

**BOARD OF CITY SERVICE COMMISSIONERS
CITY OF MILWAUKEE**

IN THE MATTER OF
CHRISTOPHER WANTY
V.
CITY OF MILWAUKEE

FINDINGS AND DECISION

This is the written determination of the Board of City Service Commissioners on the administrative appeal hearing in this case. A timely appeal was received from Christopher Wanty (hereinafter "Appellant") challenging his discharge from the position of Accounting Manager, Comptroller's Office (hereinafter "Department") on September 12, 2025.

An multi-day administrative appeal hearing was held in hybrid format (both in-person and by video conference) pursuant to Sec. 63.43, Wis. Stats. and City Service Commission Rule XIV, Section 7, on Monday, November 10, 2025 at 9:00 a.m. and Tuesday, November 18, 2025 at 1:00 p.m. The witnesses were sworn and all testimony was taken by a Court Reporter.

Appearances:

City Service Commission:	Francis Bock, President Marilyn Miller, Vice President Janet Cleary, Commissioner Steve Smith, Commissioner Heidi Wick Spoerl, Commissioner Jackie Q. Carter, Executive Secretary Kristin Urban, Staffing Services Manager Elizabeth Moore, Administrative Support Specialist
Commission Represented By:	Patrick McClain, Assistant City Attorney
Appellant Represented By:	Chris Donahoe, Hawks Quindel S.C.
Department Represented By:	Katherine Headley, Assistant City Attorney
Witnesses:	Bill Christianson, Comptroller Charles Roedell, Deputy Comptroller Margie Crabajal, Accounting Specialist, Compt. Office Richard Bare, Accts. Dir./Spec. Dep. Comp., Compt. Office Tawauna Swanigan, Bus. Fin. Mgr., Off. of the City Atty. Dave Piedt, Budget Manager, Dept. of City Development

Claudia Orugbani, Grants Fiscal Manager, Compt. (Ret.)
Therese Biernat, Business Finance Manager, DER (Ret.)
Christopher Wanty, Appellant

ISSUE

The issue is whether or not there was just cause for the action taken by the Department in accordance with sec. 63.43, Stats.

Based upon the evidence in the record, the Commission finds as follows:

FINDINGS OF FACT

A. Appellant's City Employment History

1. Appellant was first employed by the City as an Accounting Intern with the Comptroller's Office on January 6, 1999.
2. Appellant was promoted to Management Accountant on July 6, 1999.
3. Appellant was promoted to Management Accounting Specialist on November 28, 1999.
4. Appellant was promoted to Accounting Supervisor on November 4, 2007.
5. Appellant was promoted to Assistant Accounting Manager on November 2, 2008.
6. Appellant was promoted to Accounting Manager on June 25, 2014.

B. Appellant's Job Description and Work Rules

7. According to Appellant's job description, the Accounting Manager is responsible for managing the timeliness and accuracy of all financial transactions of the City; directing, supervising and managing the accounts payable processes; and advising and instructing all city departments and comptroller staff on voucher preparation questions, processing procedures, account distributions, corrections processes, and resolving accounting and timing issues.
8. The City Comptroller Office Work Rules require Department employees to report suspected instances of fraud "as soon as possible and with as much detail as you can."

9. The work rules allow numerous methods for reporting fraud, including reporting to a supervisor, the City's Fraud Hotline, the City Clerk, an elected official, or the Department of Employee Relations.
10. The rules clarify that "[i]t is imperative to report [suspected fraud] to a source that you feel comfortable with so it can be handled in a professional and timely manner."

C. ACH Fraud

11. Vendors who do business with the City of Milwaukee are permitted to file ACH forms authorizing the City to make payments to the vendor's bank account.
12. Vendors may change their bank account information on file with the City by submitting a new ACH form.
13. Prior to 2014, vendors could change ACH information by sending an email to the Comptroller's Office.
14. In 2014, however, the City was the victim of a kind of cyber attack referred to as a vendor impersonation fraud.
15. This type of fraud occurs when a scammer impersonates a vendor to change the ACH bank account information for the vendor.
16. After the change is made, payments intended for the vendor are instead directed to the scammer's account.
17. During the 2014 incident, a scammer was able to steal a vendor payment by fraudulently changing the vendor's ACH information via email.
18. After the 2014 incident, Appellant helped create a form which required vendors to provide detailed banking information, a bank verification letter, and a signature in order to change the vendor's ACH information.
19. ACH forms are processed by the Comptroller's office, and are reviewed and approved by Comptroller's Office staff.

