

STATE OF MINNESOTA  
CARVER COUNTY

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

In Re: Estate of Prince Rogers Nelson,  
Deceased.

Case Type: Special Administration  
Judge: Kevin W. Eide  
Court File No. 10-PR-16-46

**AFFIDAVIT OF LOYA JANEL WILSON  
RESPONDING TO THE SPECIAL  
ADMINISTRATOR'S REQUEST FOR  
PARENTAGE INFORMATION**

STATE OF MINNESOTA )  
 ) ss.  
COUNTY OF HENNEPIN )

I, Loya Janel Wilson, being first duly sworn under oath, deposes and states as follows:

1. What is your full name?  
Loya Janel Wilson
2. What is your birth date?  
February 16, 1957
3. Where were you born?  
Sauk Centre, Minnesota
4. Please provide a certified copy of your birth certificate. A copy of my birth certificate is provided.
5. What are the full names of your biological parents?  
  
FATHER: Loyal James Gresham Jr.  
  
MOTHER: Georgina Virginia Winston Jerricks
6. Were your biological parents married when you were born? (If yes, answer the subparts below.)  
  
No.
  - 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.
7. Were your biological parents married after you were born? (If yes, answer the subparts below.)

No.

- 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 record?
  - 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.)

No.

- 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.

James Loyal Gresham, Jr, my father, openly held me out as his biological child throughout his life. He was in Minnesota all the time. I knew HIS mother, my paternal grandmother. He often gathered his children together during the summer. Many of us stayed with him in his home in Hazelcrest, IL during the summer months. We regularly came together for holidays, family celebrations, and funerals. James Loyal Gresham, Jr. is named as my father on my birth certificate.

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.

No.

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.

No.

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.

No.

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?

No.

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.

No.

15. Detail the actions taken by you to confirm that the responses to the above requests are true and accurate.

I have made a good faith effort to collect birth and death certificates, marriage licenses and divorce decrees where relevant. I have provided copies, and am able to provide certified copies. I have spoken with my siblings, other relatives, and family friends to complete and confirm my recollections.

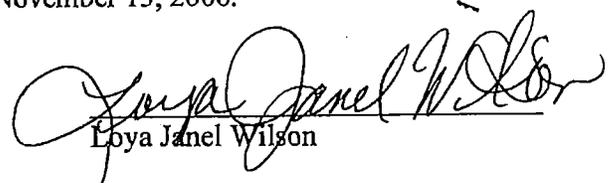
16. If you contend additional information is needed or should be considered by the Special Administrator to support your claim to be an heir, please provide such information.

I believe that I am Prince Rogers Nelson's natural half sibling. My father, Loyal James Gresham, Jr. had an affair with Maddie Shaw in 1957. I learned from another family member that my father is the father of Prince Rogers Nelson. When I asked my father if it was true, he said "possibly."

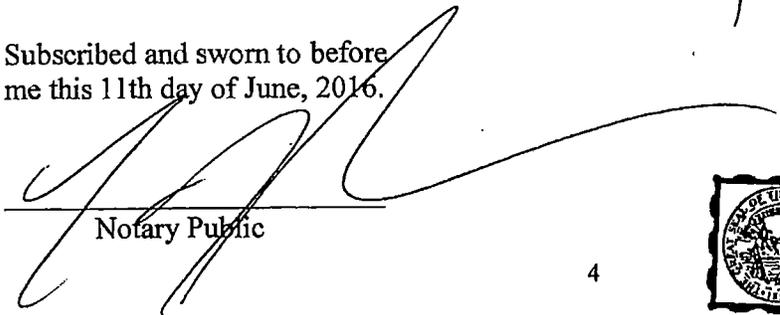
My father and Maddie Shaw knew each other all their lives. They were close friends. They collaborated musically. They often went to gigs together. They brought their families together often. I know that they saw each other regularly throughout their lives, at least once a year. I understand that my father did not openly acknowledge Prince as his son out of respect for Maddie and her then husband and my father's friend, John Nelson. My father did not want to hurt Maddie or get her "into trouble". Our father sent my sisters, Orrine Gresham and Jimmar Sandifer to Maddie Shaw's funeral and to pay his respects for him, as he was too ill to travel.

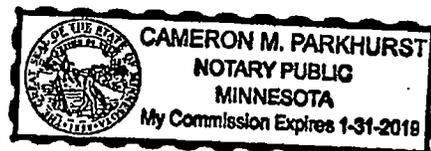
It is believed that Maddie told Prince that Loyal was his father shortly before she died. Prince visited my father in my father's home after Maddie's death. Prince and Loyal developed a relationship in the years after Maddie's death on February 15, 2002, which lasted until the death of my father on November 13, 2006.

Further your affiant sayeth naught.

  
Loya Janel Wilson

Subscribed and sworn to before  
me this 11th day of June, 2016.

  
Notary Public



Altered: 5-4-78 *J. Schmitt*  
Basis: Affidavit of Paternity

MINNESOTA DEPARTMENT OF HEALTH  
Section of Vital Statistics  
CERTIFICATE OF LIVE BIRTH

39145

BIRTH NO.

