

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS.

SUPERIOR COURT

CLAIRE FITZMAURICE et al.,

Plaintiffs,

v.

CITY OF QUINCY and THOMAS P.
KOCH, *in his official capacity as Mayor of
Quincy,*

Defendants.

C.A. No. _____

**DECLARATION OF ATTORNEY RACHEL E. DAVIDSON IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Rachel E. Davidson, hereby depose and state:

1. I am a staff attorney at the American Civil Liberties Union Foundation of Massachusetts and I represent Plaintiffs in this matter.

2. I have personal knowledge of the facts contained herein.

3. I submit this Declaration in support of Plaintiffs' motion for preliminary injunction.

4. Attached as Exhibit 1 is a true and correct copy of Peter Blandino, *How the new Quincy public safety building construction is going and when it'll be done*, PATRIOT LEDGER (Feb. 15, 2025), <https://www.patriotledger.com/story/news/2024/02/15/quincy-ma-public-safety-building-police-station-open-october-2025-budet-cost-overrun-fire-ems/72536700007/> (last visited May 14, 2025).

5. Attached as Exhibit 2 is a true and correct copy of *Quincy Public Safety/Municipal Complex Project Info*, KBA Architects, <https://www.kba-architects.com/projects/public-safety/quincy-public-safety-municipal-complex/> (last visited May 14, 2025).

6. Attached as Exhibit 3 is a true and correct copy of Mary Whitfill, *Quincy mayor requests additional \$120 million for new police station*, PATRIOT LEDGER (Feb. 9, 2021), <https://www.patriotledger.com/story/news/2021/02/09/additional-120-million-requested-new-quincy-police-station/4444907001/> (last visited May 14, 2025).

7. Attached as Exhibit 4 is a true and correct copy of Peter Blandino, *What brings 200 angry residents and uniformed officers to city hall. What the mayor says*, PATRIOT LEDGER (Feb. 25, 2025), <https://www.patriotledger.com/story/news/2025/02/25/saints-mayor-thomas-tom-koch-quincy-ma-religion-church-state-st-michael-florian-police-fire/80146584007/> (last visited May 14, 2025).

8. Attached as Exhibit 5 is a true and correct copy of Mary Whitfill, *Quincy councilors question price tag of new police station*, PATRIOT LEDGER (Mar. 16, 2021), <https://www.patriotledger.com/story/news/2021/03/16/quincy-city-councilors-look-cut-spending-new-police-station/4717199001/> (last visited May 14, 2025).

9. Attached as Exhibit 6 is a true and correct copy of Johanna Seltz, *Quincy council approves \$23 million more for public safety building*, BOSTON GLOBE (Nov. 30, 2022), <https://www.bostonglobe.com/2022/11/30/metro/quincy-council-approves-23-million-more-public-safety-building/> (last visited May 14, 2025).

10. Attached as Exhibit 7 is a true and correct copy of Peter Blandino, *10-foot-tall bronze statues of saints to adorn new Quincy police headquarters. What they cost*, PATRIOT LEDGER (Feb. 8, 2025), <https://www.patriotledger.com/story/news/2025/02/08/saints-statues->

[new-police-fire-station-quincy-ma-st-michael-st-florian/78258726007/](https://www.fox42.com/news/new-police-fire-station-quincy-ma-st-michael-st-florian/78258726007/) (last visited May 14, 2025).

11. Attached as Exhibit 8 is a true and correct copy of Suffolk Statue Payments. This is a spreadsheet provided by the City of Quincy on April 15, 2025, in response to a public records request.

12. Attached as Exhibit 9 is a true and correct copy of Peter Blandino, *Quincy City Councilors react to saint statues on public safety building: Who's saying what*, PATRIOT LEDGER (Feb. 14, 2025), <https://www.patriotledger.com/story/news/local/2025/02/14/quincy-ma-police-headquarters-statues-st-michael-city-councilors-opinions/78529927007/> (last visited May 14, 2025).

13. Attached as Exhibit 10 is a true and correct copy of Claire Fitzmaurice, *Stop the creation of two religious statues for the new Public Safety Headquarters*, Change.org, <https://www.change.org/p/stop-the-creation-of-two-religious-statues-for-the-new-public-safety-headquarters> (last visited May 14, 2025).

14. Attached as Exhibit 11 is a true and correct copy of Quincy Interfaith Network Statement Regarding Religious Statues at New Public Safety Building (Apr. 4, 2025), <https://www.facebook.com/QUINCY.INTERFAITH.NETWORK/> (last visited May 14, 2025).

15. Attached as Exhibit 12 is a true and correct copy of City Council Meeting Agenda, May 5, 2025 at 7 (Proposed Ordinance titled Establishing a Public Art & Place Making Program), https://cms7files1.revize.com/quincyma2024/Agendas%20&%20Minutes/City%20Council/City%20Council/Agendas/Council_2025_05_05.pdf (last visited May 14, 2025).