20. Appellant was one of just three Comptroller's Office employees who are authorized to approve ACH forms.
21. Appellant permitted his subordinates to conduct initial reviews of ACH forms.
22. Appellant's subordinates did not have the authority to approve an ACH form, and were required to obtain Appellant's signature (or a signature from one of the other two authorized approvers) before an ACH form was officially approved.
23. Appellant indicated his approval of ACH forms by adding his signature or initials to the form.
24. On October 7, 2024, Appellant approved a fraudulent ACH form changing the banking information for a city vendor, Walnut Way Conservation Corp. (hereinafter "Walnut Way").
25. Appellant's subordinate, Maggie Carbajal, completed an initial review of the ACH form and added her signature.
26. The ACH form and accompanying bank letter contained numerous, obvious indicators that the form was fraudulent, including misspelled words, different font sizes, a phone number which contained the letter "b," and a banking representative's signature that did not match the listed name.
27. Because Appellant approved the fraudulent ACH form, a City payment in the amount of \$143,540.85 that was intended for Walnut Way was instead sent to the fraudster's bank account on December 11, 2024.
28. On March 21, 2025, Walnut Way notified a city employee, Lynn Guerrero, that Walnut Way had not received the expected December payment.
29. Later that day, Ms. Guerrero notified Ms. Carbajal via email of the missing payment.
30. Appellant was not copied on that email.
31. Ms. Carbajal responded by stating that she did not have an "ACH return report" for the payment, and that the bank account for the vendor had been closed.
32. Ms. Carbajal advised Ms. Guerrero to send Walnut Way new ACH forms.

33. In a separate series of emails exchanged on March 21, 2025, Ms. Carbajal and Ms. Guerrero attempted to gather banking and payment information related to Walnut Way.
34. On Monday, March 24, 2025, both Ms. Carbajal and Appellant received an email from another City employee, Zachary Allen, stating that Walnut Way had not received the December payment.
35. Mr. Allen explained that Walnut Way's email account appeared to have been compromised, and that someone had used the compromised email to submit a fraudulent ACH form.
36. Mr. Allen asked if the payment could be revoked and the fraudulent account removed from the City's system.
37. The next day, March 25, 2025, Mr. Allen sent a follow up email to Ms. Carbajal and Appellant asking if they had reviewed his prior email.
38. Ms. Carbajal responded by email, stating "We have not had a chance to review your email and attachments...This will take some time to figure out."
39. Appellant was copied on Ms. Carbajal's response.
40. Ms. Carbajal then forwarded four emails from March 21 to Appellant, each time writing "Chris, For your information" in the body of the email.
41. Ms. Carbajal additionally forwarded her March 25 email chain with Mr. Allen to both Appellant and Mr. Allen.
42. The email, which was marked "High" importance, stated:

Hi!

I have forwarded your emails to Robyn in the Treasurer's Office. As far as I know we did not receive any ACH return report from US Bank regarding this payment, so we need to know what happened with those funds.

Thank you!

43. In total, the emails sent to Appellant on March 24 and 25, 2025 contained the following information: Walnut Way had not received a \$143,540.85 payment that was disbursed in December 2024; the bank account on file for the vendor had been closed without notice to

the City; Walnut Way's email account appeared to have been compromised; it appeared that someone had used the compromised email to submit a fraudulent ACH form; and the City was seeking information regarding revoking the fraudulent payment and removing the fraudulent bank account from the City's system.

44. Despite receiving numerous emails notifying him of the Walnut Way fraud, Appellant did not report the issue to anyone.

45. At the time, Appellant was the most senior employee in the Comptroller's Office to have received information regarding the Walnut Way fraud.

46. Because Appellant did not alert the Comptroller to the Walnut Way fraud, no additional security measures were put into place to prevent further instances of fraud.

47. In July 2025, a scammer was able to steal a \$460,000 payment intended for a city vendor, Scherrer Construction, by submitting a fraudulent ACH form.

48. The scammer created an email address similar to the one used by Scherrer Construction, and used that email address to submit the fraudulent ACH form.

49. On August 4, 2025, the Comptroller was notified by email that the ACH form submitted on behalf of Scherrer Construction may have been fraudulent.

50. The Comptroller immediately forwarded the email to Ms. Carbajal.

51. Appellant was copied on that email.

52. The next day, on August 5, 2025, the Comptroller wrote the City Treasurer to seek assistance in recovering the fraudulent \$460,000 payment.

53. Robyn Malone, the Investments and Financial Services Director for the Office of the Treasurer, responded by email.

54. Ms. Malone stated that it was unlikely the payment could be recovered.

55. Ms. Malone also notified the Comptroller of the Walnut Way fraud, stating:

I'm not sure if you are aware, but this is not the first time this has occurred. This also happened earlier this year with a vendor that DPW and ECO paid, Walnut Way...Going forward, perhaps a new procedure should be implemented for initial

set up and changes for vendors paid via ACH or wire, such as a phone call by the City to the vendor to verify the banking information. In the Walnut Way situation if I remember correctly the employee's email had been hacked so even though the information appeared to be coming from a known contact, it was not.

56. The Comptroller replied by email stating that he was not aware of the Walnut Way fraud, and asked Ms. Malone to provide information related to that incident.
57. The Comptroller also stated that, effective that day, the Comptroller's Office would be requiring staff to contact vendors by phone prior to approving ACH forms.
58. The Comptroller's Office opened an investigation into the Walnut Way fraud.
59. The investigation revealed that Appellant had been repeatedly notified of the fraud by email but had failed to act.

