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AFFIDAVIT OF CASSAUNDR BOYD

***Please note that I ran out of time to complete this. I'm submitting it as is expecting to have to supplement or update this at a later date in the future. It is incomplete.**

State of Minnesota

- 1. My statement to the entertainment industry.** My musical talents, those of my husband, and our assets have been a topic of great interest to industry artists who are, whether they accept it or not, complete strangers to me. I want to make a very clear statement to the entertainment industry. I am asking those of you who are decent human beings to leave me alone. These comments are not directed at you so please do not be offended. I'm talking to those that have harassed and tormented me, violated my rights, defamed me, dragged my name through the mud, cheated me, lied about me, and bragged on their closeness to Prince while they lied about him and betrayed him, worked to destroy his life, and ruin every second of mine since his death. I do not trust strangers. I certainly do not trust people that see me as a walking lottery ticket and who are foolish enough to think that I will repeat Prince's mistakes and write songs for them and represent them to make them rich and famous. So many have worked to deny me of the right to be who I am in public and enjoy my life. So, let me make myself clear. (1) I will never become the lead singer of anyone's band; (2) I will never write songs for other artists; (3) I will never choreograph for other dancers, singers, musicians, companies, etc.; (4) I will never open a film or television studio; (5) I will never allow anyone else to take credit for my work; and (6) I do not want to field offers for any kind of performance work or modeling. If I want to work with someone, I will let them know. Honestly, I can count on one hand the companies that I would want to work with. It's a very very short list. No point in you contacting me. Please leave me alone. I do not owe you an explanation. Our property is private. No one has a right to it but me. I will not allow people to death threaten and intimidate me into a performance career so they can sponge attention after they denied Prince the right to share it with me. I will not let you drag my name through the mud and pretend I'm a whore with photos of other women when I've never met you, let alone had sex with you or posed for pornographic photos. I am not a whore. I am a talented and respectable woman. I was faithful to Prince every single day of our life together and he was faithful to me. No other parties were involved. Mayte and Manuela are last two people on earth that Prince would want to be involved with. He was very happy when their divorces were finalized and excited about our monogamous life together. I'm sure many of you know that. I will choose what I want to do with the rest of my life. You will not decide with threats, harassment, intimidation and pressure. And just so you know, there is no number big enough that will make me sell my soul to the devil like you have. Please keep your whore money. I don't want or need it.
- 2. I do want contact with Prince's siblings. I think that I need you to get me a restraining order to keep them away from Paisley Park, make them return any of his assets they may have in their possession (including car and motorcycle keys, entry or access keys), keep them from using NPG records and our studios (I saw that at some point Omarr was recording overnight at Paisley with NPG singers and musicians), stop their sale of any music recorded with our at our studios, and keep them from holding out to the public that they own the "Prince Estate" as it is called.** I'll explain. About three years before his death, Prince came to me and told me that if anything happened where I couldn't get a hold of him, like an emergency, that "I should wait until the dust settles," "then wait some more," and then go to his sister Tyka and she would help me. Prince told me, after I approached Tyka or his other siblings, a lawyer he knows would contact me. Prince told me that he told Tyka about me and "she knows about our marriage." He said, "she knows your name, I showed her a picture of you, and she knows you live in a suburb right outside of Chicago." Prince told me, "if for some

reason you can't get Tyka to help you, go to any one of my other siblings and they will help you." He continued, "if for some reason you can't get any of them to help you, there's a company called "Wave" and it's an entertainment company. I told them about you. They'll help. I promise." My sweet husband really thought he'd taken care of me. He thought I'd have the help I needed if anything happened to him. We'd received death threats for years from his ex-wives and their friends, and many famous entertainers that, if he and I were seen in public, one of both of us would die. I'll explain further later. What I can say is, I did not get the help that Prince promised me from his family.