1. PLACE OF BIRTH: STATE OF MINNESOTA a. COUNTY <b>Stearns</b>		2. USUAL RESIDENCE OF MOTHER (Where does mother live?) a. STATE <b>Minnesota</b> b. COUNTY <b>Ramsey</b>	
b. CITY VILLAGE OR TOWNSHIP <b>Sauk Centre</b>		c. CITY VILLAGE OR TOWNSHIP <b>628</b>	
c. NAME OF (If not in hospital or institution, give street address or location) HOSPITAL OR INSTITUTION <b>St. Michael's Hospital</b>		d. STREET ADDRESS <b>411 Rondo Ave. Saint Paul</b>	
d. Is place of birth inside corporate limits? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		e. Is residence inside corporate limits? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	f. Is residence on a farm? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
CHILD	3. NAME (Type or print) <b>Loya Janel Jerricks</b>		
	4. SEX <b>Female</b>	5a. THIS BIRTH SINGLE <input checked="" type="checkbox"/> TWIN <input type="checkbox"/> TRIPLET <input type="checkbox"/>	5b. IF TWIN OR TRIPLET (This child born) <input type="checkbox"/> 1st <input type="checkbox"/> 2nd <input type="checkbox"/> 3rd
6. DATE OF BIRTH (Month) (Day) (Year) <b>2 16 1957</b>			7. NAME <b>Loyal James Gresham Jr.</b>
FATHER	8. COLOR OR RACE <b>Black</b>		9. AGE (At time of this birth) <b>24</b> YEARS
	10. BIRTHPLACE (State or foreign country) <b>Minnesota</b>		11a. USUAL OCCUPATION
MOTHER	11b. KIND OF BUSINESS OR INDUSTRY.		12. MAIDEN NAME <b>Georgina Virginia Jerricks</b>
	13. COLOR OR RACE <b>Negro</b>		14. AGE (At time of this birth) <b>17</b> YEARS
	15. BIRTHPLACE (State or foreign country) <b>Minnesota</b>		16. CHILDREN PREVIOUSLY BORN TO THIS MOTHER (Do NOT include this child)
17. I certify that this certificate is CORRECT. <i>Georgina Jerricks</i> (Signature of Parent)		a. How many OTHER children are now living? <b>0</b>	b. How many OTHER children were born alive but are now dead? <b>0</b>
FOR HOSPITAL BIRTHS ONLY		c. How many children were stillborn (born dead after 20 weeks pregnancy)? <b>0</b>	18a. SIGNATURE OF ATTENDANT <i>J. F. DuBois</i>
I hereby certify that I attended the birth of this child who was born alive on the date stated above, at <b>4:36 A.M.</b>		18b. ATTENDANT AT BIRTH M.D. <input checked="" type="checkbox"/> D.O. <input type="checkbox"/> MIDWIFE <input type="checkbox"/> OTHER (Specify)	18c. ADDRESS <b>J. F. DuBois, M.D. Sauk Centre, Minnesota</b>
19. DATE FILED BY LOCAL REG. <b>Feb 20 1957</b>		18d. DATE SIGNED <b>2-17-57</b>	
20. REGISTRAR'S SIGNATURE <i>L. M. Berkman</i>		Deputy State Registrar Minn. State Board of Health	

STATE OF MINNESOTA) SS  
COUNTY OF HENNEPIN)

I hereby certify that the above is a true and correct copy of the official record on file with the Section of Vital Statistics Registration of the Minnesota Department of Health.

Dated at Minneapolis  
February 7, 1984

*Frederick L. King*  
State Registrar  
Minnesota Department of Health

NOT VALID WITHOUT IMPRESSED SEAL

Any alterations shown were made under the authority of the Vital Statistics Act and the rules of the commissioner.



June 15, 2016

**Via Email**

Cameron M. Parkhurst, Esq.  
Sussman & Parkhurst  
222 North Second Street, Suite 300  
Minneapolis, MN 55401

**Re: Heirship Claim of Loya Janel Wilson**

Dear Mr. Parkhurst:

Thank you for submitting the Affidavit of Loya Janel Wilson Responding to the Special Administrator's Request for Parentage Information.

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>5</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).

Based on the materials submitted by your client, Ms. Wilson's claim is dependent upon another person other than John being determined to be Decedent's father. But as noted above, the presumption that John is Decedent's genetic father is conclusive and cannot be challenged at this point. As such, it is

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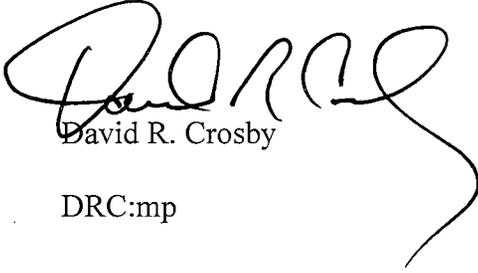
<sup>5</sup> Further, as part of Mattie and John's divorce, a Minnesota court adjudicated that they were Decedent's parents.

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the Special Administrator's determination that the evidence presented by Loya Janel Wilson is insufficient to warrant genetic testing.

Very truly yours,

STINSON LEONARD STREET LLP

A handwritten signature in black ink, appearing to read "David R. Crosby", with a long, sweeping tail extending downwards and to the right.

DRC:mp