

STATE OF MINNESOTA  
COUNTY OF CARVER

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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 SHARON L. NELSON**

Decedent.

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1. My name is Sharon L. 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. 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 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.
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.
9. During that meeting, Comerica's representatives were hostile and threatening to the Heirs, including me.
10. I was told that "there would be no voice for the heirs and no vote for the heirs."
11. One of Comerica's representatives, Andrea Bruce, became very aggressive, standing inches from my face and saying that the heirs would have no say in the affairs of Prince. She also told me I would not receive any interim distributions.
12. Comerica's actions, through Bruce and other representatives, made me feel belittled, disrespected, verbally abused, and physically threatened.
13. Importantly, Comerica refuses to allow the Heirs' attorneys or advisors to be present at the Heirs' meetings.
14. Comerica has also refused to allow a court reporter at the meetings to accurately record the substance of those meetings. 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.
15. I also believe that the Heirs' meeting minutes do not accurately reflect the discussions held at the Heirs' meetings.
16. 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.

17. As time has passed, my relationship with Comerica and its representatives continued to deteriorate. My relationship with Comerica has atrophied and any trust I once had in Comerica is gone.
18. 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.
19. Despite Comerica's conduct, I continued to attend Heirs' meetings through August 2017. For the meetings I have not attended, I reviewed the meeting minutes prepared by Comerica and discussed the issues discussed at the meetings with Norrine Nelson, who attended meetings through September 5, 2017, as well other meetings I could not attend.
20. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
21. Through their representatives and counsel, Comerica seems to be fostering an adversarial relationship with the Petitioners.
22. Comerica refuses to execute a non-disclosure agreement with my chosen business and entertainment advisor so that he may receive information that Comerica labels as confidential.
23. I cannot discuss certain critical aspects of the Estate with my advisors in order to properly understand and support or object to Comerica's proposed entertainment deals or other matters.

24. I am aware that Comerica believes [REDACTED]  
[REDACTED]  
[REDACTED]
25. I have received four updates concerning Mark Monitor's attempts to protect the Estate's intellectual property. The emails attached to the Declaration of Andrea Bruce, as Exhibits H-J, reflect communications I received.
26. Attached to this Declaration as Exhibit 1 are relevant portions of the documents attached to the September 26, 2017 email attached to the Bruce Declaration as Exhibit I.
27. Attached to this Declaration as Exhibit 2 are relevant portions of the documents attached to the October 26, 2017 email attached to the Bruce Declaration as Exhibit J.
28. In response to concerns raised by the Heirs regarding [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
29. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
30. I first learned that the Vault's contents had been removed from Paisley Park on September 29, 2017, in a conversation with Omarr Baker.
31. Learning that the Vault's contents had been taken from Paisley Park made me feel as though Prince had died again.

32. I wrote the tweets from "Sharon L. Nelson" attached to the Bruce Declaration as Exhibits E and Y. I take issue with Comerica's implication that I did anything wrong in making the tweets.

33. Contrary to Ms. Bruce's statements in her declaration, I was never told [REDACTED]  
[REDACTED]  
[REDACTED]

34. Upon learning that the contents had been removed, I called [REDACTED]  
[REDACTED]  
[REDACTED]

35. 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.

36. I have never seen Troy Carter's contract with the Estate. The first time I learned of his conflict related to his position with Spotify was on September 29, 2017.

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

[REDACTED] I do not believe anything was done to address my concerns regarding the accuracy of the statements or the necessity of the expenditures.

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

Date: November 17, 2017

Signature: Sharon L. Nelson

Signed in Washington County, State of Minnesota

**DECLARATION OF SHARON NELSON**

**EXHIBIT 1**

**FILED UNDER SEAL**

**DECLARATION OF SHARON NELSON**

**EXHIBIT 2**

**FILED UNDER SEAL**