

STATE OF MINNESOTA  
COUNTY OF CARVER

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DISTRICT COURT

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

**In the Matter of:**

**Estate of Prince Rogers Nelson,**

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

Honorable Kevin W. Eide

**Decedent.**

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**DECLARATION OF BRIAN E. JORDE  
RE ESTATE OF ALFRED JACKSON**

I, Brian E. Jorde, declare under penalty of perjury that everything I have stated in this document is true and correct:

1. I am counsel for Shawn Jackson (“Shawn”) heir-at-law of Alfred Frank Alonzo Jackson, Jr. (“Alfred”), and Petitioner and Will Contestant of the alleged Alfred Jackson July 24, 2019 Will being probated in the State of Missouri.
2. The Will Contest matter is captioned as *Jackson v. Starke* 1916-CV33231 in the Circuit Court of Jackson County, Missouri at Independence, and the underlying Probate matter is captioned as *In the Matter of the Estate of Alfred F. Jackson*, in the Circuit Court of Jackson County, Missouri Probate Division at Independence 19P9-PR01357. I am counsel of record for Shawn in each matter and knowledgeable and can testify as to the procedural history and relevant proceedings. A true and accurate copy of the Petition in the Will Contest matter is incorporated here and included as **Attachment “1”**.

3. Prior to Alfred's death he was an heir-at-law and interested party in the Estate of Prince Rogers Nelson ("Prince"). Alfred was Prince's brother.
4. Alfred was born on July 6, 1953 and was found dead on the morning of August 29, 2019 in his home at 102 NW Hackberry, Lee's Summit, Missouri, 64064. Alfred died without children and without parents or a spouse.
5. Alfred was one of six (6) siblings of Prince Rogers Nelson, aka Prince, who predeceased Alfred. After Prince's death on April 21, 2016, it was determined that Alfred held a 1/6 expectancy interest in the entire Prince Estate, which has a potential gross value of \$200,000,000 or more plus perpetual revenue generating potential.
6. At the time of Alfred's death on August 28, 2019, his heirs and next-of-kin were his five (5) living siblings: Shawn Jackson, Bruce Jackson, Omarr Baker, his brothers, and Tyka Nelson, and Venita Leverette, his sisters.
7. Despite purportedly drafting and maintaining possession of the challenged July 24, 2019 Will since the date of its purported execution, Leonardo da Vinci Starke ("Starke") did not move to probate said Will until November 12, 2019. After Alfred's death, his family requested a copy of the challenged Will from Mr. Starke, but he refused to provide one.
8. Once Starke finally revealed the Will and its contents, Shawn initiated a Will Contest challenging its validity and the circumstances and persons involved in its creation and who benefit from its contents. Starke later became P.R. of Alfred's Estate but that appointment is now challenged and argument will be heard on

February 21, 2020 as to Starke's status as P.R. and whether he or his counsel will have any ongoing role in Alfred's Estate at all.

9. Shawn Jackson has moved the Missouri court for an order removing Mr. Leonardo da Vinci Starke as P.R. of the Alfred Jackson Estate due to the fact Starke is an interested party in matters relevant to the Estate Administration and alleged contracts and alleged agreements involving Alfred, as well as being financially interested in the ultimate outcome of Alfred's Estate proceeding.
10. The Missouri Court rendered its own show cause order of February 4, 2020 on the topic of Mr. Starke. A true and accurate copy of that correspondence is incorporated here as **Attachment "2"**. The Court's order specifically stated "The filing of the Will Contest action described in the above referenced notice has vacated the office of personal representative and, in order to protect the assets of the estate, it is necessary to appoint an administrator pendente lite to serve with a sufficient surety bond." However, eight (8) days after being on notice of this Order, Mr. Starke entered his appearance in the Minnesota proceeding and represented to the court in Minnesota overseeing the Prince Estate that Mr. Starke was the P.R. of the Alfred Jackson Estate. A true and accurate copy of that correspondence is incorporated here as **Attachment "3"**.
11. The alleged sole heir of Alfred's Estate in the challenged Will, non-family member Raffles van Exel, coordinated Decedent's involvement with Starke and Primary Wave Music Fund IP Fund 1, LP, ("Primary Wave") in both the alleged loan and sale transactions. Mr. van Exel also arranged for Alfred to sign the

challenged Will, along with Starke's assistance. Mr. Starke is a Miami based and Florida licensed attorney who allegedly prepared a Missouri Will for Alfred. Mr. Starke is not a Missouri based or licensed attorney.

12. Mr. Starke also has testified that he was in fact Mr. van Excel's attorney at this time. Conveniently, he also was allegedly Decedent's attorney during all relevant times as he claims to have drafted Decedent's Will which just so happens to leave everything to Mr. Starke's business partner and purported client, Mr. van Exel. Starke has, likely in an attempt to argue some type of after that fact privilege to the no doubt damning phone, text, and email communications between Mr. van Exel and Starke, at relevant times, represented to the Missouri court in his attempt to quash certain discovery described Mr. van Exel this way – "Attorney Leonardo Starke's attorney client communications with his client Raffles Van Excel." (emphasis added).

