

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DISTRICT**

MARY BLEICK, TODD BUTLER,
ALLEN SKIERSKI, and GARY PETRIME
as individuals, and on behalf of other
persons similarly situated,

Plaintiffs,

v.

SHERYL MAXFIELD, in her official
capacity as Director of Commerce at the
Department of Commerce of the State of
Ohio, AKIL HARDY, in his official
capacity as the Superintendent of the Ohio
Division of the Unclaimed Funds,
ROBERT SPRAGUE, in his official
capacity as Treasurer of the State of Ohio,
and JOY BLEDOSE, in her official
capacity as Executive Director of the Ohio
Facilities Construction Commission

Defendants.

Case No.: 2:2025-cv-1140

**DECLARATION OF JAN PETERS
IN SUPPORT OF PLAINTIFFS'
MOTION FOR TEMPORARY
RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

DECLARATION OF JAN PETERS

I, Jan Peters, declare as follows:

1. I make this Declaration in support of Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction. The facts set forth in this Declaration are of my own personal knowledge, and if called as a witness, I could and would testify competently as to their truth.

2. I am an expert in the technical area of Information Technology. From 2000 to June 2010, I was a Senior Software Development Engineer and Senior Business Development Specialist at Amazon's German subsidiary, Amazon.de. In these roles, I functioned as a professional Information Technology ("IT") specialist, including working to integrate and utilize search engines like Amazon S3 or Google Search into hundreds of online shops I have launched or consulted since 2000. Since the middle of 2010, I have been serving as Senior eCommerce IT Specialist at BMW Global. In that role, I developed, maintained, and operated 90% of all online sales platforms of BMW, MINI, Rolls Royce, and BMW Motorrad, always exploring and utilizing search engine technologies and underlying data engineering to optimize the achievement of sales targets. Based on my vast experience working with websites, I offer the following observations and opinions.

3. I have visited the Ohio Unclaimed Property website:

<https://unclaimedfunds.ohio.gov/app/claim-search>

This website is plagued by many easily remedied deficiencies that make it more difficult (or impossible) to locate unclaimed property.

4. For example, a search for “Peters” with a fake Zip-Code of “00000” already returns 694 results, which from the first glance are already totally meaningless, not identifiable and in no way meeting the client’s expectation on how to find their property.

5. The search for a fake zip code “00000” already proves, that there must be thousands of these fakes in the underlying database, if it already delivers almost 700 for my last name “Peters”. It therefore appears there are thousands of false addresses with falsified zip codes (“00000”).

6. The search results listed are apparently sorted by the column “Owner Name”, which in fact appears to be a combination of the entry fields for “Last Name” and “First Name”. However, “First Name” field is optional to provide in the search form. The resulting list now starts with some entries showing no first name at all and proceeds with first names starting with A and so forth. Some entries in the result show a “Co-Owner Name”, which was not even offered as a search field at all.

7. The fields for “Address” and “City” are for 99% either not filled at all or filled with “UNKNOWN” – or simply nothing at all. Just very rarely there’s something appearing which is somehow close to a common writing of an address.

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SEARCH ?

This is a free and secure service provided by the Ohio Division of Unclaimed Funds to claim your lost funds.

Search Instructions
Enter your last name or the name of your business in the **Last or Business Name** field and click **SEARCH**.
To narrow your results, enter your first name, city, or zip code. Click **SEARCH**.

To provide you with a comprehensive list of possibilities, exact name matches will be shown first. Then, individuals with similar names to the name you entered will follow.

Claiming Funds
Select **CLAIM** next to the listing(s) you want to claim.
Select **CONTINUE TO FILE CLAIM** and follow the instructions provided to begin your claim.

To search for property held by other states, visit [MissingMoney.com](#).

***Last Name or Business Name:**

First Name:

Narrow your search with the following fields:

City (Optional):

Zip Code (Optional):

Property ID (Optional):

SEARCH

If you have any questions or concerns regarding the privacy of your information or the legitimacy of this website, please call our office at 1-877-644-6823

RESULTS Your search returned **694 unclaimed properties**.
Exact name matches will be shown first, followed by properties with similar names to the one entered.

Display:

First Previous **1** 2 3 4 5 Next Last

To file a claim for the funds on this list, click the Claim button next to those properties you wish to claim, then click on the "Continue to File" Claim button.

Select an Action	Owner Name	Co-Owner Name	Reporting Business Name	Address	City	State	ZIP Code	Amount	Property ID
+ CLAIM < SHARE	PETERS		SUNRIDER INTERNATIONAL				00000	UNDER \$10	18512534

8. There is no discernible order. The website produces these voluminous results because the search algorithm apparently does a full text search. It does not allow any narrowing or filtering of the search by any parameters - such as searching for an exact match by using quotation marks around the full name. This website is primitive. Regular modern search engines allow a user to search combining different search criteria, such as simply putting the full name in quotation marks or combining both with a + (so both terms must be present). Regular search engines also would allow a user to exclude terms by putting a simple dash (“-”) right before the to-be-excluded term. For example, inputting “Peters -Peterson” would search for Peters but exclude any Peterson from the result. This would allow a user to narrow down the search results tremendously. However, the form used by the State of Ohio does not allow one to input a quotation mark (not even an error message gets displayed), or any functional operator into the search field. Operators entered into the name field do get ignored or result in a even messier result list – see below. Without these functions, even the search results for uncommon names becomes overwhelming for most users.

