effective immediately, and scheduled a hearing on the suspension for March 4, 2009 through March 5, 2009, commencing at 1:00 p.m., at the

Pennsylvania Department of Banking, 17 North Second Street, Harrisburg, Pennsylvania.

The Order of Prohibition notified Galante that at the hearing, the removal of Galante as Chief Executive Officer, and his prohibition from participating in the conduct of the affairs of BHCU in any manner for an indefinite period of time will be heard in accordance with section 503(a.1)(2) and (3) of the Credit Union Code and that, at the same time, the prohibition of Galante as a director, officer, committee member, employee, volunteer or agent of any credit union under the jurisdiction of the Department for an indefinite period of time will be heard pursuant to section 503(a.1)(4).

On January 27, 2009, the Secretary of Banking designated Victoria A. Reider, Executive Deputy Secretary, to act as the adjudicator for this matter ("Adjudicator"). On January 28, 2009, the Adjudicator designated Jackie Wiest Lutz, Esquire, to act as the presiding officer for the Department ("Hearing Officer") and to prepare and file with the Department's Docket Clerk, Linnea Freeberg, a proposed report in accordance with 1 Pa. Code §§35.202 and 35.205. On February 13, 2009, the Department's Office of Credit Unions filed a *Motion to Join Boeing Helicopters Credit Union as an Indispensable Party*. This motion was granted by Order of the Hearing Officer dated February 25, 2009. Meanwhile, by letter dated February 23, 2009, F. Emmett Fitzpatrick, III, Esquire, notified the Hearing Officer that he had been retained to represent Galante and requested a continuance of the hearing scheduled for March 4 and 5, 2009 to allow time for preparation. *An Order Granting Continuance and Rescheduling Hearing* was issued by the Hearing Officer on February 25, 2009. The hearing was re-scheduled for June 4 and 5, 2009.

On or about July 28, 2008, previous to the issuance of the Order of Prohibition against Galante, the Office of Credit Unions filed a *Notice of Civil Penalty* against Galante, as Chief Executive Officer ("CEO") for BHCU (Docket No. 080203). The *Notice of Civil Penalty* notified Galante that a civil penalty in the amount of \$10,000 was being imposed against him, \$5,000 as an officer, and \$5,000 as a director of BHCU, under the authority of 17 Pa. C.S. §503(a.1)(2), because he failed in his fiduciary duty. This *Notice of Civil Penalty* notified Galante of his right to appeal the civil penalty, which Galante, through counsel, timely appealed on August 7, 2008. Hearing Officer Lutz was also designated to act as the presiding officer for this matter docketed at No. 080203.

On March 6, 2009 and April 1, 2009, the Office of Credit Unions, through counsel, requested that an additional 3 days be scheduled for the hearing on the Order of Prohibition.

On April 20, 2009, following a conference call with counsel, an Order was issued by the Hearing Officer which consolidated the matters involving the Order of Prohibition (Docket No. 090023 (ENF-ORD)) and the *Notice of Civil Penalty* (Docket No. 080203) for purposes of one hearing to be held on July 21, 2009

through July 24, 2009. The procedural posture of this consolidated proceeding then became very protracted.

On April 21, 2009 Valentino F. DiGiorgio, III of Stradley Ronon Stevens & Young, LLP, entered his appearance on behalf of Boeing Helicopters Credit Union (Docket No. 090023 (ENF-ORD)). Subsequently, on April 29, 2009, F. Emmett Fitzpatrick, III, Esquire entered his appearance on behalf of Galante (Docket No. 090023 (ENF-ORD)). On the same day, attorney Fitzpatrick filed two pleadings: a *Motion to Preclude Representation of Boeing Helicopters Credit Union by Valentino DiGiorgio, III, Esquire*; and, *Respondent's Motion for Identification, Return and Preclusion of Use of Seized Attorney-Client Privileged Communications*.

Responses to these filings were filed by the Office of Credit Unions on May 11, 2009 and by Boeing Helicopters Credit Union on May 12, 2009, respectively. Subsequently, on May 14, 2009:

- The Hearing Officer issued an Order scheduling a hearing for July 1, 2009 on the *Motions to Preclude Representation of Boeing Helicopters Credit Union by Valentino F. Digiorgio, III* and for *Identification, Return and Preclusion of Use of Seized Attorney-Client Privileged Communications*;
- Attorney Fitzpatrick notified the Hearing Officer that he would be out of the country and unavailable for a hearing on July 1, 2009;
- The Hearing Officer continued the hearing scheduled for July 1, 2009 and scheduled a pre-hearing conference for June 3, 2009;
- The Office of Credit Unions filed a *Motion for Protective Order* to protect from disclosure all documents provided by the Department or Boeing Helicopters Credit Union to Galante and his counsel; and,
- Attorney Fitzpatrick filed *John Galante's Motion to Dismiss Action for Lack of Jurisdiction*.

