

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT

In Re the Estate of:

Prince Rogers Nelson

Court File No. 10-PR-16-46

Decedent,

AFFIDAVIT OF  
Alfred Frank Alonzo Jackson

Alfred Frank Alonzo Jackson, herein Affiant, whose residential address is 6013 Larson Avenue Kansas City, MO 64133, being first duly sworn upon oath, swears and affirms that all of the following facts are true and correct to the best of their knowledge:

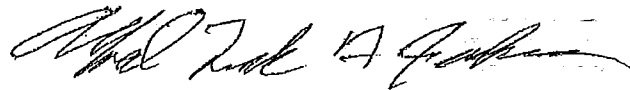
The following are answers to the Request for Parentage Information attached to this affidavit as Exhibit A.

1. My full name is Alfred Frank Alonzo Jackson
2. My birthdate is July 6, 1953.
3. I was born in Jackson County, Missouri
4. Attached as Exhibit B.
5. My Mother was Mattie Della Shaw.
6. My Father was Alfred B. Jackson Sr.
7. My parents were married when I was born.
  - a. My parents were married on (Certificate has been ordered and forthcoming)
  - b. My parents were married in Jackson County Kansas City, Missouri
  - c. My mothers maiden name was Shaw
  - d. My father acknowledged his paternity in a writing filed with the state registrar of vital records through my birth certificate and is attached as Exhibit B
  - e. Yes the man who married my mother is named as my father on my Birth Certificate and was done so with his consent.
  - f. No my father was not obligated to support me under a written voluntary promise or by court order.
  - g. Attached as Exhibit C.
  - h. Yes my parents were divorced and the divorce decree will be added to this affidavit upon receipt and title Exhibit D.

- 8. My parents were married. So this question is not applicable.
- 9. My parents were married. So this question is not applicable.
- 10. My parents were married. So this question is not applicable.
- 11. My parents were married. So this question is not applicable.
- 12. No other man is presumed to be my father.
- 13. My biological mother was not married to any other man within 280 days prior to my birth.
- 14. Has never been a question.
- 15. I have gone to the Jackson County Missouri Registrars Office in person to obtain all of the requested documentation.
- 16. My biological mother, Mattie Della Shaw, was the mother of the Decedent, Prince Rogers Nelson. Even after my parent's marriage ended, my parents continued to maintain a very cordial and closely-related friendship for the remainder of their respective lives.

**FURTHER AFFIANT SAYETH NOT,**

Dated: June 10, 2016



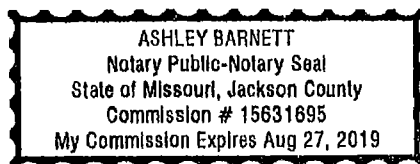
Alfred Jackson

STATE OF MISSOURI)

) ss.

COUNTY OF JACKSON)

The foregoing Affidavit of Alfred Jackson was subscribed and sworn to before me on this 10 day of June, 2016, by Alfred Jackson, Affiant named therein.

  
Notary Public

**Exhibit A****REQUEST FOR PARENTAGE INFORMATION**

Special Administrator Bremer Trust requests that you provide answers to the following questions and requests for information by affidavit signed under oath.

1. What is your full name?
2. What is your birth date?
3. Where were you born?
4. Please provide a certified copy of your birth certificate.
5. What are the full names of your biological parents?
6. Were your biological parents married when you were born? (If yes, answer the subparts below.)
  - a. When were your parents married?
  - b. Where were your parents married?
  - c. What was your biological mother's maiden name?
  - d. Please provide a certified copy of your parents' marriage certificate or other proof of marriage.
  - e. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce.

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7. Were your biological parents married after you were born? (If yes, answer the subparts below.)
  - a. When were your parents married?
  - b. Where were your parents married?
  - c. What was your biological mother's maiden name?
  - d. Did the man who married your biological mother acknowledge his paternity of you in writing filed with a state registrar of vital records?
  - e. Was the man who married your biological mother named as your father on your birth record with his consent?

- f. Was the man who married your biological mother obligated to support you under a written voluntary promise or by court order?
  - g. Please provide a certified copy of your parents' marriage certificate or other proof of marriage.
  - h. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce.
8. If your parents were not married when you were born, had they attempted to marry each other by a marriage solemnized in apparent compliance with law, although the attempted marriage is or could be declared void, voidable or otherwise invalid? (If yes, answer the subparts below.)
- a. What was the date of the attempted marriage?
  - b. Where did the attempted marriage take place?
  - c. Please provide proof of the attempted marriage.
  - d. If the invalid marriage was terminated by death, annulment, declaration of invalidity, dissolution or divorce, please provide the date of the termination and any proof of such termination.
9. If your parents did not marry or attempt to marry, did any man receive you into his home and openly hold you out as his biological child? If yes, please name the man and provide details and other evidence (e.g. sworn statements, photographs, documents) to support your answer.
10. If your parents did not marry or attempt to marry, did any man and your biological mother acknowledge the man's paternity of you in a writing signed by both of them under Minn. Stat. § 257.34 (copy attached) and filed with the state registrar of vital records? If yes, please provide a certified copy of such writing.
11. If your parents did not marry or attempt to marry, did any man and your biological mother execute a recognition of parentage of you pursuant to Minn. Stat. § 257.75 (copy attached)? If yes, please provide a certified copy of such recognition of parentage.
12. Is any other man presumed to be your father under any of the presumptions found in Minn. Stat. § 257.55 (copy attached)? If yes, please provide details, and also whether the other man signed a written consent if your father and mother signed a written acknowledgment of paternity under Request No 10 above.
13. Was your biological mother married to any man other than your biological father when you were born or within 280 days before your birth?

