

STATE OF MINNESOTA
COUNTY OF CARVER

DISTRICT COURT
FIRST JUDICIAL DISTRICT
PROBATE DIVISION

In Re:

Estate of Prince Rogers Nelson,
Decedent,

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

**DECLARATION OF
L. LONDELL MCMILLAN IN SUPPORT
OF MOTION TO QUASH
SUBPOENA DUCES TECUM**

L. Londell McMillan hereby states and declares as follows:

1. For over a decade, I represented Prince Rogers Nelson (“Prince”) as his lead counsel and then later as his business manager and partner. Prince and I became long-term friends. During my tenure with Prince, we had unprecedented success that is widely known, and I had the longest tenure as a manager or lawyer with him, without any conflict between us. I also handled some of Prince’s most personal and private matters, which I shall keep private and confidential. To the best of my knowledge, Prince refused to execute a will during my tenure.

2. I served as a brand, music, and entertainment-industry advisor to Bremer Trust National Association (“Bremer”), Special Administrator of the Estate of Prince Rogers Nelson (“Estate”).

3. By written agreements on January 20, 2017, I was engaged by Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson (“Sharon,” “Norrine,” and “John,” collectively referred to as “SNJ”) to provide them with advice regarding business and entertainment matters. This took place after the Court signed its Order for Transition from Special Administrator to Personal Representative. SNJ requested my services and support, as I’ve known Sharon for over twenty

years and became close with other non-excluded heirs during my involvement with the Estate. I was also engaged by Alfred Jackson to provide business and entertainment advice on February 6, 2017; the agreement has recently been placed in dispute by new lead counsel for Mr. Jackson after objections by others. These business agreements were all deemed to be “confidential.”

4. I had no written contracts with Sharon, Norrine, and John prior to the Court’s ruling on the Order for Transition from Special Administrator to Personal Representative, which addressed whether to name me as co-personal representative of the Estate. Before that order, I had occasion to provide advice to or to otherwise communicate about business and music-industry matters with all the non-excluded heirs. I did not seek or receive payment for this advice; rather, I sought to assist both the non-excluded heirs and the Estate navigate business issues unfamiliar to them, to the benefit of the Estate and its beneficiaries.

5. On May 3, 2017 Omarr Baker (“Baker”), Jackson, and Tyka Nelson (“Tyka”) filed a Memorandum In Opposition To Motions To Quash The Subpoena Duces Tecum To L. Londell McMillan (“Opposition Brief”), as well as an affidavit by Thomas P. Kane filed in support of the memorandum.

6. Both the Opposition Brief and Kane’s affidavit contain material factual misrepresentations, gross mischaracterizations, and conclusory opinions that require correction. Commencing almost immediately after I was appointed as an advisor to Bremer and the Estate, there have been ongoing harassment and false allegations against me, Bremer, and others in court filings.

7. Throughout the Opposition Brief, counsel for Jackson, Baker, and Tyka assert absurd and false statements, including that I personally created mistrust among the heirs. The mistrust among the heirs existed almost immediately following Prince’s death, as certain heirs had either never met or had distant relationships with each other, for various reasons.

Furthermore, numerous decisions made by some heirs who assumed they had control to the exclusion and detriment of other heirs caused mistrust. Many of the non-excluded heirs have had strong differences of opinion as to how the Estate should be managed, as noted by the Court in its decision of January 18, 2017. Accordingly, it's simply untrue that my advisory role caused their differences.

8. One of the most vile, false statements made by Baker and Tyka is that I “misappropriated estate property.” First, I handled no money or property of the Estate directly. Therefore, I could not “misappropriate” anything. At all times, I worked in good faith and in the best interest of the Estate -- with several Estate fiduciaries, non-excluded heirs’ counsel and a phalanx of lawyers to generate extraordinary value and substantial revenue for the Estate, and to maintain the integrity of Prince’s legacy and maximize the Estate’s valuable assets. All deals done under my advisory term involving estate assets were reviewed by all involved parties and their counsel, including the non-excluded heirs’ counsel. Bremer retained expert entertainment counsel to negotiate contracts, with countless redrafts and revisions sought by numerous counsel, including counsel of Tyka and Baker. Ultimately, all deals were executed only upon Court approval.

