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## COUNTY OF CARVER

DISTRICT COURT PROBATE DIVISION FIRST JUDICIAL DISTRICT

Court File No.: 10-PR-16-46

Judge Eide

In Re:

Estate of Prince Rogers Nelson,

Deceased.

**AFFIDAVIT** 

STATE OF MISSOURI	)	
	) ss	
COUNTY OF JACKSON	`	

Before me, the undersigned authority, personally appeared Venita Jackson Leverette, who, being by me duly sworn and deposed as follows:

My name is Venita Jackson Leverette. I am of sound mind, capable of making this affidavit, personally acquainted with the facts herein stated, and they are true and correct to the best of my knowledge.

- 1. What is your full legal name? Venita Giselle Jackson Leverette
- 2. What is your birth date? February 2, 1958
- 3. Where were you born? Jackson County, Missouri
- 4. Please provide a certified copy of your birth certificate. Attached as Exhibit A
- 5. What are the full names of your biological parents? Neil Jackson and Alfred B. Jackson, Sr.
- 6. Were your biological parents married when you were born? (If yes, answer the subparts below.)
  - a. When were your parents married? December 8, 1956
  - b. Where were your parents married? Jackson County, Missouri

- c. What was your biological mother's maiden name? Markham
- d. Please provide a certified copy of your parents' marriage certificate or other proof of marriage. Attached as Exhibit B
- e. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce. June 25, 1958, attached as Exhibit C
- 7. Were your biological parents married after you were born? (If yes, answer below) No
  - a. When were your parents married? Not applicable
  - b. Where were your parents married? Not applicable
  - c. What was your biological mother's maiden name? Not applicable
  - d. Did the man who married your biological mother acknowledge his paternity of you in writing filed with a state registrar of vital records? Not applicable
  - e. Was the man who married your biological mother named as your father on your birth record with his consent? **Not applicable**
  - f. Was the man who married your biological mother obligated to support you under a written voluntary promise or by court order? Not applicable
  - g. Please provide a certified copy of your parents; marriage certificate or other proof of marriage. Not applicable
  - h. Were your parents divorced? If so, please provide the date of the divorce and a certified copy of the divorce decree or other proof of divorce. Not applicable
- 8. If your parents were not married when you were born, had they attempted to marry each other by a marriage solemnized in apparent compliance with law, although the attempted marriage is or could be declared void, voidable or otherwise invalid? **Not applicable** 
  - a. What was the date of the attempted marriage? Not applicable
  - b. Where did the attempted marriage take place? Not applicable
  - c. Please provide proof of the attempted marriage. Not applicable
  - d. If the invalid marriage was terminated by death, annulment, declaration of invalidity, dissolution or divorce, please provide the date of the termination and any proof of such termination. **Not applicable**

- 9. If your parents did not marry or attempt to marry, did any man receive you into his home and openly hold you out as his biological child? If yes, please name the man and provide details and other evidence (e.g. sworn statements, photographs, documents) to support your answer. Not applicable
- 10. If your parents did not marry or attempt to marry, did any man and your biological mother acknowledge the man's paternity of you in a writing signed by both of them under Minn. Stat § 257.34 (copy attached) and filed with the state registrar of vital records? If yes, please provide a certified copy of such writing. Not applicable
- 11. If your parents did not marry or attempt to marry, did any man and your biological mother execute a recognition of parentage of you pursuant to Minn. Stat § 257.34 (copy attached)? If yes, please provide a certified copy of such recognition of parentage. Not applicable
- 12. Is any other man presumed to be your father under any of the presumptions found in Minn. Stat § 257.34 (copy attached)? If yes, please provide details, and also whether the other man signed a written consent if your father and mother signed a written acknowledgment of paternity under Request No. 10 above. **Not applicable**
- 13. Was your biological mother married to any man other than your biological father when you were born or within 280 days before your birth? **Not applicable**
- 14. Does a judgment or order exist determining a parent and child relationship between you and one of more parents: If so, please provide details and a certified copy of such judgment or order. Not applicable, See Exhibit A, Affiant's birth certificate
- 15. Detail the actions taken by you to confirm that the responses to the above requests are true and accurate. Search of vital records, court records, and knowledge of family history
- 16. If you contend additional information is needed or should be considered by the Special Administrator to support your claim to be an heir, please provide such information. The following information also should be considered by the Special Administrator:

I have reason to believe that Prince Rogers Nelson (hereafter "Prince") is my half-brother based on the following. My father, Alfred Jackson, Sr. ("Alfred Sr." or "my father") was married to Mattie Shaw ("Mattie" - biological mother of Prince) on February 19, 1953, in Kansas City, Missouri (See Exhibit D, copy of Jackson-Shaw Marriage License). My half-brother, Alfred Jackson, Jr. ("Alfred Jr." or "my brother") was born in July 1953. I can find no record of Mattie and Alfred Sr. being divorced, but suspect they were at some point after my brother's birth.

