

**Neal A. Collins**  
District No. 5 – Pickens County

**Committees:**  
Ethics  
Ways and Means

**Subcommittees:**  
Public Education  
Property Tax



**House of Representatives**  
State of South Carolina

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P.O. Box 906  
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November 17, 2023

Chief Mark Keel  
4400 Broad River Road  
Columbia, SC 29210

Re: State and County Officials Requesting an Investigation into Alleged Criminal Activity in the City of Easley

Dear Chief Keel:

Allegations of criminal activity, including misconduct in office by a public official, conspiracy to breach security, disclosure of private information, privacy violations, trespass onto city property, and theft of city property, were made on Monday night at the City of Easley's council meeting. The undersigned believes that this warrants a South Carolina Law Enforcement Division (SLED) investigation rather than local law enforcement for fairness and impartiality.

Our understanding of the allegations are as follows:

1. On March 18, 2022, a sitting city councilwoman, Denise Davidson, forwarded an email that directed the city council members to a city computer containing private and privileged information. Mrs. Davidson forwarded this email to a private citizen, Donna Rainey. The forwarded email included the address, location of the room within the building, the username, and the location of a password. (email attached)
2. On Saturday, March 19, 2022, Denise Davidson's private badge entered the room.
3. It is unknown who entered the room. Speculation has included Mrs. Davidson alone, Mrs. Davidson and Mrs. Rainey together, Mrs. Rainey alone, and/or either Mrs. Davidson or Mrs. Rainey gained or attempted to gain the ability to access the information offsite.

4. Information from this computer, including information of private citizens, was subsequently used for political purposes in recent city elections.
5. Separately, on May 9, 2022, Mrs. Davidson forwarded an email from fellow city councilman, Jim Robinson, to private citizen Donna Rainey. (email attached)
6. The May 9, 2022, email included a two-page list of sixty-two (62) private individuals and one (1) church. The information included names, loan numbers, original loan amount, beginning balance, loan date, total paid, and ending balance. (this is not attached to protect privacy)
7. Mrs. Rainey responded to Mrs. Davidson on the same day, May 9, 2022, with "Did you notice some people have several loans and one person's last name is \_\_\_\_\_. " (name omitted for privacy)(email attached)
8. From March 2022 until the elections on November 7, 2023, city information, including information about private individuals, was made publicly available through Mrs. Davidson, Mrs. Rainey, and a website that is allegedly run by the two of them, [www.easleyexpress.com](http://www.easleyexpress.com) as well as all social media platforms.
9. Mrs. Davidson and the easleyexpress.com webpage promoted four (4) candidates for office, including Mrs. Rainey.
10. On Tuesday, November 7, 2023, Mrs. Rainey won a seat on the City of Easley' council.
11. On Monday, November 13, 2023, several private citizens whose information was publicly disclosed spoke at Easley's City Council meeting. The meeting can be viewed here: <https://youtu.be/08apf6UPt8c?feature=shared>.
12. On Tuesday, November 14, 2023, Mrs. Rainey posted on the social media platform Nextdoor, "I did not get an email with a password in it. It's all fabricated." This post has since been deleted. (post attached)
13. On Tuesday, November 14, 2023, Rep. Neal Collins requested evidence of the allegations from the City of Easley. After reviewing the documents, Rep. Collins telephoned and spoke with Mrs. Rainey. Understandably, Mrs. Rainey would not answer questions on the advice of her lawyer. Rep. Collins left a voicemail with Mrs. Davidson. This has not been returned.

It is the belief of the undersigned that an investigation by SLED is warranted for two reasons: (a) the allegations of criminal activity, especially breach of private citizens' information is disturbing and (b) the City of Easley should not investigate this matter – a neutral party should. Each of us represents portions or the entirety of the City of Easley. Together, we represent the entirety of the City of Easley on county council and state delegation.

Thank you for your attention to this matter.

Sincerely,

Representative Neal A. Collins

Senator Rex Rice

Councilman Chris Bowers

Councilman Henry Wilson

Councilman Roy Costner

## Tommy Holcombe

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**From:** Denise Davidson <ddavidson@cityofeasley.com>  
**Sent:** Monday, September 5, 2022 11:05 AM  
**To:** Donna Rainey  
**Subject:** Fwd: Council Computer

Sent from my iPad

Begin forwarded message:

**From:** Chase Campbell <ccampbell@cityofeasley.com>  
**Date:** March 18, 2022 at 9:05:11 AM EDT  
**To:** Denise Davidson <ddavidson@cityofeasley.com>, "James T. Moore" <jtmoore@cityofeasley.com>, Pat Webb <pwebb@cityofeasley.com>, Nancy Breazeale <nbreazeale@cityofeasley.com>, Jim Robinson <jrobinson@cityofeasley.com>, Brian Garrison <BGarrison@cityofeasley.com>  
**Cc:** Shannon Baldwin <sbaldwin@cityofeasley.com>, Mayor Womack <mayorwomack@cityofeasley.com>  
**Subject:** Council Computer

Good Morning!

There is now a computer in the council office at the annex building (201 N First Street) for you all to utilize as needed.

You all will use the same login username "Council" and the password is on a sticky note on the computer itself.

If you have any questions, please let me know.



CHASE CAMPBELL | Network & Special Events Director  
City of Easley | 205 North First Street | Easley, South Carolina 29640  
Phone: 864-855-7900, ext. 1008 | Cell: 864-320-5482

[ccampbell@cityofeasley.com](mailto:ccampbell@cityofeasley.com) | [www.CityofEasley.com](http://www.CityofEasley.com)

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Item 1.2

Re: Loan summary

Donna Rainey <dbrainey@hotmail.com>

Mon 5/8/2022 10:01 PM

To: Denise Davidson <ddavidson@cityofeasley.com>

Did you notice some people have several loans and one person's last name is Holcombe.

---

From: Denise Davidson <ddavidson@cityofeasley.com>

Sent: Monday, May 9, 2022 10:39 AM

To: Donna Rainey <dbrainey@hotmail.com>

Subject: Fwd: Loan summary

Sent from my iPad

Begin forwarded message:

-----Original Message-----

From: robinsonlfscanner@gmail.com <robinsonlfscanner@gmail.com>

Sent: Monday, May 9, 2022 10:22 AM

To: James M. Robinson <jim@robinsonlawfirmpe.com>

Subject: Scanned from a Xerox Multifunction Printer

Please open the attached document. It was sent to you using a Xerox multifunction printer.

Attachment File Type: pdf, Multi-Page

Multifunction Printer Location: Main Office

Multifunction Printer Name: Robinson Law Firm

For more information on Xerox products and solutions, please visit <http://www.xerox.com>

9:40



Search Nextdoor



**Donna Rainey**

Pelzer Hwy · 1h



I did not get an email with a password in it. It's all fabricated.

↳ Commenting on



**Lynne Skipper**

20



I VOTED FOR DAVID, NOW I AM VOTING FOR BUTCH WOMACK! I urge everyone to watch the city council...



3



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