## **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 THOMAS P. KOCH

- I, Thomas P. Koch, 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. I selected statues of Michael and Florian for installation on the Public Safety Building due to their status as symbols in police and fire communities worldwide. The selection had nothing to do with Catholic sainthood, but rather was an effort to boost morale and to symbolize the values of truth, justice, and the prevalence of good over evil. If Michael and Florian did not have significance in the police and fire service, respectively, I would not have selected them for installation.
  - 3. At the time I made this decision, I did so because I have learned while serving as Mayor how much these symbols mean to Police, Fire and public safety officials, including who will occupy the building. I believed the statues' presence would honor, inspire, and

- encourage our First Responders and ensure their lifesaving work would remain maximally effective.
- 4. The Public Safety Building is being constructed using the Construction Manager at Risk method for public construction. While I have served as Mayor, we have done prior projects using this method. It allows for a municipality to work with a particular contractor from start to finish on major projects, such as this one, providing flexibility in the design and bidding process that allows for a better product. In this instance, I made the decision on these statues while working with a local architect on the final design features of the front façade for the building.
- 5. I had prior similar experience on a project that included a plan for statues: the construction of the Hancock Adams Common project in the heart of Quincy Center, where statues of John Adams and John Hancock were created and installed at either end on the newly constructed common. My goal then was to honor two of the founders of our country who were Quincy natives and nationally-known historic leaders. The Hancock and Adams statues were very positively received at the time and continue to serve as a popular feature on the town common.
- 6. This experience was another factor prompting my decision to install monuments on the Public Safety Building. As with Adams and Hancock, I regarded it to be similarly appropriate to erect statues of two internationally recognized symbols of the police and fire service, an act which would also serve to inspire the men and women who work in the building. There was nothing religious about this decision. The fact that Michael and Florian each happen to be saints venerated in the Catholic Church is ancillary to their significance in the Police and Fire services, respectively.

## I SIGN THIS UNDER THE PENALTY OF PERJURY THIS $9^{TH}$ DAY OF JULY, 2025

THOMAS P. KOCH, MAYOR