

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Case Type: Special Administration
Court File No.: 10-PR-16-46
Judge: Kevin W. Eide

Estate of Prince Rogers Nelson,
Decedent,

And

Tyka Nelson,
Petitioner.

**AFFIDAVIT OF STEVEN H. SILTON IN
SUPPORT OF OMARR BAKER AND
TYKA NELSON'S SUPPLEMENTAL
OBJECTIONS TO FINAL ACCOUNT
THROUGH 11/30/16, FINAL ACCOUNT
FROM 12/1/16 THROUGH 12/31/16, AND
PETITION FOR ORDER APPROVING
ACCOUNTING, DISTRIBUTION OF
ASSETS, AND DISCHARGE OF SPECIAL
ADMINISTRATOR**

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Steven H. Silton, after being duly sworn, states:

1. I am an attorney duly licensed to practice and in good standing in the State of Minnesota and, if called as a witness, I could and would competently testify to the facts stated herein based on my own personal knowledge.
2. I am an attorney at Cozen O'Connor and counsel of record for Omarr Baker and Tyka Nelson. I make this affidavit in support of Omarr Baker and Tyka Nelson's Supplemental Objections to Final Account through 11/30/16, Final Account from 12/1/16 through 12/31/16, and Petition for Order Approving Accounting, Distribution of Assets, and Discharge of Special Administrator.

3. I attended the hearing on January 12, 2017 in this underlying proceeding before Judge Kevin W. Eide at the Carver County District Court (“January 12 Hearing”).
4. At the January 12 Hearing, the Special Administrator, Bremer Trust, N.A. (“Special Administrator”), admitted that it had not provided the full accounting.
5. At the January 12 Hearing, representative for the Special Administrator, Deborah Fasen, stated that the Special Administrator failed to put in the accounting the revenues of, or the liabilities for, the licensing of Prince Rogers Nelson’s (“Decedent”) music.
6. At the January 12 Hearing, Ms. Fasen faulted the Special Administrator’s advisors, Charles Koppelman and L. Londell McMillan, for mismanaging the deal with Jobu Presents, LLC.
7. I certify that the following exhibits are true and correct copies:
 - A. Agreement executed by Jobu Presents, LLC and the Special Administrator, Bremer Trust, N.A. on July 7, 2016.
 - B. Correspondence from Marcus & Colvin, LLP to Londell McMillan and Charles Koppelman dated August 24, 2016.
 - C. Correspondence from Marcus & Colvin, LLP to Ms. Traci Bransford, Esq. dated August 29, 2016.
 - D. Correspondence from David Crosby to Ken Marcus dated September 8, 2016.

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: January 19, 2017

/s/ Steven H. Silton
Steven H. Silton

Subscribed and sworn to before me
this 19th day of January, 2017.

/s/ Amy E. Kulbeik
Notary Public