9. To file an Opposition Brief publicly suggesting that I acted unilaterally or improperly, or did anything without the inclusion and approval of all involved parties, is wholly untrue and harms a reputation that I spent many of my professional years building and protecting. I am deeply concerned that the litany of false filings, including the Opposition Brief, misleads the Court and the general public regarding my professional, zealous, and vigilant representation of Prince while he was alive -- and the professional, zealous, and vigilant assistance I rendered to the Estate to protect Prince’s legacy and his Estate’s assets. To be sure, within several hours of the filing of the Opposition Brief, two major, national news organizations

contacted me for comment on the ridiculous claims, to which I did not respond. I have also received Tweets from members of the public, criticizing me due to the repeated false filings. Attached as Exhibit A to this declaration is a May 6, 2017 tweet from @LillyJ8.

10. The Opposition Brief inaccurately argues that Sharon Nelson testified that she had *retained* me as a business advisor as of January 12, 2017. This deceitful word play is harmful. She did not use the word “retained” and instead indicated that she had me as an advisor. This is entirely consistent with my experiences with all of the non-excluded heirs – while serving as an advisor to Bremer and the Estate, I had occasion to meet with and advise and communicate with all the heirs about various business matters. During my testimony on January 12, I accurately and truthfully testified that the only business contract I personally had with any of the non-excluded heirs at that time consisted of a \$50,000 loan to Alfred Jackson – a loan I offered to make to all the non-excluded heirs at an exceedingly low interest rate. After the Court decided not to appoint me or Van Jones as co-personal representatives of the Estate, certain non-excluded heirs appreciated my services and wished to have me remain involved to protect their interests in the Estate and to advise them about business and entertainment matters. We entered into confidential written agreements confirming the terms under which I would serve in that role, going forward.

11. The Opposition Brief incorrectly and repeatedly asserts that I offered Tyka “a \$10,000,000.00 loan for her cooperation with respect to the Estate.” (Opposition Brief, pp. 6, 18). This statement is almost ludicrous in its inaccuracy. A third party offered each of the non-excluded heirs a \$10 million loan with expensive and risky terms. In an effort to counter what I believed to be rather exploitative terms, I offered to help all of the non-excluded heirs apply for a loan, with customary repayment terms, with a traditional and recognizable bank. I was offering

help and providing options to them. I did not personally offer to loan money to them or require them to pledge “cooperation” before I would help them.

12. More schemes and false claims have been asserted against me regarding the Jobu Presents complaint. I have no knowledge of, and did not have any involvement in, any alleged loan by Charles Koppelman to Jobu Presents. All allegations alleged by Jobu Presents, LLC, in its complaint against me are meritless.

13. My work on the Tribute Concert was for the love of Prince and created a forum in which Prince’s family, friends, and fans could celebrate this music legend. Of note, Tyka thanked me publicly while on stage at the Tribute Concert, yet retracted it by text the following day.

14. While acting as an advisor to the Estate, other than a \$50,000 loan to Alfred Jackson (which I offered to each non-excluded heir), I had no individual written agreement with any of the non-excluded heirs, despite the fact that the Estate and the non-excluded heirs had and have a mutuality of interest in seeing the Estate prosper. My role as an advisor to Bremer did not conflict with any advice I provided to Sharon, Norrine, and John, who have had independent counsel since the inception of this matter. I did not enter into a contractual relationship with the heirs until after the Court’s co-personal representative ruling. All of my dealings were transparent to those I had any duty or agreement to do so.

15. Attached as Exhibit B is a true and correct copy of an October 26, 2016 online story on tmz.com. I was also falsely accused of speaking to TMZ. To the best of my recollection, I have not spoken to TMZ for more than six years and never related to Prince.

16. False allegations started against me almost immediately upon Prince’s death. I chose not to defend myself and to seek peace instead. Now, however, I feel that I have no choice in the matter and must defend myself in this proceeding.

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

Signed on May 8, 2017 in the State of New York, County of New York.

/s/L. Londell McMillan

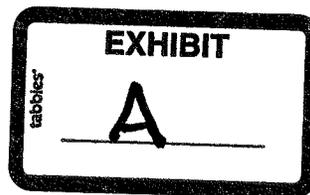
L. Londell McMillan



Lilly J (@LillyJ8)