16. Attached as Exhibit 13 is a true and correct copy of Peter Blandino, *New Quincy arts commission great idea or perhaps too little, too late? Depends who you ask*, PATRIOT LEDGER (May 5, 2025), <https://www.patriotledger.com/story/news/2025/05/02/saint-statues-quincy-ma-public-art-commission-mayor-koch-appointees/83408439007/> (last visited May 14, 2025).

17. Attached as Exhibit 14 is a true and correct copy of Prime Contract Change Order No. 015, dated July 14, 2023, between Suffolk Construction Company, Inc. and City of Quincy MA (MAYOR'S OFFICE). The document also includes a pricing contract from K. R. Rezendes, Inc. This document was provided by the City of Quincy on May 15, 2025, in response to a public records request.

18. Attached as Exhibit 15 is a true and correct copy of Prime PCO No. 357, dated February 5, 2025, to City of Quincy MA (MAYOR'S OFFICE) from Suffolk Construction Company, Inc. This document was provided by the City of Quincy on May 15, 2025, in response to a public records request.

19. Attached as Exhibit 16 is a true and correct copy of Prime PCO No. 324, dated December 3, 2024, to City of Quincy MA (MAYOR'S OFFICE) from Suffolk Construction Company, Inc. This document was provided by the City of Quincy on May 15, 2025, in response to a public records request.

20. Attached as Exhibit 17 is an email to me from James Timmins, City Solicitor of Quincy, dated May 15, 2025.

21. Attached as Exhibit 18 is a true and correct copy of an excerpt from Steven K. Green, *The Second Disestablishment* (2010).

22. Attached as Exhibit 19 is a true and correct copy of Richard Gribble, *Saints in the Christian Tradition: Unraveling the Canonization Process*, 6 STUDIES IN CHRISTIAN-JEWISH RELATIONS 2 (2011), available at <http://ejournals.bc.edu/ojs/index.php/scjr>.

23. Attached as Exhibit 20 is a true and correct copy of United States Conference of Catholic Bishops (USCCB), *Saints*, <https://www.usccb.org/offices/public-affairs/saints> (last accessed May 7, 2025).

24. Attached as Exhibit 21 is a true and correct copy of an excerpt from Henry Gibson, *Catechism Made Easy: Being a Familiar Explanation of the Catechism of Christian Doctrine* 308–09 (1882).

25. Attached as Exhibit 22 is a true and correct copy of Catholic Online, “St. Michael the Archangel,” https://www.catholic.org/saints/saint.php?saint_id=308 (last accessed May 7, 2025).

26. Attached as Exhibit 23 is a true and correct copy of Catholic Online, “St. Florian,” https://www.catholic.org/saints/saint.php?saint_id=149 (last accessed May 7, 2025).

27. Attached as Exhibit 24 is a true and correct copy of the Declaration of Plaintiff Claire Fitzmaurice.

28. Attached as Exhibit 25 is a true and correct copy of the Declaration of Plaintiff Jay Tarantino.

29. Attached as Exhibit 26 is a true and correct copy of the Declaration of Plaintiff Gilana Rosenthol.

30. Attached as Exhibit 27 is a true and correct copy of the Declaration of Plaintiff Conevery Bolton Valencius.

31. Attached as Exhibit 28 is a true and correct copy of the Declaration of Plaintiff Matthew Valencius.

32. Attached as Exhibit 29 is a true and correct copy of the Declaration of Plaintiff Lucille DiGravio.

33. Attached as Exhibit 30 is a true and correct copy of the Declaration of Plaintiff David Reich.

34. Attached as Exhibit 31 is a true and correct copy of the Declaration of Plaintiff Cynthia Roche-Cotter.

35. Attached as Exhibit 32 is a true and correct copy of the Declaration of Plaintiff Michael Cotter.

36. Attached as Exhibit 33 is a true and correct copy of the Declaration of Plaintiff Sheryl LeClair.

37. Attached as Exhibit 34 is a true and correct copy of the Declaration of Plaintiff Cody Hooks.

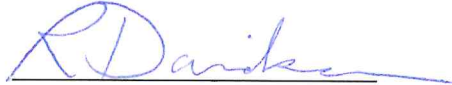
38. Attached as Exhibit 35 is a true and correct copy of the Declaration of Plaintiff Salvatore Balsamo.

39. Attached as Exhibit 36 is a true and correct copy of the Declaration of Plaintiff Marianne Balsamo.

40. Attached as Exhibit 37 is a true and correct copy of the Declaration of Plaintiff Martha Plotkin.

41. Attached as Exhibit 38 is a true and correct copy of the Declaration of Plaintiff Kathleen Geraghty.

Signed this 27th day of May 2025, under the penalties of perjury.


Rachel E. Davidson