On June 8, 2009, the Office of Credit Unions filed an answer in opposition to Galante's *Motion to Dismiss for Lack of Jurisdiction*.

By Order dated June 10, 2009, the Hearing Officer deferred a ruling on Galante's *Motion to Dismiss for Lack of Jurisdiction* until the issuance of a Proposed Report following the consolidated hearing on the *Notice of Civil Penalty* (Docket No. 080203) and the *Order for Immediate Suspension, Followed by Removal and Prohibition of John Galante* (Docket No. 090023 (ENF-ORD)). Galante, through counsel, then filed *Respondent's Motion to Sever Cases*, which was denied by the Hearing Officer on July 2, 2009.

Subsequently, on July 14, 2009, Galante filed a *Praeceptum to Withdraw Appeal* with regard to the *Notice of Civil Penalty* (Docket No. 080203). With this filing, Galante, through counsel, asserted that the question of jurisdiction which he raised earlier, but which was deferred by the Hearing Officer by Order dated June 10, 2009 was now ripe. Galante further stated that he would not attend any hearing because the Department lacks jurisdiction.

On July 17, 2009, the Hearing Officer issued an Order dismissing, with prejudice, the appeal filed by Galante from the *Notice of Civil Penalty*. On July 20, 2009, the Office of Credit Unions filed a *Motion for Reconsideration and Clarification*. This Motion was denied by the Hearing Officer by Order dated July 21, 2009. The Hearing Officer also: (1) cancelled the hearing scheduled for July 22 through 24, 2009 on Galante's *Motion to Preclude Representation of Boeing Helicopters Credit Union by Valentino DiGiorgio, III, Esquire* and Galante's *Motion for Identification, Return and Preclusion of use of Seized Attorney-Client Privileged Communications*; (2) directed the parties to file simultaneous briefs by August 21, 2009 in support of their respective positions with respect to Galante's *Motion to Dismiss for Lack of Jurisdiction* in the matter involving Docket No. 090023 (ENF-Order)(*Order for Immediate Suspension Followed by Removal and Prohibition of John Galante*); and, (3) notified the parties that upon receipt of their briefs, the Hearing Officer would certify Galante's *Motion to Dismiss Action for Lack of Jurisdiction*, together with all supporting documentation, to the agency head for consideration and disposition under the authority of 1 Pa. Code §35.187(8).

On September 19, 2009, upon receipt of the parties' briefs, the Hearing Officer certified the question raised by Galante's *Motion to Dismiss Action for Lack of Jurisdiction* to the agency head for consideration and disposition in accordance with 1 Pa. Code §35.187(8).

On December 7, 2009, the Office of Credit Unions filed a *Motion to Schedule Hearing on Issue of Preclusion of Representation of Boeing Helicopters Credit Union by Counsel*. No response was filed to this motion. Consequently, on December 24, 2009 an *Order Scheduling Hearing* was issued by the Hearing Officer which scheduled a hearing on the issue of representation of Boeing Helicopters Credit Union for January 27, 2010.

On January 5, 2010, Galante, through counsel, filed *John Galante's Second Motion to Dismiss Action for Lack of Jurisdiction*. An *Order Denying Motion to Dismiss* was issued by the Hearing Officer on January 8, 2010. This Order notified all parties that the hearing regarding the issue of representation of Boeing Helicopters Credit Union will proceed as scheduled on January 27, 2010. Subsequently, on January 13, 2010, an Order was issued by the agency head/Adjudicator on the certification of the question raised by Galante's *Motion to Dismiss Action for Lack of Jurisdiction*, which denied Galante's *Motion to Dismiss Action for Lack of Jurisdiction*.