D. The Resiliency Project

60. In 2024, the Department began a major initiative called the "Resiliency Project."
61. The purpose of the project was to document the job activities and relevant procedures for each Department position in order to preserve institutional knowledge for use during vacancies and turnover.
62. To implement the project, all Department employees were given the following "Objective #1" as part of their 2024-2025 Objectives:

Job activities list is thorough, accurate, and up-to-date. Job procedures are fully documented, comprehensive, accurate, up-to-date, and presented in an easily understandable manner. Job activities list and procedures were submitted by the due date.
63. The Comptroller designated the Resiliency Project as "Objective #1" because it was a high priority.
64. The due date for this project was August 30, 2024.
65. Appellant failed to document any procedures by August 13, 2025.

E. Discharge and Appeal Hearing

66. A pre-discharge meeting was held for Appellant on September 10, 2025 for violations of City Service Rule XIV, Section 12, Paragraphs K, L, and Q.
67. City Service Rule XIV, Section 12, Paragraph K authorizes discipline if an employee “[i]s incompetent or inefficient in the performance of or fails or refuses to perform the duties required for the position.”
68. City Service Rule XIV, Section 12, Paragraph L authorizes discipline if an employee “[i]s careless or negligent or makes unauthorized use or permits the unauthorized use of the property of the city.”
69. City Service Rule XIV, Section 12, Paragraph Q authorizes discipline if an employee “[h]as refused or failed to comply with departmental work rules, policies or procedures.”
70. During the pre-discharge meeting, Appellant claimed he was unaware of the Walnut Way fraud.
71. He further denied ever reading the contents of either Mr. Allen’s or Ms. Carbajal’s emails concerning the fraud.
72. Appellant stated that he believed he had only been copied on those emails for informational purposes.
73. When asked why he had not submitted any Resiliency Project information by the due date, Appellant indicated that the project was not a high priority and he had focused on more important projects.
74. Appellant was discharged on September 12, 2025.
75. Appellant filed a timely appeal.
76. During the appeal hearing for this matter, evidence and testimony was adduced consistent with the facts outlined above.
77. Appellant conceded that the Walnut Way ACH form contained “glaring” errors.

78. Appellant defended his failure to report the Walnut Way fraud by claiming to have overlooked the significance of Mr. Allen's and Ms. Carbajal's emails.
79. Appellant stated he gets between 50 and 100 emails per day, is frequently occupied by meetings, and was busy with numerous projects at the time the fraud was reported.
80. However, Appellant did not have any meetings scheduled on March 25, 2025.
81. Appellant admitted that his "process" for reviewing emails did not include reading every email he received.
82. Instead, Appellant did not read emails concerning issues he believed had already been resolved by his staff.
83. Appellant stated that he believed the initial Walnut Way email concerned a simple payment inquiry.
84. Appellant assumed that if Ms. Carbajal had encountered a more important issue, she would have reported it to him in person or by phone.
85. Deputy Comptroller Charles Roedell testified that he conducted the Department's investigation into the Walnut Way fraud.
86. The investigation revealed that Appellant was the most senior Department employee to have been notified of the Walnut Way fraud, but Appellant failed to take any action.
87. Mr. Roedell further testified that Appellant was the root cause of the Walnut Way fraud because Appellant both approved the fraudulent ACH form for Walnut Way and failed to act after being notified of the fraud by other employees.
88. Moreover, Appellant's failure to report the Walnut Way fraud deprived the Department of the opportunity to implement additional controls which would have prevented the later Scherrer Construction fraud.
89. Appellant's supervisor, Richard Bare, testified that Appellant is expected to review every work-related email he receives.

90. Comptroller Bill Christianson testified that all Department employees are required by the Department's work rules to report fraud and suspected fraud.

91. Mr. Christianson confirmed that if Appellant had properly reported the Walnut Way fraud, the Department could have implemented additional security measures which would have prevented the subsequent Scherrer Construction fraud.

92. Mr. Christianson testified that Appellant should have realized the significance of Mr. Allen's and Ms. Carbajal's emails.

CONCLUSIONS OF LAW

1. Appellant was an employee holding a classified position in the Comptroller's Office, the appointing authority within the meaning of Sec. 63.43, Wis. Stats., and the City Service Commission Rules.
2. The Department demonstrated by a preponderance of the evidence that Appellant violated City Service Rule XIV, Section 12, Paragraphs K, L, and Q by approving the fraudulent ACH form for Walnut Way, failing to report the Walnut Way fraud once notified of it, and failing to timely complete his Resiliency Project objectives as directed.
3. Based on the preponderance of the evidence, the Department did have just cause to discipline Appellant.
4. Based on the preponderance of the evidence, there was just cause to discharge the Appellant.

ORDER

By unanimous vote of the Board, the discharge of Appellant on September 12, 2025 is affirmed.

Dated and signed at Milwaukee, Wisconsin, this _____ 2026.

FRANCIS BOCK, PRESIDENT