13. According to testimony of Starke, he brokered a deal between a company or entity known as Primary Wave and has intimate knowledge of a purported Binding Memorandum of Agreement dated August 8, 2019 and then a purported "long form agreement" with Primary Wave allegedly executed by Alfred on August 28, 2019. Starke also testified there was a video conference that he is a witness to regarding Alfred and two law firm's representing Primary Wave, Paul Hastings of New York and Robins Kaplan of Minnesota, all material witnesses in the Alfred related Missouri litigation. A true and accurate copy of Starke's Missouri Affidavit is incorporated here as **Attachment "4"**.

14. Starke also testified “Affiant [Starke] did not receive payment of Attorney’s fees and costs from Alfred for representing his business interests. Affiant was to be compensated from the proceeds due Alfred Jackson from the agreement entered into with Primary Wave.” So, Starke has admitted he will only get compensated, per prior agreement, from allegedly assisting Decedent [Alfred] with his “business interests” if and only if the purported and to-be challenged sale of Alfred’s interests in the Prince Estate to Primary Wave is recognized, upheld and validated.
15. Upon information and belief, Alfred was unable to understand and fully comprehend the extremely complicated loan or sale documents and Petitioner believes the alleged “sale” was for less than the fair market value of what Primary Wave has stated they purchased – 90% of Alfred’s 1/6 interest in the Prince Estate. A true and accurate copy of that correspondence is incorporated here as **Attachment “5”**. See also a Memorandum by this Court regarding the Prince Estate. A true and accurate copy of that correspondence is incorporated here as **Attachment “6”**. The true value of the Prince Estate may be \$200,000,000 or more and 1/6<sup>th</sup> of that is \$33,333,333.33 and 90% of that is \$30,000,000. Upon information and belief, Starke and Primary Wave negotiated a “sale” for Alfred at less than half of that amount.
16. Note that in Attachment “5” on page 9 – Mr. Starke states in a September 10, 2019 email – two months before he even applied to by P.R. and before Mr. van Exel, who was named as P.R. in priority superior to that of Starke, represented to the

Prince Estate that “I will serve as the Executor/Personal Representative of his [Alfred’s] estate.” This was not true at that time.

17. Starke is a key material witness who will testify at trial and is presently named P.R. in charge of administering the Estate and has the duty of marshalling all assets and investigating pre-death transfers. However, he also has an expectancy interest in the exact same “sale” transaction with Primary Wave regarding Decedent’s 1/6 interest in the Prince Estate. This is problematic. As Starke indicated, if the Primary Wave sale is not upheld and validated, then Starke does not get paid, as his payment is contingent on the “sale” and he will be paid by Primary Wave and not Alfred’s Estate. It has been stated that Starke stands to make \$1,000,000 from Primary Wave if their purported purchase of 90% of Alfred’s 1/6 interest in the Prince Estate is upheld. For these reasons, your Declarant believes it likely Mr. Starke will be removed as P.R. of Alfred’s Estate and a new P.R. or Administrator Pendente Lite will be named and will fully investigate these alleged pre-death transfers and sales.

18. These Primary Wave funds and others, according to Starke, remain held by Primary Wave in a trust account pending the Will Contest and challenge to the “sale.” It is unclear, since Starke, despite being a lawyer himself, failed to appropriately file the Inventory in Decedent’s probate matter and failed to account for the alleged \$8,700,000 in “personal property” if that includes the Primary Wave trust monies or not. A true and accurate copy of the “Inventory of Property” filed by Starke is incorporated here as **Attachment “7”**.

19. Shawn has and will continue to move the Missouri Court that the P.R. in Alfred's Estate is to take no action related to accepting the Primary Wave monies held in trust or escrow until that transaction can be fully litigated and adjudicated.
20. It is important to note that Alfred, as of the date of Prince's death, April 21, 2016, was unable to live independently and was living in Waite Park, Minnesota at a facility for persons who require assistance with activities of daily living. This facility provides an intermediate level of care for residents who cannot safely live independently, such as Alfred.
21. Shawn, Alfred's brother, provided care and assistance to Alfred while Alfred was residing in Missouri. Shawn has alleged that before and as of July 24, 2019 and before and as of August 8, 2019, and before and as of August 28, 2019, that Alfred was unable to manage his property and financial affairs effectively for reason of Alfred's mental deficiency, physical illness, disability, and/or use of prescription drugs.
22. Shawn alleges Alfred's medical condition before, as of July 24, 2019, and after was such that Alfred experienced a failure of mind that deprived Alfred of intelligent action beyond the most basic of decisions. This deficiency includes the inability to adequately and fully understand a complicated and detailed legal document such as the purported July 24, 2019 Will and the alleged Short Form and Long Form "sale" transaction documents and prior loan documents with Primary Wave and/or others. As of July 24, 2019, and after, Alfred suffered from Parkinson disease type symptoms and involuntary movements due to the side

effects of certain psychiatric drugs he was also taking, and/or supposed to be taking, at these times.