On January 19, 2010, Galante, through counsel, filed an *Emergency Application Pursuant to Pa. R.A.P. 1702(b) For Stay of Hearing Ancillary to Petition For Review* with the Commonwealth Court of Pennsylvania. On January 22, 2010, Galante then filed with the Department of Banking a *Motion of Respondent, John Galante, To Certify Question of Jurisdiction* to the Commonwealth Court. On the same date, Galante, through counsel requested the Hearing Officer to postpone the hearing scheduled for January 27, 2010. This request was opposed by the Office of Credit Unions by letter dated January 26, 2010 and denied by the Hearing Officer on the same date; the parties were notified that the hearing scheduled for January 27, 2010 will proceed as scheduled. Also on January 26, 2010, an Order was issued by Commonwealth Court denying Galante's *Emergency Application for Stay of Hearing Ancillary to Petition for Review*.

On January 27, 2010, the hearing on Galante's *Motion to Preclude Representation of Boeing Helicopters Credit Union by Valentino DiGiorgio, III, Esquire* and Galante's *Motion for Identification, Return and Preclusion of use of Seized Attorney-Client Privileged Communications* was held as scheduled. Neither Galante nor counsel for Galante appeared for this scheduled hearing. Consequently, by Order dated January 27, 2010, the Hearing Officer issued an *Order Dismissing With Prejudice Motions to Preclude Representation and For Identification, Return and Preclusion of Use of Seized Attorney-Client Privileged Communications*.

Subsequently, on January 28, 2010, an Order was issued by the Hearing Officer which scheduled the hearing on the Office of Credit Union's Order of Prohibition for May 3, 2010 through May 7, 2010.

On May 3, 2010, the hearing on the Office of Credit Union's Order of Prohibition was held as scheduled. Neither Galante nor counsel for Galante appeared for this hearing.

On May 5, 2010, upon Motion of the Office of Credit Unions, an *Order Entering Judgment by Default Against Respondent John Galante* was issued by the Hearing Officer. Under the terms of the Order, the factual allegations averred in the Office of Credit Union's Order of Prohibition were deemed admitted for purposes of a final adjudication in this matter and Judgment by Default was entered against Galante for his failure to appear, without any cause shown, for his scheduled hearing on May 3, 2010. The matter is now before the Secretary for final disposition.

*(Proposed Report, 2-9)(footnotes omitted).*

## II. DISCUSSION

The Adjudicator finds that Galante waived any right to challenge the Proposed Report by failing to appear without notice and cause for the hearing on the OCU's Order of Prohibition.

On January 29, 2010, the Hearing Officer issued an order scheduling the full hearing on the merits of the OCU's Order of Prohibition against Galante for May 3 through May 7, 2010. Present for the hearing on May 3, were the OCU, the witnesses subpoenaed to testify by the OCU and counsel for Boeing Helicopters Credit Union. Neither Galante nor his counsel appeared. Not only did they fail to appear, neither he nor his counsel provided any notice to the Hearing Officer or any of the other parties that he would not be appearing.<sup>1</sup> It also does not appear from the record that Galante or his counsel thereafter ever provided an explanation to the

<sup>1</sup> In the Proposed Report, the Hearing Officer describes Galante and his counsel's failure to appear as follows:

At the commencement of the hearing, the Hearing Officer noted for the record that the hearing notice notified the parties that the hearing was scheduled for Monday, May 3, 2010, through Friday, May 7, 2010, commencing at 9:00 a.m. each day at the Office of General Counsel, 333 Market Street, 17<sup>th</sup> Floor, Large Conference Room, Harrisburg, PA 17101. The Hearing Officer further noted for the record:

This morning at nine o'clock, all parties with the exception of Mr. Galante were present. Ms. Carroll, representing the Department of Banking Office of Credit Unions, appeared with all of the witnesses that she had subpoenaed to be in attendance today. Also in attendance, representing the interests of Boeing Helicopters Credit Union, was Sandra Girifalco of the Law Firm of Stradley, Ronon, Stevens & Young in Malvern, Pennsylvania.

We waited at least an hour and a half to approximately 11:30 a.m. realizing that occasionally traffic tie-ups, accidents, et cetera, have a tendency to result in people arriving late. My practice is typically to allow the parties 15 minutes to arrive at a scheduled hearing and then to entertain a motion from any party in attendance as to how he or she or they would like to proceed. And that's what basically occurred this morning.

It was decided . . . that since Mr. Galante had not appeared and there were no communications by Mr. Galante and/or his counsel to my office as the Hearing Officer or to the Department of Banking's Office that we would reconvene at two o'clock, . . . and I would entertain a motion at that time by the Department of Banking, Office of Credit Unions, with the understanding that we would also hear from. . . the docket clerk for the Department to essentially read into the record the chronology of all of the filings that have occurred to date with respect to this matter so that it is very clear on the record and from the record that Mr. Galante and his counsels (sic) were indeed notified properly and, in fact, participated to a large extent in these proceedings, even in the scheduling date for this hearing. All parties agreed to the actual hearing date that we finally reached.

