#### STATE OF MINNESOTA COUNTY OF CARVER

In Re:

Estate of Prince Rogers Nelson,

Deceased.

### DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

Court File No.: 10-PR-16-46

# **AFFIDAVIT OF SHARON NELSON**

# STATE OF MINNESOTA ) ) ss. COUNTY OF CARVER )

I, Sharon Nelson, being first duly sworn upon oath, deposes and states as follows:

- 1. My name is Sharon Nelson and I am over 18 years if age. I make this Affidavit based upon my personal knowledge of the Personal Representative of the estate of Prince Rodgers Nelson, Comerica Bank "Comerica".
- 2. On or about January 2017, I along with the other five non-excluded heirs of Prince unanimously nominated Comerica as the Personal Representative of the estate based on prior communications with them.
- 3. Prior to receiving the nomination, Comerica gave the non-excluded heirs a detailed proposal of how they would administer the Estate, should they be appointed Personal Representative of the estate.
- 4. My vote and other non-excluded heirs selection of Comerica was based upon the representations that they made in that proposal. One of the major promises made by Comerica was that the heirs would have decision-making input and a voice in the major opportunities, negotiations and decisions that affect the Prince Estate.
- 5. Another big promise made by Comerica was that they had an entertainment division of their company and that they would work with the non-excluded heirs and the heirs' team to ensure that the legacy of Prince is properly preserved.

6. Comerica also promised a swift and expeditious process to distribute the estate to the non-excluded heirs.

# COMERICA'S THREE HEIRS MEETINGS

- 7. On February 28, 2017, Comerica met with five of the non-excluded heirs. At this meeting, Comerica proceeded to explain to the heirs that "there would be no voice for the heirs and no votes for the heirs".
- 8. Comerica continued to detail that they would be in charge for the next 14 years, and that the non-excluded heirs would be informed of their decisions, but the decisions were Comerica's to make, and the heirs would be informed in due course.
- 9. This meeting became very hostile and the representatives from Comerica spoke very harshly to the non-excluded heirs, with one of the bank representatives actually standing up within inches from my face and speaking very aggressively saying that the heirs have no say in the affairs of my brother, Prince. (Please see my email letter to Comerica dated March 6, 2017).
- 10. As an elder and one of the non-excluded heirs I was shocked and horrified by the arrogance displayed by Comerica and its representatives. Neither Comerica nor any of its representatives did business with my brother prior to his passing. Comerica and its representatives know little if anything about the entertainment industry and even less about my brother's business specifically.
- 11. I object to the Order Comerica proposes for all the reasons I stated above and because in the month since their appointment, Comerica has shown it's lack of experience, failed to resolve some important business with the Estate and Universal Music, been dictatorial and bullish with some of the non-excluded heirs. Comerica refuses to meet with and be transparent with the respective business teams of the non-excluded heirs and seeks to be the sole decision maker for a business they know very little about.
- 12. The proposed Order would be a greater power grab for Comerica and its representatives, by giving them total authority to make entertainment decisions (which Comerica has zero experience in doing) without the approval of the heirs, and unnecessarily drag out the estate process for 14 years.
- 13. This proposed Order is contrary to the best interest of the estate and should be denied, as this estate is a one of a kind entertainment estate, for one of the biggest recording artist of all time, and no one entity, here Comerica, should be vested with

the ability to make all of the decisions. We wish to have the Heirs appoint a committee to make decisions for all the entertainment and management matters.

FURTHER YOUR AFFIANT SAYETH NOT.

rron Nelson

Sharon Nelson

Subscribed and sworn to before me this  $10^{h}$  day of March, 2017.

Notary Public

SHEILA MOE **Notary Public** Minnesota Commission Expires January 31, 2020

### **Randall Sayers**

F <b>ro</b> m:	Sharon Nelson <jupsn.llc@gmail.com></jupsn.llc@gmail.com>
Sent:	Monday, March 6, 2017 4:43 PM
To:	Andrea Bruce
Cc:	Angela W Aycock
Subject:	Comerica Problems and Harassment

This email is being sent after taking sometime to reflect on the actions Conducted during the family meeting by the representatives of Comerica last week.

I must note that there are specific things that were not included in the meetings minutes of February 28, 2017, such as the inexcusable conduct from Andrea Bruce, which resulted in the need for me to excuse myself from the meeting early.

After it was apparent by way of the comments by the Comerica representatives during this meeting that we would not have a say, vote, input on decisions, or questions regarding interim distributions, I decided that the meeting was not of value or results since our concerns were being dismissed.

As I was preparing to leave the meeting Andrea approached me with a hostile attitude, she was standing directly in front of me approximately two inches from my face. She then attempted to explain with tight lips saying that I would not receive an interim distribution among other things.

Andrea's actions were beyond disrespectful and a violation of my personal space, however, I remained calm. As an heir of my brother's estate for which you were hired to serve, i will not tolerate any form of Harassment or disrespect.

Prior to Comerica's appointment as

PR we were treated with respect, we were told that they would work with us and assured us that they would work on behalf of our best interest and the Estate.

Based on the most recent actions of misconduct, unprofessionalism, and other business issues, I no longer feel that the decision to appoint Comerica to the PR position was the best thing for us.

I am requesting to have Andrea Bruce and Angela Aycock removed from handling Prince Estate matters permanently.

Sincerely, Sharon Nelson

Sent from my iPhone