

STATE OF MINNESOTA  
COUNTY OF CARVER

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FIRST JUDICIAL DISTRICT  
DISTRICT COURT  
PROBATE DIVISION

In re:

Estate of Prince Rogers Nelson,

Decedent.

**Court File No. 10-PR-16-46**  
**Judge Kevin W. Eide**

**PETITION FOR COMPENSATION**

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The undersigned Petitioners, Sharon L. Nelson, Norrine P. Nelson, and John R. Nelson, (collectively “SNJ”), as heirs to the estate of Decedent Prince Rogers Nelson (“Prince Estate” or “Estate”), state:

1. Sharon L. Nelson is one of the joint Petitioners in this matter.
2. Norrine P. Nelson is one of the joint Petitioners in this matter.
3. John R. Nelson is one of the joint Petitioners in this matter.
4. All Petitioners are the Decedent’s heirs (Order Determining Intestacy, Heirship & McMillan Matters ¶ 2 (dated May 18, 2017)).
5. As heirs, the Petitioners are interested persons under the laws of Minnesota. Minn. Stat. § 524.1-201(33).
6. SNJ Petitioners jointly petition the Court to approve payment for services and efforts provided to the Estate.
7. All the heirs have provided considerable time and investment in business matters related to the Estate. Unlike others, who have performed services for the Prince Estate, SNJ has not received any financial sums for numerous and repeated services they have contributed to the Estate. Moreover, SNJ has had to rely solely on their pension, social security, personal

savings, and loans from friends to cover the costs needed to support the Prince Estate despite the millions paid to advisors, attorneys and others approved by the Court. There have been extraordinary fees and expenses paid out and generated by the Estate and its agents, yet there continues to be the need for the court approved Heirs to participate in meetings yet such required involvement has not been supported financially by the Prince Estate, our inheritance to be. Presently, there is the need for SNJ to respond to the efforts by Primary Wave in a mediation directed by the Court. There are very important concerns related to Primary Wave's efforts to have input into the affairs of the Prince Estate. SNJ cannot afford to maintain the desired support needed without financial compensation for their work with respect to assets they shall inherit. While SNJ continue to wish to support the Prince Estate and protect its assets, SNJ have spent significant time and efforts in reviewing and addressing estate matters without compensation, and should be made whole in such efforts to assist and benefit the Estate for past, future and on-going matters. Lastly, there will be considerable important and urgent decisions involving state and federal tax negotiations, proposed payment, possible debt financing and other planning to distribute the Prince Estate assets. Accordingly, reasonable compensation and payment for travel costs as well as other out of pocket expenses should be paid and reimbursed to SNJ.

8. As this Court is aware, the Estate has now been on-going for over three years. In this time, millions have been paid to the Personal Representatives, their accountants, attorneys, and legal advisors.
9. Heirs have previously requested that they be granted partial distributions from the Estate before a final and full resolution and payment is made with the taxing authorities. Despite requests for distributions since 2017, no distributions have been paid to the Heirs.

10. Previously, SNJ have made multiple submissions objecting to the significant expenses and fees generated by Comerica out of a concern, among other reasons, that the excessive expenses would leave nothing for the Heirs at the end of the administration. However, in the September 7, 2018 Order, this Court determined that a review of cash flow analysis done by Comerica indicated that SNJ's fear that nothing will be left for the Heirs at the end of the administration "is not a legitimate concern." Furthermore, this Court has continued to authorize Comerica's petitions to approve interim accountings and large payments to others providing services to the Estate yet not the Heirs.
11. Regrettably, one Heir, Alfred Jackson has passed away before the Estate has closed and before any distributions have been made. It is alleged by Primary Wave that Alfred Jackson assigned his expectancy inheritance interest to Primary Wave, one or two days, prior to his death. Another Heir, Tyka Nelson has allegedly transferred her expectancy interest in the Prince Estate to Primary Wave also, allegedly for a large payment. Primary Wave alleges that Alfred Jackson sold 90% of his expectancy interest just before Alfred's death. These series of events are disconcerting, as it belies the fact that almost all parties involved with this Prince Estate have received payments except the Heirs.
12. It is SNJ's understanding that Omarr Baker has also entered into significant loans against his expectancy interest in the Estate with numerous parties, including Primary Wave. SNJ wish to avoid further debts, costs and expenses while also being engaged to assist the Estate.
13. The SNJ Heirs have been offered similar high interest loan opportunities against their expectancy interests in the Estate by Primary Wave and others, but have rejected such loan offers to fully protect their interests in the Estate and the legacy of Prince.
14. Despite refusing loan offers, SNJ heirs have significant financial instability due to their limited financial resources. SNJ had attorney liens entered against their expectancy interest in

the Estate. Due to limited funds, SNJ has had to appear in these proceedings without representation on their own behalf, or forego making submissions on certain matters such as excessive legal fees and petitions not in the best interest of the Estate.

15. Primary Wave's involvement provides further need and justification for compensation to the SNJ Heirs. SNJ have set forth their concerns and objections to granting Primary Wave's motion to be recognized as an interested person in SNJ's January 10, 2020 letter to this Court. Of particular concern and relevance for this Petition is the significant imbalance between the legal, professional and financial resources Primary Wave has at its disposal compared to SNJ. There has been mediation on this matter and all parties participating were compensated except the Heirs. It would be only fair for individuals with limited financial resources to receive some form of remuneration for time spent engaging in mediation on these matters as all other parties involved are being compensated for their role. Furthermore, some Estate compensation would assist SNJ in potentially working with legal or professional experts in preparation for hearings, mediations and other Estate related matters, as Primary Wave and Comerica will both have numerous representatives supporting their positions, all compensated by the Estate's funds (often against the very same Heirs such parties were engaged to protect).
16. In addition, SNJ have spoken with Alfred Jackson's heirs and they are expected to generate additional expenses and legal fees related to investigating the circumstances surrounding the death of their co-beneficiary Alfred Jackson, as well as a contested will that has been filed in the Circuit Court of Jackson County, Missouri. These matters will impact these proceedings.
17. SNJ needs to provide sufficient oversight, expertise and involvement in the negotiations related to these proceedings, especially state and federal tax authorities, over the next six months. Sharon Nelson has years of experience working in corporate America and Norrine

Nelson has years of experience working with the Hennepin County Economic Assistance and Community Services divisions, all beneficial skills.

18. Given the significant financial hardships SNJ face, the efforts and time SNJ have expounded, the need to address Primary Wave's efforts to insert itself in the Estate, the important tax and transition decisions ahead, and the substantial expenses and fees paid out to the Personal Representative, it's lawyers and its other advisors, SNJ respectfully request that this Court approve reasonable compensation to the Heirs for it's time, services and work on the Estate.
19. In the alternative, SNJ ask that this Court instruct Comerica to reach an agreement with SNJ regarding a way that SNJ may receive possible consultancy payments in exchange for beneficial services provided to the Estate.

**WHEREFORE**, the undersigned Petitioners respectfully request the Court:

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

**Petitioners:**

Date: 3/11/2020

Sharon L. Nelson:



Signed in Washington County,

State of Minnesota

Date: 3/11/2020

Norraine P. Nelson:



Signed in Hennepin County,

State of Minnesota

Date: 3/11/2020

John R. Nelson: *Norrine Nelson for John R. Nelson*

Signed in Hennepin County,

State of Minnesota

**Attorneys for Petitioners:** None