So the fact that they are not present, I feel is inexcusable, particularly since no one has had the decency or courtesy to contact anyone to explain why they cannot appear. . . I will at this time turn it over to Ms. Carroll to introduce. . . testimony of her witness and then I will entertain a motion if she would like to make one as to the disposition of this proceeding. (Transcript, pgs. 5-8)

*(Proposed Report 31, fn. 15.)*

Hearing Officer for their absence and conduct. As a result of Galante's unexcused absence without notice, the Hearing Officer entered an order of judgment by default against Galante on May 7, 2010, deeming the OCU's allegations against him admitted. The default order was followed by the Proposed Report in July to which Galante filed a brief on exceptions challenging the findings therein; however, as a result of Galante's unexcused actions, the Adjudicator finds that he waived his right to contest the findings contained in the Proposed Report.

Although Galante filed a brief on exceptions to the Proposed Report, nothing contained therein supports any basis or justification for his failure to appear. In fact, Galante's brief does not address or explain his unexcused failure to appear and the issue is essentially ignored.<sup>2</sup> Instead, Galante seeks to again argue that the OCU had no jurisdiction to enter the Order of Prohibition against him and, on that basis, challenge the findings of fact and conclusions of law in the Proposed Report. Yet, the question of jurisdiction was already addressed prior to the hearing and Galante offers no justification, legal or otherwise, for his failure to appear that would permit him to now challenge the Hearing Officer's findings.

The issue of the OCU's jurisdiction was addressed by both the Adjudicator and the Commonwealth Court of Pennsylvania before the full hearing on this matter was scheduled to begin.<sup>3</sup> Galante first raised the issue of jurisdiction when he filed a Motion to Dismiss Action for Lack of Jurisdiction which was denied by the Adjudicator by order dated January 13, 2010, (the "Jurisdiction Order"), holding that the OCU had jurisdiction to proceed against Galante. In response, on January 20, 2010, Galante filed an Emergency Application Pursuant to Pa.R.A.P.

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<sup>2</sup> Galante briefly alludes to his failure to appear stating "the Hearing Examiner thereafter held a "hearing" on May 3, 2010, which was attended only by the DOB." *Galante Brief on Exceptions*, pg. 2.

<sup>3</sup> The issue of jurisdiction is fully addressed by the Adjudicator's Order of January 13, 2010, the memorandum opinion of the Honorable Rochelle S. Friedman of the Commonwealth Court dated January 28, 2010, *John Galante v. Pennsylvania Department of Banking, Office of Credit Unions*, 83 C.D. 2010 (Jan. 28, 2010), and the Proposed Report, adopted in its entirety by the Adjudicator, and need not be addressed again herein.

1702(b) For Stay Hearing Ancillary to Petition for Review (the "Stay Petition") with the Commonwealth Court of Pennsylvania. In the Stay Petition, Galante requested that the Commonwealth Court stay a hearing scheduled by the Hearing Officer on two motions he filed in the administrative proceeding. Galante sought to have the stay remain in effect pending his seeking an appeal of the Jurisdiction Order through either a motion to the Adjudicator to certify the Jurisdiction Order for immediate appeal or upon permission of the Commonwealth Court to allow an interlocutory appeal of the Jurisdiction Order. Galante filed his motion requesting the Adjudicator certify the Jurisdiction Order for immediate appeal on January 25, 2010.

The Commonwealth Court denied Galante's Stay Petition by order on January 26, 2010, which was followed by a memorandum opinion by the Honorable Rochelle S. Friedman wherein it was concluded that the OCU had the jurisdiction to proceed. *John Galante v. Pa. Dept. of Banking, Office of Credit Unions*, 83 C.D. 2010 (Jan. 28, 2010). It should be noted that, after the Stay Petition was denied, Galante and his counsel failed to appear without notice for the January 27<sup>th</sup> hearing on his own motions.<sup>4</sup> The Adjudicator subsequently denied Galante's motion to certify the Jurisdiction Order for immediate appeal on February 1, 2010. On February 26, 2010, Galante then attempted to appeal the Jurisdiction Order by filing with the Commonwealth Court a Petition for Permission to Appeal Interlocutory Decision Regarding Jurisdiction. The petition was denied on March 25, 2010.