23. Shawn alleges as of July 24, 2019, and after, Decedent was taking Haloperidol. Haloperidol is an antipsychotic medication used to treat certain mental/mood disorders such as schizophrenia and schizoaffective disorders. Haloperidol works by helping to restore the balance of certain natural substances in the brain (neurotransmitters).
24. Shawn alleges Alfred had a long history of Parkinson disease, hypertension, and depression. Alfred had sought and received psychiatric care for decades and the medications described above were done so by his psychiatrist.
25. Shawn alleges as of July 24, 2019 and after, Alfred was 66 years old, was effected by infirmity of the mind and body, had failing memory, vacillating judgment, repeated himself often without appreciation of the fact the same story or information had just been shared, exhibited childlike characteristics at times, would often, in the course of a conversation begin speaking in a nonsensical manner devoid of context, was unable to manage any financial affairs, or run basic errands, or organize his home, suffered from confusion and delusions, and other circumstances, all of which individually and together controlled or influenced Decedent's testamentary actions before, as of July 24, 2019, and his actions thereafter up and until his moment of death, hours after he allegedly entered into the largest financial and business transaction of his life with Primary Wave at the

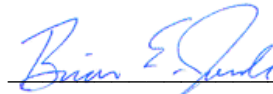


coordination of Mr. van Exel and Mr. Starke and other agents of Primary Wave for each and all of their personal benefit.

26. Based upon the foregoing it is premature to include Primary Wave or grant Primary Wave any rights or status in the Prince Estate related to their purported interest in Alfred's or Alfred's Estate's interest in the Prince Estate.

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.**

February 18, 2020



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Brian E. Jorde

Domina Law Group pc llo  
2425 S. 144<sup>th</sup> St.  
Omaha, NE 68144-3267

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE

SHAWN JACKSON,

Petitioner

vs.

LEONARDO DA VINCI STARKE,  
PERSONAL REPRESENTATIVE OF THE  
ESTATE OF  
ALFRED FRANK ALONZO JACKSON, JR.  
3340 McDonald Street  
Miami, FL 33133  
Respondent.

Case No. \_\_\_\_\_

**PETITION FOR WILL CONTEST**

**ALLEGATIONS COMMON TO EACH COUNT**

1. That Petitioner Shawn Jackson (hereinafter referred to as "Petitioner") is a resident of Kansas City, Jackson County, Missouri. Petitioner is a brother and heir at law of Decedent. The purported Will of July 24, 2019, has a material and adverse impact on the Petitioner. Petitioner is the proper person to challenge the Will and has standing to do so.

2. That Respondent Leonardo da Vinci Starke ("Respondent"), named as Personal Representative, is a resident of Miami Florida. Leonardo da Vinci was named as successor Personal Representative within the challenged Will and became the PR after the November 12, 2019 renunciation of Raffles to act as personal representative. The challenged Will has been submitted for probate in the Circuit Court of Jackson County Court, Missouri, Probate Division Case No. 19P9-PR01357.

3. Alfred Frank Alonzo Jackson, Jr. (“Decedent” and “Alfred”), was born on July 6, 1953 and was found dead on August 29, 2019 in his home at 102 NW Hackberry, Lee’s Summit, Missouri, 64064. Alfred died without children and without parents or a spouse.

4. At the time of his death Decedent his heirs and next-of-kin were his five living siblings: Shawn Jackson, Bruce Jackson, Omarr Baker, his brothers, and Tyka Nelson, and Venita Leverette, his sisters. Alfred’s other brother, Prince Rogers Nelson, aka Prince, predeceased Alfred.

5. After Prince’s death on April 21, 2016, and the determination that Alfred held a 1/6 expectancy interest in the entire Prince Estate, which has a potential gross value of \$200,000,000 or more, non-family members began appearing in Alfred’s life and attempted to befriend Alfred and exert influence over him for their own and/or their associates hopeful monetary gain.

6. On November 13, 2019, Leonardo da Vinci Starke (“Respondent”), as Applicant, filed his Application for Letters Testamentary and attached a purported Will allegedly signed by Alfred on July 24, 2019. This purported Will leaves 100% of Alfred’s Estate to a non-family member named Raffles van Exel (“Raffles”) of 932 Larrabee Street, #304, West Hollywood, California, 90069. Raffles is a person with a questionable history, and an individual with whom Alfred did not have a lengthy or deep relationship.

7. Following presentment of the peculiar and purported July 24, 2019 Will, this Will Contest lawsuit was filed.

8. The Circuit Court has subject matter jurisdiction of this Will contest case, after transfer here, pursuant to 473.083 RSMo. Venue in Jackson County, Missouri is proper because the estate proceeding is pending here and decedent died as a resident of Jackson County, and the underlying probate is occurring in Jackson County.

9. In early 2016, Alfred was living in Minneapolis Minnesota.

10. After his brother Prince died in April 2016, Bruce Jackson ("Bruce") became concerned about opportunistic persons and entities who may try to take advantage of Alfred and Alfred came to live with Bruce in Kansas City, Missouri.

11. During this time there was much fighting and legal wrangling in the Prince Estate being administered in Minneapolis Minnesota.

12. Once Alfred was declared by the court to be a 1/6 heir of the Prince Estate, he now had a very valuable expectancy interest in that Estate.

13. Because the value of the Prince Estate is largely in the intellectual property and music rights, music industry persons and companies were persistently trying to gain access to and favor with Alfred through various means.

