

**State of Minnesota****District Court**

County of CARVER

Judicial District: 1<sup>st</sup>.

Court File Number: 10-PR-16-46

Amelia S. Wodehouse aka Christina D. Johnson

Plaintiff

## Civil Complaint

Vs

Estate of Prince Rogers Nelson

Defendant

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The Plaintiff makes the following complaints against the Defendant:

If you have more than 1 complaint against Defendant, list each complaint separately, including any Supporting facts.

1. Breach of Contract, Valid Digital Will Contract which has been in existence since at least the year 1996 which is the year that eyewitness can confirm this contract was made valid. According to the Plaintiff's professional knowledge the Will Contract would have been updated on an annual basis thereafter. The acknowledgement of the Will Contract came by the Plaintiff approximately in the year 2000 via a company that I co-owned with a TV actor. The name of the company was called "Royal Airs" which was a charitable gifting organization that worked in association with "Ameriprise" and the documentation is registered. A special faith-based program rolled out for minority churches and other religious organizations to "leave a legacy" and the bank was Credit Suisse. The defendant's representative/legal counsel/Special Administrator as well as Paisley Park Management staff was contacted for over 2 years regarding this matter. The Will Contract on digital form has been ordered as of June 24, 2021. This Will Contract gave rise to a duty the defendant failed to provide the charitable gifts as he agreed to do in the contract which the average grouping of this "legacy Program" on average was over 100M.

Based on the complaints above, Plaintiff demands the following relief:

Proximate causation-As a result of the defendant's breach of the contract, that the Plaintiff lost approximately \$100M in value assets. Plaintiff has conferred a benefit on the defendant who has knowledge thereof (2) defendant voluntary bases accept and retains the benefit conferred.

Damages are to include but not limited to See "Exhibit A."