

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In the Matter of:

Court File No. 10-PR-16-46

Judge Kevin W. Eide

Estate of Prince Rogers Nelson,

Decedent.

**DECLARATION OF
BRIAN WOLFE**

[REDACTED]

I, Brian Wolfe, declare and state as follows:

1. I am the Manager of the Estate Administration Department at Comerica Bank & Trust, N.A. ("Comerica"). I have been with Comerica for six years. Previously, I was with JP Morgan Chase, where I was responsible for trust and estate matters, including the running, auditing, and inventorying of trust asset vaults. In conjunction with Angela Aycock and Andrea Bruce, I have been supervising the inventory process at Paisley Park for the Estate of Prince Rogers Nelson (the "Estate").

2. After its appointment as Personal Representative of the Estate, Comerica began the process of inventorying the audio and video assets located at Paisley Park. We created a customized database to log and track the assets and trained ten Comerica staff on the database and inventory procedures. In March 2017, our staff began the process of inventorying these assets on-site at Paisley Park.

3. We located audio and video assets in several areas of Paisley Park. [REDACTED]. The remaining assets were located in office or residential spaces referred to as the "Pre-Vault," "White Room," "Gold Room," "Archived Storage Room," and "Studio Storage Room." [REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- None of the storage spaces—including the Vault—appeared to have humidity controls and all appeared to have insufficient climate controls for the proper preservation of audio and video materials.
- We encountered boxes adhered to shelves that we had to peel off, cardboard boxes with evidence of water damage, mold on assets, rusted film canisters, and containers of film that smelled strongly of vinegar, which is an indication of acetate film degradation.

7. These conditions, as well as a report we received from a security consultant hired to evaluate Paisley Park, led us to the conclusion that the Estate's audio and video assets were not being well preserved at Paisley Park and should not continue to be stored there.

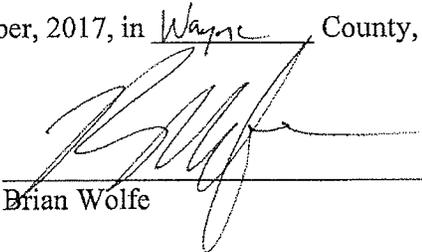
8. After researching and vetting storage and archiving facilities and reviewing the proposal we received from Iron Mountain Entertainment Services, Comerica and Troy Carter determined that Iron Mountain's Hollywood, California storage and archival facility is the optimal place for storing and preserving the Estate's audio and video assets. This decision was based on the specialized nature of the Hollywood facility, which is intended for storage and archiving of entertainment assets specifically, the level of security and privacy offered by a dedicated vault at the facility, their expertise in preservation of audio and video media, and the world-class archival and digitization studio on-site.

9. We transferred the audio and video assets from the Vault, Pre-Vault, and Gold Room to Iron Mountain's Hollywood facility on August 6, 2017. I personally supervised the

loading of the Estate's assets onto Iron Mountain's trucks at Paisley Park, sealed the trucks using a seal marked with a unique identifier, monitored the trucks by GPS, flew to Los Angeles, and then personally verified and broke the seals upon the trucks' arrival at Iron Mountain's Hollywood facility. Comerica filmed and photographed the process. The Carver County Sheriff's Office was also notified of the heightened activity at Paisley Park when the assets were loaded onto Iron Mountain's trucks.

10. We anticipate completing the transfer of assets to Iron Mountain by the end of this month.

I declare under penalty of perjury that everything I have stated in this document is true and correct. Signed this 10th day of November, 2017, in Wayne County, Michigan.



Brian Wolfe