14. At some point Alfred made the acquaintance of a person now calling himself Raffles van Exel ("Raffles"). His real name is unknown, but he is known to use other names and pseudonyms, and to have impersonated others in the past.

15. Raffles claims to be Founder / President of Raffles Entertainment as found at: <https://www.linkedin.com/in/raffles-van-exel-044a5127>.

16. Raffles claims to have guided "some of the world's most acclaimed executives and celebrities: Actor Quinton Aaron from the smash hit The Blind Side with

Sandra Bullock, Peter Lamas CEO and founder of Lamas beauty, the late King of Pop Michael Jackson, Whitney Houston, Patti LaBelle, Lance Bass (Founding member of iconic pop group, N'Sync), Flavor Flav of the iconic rap group Public Enemy and of the "Flavor of Love" fame, George Benson, and the late Ray Charles. Raffles van Exel has produced for The Queen of Salsa - the late and great Celia Cruz, funk pioneer George Clinton, Sisqo, Nick Cannon, Howie Dorough (Founding member of Grammy nominated group, The Backstreet Boys), rap icon and actor Ice-T, and a host of other artists.”

17. Raffles has a colored history involving musicians and those around them.

18. Raffles was in the hotel room of Whitney Houston at or shortly after the moment she was found dead from a drug overdose and he removed evidence from the room prior to police arriving according to:

<https://www.nydailynews.com/entertainment/gossip/whitney-houston-close-friend-raffles-van-exel-admits-removing-evidence-singer-hotel-room-death-article-1.1052013>

19. It has been alleged Raffles supplied cocaine to Ms. Houston shortly before her death according to: <https://www.nydailynews.com/entertainment/gossip/whitney-houston-close-friend-raffles-van-exel-admits-removing-evidence-singer-hotel-room-death-article-1.1052013>

20. It has been alleged Raffles took pictures of Whitney Houston's dead body and sold it to the media for his personal gain according to:

<https://www.youtube.com/watch?v=vGDn3o4ZBS0>

21. Raffles inserted himself into Michael Jackson's entourage and is believed to have benefited from Michael Jackson's death via distribution of assets and or personal property.

22. Raffles has a history of searching out celebrities and their family when they are at a low point and then inserting himself into their lives ultimately for his own financial gain or for financial gain of those he is associated with.

23. Raffles produced a video as seen at:  
<https://www.youtube.com/watch?v=YSF1aPLF2sY> portions of which are publicly available on YouTube, wherein he describes the art of the Hollywood con and how to get close to celebrities.

24. Raffles believes rules and laws are made to be broken – as long as you do it elegant and that he is willing to do whatever it takes.

25. Raffles believes that celebrities are like everyone else – the more they see you the more comfortable they will be with you.

26. Raffles believes that in order to get into someone's circle, just be around and once you are in the circle the network starts.

27. Raffles video captures how he fraudulently gains access into the 2003 Billboard Awards at the MGM Grand Hotel and Casino without any credentials or tickets or authorization to be there.

28. The Raffles video catalogs a series of lies and deceit in order for Raffles to achieve his goals.

29. Raffles stated “always go for the kill and never take no for an answer, especially not from somebody who is not in the power or liberty to say yes.”

30. One of Raffles personal rules is to “show no shame.” This equates to “lying to a blind man” to get what you want as demonstrated in his video.

31. The life mantra and talent for being a con and playing people to advance his own purposes was in full display and effect during the time Raffles worked himself into Alfred’s circle.

32. Through a series of calculated actions Raffles was able to isolate Alfred so that Raffles would have the ability to unduly influence and fraudulently bait Alfred into allegedly signing a Will on July 24, 2019. That Will and its contents did not embody or describe Alfred’s true intent.

33. Anyone who truly knew Alfred knew that he wanted to leave his assets to his family.

34. Part of Raffles, and others working with him, scheme to get Alfred to sign a Will leaving everything to Raffles included handpicking a lawyer, who had no prior relationship with Alfred at all, to fly from Miami, Florida, to Kansas City Missouri with a Will that was drafted at Raffles direction and to present that Will to Alfred.

35. Part of Raffles, and those working with him, scheme was to make Alfred believe that Leonardo was Alfred’s lawyer, someone whom Alfred could trust to advise Alfred and look after his interests, and someone who did not have a loyalty or financial relationship with Raffles.

36. Part of Raffles, and others working with him scheme, was to get Alfred to sign a Will leaving everything to Raffles included was to find persons to notarize and witness the alleged Will execution who were persons not known to Alfred and who did not understand Alfred's limitations and medical and psychiatric history.

37. Part of Raffles, and others working with him, scheme to get Alfred to sign a Will leaving everything to Raffles included hiding their plans from Bruce, who was Alfred's caregiver and Power of Attorney – despite the fact that Raffles knew Bruce held a Power of Attorney.

38. Months prior to filing this Will Contest, Petitioner put Raffles and Leonardo da Vinci on notice to preserve relevant evidence.

### COUNT I

#### WILL CONTEST- IMPROPER EXECUTION

39. Petitioner incorporates by reference paragraphs no. 1 through 38 set out above into Count I of his Petition.

40. That the purported July 24, 2019 Will is invalid because it was not validly executed.

41. Decedent did not sign the purported Will in its final form as submitted to this Court by Respondent.

42. Decedent did not declare the purported Will in its final form as submitted to this Court by Respondent to in fact be Decedent's final Will.

