

BEFORE THE FEDERAL ELECTION COMMISSION

SENT VIA ELECTRONIC MAIL TO: rheilizer@fec.gov

And Via First Class U.S. Mail

Wednesday, September 7, 2016

MUR # 1134

Ms. Ruth Heilizer, Esquire
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Direct: 202-694-1598
Telephone: 202-694-1650
Telephone: 202-694-1000

AMENDED
COMPLAINT AGAINST NEWT 2012, INC.

OFFICE OF GENERAL
COUNSEL

2016 SEP 14 PM 1:55

RECEIVED
FEDERAL ELECTION
COMMISSION

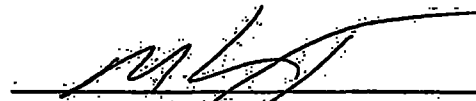
Dear Ms. Heilizer,

Pursuant to the Federal Election Campaign Act ("FECA") as well as Federal Election Commission ("FEC"), I Melvin L. Stevens, Jr., files this Amended Complaint against NEWT 2012, Inc., and in support thereof states as follows:


1. On December 21, 2011 NEWT 2012, Inc., entered into a 3 (three) month Commercial Lease with me for a Turn-Key Office call center located in my (former) building located at 180 North Westmonte Drive, Altamonte Springs, Florida 32714. Up front, I spent a great deal of my own funds assembling the furniture, fixtures and equipment, as well as had the phone systems and computer systems wired, installed and activated.
2. On March 1, 2012, NEWT 2012, Inc., was invoiced \$4,530.45 for these services NEWT 2012, Inc. (See attached exhibit "A")
3. On May 3, 2012, I submitted the completed required Vendor Questionnaire as required by Mr. Taylor Swindle, CFO of NEWT 2012, Inc. (See attached exhibit "B")

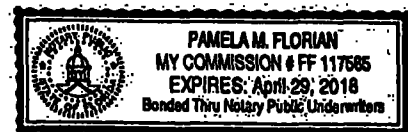
- 170044414405
4. On September 20, 2012 I last received a check from Newt 2012, Inc., Check #2593 drawn on Chain Bridge Bank, N.A., for \$100.00, toward their unpaid invoice which through his own volition recognizes the unpaid balance of \$2,430.45. (See attached exhibit "C")
 5. On March 18, 2015 was the last communication received *from* Mr. Taylor Swindler, CFO regarding payment via e-mail where he stated he should be able to send something in April. (See attached exhibit "D")
 6. On July 11, 2016, my office sent yet another letter (Via email and U.S. Mail) with a statement to Mr. Taylor Swindle and Newt Gingrich pleading with them to simply pay the balance with interest. (See attached exhibit "E")
 7. Lastly, I have been unsuccessful in even getting a response *despite repeated attempts via e-mails and voice mails* from them since March 18, 2015 regarding payment.
 8. On August 1, 2016, Mr. Taylor Swindle, CFO of Newt 2012, Inc., & Gingrich Productions, located at 4501 North Fairfax Drive, Suite 901, Arlington, CA 23303, filed a Debt Settlement Plan with the Federal Election Commission, FEC I.D. No.: C-00496497.
 9. On page 14, box E, of said Debt Settlement Plan; reflects the amount of \$1,830.45 as an undisputed debt owed to Security Financial Enterprises/Mel Stevens Jr. *The actual unpaid debt owed to me is \$2,430.45; with interest of \$1,385.00 for 59 months delinquent totaling \$3,815.55.* (See attached exhibit "F")
 - 10) I would respectfully ask for the FEC's intervention in correcting the inaccurate amount of debt he reported to the FEC to reflect the true and correct amount owed of \$3,815.55; further, we would very much like to be paid IN FULL.

FURTHER AFFIANT SAYETH NOT



Melvin L. Stevens, Jr.

SUBSCRIBED TO and Sworn to before me, the undersigned authority, MELVIN L. STEVENS, JR., who has produced personally known as identification OR is personally known to me and who did take an Oath on this 7th day of September 2016.


Notary Public



Respectfully Submitted:


Mel Stevens, Jr.,
499 North State Road 434, Suite 2157
Altamonte Springs, Florida 32714
Cell:
Primary E-Mail: _____
Secondary E-Mail: _____

Copies to:
Mr. Taylor Swindle/ Mr. Newt Gingrich
4501 North Fairfax Drive, Suite 900,
Arlington, Virginia 23303
E-Mail: info@newt.org / tswindle@newt.org

Answer to U2 #9

Exhibit A

Security Financial Enterprises, Inc.

