

**STATE OF MINNESOTA**  
**COUNTY OF CARVER**

**DISTRICT COURT**  
**PROBATE DIVISION**  
**FIRST JUDICIAL DISTRICT**

Court File No. \_\_\_\_\_

**Estate of**

Prince Rogers Nelson,  
**Decedent.**

**PETITION FOR FORMAL**  
**APPOINTMENT OF SPECIAL**  
**ADMINISTRATOR**

The undersigned Petitioner, Tyka Nelson, states:

1. My address is 539 Newton Avenue N., Minneapolis MN 55405.
2. I am an interested person as defined by Minnesota law because I am the Decedent's heir.
3. The Decedent was born on June 7, 1958 in Minneapolis, State of Minnesota.
4. The Decedent died on April, 21, 2016 in Chanhassen, State of Minnesota.
5. At the time of death, the Decedent was domiciled in Carver County, State of Minnesota, at 7801 Audubon Road, Chanhassen, Minnesota, 55317.
6. As best as I know or can ascertain with reasonable diligence, the names, addresses, relationships, and birthdates, if minors, of the Decedent's heirs and others interested in this proceeding, are:

Name and Mailing Address	Relationship and Interest (list all)	Birth Date of Minors
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See Attached Exhibit A

7. All persons described as heirs have survived the Decedent by at least 120 hours.
8. Negative Allegation Statement – The Decedent left surviving no spouse; issue; parents; brothers, sisters or issue of deceased brothers or sisters other than those named in this petition.
9. I do not know of the existence of a Will and have no reason to believe that the Decedent executed testamentary documents in any form.

10. There is no pending application or petition for probate of a Will or appointment of a Special Administrator in this or any other court.
11. A Special Administrator is needed because no Personal Representative has been appointed in Minnesota or elsewhere.
12. Venue for this proceeding is in Carver County, State of Minnesota, because the Decedent was domiciled in this county at the time of death and was the owner of property located in the State of Minnesota.
13. I estimate the Decedent's assets and indebtedness are as follows:

<u>Probate Assets</u>		<u>Non-Probate Assets</u>	
Homestead	unknown	Homestead	unknown
Other Real Estate	unknown	Other Real Estate	unknown
Cash	unknown	Cash	unknown
Securities	unknown	Securities	unknown
Other	unknown	Other	unknown

Approximate Indebtedness

unknown

14. Appointment of a Special Administrator is necessary because:
  - (a) No Personal Representative has been appointed in Minnesota or elsewhere;
  - (b) The Decedent had substantial assets consisting of personal and real property that requires protection;
  - (c) The Decedent owned and controlled business interests that require ongoing management and supervision; and
  - (d) The Decedent has heirs whose identities and addresses need to be determined.
15. An emergency exists to the extent that the appointment should be made without notice because immediate action and decisions need to be made to continue the ongoing management and supervision of Decedent's business interests; and because the names and addresses of all interested parties are currently unknown.
16. Bremer Bank, National Association, has provided financial services to the Decedent for a number of years and has knowledge of his personal financial and business financial affairs. Its affiliate, Bremer Trust, National Association, is in the best position of any corporate trust company to protect the Decedent's assets pending the appointment of a Personal Representative.
17. I am not aware of any Demand for Notice concerning the Decedent's estate that may have been filed in Minnesota or elsewhere that has not otherwise been waived.

WHEREFORE, the undersigned requests the Court:

1. Waive a hearing of this Petition;
2. Appoint Bremer Trust, National Association as Special Administrator of the Estate, with no bond, in a supervised administration;
3. Authorize issuance of Letters of Special Administration to Bremer Trust, National Association upon qualification and acceptance; and
4. Grant such other relief as may be proper.

Under penalties for perjury, the undersigned, declares and affirms that the undersigned has read this document and knows or believes its representations are true and complete.

 4-26-16  
Petitioner Date

Matthew J. Shea (License No. 309308)  
Brian A. Dillon (License No. 0386643)  
Gray, Plant, Mooty, Mooty & Bennett, P.A.  
80 South Eighth Street, Suite 500  
Minneapolis, MN 55402  
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Brian A. Dillon's Phone: (612) 632-3313  
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Estate of Prince Rogers Nelson

Court File No. \_\_\_\_\_

**Exhibit A: Interested Persons**

<b>Name and Address</b>	<b>Relationship and Interest</b>	<b>Adult/Deceased or Birthdate (if minor)</b>
John Nelson	Half Brother/heir	Adult
Norrine Nelson	Half Sister/heir	Adult
Sharon Nelson	Half Sister/heir	Adult
Alfred Jackson	Half Brother/heir	Adult
Omar Baker	Half Brother/heir	Adult
Lorna Nelson (predeceased – no children)	Predeceased Half Sister	Predeceased
Tyka Nelson 539 Newton Avenue N Minneapolis MN 55405	Sister/heir	Adult
Bremer Trust, National Association 1100 West St. Germain Street St. Cloud, MN 56301  And  c/o Laura Krishnan, as counsel for Bremer Trust, National Association 150 S. 5th Street, Suite 2300 Minneapolis, MN 55402	Nominated Special Administrator	

Minn. Stat. § 524.3-301(1)(ii) requires that the petition contain the name, address and date of birth, if minor, of the decedent's spouse, children, and heirs. Courts may also require listing all interested parties or persons, including personal representatives, demandants, guardians or conservators, natural guardians for any minor children, primary trust beneficiaries, creditors, foreign consul, and fiduciaries.