43. Any purported Witnesses to said purported 2019 Will were not asked to witness Decedent's signing of said Will at request of Decedent.



44. That to be a valid Will, the writing is required to be in writing, signed by the testator and is required to be signed by at least two individuals, each of whom witnessed the signing. These requirements were not observed or completed with the challenged Will.

45. That the Will Proponent has failed to prove the purported July 24, 2019 Will was either actually signed by Decedent or that someone else signed Decedent's name while both in the presence of the Decedent and at Decedent's direction.

46. That this Petitioner believes that the purported signature is not that of Decedent and that Decedent never directed any other person to sign the purported July 24, 2019 Will in the presence of the Decedent.

47. That the Petitioner believes that the Will Proponent has failed to prove the purported July 24, 2019 Will was actually witnessed by at least two individuals each of whom witnessed either the signing or the testator's acknowledgment of the signature or of the will all prior to testator's death.

48. That the Petitioner believes that the purported July 24, 2019 Will was not witnessed by at least two individuals each of whom witnessed either the signing or the testator's acknowledgment of the signature or of the will all prior to testator's death.

WHEREFORE, Petitioner prays for Judgment to be entered against Respondent for the improper execution of Decedent's will; that Petitioner recover damages against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will, as filed with the Court, not to be Decedent's last will and testament based upon the faulty and improper execution of the

Will; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate based upon the fact that the improper execution of the Will denies Respondent any claim in the Estate; that Decedent's Will be determined to be invalid; that this Court grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

## COUNT II

### WILL CONTEST-LACK OF TESTAMENTARY CAPACITY

49. Petitioner incorporates by reference paragraphs no. 1 through 48 set out above into Count II of his Petition.

50. That the purported July 24, 2019 Will is invalid because Decedent did not have testamentary capacity when Decedent executed the purported Will.

51. As of July 24, 2019, and after, Decedent was not of sound and disposing mind and memory.

52. As of July 24, 2019, and after, Decedent could not understand or comprehend the purport and effect of what was taking place with the purported July 24, 2019 Will or what he was doing.

53. That in order to possess "testamentary capacity" Decedent, at the time of allegedly executing the purported July 24, 2019 Will, must have understood the nature of Decedent's act in making a will, must have known the extent and character of Decedent's property, must have known and understood the proposed disposition of Decedent's

property, and must have known the natural objects of Decedent's bounty. These elements were not met as none of these were true as to Alfred on July 24, 2019.

54. That as of July 24, 2019, Decedent did not understand the ordinary affairs of life, was not able to understand the extent of his, was not able to know the persons who were the natural objects of his bounty, and not capable of intelligently weighing and appreciating his natural obligations to those persons.

55. That at all relevant times on the date of the alleged execution of the contested July 24, 2019, and after, Decedent did not understand the nature of his act in making the will because he did not understand that the purported Will sought to exclude each and every one of Decedent's siblings, or that it left 100% of everything in Decedent's Estate to a person who was not family and whom Decedent had a short and sorted history with.

56. That at all relevant times on the date of the alleged execution of the contested documents, Decedent did not know the extent and character of Decedent's property because the purported Will fails to specify or list or identify the true nature and extent of Decedent's assets and property.

57. That at all relevant times on the date of the alleged execution of the contested documents, Decedent did not know or understand the proposed disposition of Decedent's property because he did not understand all the property he in fact owned or had an interest in and that the purported Will devised 100% of his assets to a person who was not family and had a short history under suspicious circumstances with the Decedent.

58. That at all relevant times on the date of the alleged execution of the contested Will, Decedent did not know the natural objects of his bounty.

59. That at all relevant times Decedent had granted Power of Attorney over his personal and financial affairs in order to protect himself from those with impure motives seeking to take advantage of the fact that Decedent is an heir to the Prince Estate and holds a 1/6<sup>th</sup> expectancy interest in the entire Prince Estate.

60. That said Attorney in fact was purposely not consulted and intentionally kept in the dark during which time Raffles, and others working with him, executed their plan to dupe Decedent into executing a will and trusting each of them to lay the groundwork for future purported transactions.

**WHEREFORE**, Petitioner prays for Judgment to be entered against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will not to be Decedent's last will and testament based upon the fact that Decedent did not possess testamentary capacity at the time Decedent allegedly signed the purported July 24, 2019 Will; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate based upon Decedent's lack of testamentary capacity; that Judgment be entered that Decedent lacked testamentary capacity to have executed the July 24, 2019 Will; that Decedent's Will be determined to be invalid; that this Court grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

### COUNT III

#### WILL CONTEST-LACK OF MENTAL CAPACITY

61. Petitioner incorporates by reference paragraphs no. 1 through 60 set out above into Count III of his Petition.

62. That the purported July 24, 2019 Will is invalid because Decedent did not have the requisite mental capacity when Decedent allegedly executed the purported Will on July 24, 2019.

63. That before and as of July 24, 2019 Decedent was unable to manage his property and financial affairs effectively for reason of Decedent's mental deficiency, physical illness, disability, and/or use of prescription drugs.