Shortly after Prince's death, I saw in the media that Tyka filed an application with the court that said that Prince had no will, no wife, and no heirs and that she and her siblings had the right to divide his assets up. I was speechless. I thought "she knows about me, how could she file those papers." When Prince died, I was literally disoriented the first two weeks. I still had to help my mom. Fortunately, the day he died, I was home and not at my mom's house. No one in my family knows about my relationship with Prince. After the death threats began, we decided to keep our relationship a secret and see if we could reveal it down the road as people moved on with their lives or got over their crushes. But it just seemed to get worse as time went on. The threats were more frequent, more and more people were making them, and they were always the same "if you're seen in public with her, she's dead and so are you." Prince received these threats face to face and told me about them. I never received them, but saw people follow me home and felt very concerned for my safety and Prince's at times. I had no one to talk to about Prince's death. And his family seemed to be proceeding as if I didn't exist, even though I knew at least Tyka know about me. I wanted to believe that, maybe she's waiting for me to come to her, get her attention. I wasn't sure. If Tyka was trying to steal the estate from me, I thought she might help the people that were threatening to kill me. I might be in great danger if I go directly to her. I needed to be sure. So, I waited. Aside from my terrible grief, I had some problems that cropped up in the next few years. I got in an accident where totaled my car. I immediately thought that Kanye West and Mayte Garcia were to blame, as Prince had total five cars and one motorcycle over the years and told me that Mayte ran him off of the road while he drove in the countryside of Minnesota and kept going. Prince said that he believed Mayte had Kanye's help in "getting away with things" and that he saw her driving the cars that ran him off of the road. She was long gone and no one could prove she was there, so the police said they could do nothing. He had no proof. I believed they finally started in on me now that Prince was dead and wasn't here to protect me anymore. Prince told me if it ever happened to me, I had to stop driving. I started taking the bus. Mayte had recently release a book which I have not read, but includes nothing but filler, fluff, and lies as far as I can tell from press reports about its contents. Beginning in 2002, Mayte came to Paisley Park (almost annually until 2010) to try to convince Prince to reconcile with her and he repeatedly refused. After he and I began our relationship, in August 2004, Mayte returned to Paisley Park and again asked Prince to reconcile with her. He turned her down again and asked her to stop coming back asking the same question – he will never want to get back together with her. He wished he never married her. Prince told me Mayte said "I saw you with your new girlfriend. She's pretty. But if I ever see you in public with her again, she's dead so are you" and then left. That's where the death threats started. By 2008, he said they were coming from at least 30 people. He didn't tell me about every person, he said he couldn't bear it. I've listed who I remember below. He wanted to do the 2008 Grammy's with me but said it wasn't safe, we couldn't do it. For the rest of his life, Prince and made music and worked together quietly so that we could enjoy it and concealed our relationship. I only spent one or two days a month at Paisley Park if I was lucky. But we had the best relationship and marriage that anyone could dream of having. "No one is more in love than Prince and I" I always thought. Back to Tyka. So, this accident happened, it happened at the corner right near my home (details are explained later) and I worried that Prince's sibling were involved. At least one of them knew about me, and their wasting money putting our assets through probate just so they can control them, knowing I might be afraid. I believe that Mayte wanted

people to believe Prince wanted her and went to great lengths to make people think so so she could be popular and get attention. Prince told me that Mayte and Manuela were pretending that they were allowing me to be married to Prince and that they told people we were in a four way relationship with them (as in Prince and I would have sex with both of them). Of course, this was a lie. Prince told me when people asked him about it, he would tell them “Mayte and Manuela don't know my wife. All I want or need is Cassaundra.” I believe that Mayte and Manuela used Kanye West's resources to assist them in trying to kill me and get away with it. To date, I've never met either one of them. Never seen them face to face. Yet, they've been dragging my name through the mud and threatening us for years. I could not believe that they had the nerve to host a celebrity attended memorial for Prince as if they loved him, when I know they're glad he's dead. Prince hated them both I assure you and made sure they knew it. But Mayte and Manuela have no talent that would help them become or maintain fame, so they latch on to people like Prince to get into social circles that they could otherwise never become a part of. I decided that I had to assert myself and see what happened. I made my first of two visits to Paisley Park since Prince's death, vowing to confront Tyka and make my presence known.

3. My First Trip Back to Paisley Park – October 11-13, 2019

I decided I'd see if I liked the museum idea and booked a tour. I took the 9:45pm Megabus from Chicago overnight and arrived in Minneapolis in the vicinity of the scheduled arrival time of 6:10am on October, 12, 2019. I decided to go to the Mall of America because I had never been there before and I had lots of time before my tour at Paisley Park. I had booked the trip a couple of weeks before. I realize that Morris Day had a book signing there on October 11th but I assure you I wasn't in town to see him or meet him. It was a coincidence. To date, I've never met Morris Day. I looked around and took some pictures. Ate and called my mom. Then I got on a bus that got me to the Marshall Transit Station. Unfortunately, it wasn't easy to get to Paisley Park from there. I never took public transportation in Minnesota before and had never taken Ride Shares before and wasted over an hour trying to get a ride on my Uber app. It wasn't working. So, I called a cab. I was worried I'd be too late, so I dropped off my bags at my hotel (it was too early to check in) and went directly to Paisley Park. The staff let me sit in the entry for a while as I arrived way too early and it was unseasonably cold outside. Our tour guide was Tomi. I'd heard about him before. He married a friend of Prince's from high school and came to lots of events at Paisley Park over the years. I'd never met any of Prince's friends, so it was neat to hear his stories about him. It was overwhelming to be back at Paisley Park again. So overwhelming in fact that it seemed more than I could handle. I saw on the internet that fans left all of these tributes in front of our house and near the bridge area close by so I brought some paint so I could paint one. It was harder than I thought. I went back to my room, picked up some chinese food, and went to bed. I'd done all that I could handle but decided to come back soon. I thought, I'll go to the celebration in 2020 and talk to Tyka in public. Safer that way. I should be able to get to her. I'll tell security I need to speak to her, I'm a close friend of Prince's. Should be easy I thought. I went home to recuperate and plan. I only stayed one full day. I left the next day on a daytime Megabus on October 13, 2019 at 8:30am with an arrival time in Chicago of 5:20pm. My trip back seemed uneventful until we stopped at the T.A. Station. I got off to get some Taco Bell. While running back to the bus I could swear I saw what looked like Mayte and Manuela getting in and out of a truck off while parked at a gas pump. I'd never seen them in person, but of course I know what they look like. And there were two women that looked like them talking to each other and my gut just told me it was them. If I was right, now Mayte's following me again. Remember, she told Prince to his face that she'd seen us together. He told me he was watching me on surveillance and saw he following me or us many times over the years so this wasn't a stretch. I said, ok, so I'm most likely right about the accident. Who's helping her is the question. Obviously Manuela. She's married to Eric Benet, a singer with lots of connections. Who else? Tyka? Not sure, had to find out. Meanwhile, the press reported that Tyka took out a loan and sold a “portion of her interest in Prince's estate to Wave.” I was incredulous. “So...the company that Prince told me I could get help from is trying to steal my estate out from under

