## AFFIDAVIT OF DINO GRONDIN

My name is Dino Grondin. My mother is Margaret Perrazola AKA Margie Grondin, who was the person who led the allegations in the Head Start case where Joseph Allen and Nancy Smith were convicted and sent to prison.

My mom made false allegations in the past couple of years against my wife, Emily. She accused my wife of sexual abusing our daughter, who I'll called AG. She made up all sorts of lies to try to get charges brought so she could take custody of AG, and she did in fact get custody for a while until her scheme fell apart. She was caught in those lies. For example, one lie is she told me that doctors had found evidence of sexual abuse on my daughter at a time when my daughter was too young to talk. This is captured in a recording on a "nanny cam" that was in my house. That turned out to be a lie, the doctors had actually said there was no evidence of sexual abuse and they were not concerned about my daughter's safety. My mom also claimed, after she got custody of our daughter and my daughter was old enough to talk, that my wife abused our daughter during a scheduled visitation when state or county officials of some sort were supervising the whole thing, so it couldn't have happened. The detective who investigated that claim said that Margie had coached our daughter to make the false allegations. For about two years my mom was constantly making false allegations, lying to everyone, and doing everything she could to first get, and then keep, custody of our daughter.

At one point when this was going on, I started to wonder if my mom was doing this so she could get custody of AG and then put AG in a situation where she could claim abuse so she could sue someone with deep pockets for money. The reason I had these suspicions is because when I was six my mom coached my little sister to make false allegations in the Head Start case for money. I saw it with my own eyes and was old enough to understand what was going on. She told my sister what to say and practiced with her, telling her that if she got it right we would get enough money to go to Disneyworld. She held Disneyworld over her as a reward. I wanted to go to Disneyworld too. My mom incorporated the allegations into games, and made my sister say it right to get little rewards. She also said at different times that if my sister didn't get the story right, the "Cucuy," which she used like you would say "boogeyman," was going to come kill her family and then kill her.

In about August 2020, I shared my suspicions with my dad. He told me, yes, you should be worried, because she made up those allegations in the Head Start case for money and she's probably trying to do it again. But she can't do it without a little kid to claim someone abused, so she's trying to get custody of a little kid and making up false allegations against my wife to get custody. He told me to go online and find the documents in the Head Start case. So I did. My wife and I found them and read all the things in the parole documents put together by the Ohio Innocence Project. We also read other things we found on the internet about the case.

When I read those documents, I had a panic attack so bad I had to go to the hospital. I have the medical records from this visit. The reason I had a panic attack was that some of the things the kids alleged in that case were forms of sexual abuse that my mom and her male companion(s)

had done to us kids when we were little. Like sexual abusing us with sticks and even making us pee into a bottle for reasons I still don't understand. It was traumatic reading about it because it was done to me. Also, I saw my sister being sexual abused by a male companion, on some occasions with my mom present. On one occasion, the man was licking my sister's face all over and the man and my mom were laughing hysterically. They made me leave the basement where this was happening. Then screams came from the basement, my sister screamed. This happened on more than one occasion. I was also sexually abused by a male companion of my mom on more than one occasion.

Also, reading the documents online brought me back to what I saw with my mom coaching my sister about. For example, there was a sentence about how the kids said Joseph was black with spots. I know exactly what that is all about. My mom had a male companion put on black hunter's paint, or black or dark face paint of some sort, and pretend to be Joseph to get my sister ready for her allegations in the Head Start case. She had to call him Joseph and she had to practice saying what "Joseph" did to her. The man didn't put it on very evenly and there were spots where the hunter's paint was bare and his skin showed through. He looked like a black man with spots. I saw this with my own eyes.

At the same time, my mom had a picture of a black man on the wall in the basement, which I think must have been some sort of mug shot or something of Joseph Allen. She moved it around to different places on the basement walls. My sister had to study it point to it and say it was Joseph. My mom on some occasions had the other kids from the Head Start case down in the basement, and coached them the same way. The allegations I read in the court documents online were the things my mom was coaching them to say, and a lot it was sexual abuse that had gone on in my own family. My mom played "school" with the kids in the basement, and actually set the basement up like a little school with tables or desks, and created educational games. My mom was the "teacher." The tables and desks are still in storage at my grandmother's house. The kids had to say the allegations of sexual abuse the way she wanted them to say it in order to advance in the game.

Three of the kids in the Head Start case who made the allegations admitted to me that nothing happened and the allegations were made up. One of them admitted this to me at the time the allegations were happening, one admitted this to me when we were teenagers, and the third after we were adults. One of them said Margie has told them if it is ever discovered that the story is not true, the kids in the Headstart case will be publicly disgraced and shamed. Margie has also told her they will have to give all of the money back. This person who was a child "victim" in the Head Start case believes this and is worried that, if it is discovered that the allegations were false, everyone will have to give the money back and she will lose her house and everything she has in order to pay it back. My little sister who was involved in the case will not talk about and it and is very much under the influence of my mom. My mother is extremely manipulative and controlling.