

STATE OF MINNESOTA
COUNTY OF CARVER

FIRST JUDICIAL DISTRICT
DISTRICT COURT
PROBATE DIVISION

Court File No. 10-PR-16-46
Judge Kevin W. Eide

In re:

Estate of Prince Rogers Nelson,

DECLARATION OF NORRINE P. NELSON

Decedent.

1. My name is Norrine P. Nelson. I am one of the Heirs to the Estate of Prince Rogers Nelson ("Estate").
2. I am one of the Petitioners in the Petition to Permanently Remove Comerica Bank & Trust, N.A. as Personal Representative and make this declaration in further support of that Petition and the reply memorandum filed contemporaneously with this declaration.
3. During the process of selecting a personal representative to replace Bremer Trust, I was supportive of Comerica Bank & Trust, N.A. ("Comerica").
4. As part of that process, Comerica promised the Heirs that we would have both a voice and a vote in important Estate matters, especially concerning Prince's legacy.
5. 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.
6. Based in part on those representations, I did not object to Comerica's appointment as personal representative.
7. I was present at the February 28, 2017 Heirs' meeting.

8. During that meeting, Andrea Bruce argued with Sharon Nelson in a raised voice and put her face inches within Sharon's face in a threatening manner.
9. In that meeting, Comerica's representative said that "there would be no voice for the heirs and no vote for the heirs."
10. I was shocked at Comerica's conduct, especially in light of their promise to give the Heirs a voice and a vote.
11. [REDACTED]
12. To this day, Comerica refuses to allow the Heirs' attorneys or advisors to be present at the Heirs' meetings. I find it difficult to understand complicated business and legal matters without consultation with my advisors and attorneys.
13. I believe it is important for there to be an accurate record so the Heirs can have discussions with their attorneys and/or advisors following the meetings.
14. I also believe that the Heirs' meeting minutes do not accurately reflect the discussions held at the Heirs' meetings. The minutes appear deliberately vague and/or ambiguous with respect to the specifics discussed at the meetings.
15. 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.
16. As time has passed, my relationship with Comerica and its representatives has deteriorated. I no longer trust Comerica.
17. I feel like I can no longer attend Heirs' meetings. Comerica's conduct has created an environment where I 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.

18. I believe Comerica refuses to execute a non-disclosure agreement with Mr. McMillan to keep important information that Comerica labels as confidential from him.

19. Without Mr. McMillan's knowledge of confidential information, I cannot discuss certain critical aspects of the Estate with him in order to properly understand and object to Comerica's proposed entertainment deals or other matters.

20. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

21. I first learned that the Vault's contents had been removed from Paisley Park on September 29, 2017, in a conversation with Sharon Nelson who had spoken to Omarr Baker.

22. Upon learning that the Vault's contents had been taken from Paisley Park without my knowledge, I felt betrayed and shocked by Comerica's actions.

23. While Comerica had discussed certain aspects of the proposed transfer in Heirs' meetings, it never disclosed that it had reached an agreement with [REDACTED] nor did I give my approval for the move.

24. I have never seen Troy Carter's contract with the Estate. No one from Comerica ever explained to me that he had a conflict with Spotify.

25. At the meeting with the Court on September 29, 2017, [REDACTED]
[REDACTED]

26. [REDACTED]
[REDACTED]

27. I receive certain account statements from Comerica on a monthly basis. However, I have no confidence in the accuracy of those statements.

28. [REDACTED]
[REDACTED]

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

Date: November 17, 2017

Signature: Notrine Nelson

Signed in Hennepin County, State of Minnesota

DECLARATION OF NORRINE NELSON

EXHIBIT 1

FILED UNDER SEAL