Therefore, it is abundantly clear that at the time of the hearing on the OCU's Order of Prohibition on May 3, Galante was bound by the decisions of both the Adjudicator and the Commonwealth Court that affirmed the jurisdiction of the OCU to proceed. However, instead of adhering to administrative procedure by attending the hearing to defend himself and preserve his

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<sup>4</sup> At the motion hearing, the Hearing Officer noted that her "office has not received any communication from Mr. Fitzpatrick indicating his whereabouts, and . . . neither Mr. Fitzpatrick, nor his client, John Galanta (sic) is present. . . ." See *Transcript of Hearing on January 27, 2010*, pg. 5.

rights, Galante chose to not appear in spite of the orders affirming jurisdiction. Not only did Galante decide not to appear for the hearing, he did so without any notice from himself or his counsel to the Hearing Officer or any other party, thereby causing the other parties and witnesses to incur undue expense and inconvenience. Moreover, this was the second time in this proceeding Galante and his counsel failed to appear without notice or excuse to a scheduled hearing.

“The rules of administrative procedure are not mere suggestions, and compliance with them is necessary for the orderly administration of state government.” *Snyder Mental Health Center v. Dept. of Public Welfare*, 898 A.2d 1227, 1229-30 (Pa. Cmwlth. 2006). To hold that Galante did not waive his right to challenge the Proposed Report would be to condone his conduct and set a precedent that a party may pick and choose the parts of an administrative proceeding they wish to participate in, thus frustrating the purpose of the administrative process. Moreover, such conduct squarely runs counter to the principle of exhausting administrative remedies. *Cf. Ohio Casualty Group of Insurance Companies v. Argonaut Ins. Company*, 514 Pa. 430, 435, 525 A.2d 1195, 1197 (1987)(recognizing the principle that statutorily prescribed remedies are to be strictly pursued and an unjustified failure to follow an administrative scheme undercuts the rationale of the administrative process); *Shenango Valley Osteopathic Hospital v. Dept. of Health*, 499 Pa 39, 47; 451 A.2d 434, 439 (1982)(stating the failure to follow the administrative scheme undercuts the foundation of the administrative process). Accordingly, the Adjudicator finds that Galante, by choosing to not attend the hearing as he did, has waived his right to challenge the Proposed Report and the findings therein.

## VI. CONCLUSION

Therefore, based upon the pleadings, the Proposed Report, the findings of fact and conclusions of law contained therein, the Brief on Exceptions filed by Galante, the reply brief

filed by the OCU, the record in this matter and the reasons more fully set forth above, the Adjudicator **affirms** and **adopts** the Proposed Report, and the recommendations contained therein, in its entirety and it is hereby **ORDERED** and **DECREED** that:

1. John Galante is permanently prohibited from working in any capacity in any credit unions under the jurisdiction of the Commonwealth of Pennsylvania Department of Banking pursuant to 17 Pa.C.S. § 503(a.1.)(4).
2. The Department shall publish this Final Order and provide notice to all credit unions under the Department's jurisdiction that Galante is prohibited from working in the credit unions.

BY:

Date of Mailing: 4/14/11

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Victoria A. Reider  
Executive Deputy Secretary

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING

FILED

JOHN GALANTE,  
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PA DEPT OF BANKING

Docket No. : 090023 (ENF-ORD)

CERTIFICATE OF SERVICE

I hereby certify that on April 14<sup>th</sup>, 2011, I caused to have served a true and correct copy of the foregoing documents and all attachments thereto and/or enclosures therewith, upon the following individuals in accordance with the requirements of 1 Pa. Code § 33.31 (relating to service by agency), in the manner indicated below:

**By Hand Delivery:**

✓ Linda Carroll  
Deputy Chief Counsel  
Department of Banking  
17 North Second Street  
Suite 1300  
Harrisburg, PA 17101-2290

**By United States First Class Mail:**

Sandra Girifalco, Esquire  
Stradley, Ronon Stevens & Young, LLP  
30 Valley Stream Parkway  
Malvern, PA 19355

F. Emmett Fitzpatrick, III, Esquire  
Kenneth R. Vennera, Esquire  
Flamm Walton, PC  
794 Penllyn Pike  
Blue Bell, PA 19422-1669

By:

✓ Linnlea Freeberg, Docket Clerk  
Pennsylvania Department of Banking  
17 North Second Street, Suite 1300  
Harrisburg, Pennsylvania 17101