

U.S. Department of Labor

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August 22, 2025

Christina Rosas, President
Union of Unite Here Staff
725 S. Hualapai Way
Apt. 2006
Las Vegas, NV 89145

Case Number: 310-6030535()
LM Number: 544263

Dear Christina Rosas:

This office has recently completed an audit of Union of Unite Here Staff (UUHS) under the Compliance Audit Program (CAP) to determine your organization's compliance with the provisions of the Labor-Management Reporting and Disclosure Act of 1959 (LMRDA). As discussed during the exit interview with you on August 7, 2025, the following problems were disclosed during the CAP. The matters listed below are not an exhaustive list of all possible problem areas since the audit conducted was limited in scope.

Recordkeeping Violations

Title II of the LMRDA establishes certain reporting and recordkeeping requirements. Section 206 requires, among other things, that labor organizations maintain adequate records for at least five years by which each receipt and disbursement of funds, as well as all account balances, can be verified, explained, and clarified. As a general rule, labor organizations must maintain all records used or received in the course of union business.

For disbursements, this includes not only original bills, invoices, receipts, vouchers, and applicable resolutions, but also documentation showing the nature of the union business requiring the disbursement, the goods or services received, and the identity of the recipient(s) of the goods or services. In most instances, this documentation requirement can be satisfied with a sufficiently descriptive expense receipt or invoice. If an expense receipt is not sufficiently descriptive, a union officer or employee should write a note on it providing the additional information. For money it receives, the labor organization must keep at least one record showing the date, amount, purpose, and source of that money. The labor organization must also retain bank records for all accounts.

The audit of UUHS's 2024 records revealed the following recordkeeping violations:

1. General Reimbursed Expenses

UUHS did not retain adequate documentation for reimbursed expenses incurred by President Leslie Lewis totaling at least \$2,814. For example, the union only maintained copies of his personal bank statement with highlighted debit card transactions to Hilton

New York on June 17 and June 24, 2024. The audit indicated this disbursement was associated with his attendance at the UNITE HERE 2024 Convention.

As noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

2. Receipt Dates Not Recorded

Entries in the local's receipts journal for counter deposits reflect the date the union deposited money, but not the date money was received. Union receipts records must show the date of receipt. The date of receipt is required to verify, explain, or clarify amounts required to be reported in Statement B (Receipts and Disbursements) of the LM-3. The LM-3 instructions for Statement B state that the labor organization must record receipts when it actually receives money and disbursements when it actually pays out money. Failure to record the date money was received could result in the union reporting some receipts for a different year than when it actually received them.

3. Information not Recorded in Meeting Minutes

During the audit, you advised OLMS that the executive board authorized travel expenses that exceeded \$150 for the UNITE HERE convention at an executive board meeting. Article XIII, Section 1 of the UUHS Constitution and Bylaws requires expenses incurred by the President or Secretary-Treasurer in an amount greater than \$150 should be approved by the executive board. However, executive board meeting minutes during the audit year contained no reference to expense approvals. Minutes of all membership or executive board meetings must report any disbursement approvals made at those meetings.

4. General Expenses

UUHS did not maintain adequate supporting documentation for general expenses, including attorney fees, QuickBooks, and Zoom, incurred by the union for at least 24 transactions totaling at least \$11,234.49.

As noted above, labor organizations must retain original receipts, bills, and vouchers for all disbursements. The president and treasurer (or corresponding principal officers) of your union, who are required to sign your union's LM report, are responsible for properly maintaining union records.

Based on your assurance that UUHS will retain adequate documentation in the future, OLMS will take no further enforcement action at this time regarding the above violations.

Reporting Violations

The audit disclosed a violation of LMRDA Section 201(b), which requires labor organizations to file annual financial reports accurately disclosing their financial condition and operations. The Labor Organization Annual Report Form LM-3 filed by UUHS for the fiscal year ended December 31, 2024, was deficient in the following areas:

1. Disbursements to Officers

UUHS did not include some reimbursements totaling approximately \$2,086 to President Leslie Lewis in Item 24 (All Officers and Disbursements to Officers). It appears the union erroneously did not report these payments on the LM-3.

The union must report most direct disbursements to UUHS officers and some indirect disbursements made on behalf of its officers in Item 24. A "direct disbursement" to an officer is a payment made to an officer in the form of cash, property, goods, services, or other things of value. See the instructions for Item 24 for a discussion of certain direct disbursements to officers that do not have to be reported in Item 24. An "indirect disbursement" to an officer is a payment to another party (including a credit card company) for cash, property, goods, services, or other things of value received by or on behalf of an officer. However, indirect disbursements for temporary lodging (such as a union check issued to a hotel) or for transportation by a public carrier (such as an airline) for an officer traveling on union business should be reported in Item 48 (Office and Administrative Expense).

2. Total Receipts & Total Disbursements

Item 44 (Total Receipts) is reported as \$14,731, but this amount is incorrect because the union mistakenly underreported Item 38 (Dues Receipts) by approximately \$250. Item 55 (Total Disbursements) is reported as \$10,539 but should be reported as \$12,874, a difference of \$2,335. The reporting violation pertaining to total disbursements was mostly attributed to the reporting violation in Item 24 listed above.

3. Incorrect Fiscal Year End Date

During the audit, you advised that the union's fiscal year ended December 31, 2024. The union incorrectly reported its fiscal year end as December 11, 2024.

4. Failure to File Bylaws

The audit disclosed a violation of LMRDA Section 201(a), which requires that a union submit a copy of its revised constitution and bylaws with its LM report when it makes changes to its constitution or bylaws. UUHS amended its constitution and bylaws in 2016 but did not file a copy with its LM report for that year.

As agreed, UUHS will file a copy of its current constitution and bylaws via the OLMS Electronic Filing System (EFS) as soon as possible but not later than September 8, 2025.

UUHS must file an amended Form LM-3 for the fiscal year ended December 31, 2024, to correct the deficient items discussed above. The report must be filed electronically using the EFS available at the OLMS website at www.olms.dol.gov. The amended Form LM-3 must be filed no later than September 8, 2025. Before filing, review the report thoroughly to be sure it is complete and accurate.

Other Violation

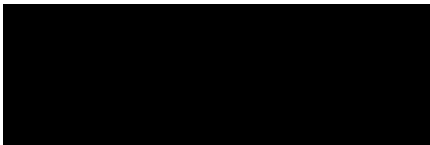
Failure to File Prior Year LM-3 Report

At the beginning of this audit in March 2025, UUHS had yet to file its LM-3 report for fiscal year ending December 31, 2023. The LM-3 Instructions require reports to be filed within 90 after the end of the labor organization's fiscal year.

UUHS filed its LM-3 report for fiscal year ending December 31, 2023 on April 30, 2025.

I want to extend my personal appreciation to Union of Unite Here Staff for the cooperation and courtesy extended during this compliance audit. I strongly recommend that you make sure this letter and the compliance assistance materials provided to you are passed on to future officers. If we can provide any additional assistance, please do not hesitate to call.

Sincerely,



Investigator

cc: Lynx Tchernyshyov, Secretary-Treasurer