64. That Decedent's medical condition before, as of July 24, 2019, and after was such that Decedent experienced a failure of mind that deprived Decedent of intelligent action beyond the most basic of decisions. This deficiency includes the inability to adequately and fully understand a document such as the purported July 24, 2019 Will. As of July 24, 2019, and after Decedent suffered from Parkinson disease type symptoms and involuntary movements due to the side effects of certain psychiatric drugs Decedent was also taking at these times.

65. That as of July 24, 2019, and after Decedent was taking Haloperidol. Haloperidol is an antipsychotic medication used to treat certain mental/mood disorders such as schizophrenia and schizoaffective disorders. Haloperidol works by helping to restore the balance of certain natural substances in the brain (neurotransmitters).

66. That Decedent had a long history of Parkinson disease, hypertension, and depression. Decedent had sought and received psychiatric care for decades and the medications described above were done so by his psychiatrist.

67. That as of July 24, 2019 and after, Decedent was 66 years old, was effected by infirmity of the mind and body, had failing memory, vacillating judgment, repeated himself often without appreciation of the fact the same story or information had just been shared, exhibited childlike characteristics at times, would often, in the course of a conversation being speaking in a nonsensical manner devoid of context, was unable to manage any financial affairs, or run basic errands, or organize his home, suffered from confusion and delusions, and other circumstances, all of which individually and together controlled or influenced Decedent's testamentary actions before, as of July 24, 2019, and his actions thereafter.

68. That such conditions of Decedent described above did in fact influence and controlled his testamentary actions.

69. That the purported terms and provisions of the July 24, 2019 purported Will itself are so inconsistent, as previously described, with Decedent's true will and intent and are so unjust and unreasonable when compared with Decedent's true will and intent such that the only logical conclusion is that Decedent lacked the requisite mental capacity as of his purported testamentary actions of July 24, 2019, and that that alleged document is invalid.

70. That the terms and provisions of the purported July 24, 2019 Will are so far from Decedent's true intentions, and historical actions and valued personal relationships such that the purported Will is so unjust and unreasonable as to be invalid.

71. That the burden is upon the proponent of a will to prove, not only the execution of the will, but the capacity of the testator.

72. That where evidence relating to mental capacity to make a will is conflicting, the issues of fact are questions for the jury to determine.

**WHEREFORE**, Petitioner prays for Judgment to be entered against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will not to be Decedent's last will and testament based upon the fact that Decedent did not possess the mental capacity at the time he allegedly signed the purported July 24, 2019 Will to execute such a document; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate based upon Decedent lack of testamentary capacity; that Judgment be entered that Decedent lacked testamentary capacity to have executed the July 24, 2019 Will; that Decedent's purported Will dated July 24, 2019 be determined to be invalid; that this Court grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

#### COUNT IV

#### WILL CONTEST-UNDUE INFLUENCE

73. Petitioner incorporates by reference paragraphs no. 1 through 72 set out above into Count IV of his Petition.

74. The purported July 24, 2019 Will is invalid because it is a product of undue influence.

75. The purported July 24, 2019 Will is a product of undue influence because: a) there was opportunity by one or more persons to exercise such influence; b) there was disposition by one or more persons to exercise such influence for an improper purpose, and c) the result of the purported July 24, 2019 Will is clearly the effect of such influence.

76. That at all relevant times leading up to and on the date of the alleged execution of the purported July 24, 2019 Will, the free will of Decedent was overpowered and destroyed, resulting in Decedent being told to sign a will that otherwise would not have been signed by him.

77. That at all relevant times leading up to and on the date of the alleged execution of the purported July 24, 2019 Will, Raffles, and others working on his behalf or direction, had the opportunity to exercise such influence because they had claimed to befriend Alfred, claimed to have been only acting in his interest, inserted themselves into his life at a time his was vulnerable and in need of sound unbiased advice and guidance but instead leveraged Alfred's condition for their own purposes and gain, and unduly influenced Alfred to take actions he would not have otherwise taken.



78. That at all relevant times leading up to and on the date of the alleged execution of the purported July 24, 2019 Will, Decedent had the disposition to be unduly influenced by Raffles, and others working on his behalf or direction, because Decedent's mind was amenable to undue influence.

79. That at all relevant times leading up to and on the date of the alleged execution of the purported July 24, 2019 Will, Raffles, and others working on his behalf or direction, had the disposition to exercise such influence for an improper purpose.

80. That Raffles, and others working on his behalf or direction, did exercise such undue influence to the extent that such actions defeated the true will and intent of Decedent.

81. That Raffles, and others working on his behalf or direction, exercised such manipulation upon Decedent that it destroyed Decedent's free agency and substituted their purpose for that of Decedent.

82. That the result of the purported July 24, 2019 Will is clearly the effect of such influence because the content of the purported July 24, 2019 Will does not accurately reflect the true intent or wishes of Decedent as they existed at the time the purported July 24, 2019 Will was allegedly executed.

83. That undue influence is reasonably inferred from the facts and circumstances surrounding the Decedent including but not limited to how Decedent lived their life, Decedent's character, mental and physical condition.