14. Does a judgment or order exist determining a parent and child relationship between you and one or more parents? If so, please provide details and a certified copy of such judgment or order.
15. Detail the actions taken by you to confirm that the responses to the above requests are true and accurate.
16. If you contend additional information is needed or should be considered by the Special Administrator to support your claim to be an heir, please provide such information.

Exhibit B

### BIRTH CERTIFICATION

DATE PAID: JULY 24, 1953 STATE FILE NUMBER 124-53-041148

CHILD'S NAME ALFRED FRANK ALONZO JACKSON

DATE OF BIRTH JULY 6, 1953 COUNTY OF BIRTH JACKSON SEX MALE

MOTHER'S MAIDEN NAME MARY D SHAW

MOTHER'S AGE 19 MOTHER'S STATE OF BIRTH MINNESOTA

FATHER'S NAME ALFRED B JACKSON

FATHER'S AGE 32 FATHER'S STATE OF BIRTH MISSOURI

THIS IS A TRUE CERTIFICATION OF NAME AND BIRTH FACTS AS RECORDED BY THE  
BUREAU OF VITAL RECORDS, JEFFERSON CITY, MISSOURI.

*Richard H. Linn*  
Richard H. Linn  
State Registrar of Births

DATE ISSUED AUGUST 12, 2003

Exhibit C

# MARRIAGE LICENSE.

No. **B15290**

OFFICE OF  
**RECORDER OF DEEDS.**

JACKSON COUNTY, MISSOURI,  
AT KANSAS CITY.

STATE OF MISSOURI } ss.  
COUNTY OF JACKSON.

This license authorizes any Judge, licensed or ordained preacher of the Gospel, who is a citizen of the United States, or other person authorized under the laws of this State to solemnize marriage between Clara of the County of Jackson and State of Mo who is the age of twenty-one years and Martha of the County of Mo and State of Mo who is the age of twenty-one years

Witness my hand as Recorder, with the seal of office hereon affixed, at my office in Kansas City, Missouri, this 19 day of Feb 1953  
Jack W. High RECORDER.  
W. H. ... DEPUTY RECORDER.

STATE OF MISSOURI } ss.  
COUNTY OF JACKSON.

This is to certify that the undersigned, as Magistrate did in said County and State, on the 19 day of Feb 1953 unite in marriage the above named persons.  
Bernard W. Sneyden  
1830 Main

The person performing the marriage ceremony will please insert after his signature the place of his Office, Church, or Residence. This license must be returned to the office of Recorder of Deeds by the person solemnizing the marriage, within ten days from the issuing thereof.

THIS LICENSE VOID AFTER TEN (10) DAYS FROM DATE OF ISSUANCE.



June 15, 2016

**Via Email**

Frank K. Wheaton, Esq. & Associates  
Attorneys and Counselors at Law  
201 Illinois Street, Suite 1600  
Indianapolis, IN 46204

**Re: Heirship Claim of Alfred Frank Alonzo Jackson**

Dear Mr. Wheaton:

Thank you for submitting the Affidavit of Alfred Frank Alonzo Jackson.

With respect to the Protocol adopted by the Court, the Special Administrator's goal is to apply existing Minnesota law equally to all persons claiming to potentially be an heir of the Decedent. Such relevant law includes the Minnesota Probate Code (Minn. Stat. Ch. 524), the Minnesota Parentage Act (Minn. Stat. §§ 257.01 through 257.75) and Minnesota common law.

Under Minnesota law, if it is determined that Decedent is not the father of any living children (or their descendants), then Decedent's siblings and half-siblings (and descendants of any deceased siblings and half-siblings) may be determined to be heirs, in the event no Will is found. Minn. Stat. § 524.2-103(3). To be a sibling or half-sibling, a person must share at least one genetic parent with Decedent. *Id.* Because they were married when Decedent was born, Mattie Della (Shaw) ("Mattie") and John Lewis Nelson ("John") are presumed to be Decedent's genetic parents. Minn. Stat. § 257.55, subd. 1(a).<sup>11</sup> Only a very limited group of persons have standing to challenge that presumption, and, in any event, the time to make such a challenge passed long ago. Minn. Stat. § 257.57, subd. 1(b). As such, there is an irrebuttable presumption that John and Mattie are Decedent's genetic parents. *Id.*; Minn. Stat. § 524.1.201(22) and (23); *see also In re Estate of Jotham*, 722 N.W.2d 447, 455-56 (2006). Thus, to potentially qualify as an heir of Decedent as a sibling or half-sibling, the claimant must be a descendant of either Mattie or John (or both).

The materials provided by your client under oath confirm that he is Mattie's son and was born during Mattie's marriage to Alfred B. Jackson Sr. As such, it is the Special Administrator's determination

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<sup>11</sup> Further, as part of Mattie and John's divorce, a Minnesota court adjudicated that they were Decedent's parents.

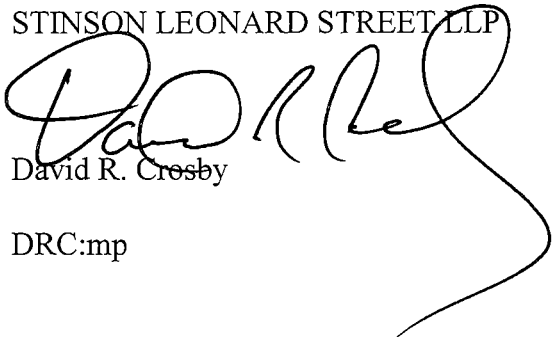


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that Alfred Frank Alonzo Jackson is Decedent's half-sibling as a matter of law, and that no genetic testing need take place to establish his relationship as Decedent's half-sibling.

Very truly yours,

STINSON LEONARD STREET LLP

  
David R. Crosby

DRC:mp