

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration

Court File No: 10-PR-16-46

Estate of Prince Rogers Nelson,

Judge: Kevin W. Eide

Decedent.

**DECLARATION OF SHARON
NELSON IN SUPPORT OF THE JOINT
PETITION TO LIMIT COMERICA
BANK & TRUST N.A. AS PERSONAL
REPRESENTATIVE**

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1. My name is Sharon L. Nelson. I am one of the Court Approved Heirs to the Estate of Prince Rogers Nelson ("Estate"), and I am 79 years old.
 2. I am also one of the United Petitioners in the Joint Petition to Permanently Limit Comerica Bank & Trust, N.A. as Personal Representative and make this declaration in further support of that Joint Petition and the reply memorandum filed contemporaneously with this declaration.
 3. As an Heir, I consider it both a duty and a privilege to honor and protect Prince's legacy.
 4. During the process of selecting a Personal Representative to replace Bremer Trust, I was supportive of Comerica Bank & Trust, N.A. ("Comerica").
 5. As part of that process, Comerica represented that it had entertainment expertise and Comerica promised the Heirs that we would have both a voice and a vote in important Estate matters, especially concerning Prince's legacy.
 6. I understood that Comerica, as Personal Representative, would not necessarily involve the Heirs in each and every decision. However, they promised that our input and ideas

would be given significant and serious weight, and they would work with the Heirs advisors.

7. Based in part on those representations, I did not object to Comerica's appointment as Personal Representative.
8. As I attested in my March 10, 2017 affidavit, Comerica held an Heirs' meeting on February 28, 2017 where Andrea Bruce of Comerica threatened me and others were hostile.
9. Comerica's representatives regularly make me and other Heirs feel belittled, disrespected, verbally abused, and insulted.
10. I believe that the Heirs' meeting minutes do not accurately reflect the discussions held at the Heirs' meetings.
11. Had I known that Comerica did not intend to listen to the Heirs, particularly on important entertainment decisions concerning Prince's legacy, I never would have supported Comerica in its bid to become personal representative.
12. As time has passed, my relationship with Comerica and its representatives continued to deteriorate. I believe the same thing has happened to all the others Heirs. Our relationship with Comerica has atrophied and any trust we once had in Comerica is gone.
13. Comerica's conduct has created an environment where the Heirs feel that it is futile to attend Heir meetings, cannot have meaningful conversations with Comerica or its representatives, or contribute to the Estate and the protection of Prince's legacy.
14. Through their representatives and counsel, Comerica has fostered an adversarial relationship with the Petitioners.

15. Comerica continues to misrepresent facts to belittle and disrespect the Heirs, such as the Joint Petition was a scheme of other certain advisors, which do not even represent me.
16. On prior occasions, I have objected to the poor services and conduct of Comerica and even filed a Petition to Remove Comerica, which was DENIED by the Court despite the truth of our claims.
17. In response to concerns raised by the Heirs regarding the payment of taxes, Comerica dismisses us or advises us that they are waiting on a response from the tax authorities.
18. Comerica has asked all of the Heirs to attend meetings, events and provide input yet I am treated with disrespect and not reimbursed for my time and travel costs.
19. The Heirs receive certain account statements from Comerica on a monthly basis.

However, I have no confidence in the accuracy of those statements. In response to questions I had about amounts spent by Comerica, I was told that "we just throw those statements together and had no idea you looked at them." I do not believe anything was done to address my concerns regarding the accuracy of the statements or the necessity of the expenditures.
20. Comerica's continued personal representation of the Estate would cause more harm and damages for the Estate and after considerable thought by the Heirs, each heir of the Estate agreed to limit the responsibility of Comerica and seek a transition to competent Personal Representative(s).
21. The Heirs have been working together to establish an appropriate business entity, competent advisors, and strategic business plan in the best interests of the Estate.
22. The Heirs believe with the replacement of Comerica, the Heirs will be able to attract the investment needed to pay creditors and close out the Estate.

23. I believe Comerica will unduly interfere with any good-faith efforts to close out the
Estate.

**I declare under penalty of perjury that everything I have stated in this document is true
and correct.**

Date: April 17, 2019

Signed in Washington County, State of Minnesota

Signature: _____

Handwritten signature of Sharon L. Nelson in cursive script, written over a horizontal line.