

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, SS

SUPERIOR COURT
C.A. NO 25CV00576

CLAIRE FITZMAURICE, et al.

Plaintiffs,

v.

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

Defendants.

AFFIDAVIT OF JAMES S. TIMMINS

I, James S. Timmins, being first duly sworn, do hereby depose and state as follows:

1. I make each of the following statements of my own personal knowledge.
2. Attached as Exhibit 1 is a table containing examples of statues and depictions of religious figures on public property in the state of Massachusetts. The table summarizes the contents of the cited government websites and publications, historical society websites, news articles, and other sources, links to which appear in the table.
3. Attached as Exhibit 2 is a table containing examples of statues and depictions of religious figures on public property in the United States. The table summarizes the contents of the cited government websites and publications, historical society websites, news articles, and other sources, links to which appear in the table

4. Attached as Exhibit 3 is a table containing examples of crosses in fire department imagery within Massachusetts and major U.S. cities. The table summarizes the contents of the cited Massachusetts fire department websites, official Facebook accounts, organizations, and publications documenting the activity of aforementioned departments and organizations, links to which appear in the table.
5. Attached as Exhibit 4 is a true and correct copy of the International Firefighter's Day webpage entitled *About IFFD* and can be accessed at <https://perma.cc/98GY-8FBZ>.
6. Attached as Exhibit 5 is a true and correct copy of chapter 1, page 6 of the April 30, 2024 book *Fundamental Firefighter Skills, Fifth Edition*. The chapter is entitled *The Fire Service* and the relevant section is titled *The Firefighter's Cross*. The book can be accessed at https://www.google.com/books/edition/Fundamentals_of_Firefighter_Skills_Fifth/PV_5EAAAQBAJ?hl=en&gbpv=1&dq=florian+cross&pg=PA6&printsec=frontcover.
7. Attached as Exhibit 6 is a true and correct copy of a July 13, 2019 Associated Press article by Brandie Kessler and York Daily Record entitled *Officer's Tattoos Share Personal Meaning, Help Them Connect*. The article can be accessed at <https://perma.cc/RP3U-D8LF>.
8. Attached as Exhibit 7 is a true and correct copy of a webpage from First Responders Foundation. The webpage is entitled *First Responders National Society of Saint Michael and Saint Florian* and can be accessed at <https://perma.cc/TJ8Z-ASGG>.
9. Attached at Exhibit 8 is a true and correct copy of a webpage from the City of Wilmington North Carolina. The webpage is entitled *WFD Fallen Firefighters Memorial* and can be accessed at <https://perma.cc/AM3P-QHYM>.

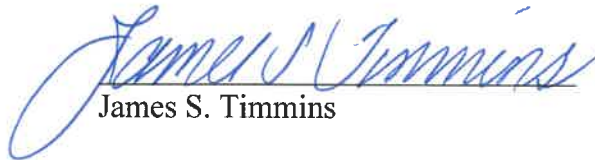
10. Attached at Exhibit 9 is a true and correct copy of the Toronto Police Service webpage memorializing the November 18, 2024 article by Ron Fanfair. The article is entitled *Faith Helps Overcome Challenges* and can be accessed at <https://perma.cc/4F5M-5WYF>.
11. Attached at Exhibit 10 is a true and correct copy of a brochure from Saint Michael's House, a publicly endorsed treatment center for law enforcement officers, detailing its services and amenities. The brochure can be accessed at <https://perma.cc/Q3PP-N8LF>.
12. Attached as Exhibit 11 is a true and correct copy of a newsletter of *Fire Focus* memorializing the winter 2015 Newsletter of the New Jersey Division of Fire Safety. The newsletter can be accessed at <https://perma.cc/8AVL-G9NE>.
13. Attached at Exhibit 12 is a true and correct copy of a November 11, 2022 news clip from NBC Connecticut entitled *Story Behind St. Michael Statue That Brought Comfort to Grieving Bristol Police Department* and can be accessed at <https://www.nbcconnecticut.com/news/local/story-behind-st-michael-statue-that-brought-comfort-to-grieving-bristol-police-department/2913761/>.
14. Attached at Exhibit 13 is a true and correct copy of a webpage from the Metropolitan Museum of Art entitled *St. Florian*. The webpage and contains an image and account of a piece within the Museum's collection and can be accessed at <https://perma.cc/JY4T-PL3D>.
15. Attached at Exhibit 14 is a true and correct copy of a webpage from raphaelpaintings.org. The webpage is entitled *St. Michael - by Raphael* and can be accessed at <https://perma.cc/L4K4-KN7E>.
16. Attached as Exhibit 15 is a true and correct copy of a webpage from Volunteer Guide. The webpage is entitled *Patron Saint of Firefighters* and can be accessed at <https://perma.cc/6MAS-Q58E>.

17. I accessed the websites and sources from which the images and information in the above 15 exhibits was compiled.

18. Attached as Exhibit 16 is a true copy of Quincy Municipal Ordinance 2009-112, "Public Art Program."

19. Attached as Exhibit 17 is a true copy of a letter dated January 4, 2021 authorizing the city of Quincy to use the CM-at-risk alternative delivery method for the Quincy Public Safety Headquarters project.

I SIGN THIS UNDER THE PENALTY OF PERJURY THIS 9TH DAY OF JULY, 2025.


James S. Timmins