5/6/17, 8:18 AM

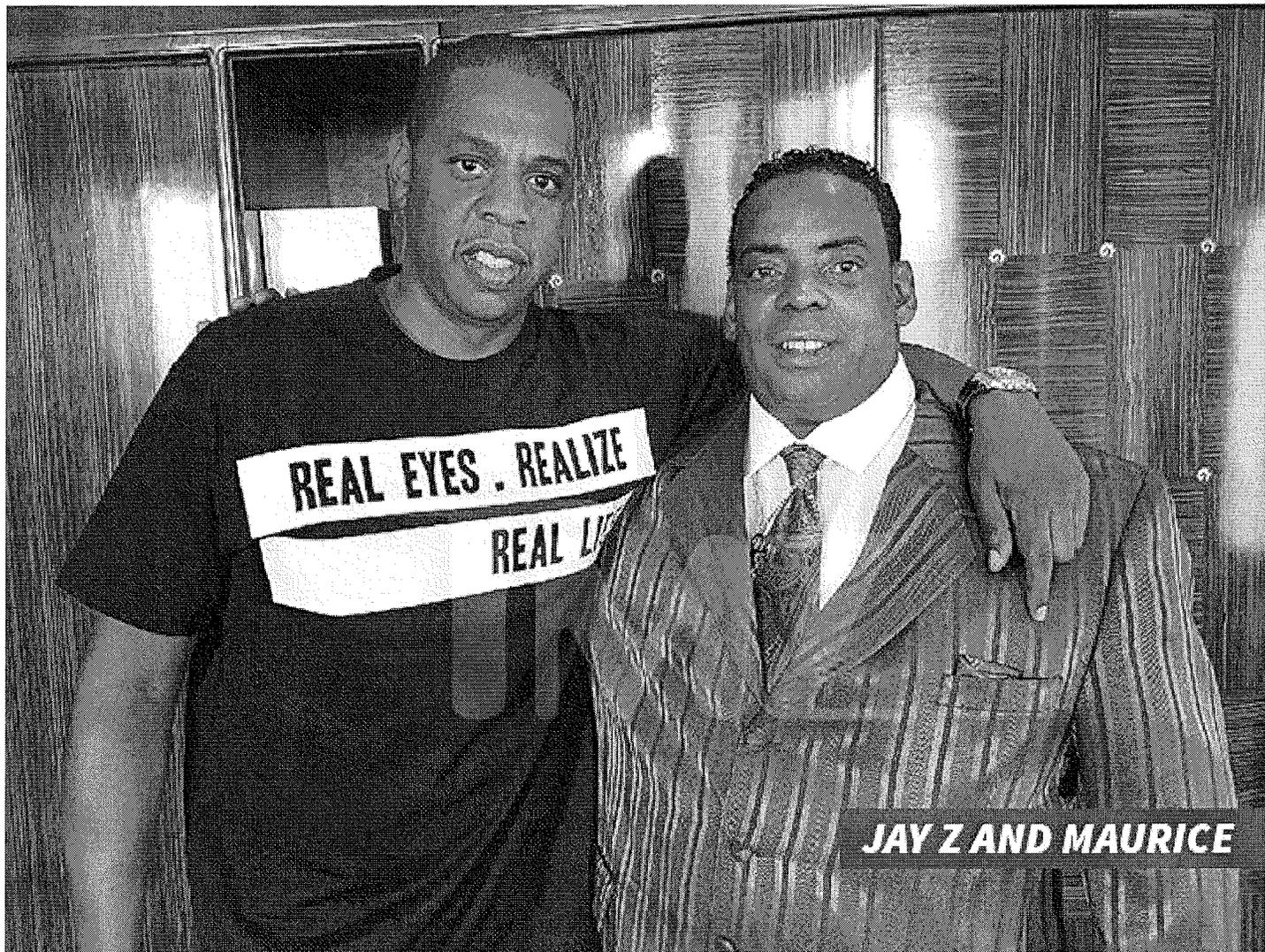
Seek the TRUTH. RIGHT @LondellMcMillan ?!! #PurpleArmyIsComingForYouNext
mncourts.gov/mncourtsgov/me...



Jay Z Bid to Buy Prince's Unreleased Music

TMZ www.t TMZ.com/2016/10/26/jay-z-prince-buy-music/

EXCLUSIVE



JAY Z AND MAURICE

TMZ.com

Jay Z tried to snap up all the unreleased **Prince** music that was unearthed at Paisley Park after the singer's death ... TMZ has learned.

We've learned Jay met with Prince's sister, **Tyka**, and her husband, **Maurice Phillips**, several weeks ago. The mogul flew Tyka and Maurice to NYC to meet with him.

Sources close to Prince's family tell us ... Jay made an offer of around \$40 million. We were unable to confirm the figure from Jay's camp.

But there was a rub. Tyka may be Prince's only full sibling, but she has to get sign-off from all the brothers and sisters, in addition to the trust that is managing the estate.

Word is that JZ is still in the running to get the overall deal for streaming rights ... but it will be very expensive and there are some major players in the game.