Mel Stevens

499 N. SR 434 #2157

Altamonte Springs, FL 32714

Invoice

| Invoice D... | Invoice #: |
|--------------|------------|
| 3/1/2012 | 96 |

Bill To:

Taylor Swindle
Treasury Director
NEWT2012 Campaign Headquarters
4501 N. Fairfax Drive, Suite 900
Arlington, VA 22303

P.O. Number:

Due Date:

Project:

PER LEASE

3/1/2012

| Date | Description | Amount |
|------------------|--|------------|
| 1/1/2012 | JANUARY 2012 RENT | 1,400.00 |
| 1/1/2012 | Seminole County, FL Sales & Use Tax @ 6% | 84.00 |
| 2/1/2011 | FEBRUARY 2012 RENT | 1,400.00 |
| 2/1/2012 | Seminole County, FL Sales & Use Tax @ 6% | 84.00 |
| 12/31/2011 | Furniture Move & Turn-Key Call Center Set-Up: Emergency by 01-01-2012 (per Antori Miranda) | 350.00 |
| 1/24/2011 | RNC Electrical: Emergency Telephone & Internet Hook Up (per Antori Miranda) See attached invoice | 747.50 |
| 1/30/2012 | Catering Services for Newt 2012 Fundraiser held in Winter Park Florida: See attached Invoice | 440.00 |
| 1/23/2012 | Fed-Ex Charge: Ship Cell Phones & Stickers to Newt Office in Coral Springs, FL | 24.95 |
| 3/19/2012 | LATE FEES - 10% of Monthly Rent @ 2 months rents = \$298.00 WAIVED Per Mel Stevens, Jr. | 0.00 |
| 3/19/2012 | LATE FEES - \$25.00 Daily Charge @ 2 Months = \$1,500.00 WAIVED per Mel Stevens, Jr. | 0.00 |
| DUE UPON RECEIPT | | |
| Total | | \$4,530.45 |
| Payments/Credits | | \$0.00 |
| Balance Due | | \$4,530.45 |

Last Payment

Rec'd

9-16-13

In

Balance

1430.45

5-3
Pamela M Florian

From: Pamela M Florian [pamela@securityfinancial.com]
Sent: Thursday, May 03, 2012 12:05 AM
To: 'George Shelton'; 'tswindle@newt.org'
Cc: mel@securityfinancial.com
Subject: Completed Newt 2012 Vendor Questionnaire by Security Financial -Orlando Florida
Attachments: Executed Sec Fin Newt 2012 Vendor Questionnaire 05-02-12.pdf

Re: Newt
ben w...

exhibit B

Good Evening Mr. Shelton and Mr. Swindle:

Attached in PDF format with supporting documents is Security Financials completed Vendor Questionnaire for NEWT 2012 in support of our invoice #96 dated 03-01-12 in the amount of \$4,530.45 for services we provide.

We are very disappointed that Mr. Gingrich has withdrawn the presidential race as we fully supported him. Mr. Stevens personally met Mr. Gingrich, his wife and daughter on several occasions here in Florida and everyone was impressed.

Thank you Mr. Shelton and Mr. Swindle.

Kindest Regards,
Pamela M. Florian,
Executive Assistant
Security Financial Enterprises, Inc.
407-661-9700 ext. 101
407-661-9099 fax
pamela@securityfinancial.com

Personal Quote:

It is nice to be important, but it is more important to be nice!

This e-mail, and any attachments thereto, is intended for use by the addressee(s) named herein and may contain legally privileged and/or confidential information. If you are not the intended recipient of the e-mail, you are hereby notified that any dissemination, distribution or copying of this e-mail, and any attachments thereto, is strictly prohibited. If you have received this e-mail in error, please kindly notify me at 407-661-9700.x101 and permanently delete the original and any copy of any e-mail and any printout thereof. Thank you in advance!!

6-14-16

Past Due

exhibit C

Re: Westmonte 2593

NEWT 2012, INC.
4501 N FAIRFAX DRIVE
NINTH FLOOR
ARLINGTON, VA 22203

CHAIN BRIDGE BANK, N.A.
MCLEAN, VIRGINIA 22101
68-947-560

9/16/2013

PAY TO THE ORDER OF Mel Stevens

\$ 100.00

One Hundred and 00/100

DOLLARS

Security Financial Enterprises, Inc.
180 North Westmonte Drive
Altamonte Springs, FL 32714

MEMO

Rent

[Signature]
AUTHORIZED SIGNATURE

NEWT 2012, INC.

Mel Stevens

2593

| Date | Type | Reference |
|----------|------|-----------|
| 9/6/2012 | Bill | 030112A |

Original Amt.
* 4,530.45

Balance Due
2,430.45

9/16/2013 *

Discount

Payment

100.00

Check Amount

100.00

SEP 20 2013

Balance 2,430.45

This is the last payment we received

Re: Hello .. ? ? ? ? are you still with Newt?

Page 1 of 1

From: Taylor Swindle <tswindle@newt.org>

To: Pamela M. Florian

Subject: Re: Hello .. ? ? ? ? are you still with Newt?