me...Tyka is using them to intimidate me.” As soon as I saw these reports, that's what I thought. Do you understand why? I came up there in September 2019 but did not confront Tyka because I couldn't handle it yet. By December 2019 she made this agreement with Wave. She was even photographed at a Wave party soon after. I thought, Tyka must have found out and then got some muscle to help her keep me out. How is it that she is selling my property as if she has the right to it? She knows she doesn't. And Wave knows she doesn't. Prince told me himself. I got angry. I thought, so they want me to be scared. I've got to fight this big company now to get my property, not just his siblings. Won't be so easy for me so thinks. Meanwhile, back at home, I'm on the bus and walking around on foot, and it seems like people are following me everywhere. I'll explain my concern about Kaytranada now. I've told you that I help my mom. She's got some physical problems and I help her out at home four days a week. When Prince died, I needed an outlet and started gardening in her backyard. That's when a man named Mr. Williams started waving at me while he was walking his dog. He lived down the street. I'd never met him before but he'd lived there for years. I'd walk past his house and we kind of became friends. When it got cold, he started offering me rides home (though I never got him to drop me off at home, only a nearby Footlocker just because I don't like people knowing where I live). Sometimes I took them. I thought he was great. Like a grandfather friend. Then, I saw him after I returned from Paisley Park in October, 2019. He picked me up. Out of the blue, he asked me to sing. I felt uncomfortable but did it. Then he told me I had a professional singing voice and told me I should really do something with that. I became very concerned. Then I remembered months ago that he told me he had a grown son who was never around. He traveled across the country. He is a professional DJ. Instantly, I knew he knew Kanye. This was a set up. And it began right after Prince died. I couldn't believe he worked on me for 3 ½ years. I think he was told to kidnap or hurt me but he couldn't bring himself to do it. I started avoiding him. I had to be rude. One day he waved at me to get in his car. I said no, I didn't want a ride. He had already moved out of the house he had been living at but claimed to continue to go by to check the mail. He went ahead and by the time I got to his house he was checking his old mail box. I had to ignore him and walk past. At this point, I was really concerned that Tyka and my other inlaws were colluding with Wave and with Mayte, Manuela, Kim Kardashian and Kanye West, and possibly the other celebrities who had been threatening Prince and I for years. I went to a local grocery store named Food4Less in the morning on the way to my mom's house one day. I was at the corner where cars enter about to cross the street to catch the bus when I saw Mr. Williams pull up to my side and say nothing. I ignored him and waited to cross the street. I caught the bus. Then got off of the bus and walked across the street toward Mendards (to Dorchester) like I always do and saw that Mr. Williams had driven to Menards and was sitting in the parking lot, in clear view of me. I have to tell you that he sat in the Mendards parking lot often during the 8 o'clock hour in the morning. He had told me that old retired guys often hung out in the parking lot there and he'd often pick me up, chat with me, and drop me off at my mom's house. That day, I ignored him completely and he ignored me. I thought, for sure, he's working for Kanye. In the months that followed I'd occasionally be on the bus on my way home and look to my left and see what looked like him driving in the left lane next to the bus. It was very creepy. I saw that the Prince Estate hired a former Black Girls Rock executive and I thought they are trying to steal my house and Prince's music from me and make our home their personal artist showcase concert retreat where they can show off all of the people that threatened us (ex. Beyonce, Rihanna, Alicia Keys). They'd love to steal everything from me I thought. They'd all hit on him over the years repeatedly, including every year of our marriage even though he told me they knew about it. They want to pretend that he is their husband when he is mine. Disgusting I thought. I always intended to come forward, but as I did, it seemed the stalking was getting worse. I felt like I was getting veiled death threats (with Tyka contracting with Wave, seeing what might be Mayte and Manuela following me, with Mr. Williams seeming to collude with them (how'd he know I could sing, why'd he ask), with strangers taking the bus or walking where I did, showing up at all the places I'm going too often, too much at the same time, too often to be a coincidence).