84. That without the undue influence exerted upon Decedent by, Raffles, and others working on his behalf or direction, the purported July 24, 2019 Will would have

never of come into existence let alone have been executed by Decedent, if it in fact was so executed.

85. That Decedent did not possess the mental capacity as of the date Decedent allegedly executed the July 24, 2019 Will.

**WHEREFORE**, Petitioner prays for Judgment to be entered against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will not to be Decedent's last will and testament based upon the fact that Decedent was unduly influenced by the Respondent at the time Decedent allegedly signed the purported July 24, 2019 Will as to make the Will invalid; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate; that Judgment be entered that Decedent was unduly influenced to execute the July 24, 2019 Will; that Decedent's purported Will dated July 24, 2019 be determined to be invalid; that this Court grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

#### COUNT V

#### WILL CONTEST-DURESS

86. Petitioner incorporates by reference paragraphs no. 1 through 85 set out above into Count V of his Petition.

87. That the purported July 24, 2019 Will is invalid because it is a product of duress.

88. That the duress suffered by Decedent through the actions and pressure of Raffles, and others working on his behalf or direction, was such that it overcame Decedent's will and understanding.

89. Raffles, and others working on his behalf or direction, had motive to induce or through duress obtain Alfred's signatures upon the July 24, 2019 Will, and these motives and intentions led to actions which caused Alfred to experience duress and created an atmosphere and environment where he thought he had to give in to their desires and intentions.

90. Without the duress exerted upon Decedent by, Raffles, and others working on his behalf or direction, the purported July 24, 2019 Will would have never of come into existence let alone have been executed by Decedent, if it in fact was so executed by Alfred.

**WHEREFORE**, Petitioner prays for Judgment to be entered against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will not to be Decedent's last will and testament based upon the fact that Decedent allegedly signed the purported July 24, 2019 Will under duress; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate based upon the unlawful duress Decedent was under when he allegedly executed the Will; that Decedent's purported Will dated July 24, 2019 be determined to be invalid; that this Court grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

**COUNT VI****WILL CONTEST-FRAUD**

91. Petitioner incorporates by reference paragraphs no. 1 through 90 set out above into Count VI of his Petition.

92. The purported July 24, 2019 Will is invalid because it is a product of fraud.

93. The fraud perpetrated on Decedent through the actions of Raffles, and others working on his behalf or direction, was such that it overcame Decedent's will and understanding.

94. The purported Will of July 24, 2019 is a, but not the only, product of Raffles, and others working on his behalf or direction, systematic plan to enrich themselves and eliminate Alfred's family from receiving any assets of Alfred's estate.

95. Raffles, and others working on his behalf or direction, used false statements and false promises relied upon by Alfred, all at a time when Raffles, and others working on his behalf or direction, knew Alfred could not uncover the truth or understand the truth such that the fraud and fraudulent acts and statements effectively eliminated Alfred's true will.

96. Without the fraud exerted upon Decedent by Raffles, and others working on his behalf or direction, the purported July 24, 2019 Will would have never of come into existence let alone have been executed by Decedent, if it in fact was so executed.

97. Decedent did not possess the mental capacity as of the date Decedent allegedly executed the July 24, 2019 Will.

**WHEREFORE**, Petitioner prays for Judgment to be entered against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will not to be Decedent's last will and testament based upon the fact that Decedent did not possess the mental capacity at the time he allegedly signed the purported July 24, 2019 Will and was fraudulently induced to execute such a document; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate based upon the fraud and deceit exercised in gaining the alleged signature of Decedent on the purported Will; that Judgment be entered that Decedent was fraudulently induced to execute the July 24, 2019 Will; that Decedent's purported Will dated July 24, 2019 be determined to be invalid; grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

## COUNT VII

### WILL CONTEST-MISTAKE

98. Petitioner incorporates by reference paragraphs no. 1 through 97 set out above into Count VII of his Petition.

99. That the purported July 24, 2019 Will is invalid because it is a product of mistake.

100. That the mistake and mistakes made as found in and through the act of both creation and alleged execution of the purported July 24, 2019 Will, are a direct and

proximate result of actions of Raffles, and others working on his behalf or direction, was such that it overcame Decedent's will and understanding.

101. The purported Will of July 24, 2019 is but another product of Raffles, and others working on his behalf or direction, in a systematic plan to enrich themselves and eliminate Alfred's family from receiving any assets of Alfred's estate.

102. Without the mistake perpetrated by Respondent and mistakes made by Decedent at the time of allegedly executing the purported July 24, 2019 Will, the purported July 24, 2019 Will would have never of come into existence let alone have been executed by Decedent, if it in fact it was so executed by Alfred.

103. The purported July 24, 2019 Will makes impractical, inconsistent, and impossible gifts of land, devising the same or similar land to more than one person such that the entire Will was obviously not read or understood by Decedent as to make the entire Will invalid.

