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## STATE OF MINNESOTA

COUNTY OF CARVER

In Re:

And

Tyka Nelson,

DISTRICT COURT FIRST JUDICIAL DISTRICT PROBATE DIVISION

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

**DECLARATION OF RANDY JACKSON IN** SUPPORT OF OBJECTION TO PETITION FOR FORMAL ADJUDICATION OF INTESTACY, DETERMINATION OF HEIRS AND APPOINTMENT OF PERSONAL REPRESENTATIVE

STATE OF ) SS. COUNTY OF

Petitioner.

Estate of Prince Rogers Nelson,

Decedent,

Randy Jackson, after being duly sworn, states:

- I submit this affidavit in support of Omarr Baker and Tyka Nelson's objection in part to 1. the Joint Petition for Formal Adjudication of Intestacy, Determination of Heirs, and Appointment of Personal Representative, dated December 7, 2016. I have personal knowledge of all the facts contained herein.
- I am the brother of the late singer-songwriter Michael Jackson. I performed with the 2. Jackson 5. L. Londell McMillan represented my brother prior to his death.
- 3. After the death of my brother, Mr. McMillan represented my mother, Katherine Jackson. During the pendency of his representation, I did not feel that Mr. McMillan was a diligent or loyal attorney.
- 4. Mr. McMillan, upon information and belief, never represented the estate of my late brother in any capacity.

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- 5. Upon information and belief, Mr. McMillan negotiated with attorneys for my late brother's estate, supposedly as attorney for my mother Katherine Jackson, to personally enrich himself. In addition, Mr. McMillan would often take actions that were not authorized by my mother and were not in her best interest.
- 6. There were times during Mr. McMillan's representation of my mother and during the representation of my brother during his life in which substantial amounts of money went missing.
- 7. Due to these issues, among others, Mr. McMillan was fired my mother and, to my knowledge, is not working with my late brother's estate in any capacity.
- I declare under penalty of perjury that everything I have stated in this document is true and correct pursuant to Minnesota Statute § 358.116.

Randy Jackso

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: January 11, 2017