4. My Second Trip Back to Paisley Park – September 3-6, 2020

I had planned to attend the Celebration in June of 2020. Unfortunaely, Covid hit, and there was no going anywhere for some time. The headliners list came out in December 2019. I became concerned about the performers on this list, especially Kaytranada. Kaytranada is noted as a collaborator with Kanye West. To me, his headliner spot proved that Tyka was somehow colluding with Kanye West. But was it to kill me or enslave me to perform. As I'll explain later, I saw Kanye following me myself. Kanye has a thing for me. His death threats to Prince always included some sort of sexual demand. Kanye threated Prince that "you and Cassaundra are going to start fucking Kyle (Jenner). If you don't, I'll kill you both." Sick stuff like that or... "Tell Cassaundra she's dead if you bring her to the party, unless she's willing to suck my balls." Kanye West might be the most dispicable person on the face of the earth. Not sure. Believe it or not Beyonce and Rihanna have a thing for me. They wanted both of us. Most of the people on the death threats list are bisexual and have open relationships or marriages. Prince told me Beyonce didn't care which one of us she got, as long it was one of us, and when she found out we got married, she married Jay-Z less than 2 months later, when she relized we meant it, "no bitch!! we don't want ya!!" Prince told me that Beyonce hit on him from the second she met him when she was 19 until the last time he saw her, months before his passing in 2016 and that, once he and I were together, she brought me up and asked for a threesome or even a foursome that included Jay-Z every single time he saw her. She'd even hit on him right in front of her husband or while he was learing at them from across the room. When Prince said no and that "Cassaundra's off limits...my wife is off limits" she'd threaten to kill us. Her sister started doing it too. Solange was on Prince's "list." Prince had a list of people that couldn't come anywhere near him for any reason and could not be invited to parties. They were sent a letter telling them so so they didn't show up and have to get escorted out. Prince felt he could not do this to industry heavyweights like Jay-Z, Beyonce, Rihanna, and others but he could certainly do this to Solange. Lots of L.A. Lakers were on this list. Shaquille O'Neal was on this list. So was Serena Williams believe it or not (she was rude to him at a tennis match he said). Lots of people. The Kardashians were all on the list but he could not block Kim because of Kanye. At least that's the way he felt. So, I couldn't travel because of Covid. I kept scheduling Megabus trips and canceling them (June 2, 2020 9:45 pm trip from Chicago to Minneapolis returning to Chicago June 8, 12:00pm canceled; Trip scheduled for weekend of July 10, 2020 canceled, trip scheduled for week of August 12, 2020 canceled, September 2 9:45 pm trip from Chicago to Minneapolis with return departure to Chicago September 5 at 11:40 pm (canceled by Megabus due to Covid restrictions and changed trip to air travel)). Covid infection rates were finally lowering where I felt I could manage a trip. I decided to fly. Probaby safer and definitely quicker. I took at 9:00 am United Airlines flight out of Ohare in Chicago on September 3, 2020. I returned on an 11:20 am United Airlines flight out of Minneapolis on September 6, 2020. I bought two tour tickets to Paisley Park this time. I should note, on August 19, 2020, I initaly made a mistake and bought a tour ticket for September 3, 2020 for the 10 am tour. I knew that I'd barely have made it off of the plane by then and could not make that tour. I sent an email to info@paisleypark.com and stated: I accidentally bought a tour ticket for September 3rd 2020 at 10am. I wanted the afternoon ultimate tour from 2pm to 5pm. Can you change my ticket and send me a new one for the tour I want? Cassaundra Boyd." On August 20, 2020, I received the following response from info@paisleypark.com, which stated: "Hi Cassaundra, I have changed your ticket to the 2:00 Ultimate tour on September 3. The ticket is reissued and you should have it in your email. See you then! Paisley Park Team." September 3, 2020 was a Thursday. I left very early, got past security early. Had hours to wait. I had a snack. Waited for a while close to my departure gate. At some point, I saw a small private plane coming toward my gate. I can't explain why, but I thought it was Mariah Carey's plane. Prince had told me that she is a bitch and that she likes to pick up her friends and go places on her plane and stir up trouble. I couldn't understand why that plane was in that area. I thought it was possible that, if it was Mariah Carey's plane, that Mayte and Manuela would be on it because of Eric Benet. I knew that Eric and Mariah had done a duet together