Sometime after 1953, Mattie left Kansas City, Missouri and relocated to Minnesota. Mattie returned to Kansas City with Alfred Jr. and requested that my father and grandparents care for him. Mattie returned to Minnesota, and Alfred Jr.

stayed behind in Kansas City and lived primarily with my father and grandparents, Mamie and Ollie Bruce. During the time frame after Alfred Sr. and Mattie were purportedly divorced, my brother recalls seeing Mattie with Alfred Sr. on multiple occasions. Mattie would visit my brother in Kansas City, or my brother would visit Mattie in Minnesota. Alfred Sr. was always present during these visits, and many times the visits were overnight stays. From 1953 to 1992, Mattie and Alfred Sr. maintained communication with each other and saw each other.

My father, Alfred Sr., married my mother, Neil Markham ("Neil"), on December 8, 1956 (See Exhibit B, copy of Jackson-Markham Marriage Certificate) and I was born on February 2, 1958 (See Exhibit A, copy of my birth certificate). After my birth we lived with my grandmother and did not return to the family home. Alfred Sr. and my mother were divorced on June 8, 1958 (See Exhibit C, Divorce Decree). I believe to this day that the reason my parents divorced was because my mother was pregnant with me at the same time Mattie was pregnant with Prince. Prince was born a little more than three months after me on June 7, 1958. I asked my mother many times why she divorced my father, but she refused to discuss it. In the years following my birth, I recall seeing Mattie on several occasions when Mattie visited my brother; and I also recall that Alfred Sr. was always present during those occasions.

Alfred Jr. believed our father was also the biological father of Prince. Alfred Jr. commented that our father and Mattie had a long distance relationship through the years. When we were in our 40s, Alfred Jr. informed me that I needed to know something about our father. Alfred Jr. told me he finally asked Mattie if she could confirm his suspicions about our father. During the conversation, Mattie confided to my brother that our father may also be Prince's father. Mattie also told my brother that he was not to discuss the subject with anyone. Although I saw Mattie after hearing this from Alfred Jr., I never discussed the issue with her.

Mattie visited Kansas City and stayed with my brothers, Alfred Jr. and Bruce Jackson, even after our father and my mother died. Alfred Sr. died on August 21, 1992 (See Exhibit E, Alfred Jackson Sr. Death Certificate) and my mother died on January 25, 1997 (See Exhibit F, Neil Jackson Death Certificate). Mattic Shaw died on February 15, 2002.

Although I am very concerned with protecting my privacy, I would like to know if my father was also the biological father of Prince. Not only would it clear up a family mystery, but it would give me an explanation as to why my mother and father divorced shortly after my birth. Finally, it would also afford me the opportunity to protect my legal rights in this matter.

Further, Affiant Sayeth Not. I declare under penalty of perjury that this affidavit is true and correct.

Affiant- Venita Jackson Leverett

In witness whereof I have subscribed my name and affixed my official seal this 16<sup>th</sup> day

of June, 2016.

CARLA M. JOHNSON
Notary Public, Notary Seal
State of Missouri
Jackson County
Commission # 13489991
y Commission Expires June 04, 2017

(Signed)

(Seal)

## Exhibit A

MO 580-0690 (2-12)

KANSAS CITY HEALTH DEPT VITAL STATISTICS-CLIFF DENNIS 2400 TROOST SUITE 1000 KANSAS CITY MO 64108

VENITA LEVERETTE 2828 SE BINGHAM CIRCLE LEES SUMMIT MO 64063



## REGISTRANT(S):

VENITA GISELLE JACKSON B9999-999999 1 COPY

YOUR RECENT REQUEST HAS BEEN ACTED UPON AS INDICATED BELOW:								
DATE RECEIVED	TOTAL AMOUNT		PROCESSING FEE	REFUND				
04/29/2016	15.00	15.00	REQUIRED 0.00					

UNAPPLIED REMITTANCES ONLY VALID FOR ONE YEAR AFTER RECEIPT. When you inquire about your request, please return this receipt. If a refund is indicated, it will be mailed within 30 to 60 days.

**BIRTH CERTIFICATION** DATE FILED: MARCH 6, 1958 STATE FILE NUMBER: 124-58-008082 OHILD'S NAME: VENITA GISELLE JACKSON DATE OF BIRTH: FEBRUARY 2, 1958 COUNTY OF BIRTH: JACKSON SEX: FEMALE MOTHER'S MAIDEN NAME NEIL MARKHAM MOTHER'S AGE: 31 MOTHER'S STATE OF BIRTH: LOUISIANA FATHER'S NAME: ALFRED B JACKSON FATHER'S AGE: FATHER'S STATE OF BIRTH ISSUED ON BEHALF OF MO DEPT HEALTH & SENIOR SERVICES: KC HEALTH THIS IS A TRUE CERTIFICATION OF NAME AND BIRTH FACTS AS RECORDED BY THE BUREAU OF VITAL RECORDS, JEFFERSON CITY, MISSOURI. APRIL 29, 2016 DATE ISSUED: Crafg B. Ward Registrar of Vital Statistics

## Exhibit B