Date: Wed, Mar 18, 2015 3:20 pm

Exhibit "D"

Hi Pamela,

We should be able to send something in April.

Thanks for checking in.

Taylor O. Swindle

On Mar 18, 2015, at 3:14 PM, Pamela M. Florian

> wrote:

Hi Taylor :) just want to see whats up? are you still there?

Kindest Regards,
Pamela M. Florian

Cell:

Mel Stevens, Jr. 407-271-1107

E-Mail:

PERSONAL QUOTE: It is nice to be important - but is more important to be
NICE!!

Exhibit "E"

Mel Stevens Jr.
Licensed Real Estate Broker

STATEMENT

Mr. Mel Stevens, Jr.
499 N. SR 434, Suite 2157, Altamonte Springs, FL 32714
407-271-1107 /

DATE: JULY 11, 2016
INVOICE # 96.

TO Gingrich Productions / Newt 2012 Campaign
Mr. Newt Gingrich and/or Chief Financial Officer
4501 North Fairfax Drive, Suite 900
Arlington, Virginia 22303
Telephone: 703-678-2231 / info@gingrichproductions.com
AND tswindle @newt.org

INVOICE DESCRIPTION

Newt 2012 Campaign / Turn Key Office / Fundraiser

PAYMENT TERMS

Due on receipt - PLEASE

DESCRIPTION

Finance Charges on delinquent balance at 12% per annum on \$2,430.45
*** 57 Months Past Due ***

Invoice No. #96 - Date: March 1, 2012 - original invoice \$4,530.45 - Remaining Balance:

TOTAL

\$1,385.10

\$2,430.45

MAKE CHECK PAYABLE TO MEL STEVENS, JR.

TOTAL DUE **\$3,815.55**

We appreciate your prompt payment!

From: Pamela M. Florian <

To: info <info@newt.org>; tswindle <tswindle@newt.org>

Cc: ml2stevens

Subject: Unpaid Invoice from 2012 - Current statement with interest. NEEDS PAID!!!!!! v

Date: Wed, Jul 13, 2016 11:58 am

Attachments: 07-08-16 Past due Newt 2012 Invoice with interest.docx (34K)

Exhibit E

Hello - will someone PLEASE respond to us. This is so unfair and unprofessional. WE NEED TO BE PAID. how would you feel if this were you????

PLEASE SIMPLY CUT A CHECK AND PAY US AND BE DONE WITH THIS MATTER!!!!!!

Kindest Regards,
Pamela M. Florian

Mel Stevens, Jr. 407-271-1107
E-Mail:

PERSONAL QUOTE: It is nice to be important - but is more important to be NICE!!

17044414412

DEBT SETTLEMENT PLAN

PART III

Exhibit F

| | | | |
|--------------------------------|----------------------------|------------|-----------|
| NAME OF COMMITTEE Newt 2012 | FEC ID NUMBER C00396497 | PAGE 11 | OF 123 |
|--------------------------------|----------------------------|------------|-----------|

LIST REMAINING DEBTS

| A. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR | AMOUNT OWED TO CREDITOR | AMOUNT EXPECTED TO PAYOFF |
|---|-------------------------|---------------------------|
| Premiere Global Services PO Box 404351 Atlanta, GA 30384 TYPE OF CREDITOR: <input checked="" type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | 261.99 | 0 |
| B. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR Pro Productions Services 3532 E. Elwood St. Phoenix, AZ 85040 TYPE OF CREDITOR: <input checked="" type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | 31,684.38 | 0 |
| C. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR Reach Technologies 2481 Hilton Dr. Gainesville, GA 30501 TYPE OF CREDITOR: <input checked="" type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | 6,925.00 | 0 |
| D. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR Resilent Corporation 1530 Devere Dr. Pasadena, MD 21122 TYPE OF CREDITOR: <input checked="" type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | 22,500.00 | 0 |
| E. FULL NAME, MAILING ADDRESS AND ZIP CODE OF CREDITOR Security Financial Enterprises, Inc. 180 Northwestmonte Dr. Altamonte Springs, FL 32714 TYPE OF CREDITOR: <input checked="" type="checkbox"/> INCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> UNINCORPORATED COMMERCIAL VENDOR <input type="checkbox"/> CANDIDATE <input type="checkbox"/> COMMITTEE EMPLOYEE <input type="checkbox"/> OTHER INDIVIDUAL IS THIS A DISPUTED DEBT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | 1,810.45 | 0 |

DOES THE COMMITTEE HAVE SUFFICIENT FUNDS TO PAY THE REMAINING AMOUNTS TO BE PAID OR OFFERED?

☒ YES ☐ NO IF NO, WHAT STEPS WILL BE TAKEN TO OBTAIN THE FUNDS?