

MISCELLANEOUS ELECTRONIC SUBMISSION TO THE FEC (FEC Form 99)

NAME OF COMMITTEE (In Full)

FEC IDENTIFICATION NUMBER

Seafarers Political Activity Donation - Seafarers International Union of NA-AGLIW C00004325

Mailing Address 5201 Capital Gateway Drive

City State ZIP Code
Camp Springs MD 20746

Chelsea Diab (previously Chelsea Heindel) served as the Committee's Treasurer from March 7, 2022, until October 2025, and in several positions, last as an administrative assistant, at the Committee's connected organization, the Seafarers International Union of NA-AGLIW (SIU). The Committee's separate Form 99 letter explains the nature and amount of Ms. Diab's embezzlements of Committee funds during her tenure, and the resulting amendments that the committee is filing to correct the false reports submitted by Ms. Diab to conceal her actions.

The embezzlement initially came to light during an internal review conducted in October 2025 by other SIU staff of one of the Committee's two affiliated federal political committees. Ms. Diab initially denied wrongdoing, but subsequently acknowledged her responsibility upon being confronted with contradictory evidence. The SIU immediately terminated her employment, removed her from her Treasurer positions, and launched a comprehensive review of all three committees' records during her tenure, including a demand to Ms. Diab that she turn over some of her personal banking records, with which she complied.

Upon Ms. Diab's termination, Thomas Orzechowski was appointed as the new Treasurer and immediately implemented a series

of corrective measures, including:

Segregation of duties for check receipts, deposit preparations, deposit review, and physical deposit into the appropriate account

Reconciliation of bank deposits with the deposit log

A two-signature requirement for all disbursements

Implementation of a formal accounting system and new PAC management software

Addition of positive pay controls on all accounts, with monthly bank statement reviews

Adoption of written operating procedures and guidance

Stronger record retention policies and procedures

A two-person review and verification process for all FEC filings prior to submission

The SIU also retained outside legal counsel, engaged a forensic auditor, and hired a professional reporting compliance firm to assist with the preparation and filing of all required amended FEC reports, most of which have been submitted, and the SIU has been in regular contact with the Commission's Reports Analysis Division about how best to accomplish that effort.

The SIU promptly reported the embezzlement to the Commission, the Financial Crimes Division of Prince George's County, Maryland (where the SIU headquarters is located), and to the Federal Bureau of Investigation. The SIU and the committees are cooperating fully with all authorities.

The Committee's losses were covered under an applicable insurance policy and reimbursed by the insurer, Chubb and Son Federal Insurance Company, as disclosed on the Committee's original April 2026 Monthly Report. This payment, for \$292,888.69, covered the entire amount claimed by the Committee less a \$2,500 deductible amount.

The SIU's internal investigation has determined the full extent of the misappropriations; that Ms. Diab acted alone; and that no other individuals at the SIU (or elsewhere, as far as SIU can determine) were involved in or aware of the misconduct.