104. Decedent did not possess the mental capacity as of the date Decedent allegedly executed the July 24, 2019 Will.

**WHEREFORE**, Petitioner prays for Judgment to be entered against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will not to be Decedent's last will and testament based upon the fact that Decedent did not possess mental capacity at the time Decedent allegedly signed the purported July 24, 2019 Will to execute such a document; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate based upon mistakes made by Decedent and others in

the alleged execution of the Will; that Judgment be entered that Decedent mistakenly executed the July 24, 2019 Will; that Decedent's purported Will dated July 24, 2019 be determined to be invalid; that the Court grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

### COUNT VIII

#### WILL CONTEST- REVOCATION

105. Petitioner incorporates by reference paragraphs no. 1 through 104 set out above into Count VIII of his Petition.

106. Revocation is pled in addition to and/or in the alternative of the foregoing theories.

107. The purported July 24, 2019 Will is invalid because it was revoked prior to Decedent's death.

108. A will or any part thereof is revoked (a) by a subsequent will which, as is evident either from its terms or from competent evidence of its terms, revokes the prior will or part expressly or by inconsistency; or (b) by being burned, torn, canceled, obliterated, or destroyed, with the intent and for the purpose of revoking it by the testator or by another person in the presence of and by the direction of the testator.

109. That the purported July 24, 2019 Will was revoked by being canceled with the intent and for the purpose of revoking it by the testator or by another person in the presence of and by the direction of the testator.

110. That Decedent did not possess the mental capacity as of the date Decedent allegedly executed the July 24, 2019 Will.

**WHEREFORE**, Petitioner prays for Judgment to be entered against Respondent in an amount in excess of Twenty-Five Thousand Dollars (\$25,000); that a judgment be entered declaring Decedent's Will not to be Decedent's last will and testament based upon the fact that Decedent revoked the purported July 24, 2019 Will; for an order that excludes and denies Respondent from any claim or right of inheritance from Decedent under Decedent's Estate based upon Decedent's lack of testamentary capacity; that Judgment be entered that Decedent revoked the purported July 24, 2019 Will; that Decedent's purported Will dated July 24, 2019 be determined to be invalid; that the Court grant Petitioner's costs and expenses, including reasonable attorney's fees of this action to be paid by the Respondent and for such other relief as the Court shall deem just and proper.

### **Jury Demand**

111. Petitioner respectfully requests trial by jury.

By: /s/ Brian E. Jorde  
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By: /s/ Donald J. Quinn II  
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ATTORNEYS FOR PETITIONER



VERIFICATION

STATE OF MINNESOTA )  
COUNTY OF JACKSON )

The undersigned, Shawn Jackson, of lawful age and being first duly sworn upon his oath, states that the allegations and avowments set forth in the foregoing Petition are true and accurate to the best of his knowledge and belief.

  
Shawn Jackson

Subscribed and sworn to before me, a Notary Public, this 13<sup>th</sup> day of December, 2019.



  
Notary Public

My Commission Expires: 07/21/20

# Attachment 2

<p><b>FILED</b> <b>DIVISION 19</b></p> <p><b>04-Feb-2020 14:20</b></p> <p>CIRCUIT COURT OF JACKSON COUNTY, MO</p> <p>BY _____</p>
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# Attachment 3

STATE OF MINNESOTA  
COUNTY OF CARVER

DISTRICT COURT  
FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In re:

Estate of Prince Rogers Nelson,  
Decedent.

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

NOTICE OF APPEARANCE

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PLEASE TAKE NOTICE that the undersigned hereby notifies the Court that Leonardo Starke enters his appearance in this matter as Personal Representative of the Estate of Alfred Jackson. Leonardo D. Starke requests that he be added to the service list, and that he be sent copies of all correspondence, notices, orders and other pleadings in the above-captioned matter.

Dated: February 12, 2020

/s/Leonardo D. Starke  
LEONARDO D. STARKE  
3340 McDonald Street  
Miami, FL 33133  
Telephone: (305)588-3074  
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PERSONAL REPRESENTATIVE FOR THE  
ESTATE OF ALFRED JACKSON

# Attachment 4



# Attachment 5

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# Attachment 6

## MEMORANDUM

On September 3, 2019, Attorney Eric Magnus filed a Notice of Appearance in this matter on behalf of Primary Wave LP (hereafter "Primary Wave"), claiming to have a life expectancy interest in the Estate under Minn. Stat. § 524.1-201(33). Primary Wave alleges that its life expectancy interest in the Estate immediately vests at the time of the decedent's death.

On September 12, 2019, Primary Wave moved for a status conference with the Court and the other parties to the proceedings. At this conference, Primary Wave argued that a status conference is premature, arguing that the validity of the conveyance and the identity of the decedent's heirs are still in question. At this point, a status conference would be premature.

The Court will admit that presiding over this matter is more than a probate proceeding. However, this is a matter that has already been heard and their "clout" may depend on the number of heirs. The Court has determined that there are six heirs to the Estate and that the opportunity to receive information regarding the Estate is being provided by the Personal Representative and the Court. The Court will continue with this communication and decision making process. The nature of the music assets of the Estate and the complexity of the Estate. The Court will continue to make decisions it deems appropriate. In doing so, will listen to all relevant information and arguments. The gathering of the information and decision making process is still only six heirs to this Estate including the decedent's children.

The Court will revisit Primary Wave's request for a status conference. Primary Wave's purchase is confirmed and Mr. Jackson's own representation of the Estate facilitates the administration of this Estate.

K. W. E.

# Attachment 7



