

# FREEDOM FROM RELIGION *foundation*

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The Honorable Thomas P. Koch  
City of Quincy  
1305 Hancock Street  
Quincy, MA 02169

Re: Unconstitutional religious statues

Dear Mayor Koch and Members of the City Council:

I am writing on behalf of the Freedom From Religion Foundation (FFRF) regarding a constitutional concern with the construction of the City of Quincy's new police headquarters. FFRF is a national nonprofit organization with more than 42,000 members across the country, including over 800 members in Massachusetts. Our purposes are to protect the constitutional principle of separation between state and church, and to educate the public on matters relating to nontheism.

Multiple concerned Quincy citizens reported that the City is planning to install two large religious statues on the facade of the city's new police headquarters building. A news report confirms that statues of Catholic figures Saint Michael the Archangel and Saint Florian, each ten feet tall, are planned to be placed outside the new building.<sup>1</sup> We understand that these statues will cost the city \$850,000. We further understand that the decision to purchase and install these statues was made exclusively by Mayor Koch without consulting the City Council.

We ask that the City rescind its plan to place these religious statues in front of its new police headquarters in order to respect the diversity and First Amendment rights of Quincy residents.

The Supreme Court has long held that the Establishment Clause requires "government neutrality between religion and religion, and between religion and nonreligion." *McCreary Cty., Ky. v. ACLU of Ky.*, 545 U.S. 844, 860 (2005); *Wallace v. Jaffree*, 472 U.S. 38, 53 (1985); *Epperson v. Ark.*, 393 U.S. 97, 104 (1968); *Everson v. Bd. of Educ. of Ewing*, 330 U.S. 1, 15–16 (1947). The proposed purchase and display of two religious statues conveys a message to non-Christians and nonreligious citizens that they are not welcome or accepted in Quincy.

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<sup>1</sup> <https://www.patriotledger.com/story/news/2025/02/08/saints-statues-new-police-fire-station-quincy-ma-st-michael-st-florian/78258726007/>.

The Massachusetts Declaration of Rights similarly requires government neutrality on religious matters. “All religious sects and denominations...shall be equally under the protection of the law; and no subordination of any one sect or denomination to another shall ever be established by law.” Mass. Decl. of Rights Art. XI. Massachusetts courts consider four factors when analyzing a potential religious violation: 1) whether the action has a secular purpose, 2) whether the primary effect of the action neither advances nor inhibits religion, 3) whether the action avoids excessive government entanglement with religion, and 4) whether the action has a divisive political potential. *Colo v. Treasurer & Receiver Gen.*, 378 Mass. 550, 558 (1979). While the application of these factors is a balancing act, the statues at issue here clearly violate each factor, rendering their display on government property plainly unconstitutional.

Here, the statues are plainly religious in nature. Saint Florian was a Christian martyr who was canonized by Pope Lucius III.<sup>2</sup> Saint Michael the Archangel is revered in the Catholic faith and plays a crucial role as a “defender of faith, protector of souls, and a symbol of divine justice.”<sup>3</sup> Michael’s role in other faiths does not negate the religious nature of his figure—on the contrary, it further emphasizes that his statue serves no secular purpose. Neither of these figures have any significance outside of religious contexts.

The placement of statues of prominent Catholic figures in front of a government building indicates not only that the city favors religion over non-religion, but Catholicism over all other denominations. That members of a particular religion consider the two patron saints of first responders is irrelevant to the constitutional analysis. Patron saints are still unquestionably religious figures and their statues advance religion on government property.

The statues unconstitutionally entangle Quincy government with religion and are ripe for political divisiveness. Mayor Koch has admitted to receiving “a number of emails” both for and against the statues.<sup>4</sup> Citizens interact with and rely on law enforcement officers during some of the most urgent and vulnerable times of their lives. The Quincy Police Department serves a diverse population that consists of not only Christians, but also minority religious and nonreligious citizens. We hope you will agree that the Department must be even-handed and avoid any appearance of bias toward some citizens or hostility toward others. Religious messages sent by the city government exclude those who are a part of 48 percent of Massachusetts residents who are non-Christians, including the 37 percent who are now religiously unaffiliated.<sup>5</sup> Religious messages coming from the city government needlessly marginalize the non-Christian and nonreligious citizens in Quincy, turning them into political outsiders in their own community.

While Quincy government officials are certainly free to practice religion on their own time, the cloak-and-dagger approach taken by Mayor Koch to force religion upon Quincy residents is flatly unconstitutional. The Quincy Police Department serves all citizens regardless of belief or nonbelief. We urge you to respect and honor your community’s diversity by rescinding the plan

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<sup>2</sup> <https://www.stflorianparish.org/history/saint-florian/>.

<sup>3</sup> [https://www.catholic.org/saints/saint.php?saint\\_id=308](https://www.catholic.org/saints/saint.php?saint_id=308).

<sup>4</sup> <https://www.cbsnews.com/boston/news/quincy-saint-statues-police-fire-building/>.

<sup>5</sup> <https://www.pewresearch.org/religious-landscape-study/state/massachusetts/>.

to place religious statues in front of the new police headquarters. Please respond in writing with the steps you are taking to address this matter so that we may inform our citizen complainants. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Madeline Ziegler". The signature is written in black ink and is positioned below the word "Sincerely,".

Madeline Ziegler  
*Staff Attorney*  
*Freedom From Religion Foundation*

MEZ:kjs