

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT DEPARTMENT  
OF THE TRIAL COURT

\_\_\_\_\_  
BOSTON POLICE COMMISSIONER  
DENNIS WHITE,

Plaintiff,

v.

CITY OF BOSTON AND  
ACTING MAYOR KIM JANEY,

Defendants.  
\_\_\_\_\_

Civil Action No. 2184CV01138

**AFFIDAVIT OF WILLIAM GROSS**

William Gross, on oath, hereby states as follows:

1. I am the former Commissioner of the Boston Police Department, and make this affidavit based on my personal knowledge.
2. In January 2014, I was the Superintendent-in-Chief of the Boston Police Department (“Chief”), the second highest ranking officer in the Boston Police Department (“BPD”). At that time, the BPD Commissioner was William Evans (“Evans”).
3. In January 2014, Evans and I were responsible for reviewing and preliminarily approving candidates for promotion to the BPD Command Staff, who included, among others, Dennis White (“White”). White was a candidate for promotion to Deputy Superintendent.

4. In January 2014, Superintendent Frank Mancini, who was the Commander of Internal Affairs, provided a copy of White's and the other candidates' IA files to Commissioner Evans and me.

5. Evans and I looked at every candidate including their Internal Affairs ("IA") file.

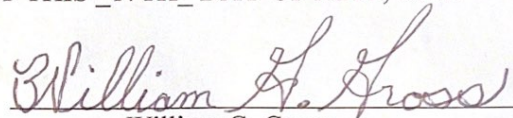
6. The Mayor of Boston must approve any candidate to the Command Staff.

7. Once Evans and I had the candidates for promotion selected, they were presented to Mayor Martin Walsh, who was briefed on each candidate and their IA history.

8. There is no way anyone is brought onto the Command Staff without such a briefing to the Mayor and approval by the Mayor.

9. The City, including Mayor Walsh, was aware no later than January 2014 of White's IA record.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 17TH DAY OF MAY, 2021.

  
William G. Gross