SEARCH ?

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Search Instructions
Enter your last name or the name of your business in the **Last or Business Name** field and click **SEARCH**.
To narrow your results, enter your first name, city, or zip code. Click **SEARCH**.

To provide you with a comprehensive list of possibilities, exact name matches will be shown first. Then, individuals with similar names to the name you entered will follow.

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Select **CONTINUE TO FILE CLAIM** and follow the instructions provided to begin your claim.

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***Last Name or Business Name:**

First Name:

Narrow your search with the following fields:

City (Optional):

Zip Code (Optional):

Property ID (Optional):

SEARCH

If you have any questions or concerns regarding the privacy of your information or the legitimacy of this website, please call our office at 1-877-644-6823

RESULTS Your search returned **1000 unclaimed properties**.

Exact name matches will be shown first, followed by properties with similar names to the one entered.

CONTINUE TO FILE CLAIM (0)

Display:

20 results

First

Previous

1

2

3

4

5

Next

Last

To file a claim for the funds on this list, click the Claim button next to those properties you wish to claim, then click on the "Continue to File" Claim button.

Select an Action	Owner Name	Co-Owner Name	Reporting Business Name	Address	City	State	ZIP Code	Amount	Property ID
+ CLAIM < SHARE	PETERS PETERS		ARMSTRONG UTILITIES INC	1783 LYNN MAR AVE	YOUNGSTOWN	OH	44514	\$50 TO \$100	28683557
+ CLAIM < SHARE	PETERS PETERS		PAYPAL INC	15493 COUNTY AIRPORT RD	EAST LIVERPOOL	OH	43920	UNDER \$10	26381269
+ CLAIM < SHARE	PETERS PETERS		ARMSTRONG UTILITIES INC	1825 W MARKET ST	ORRVILLE	OH	44667	\$50 TO \$100	28683556
+ CLAIM < SHARE	PETERSON & PETERSON/% PETERSON CAROLYN		SAFEGUARD BUSINESS SYSTEMS INC	PO BOX 234	LORE CITY	OH	43755	\$10 TO \$50	1343022
+ CLAIM	PETERSON		PHILIPS NORTH AMERICA LLC	39 SPRUCE DR	ANDOVER	OH	44003	UNDER \$10	22778236

9. The website lists hundreds of other results with unnecessary matches, such as for the name “Aaron Peters” when a user is searching only for “Andrew Murphy.” The search result list only starts with 3 entries of “Peters Andrew”, but right away goes on with the logic described above (no first name – other first names starting with a, and so on). This behavior completely clutters the result page with unnecessary search results, making it impossible to locate, e.g., a Andrew Peters, which for instance holds a second first name. No matter what first names you enter,

the search result in this example will always deliver 694 entries to scroll through, to find something meaningful according to what the client is eventually searching for.

10. The website does not show any sorting mechanism; so, the user would not have to scroll through all of the results to avoid overlooking potential hits by abbreviations such as “P. Murphy” or misspellings like “Murph.” Based on my experience working on websites, the result order is very likely dependent on the search process—i.e., how the software script runs through the database—rather than any logical order.

11. All of the above is showing under the condition that I am already searching for a fake zip code, which does not even exist! If the client opens up the search to no given zip code – as he might just not know it or does not want to exclude potential locations from the result – the result page shows thousands of matches for review. It leaves the user—who is just a lay person searching for his property—to review hundreds or thousands of matches. (As discussed in more detail below, the search function is also arbitrarily limited to just 1,000 matches even if there are more.)

12. This problem grows exponentially with more common names. In fact, it appears that the website’s database is limited to 1,000 results when the name is common—and does not even list all of the properties beyond 1,000. For example, searching for “John Smith” or “Mark Johnson” all yielded exactly 1,000 results. There are clearly more than 1,000 results found for these common research queries , but the cap is limited to 1,000.

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To narrow your results, enter your first name, city, or zip code. Click **SEARCH**.

To provide you with a comprehensive list of possibilities, exact name matches will be shown first. Then, individuals with similar names to the name you entered will follow.

Claiming Funds
Select **CLAIM** next to the listing(s) you want to claim.
Select **CONTINUE TO FILE CLAIM** and follow the instructions provided to begin your claim.

To search for property held by other states, visit [MissingMoney.com](#).

***Last Name or Business Name:**

First Name:

Narrow your search with the following fields:

City (Optional):

Zip Code (Optional):

Property ID (Optional):

SEARCH

If you have any questions or concerns regarding the privacy of your information or the legitimacy of this website, please call our office at 1-877-644-6823

RESULTS Your search returned 1000 unclaimed properties.

Exact name matches will be shown first, followed by properties with similar names to the one entered.

CONTINUE TO FILE CLAIM (0)

SEARCH ?

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***Last Name or Business Name:**

First Name:

Narrow your search with the following fields:

City (Optional):

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Property ID (Optional):

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RESULTS Your search returned 1000 unclaimed properties.

Exact name matches will be shown first, followed by properties with similar names to the one entered.

CONTINUE TO FILE CLAIM (0)

Display:

First Previous **1** 2 3 4 5 Next Last

To file a claim for the funds on this list, click the Claim button next to those properties you wish to claim, then click on the "Continue to File" Claim button.

13. Accordingly—unless by sheer coincidence all of these names yield exactly 1,000 properties—some seized properties go completely unlisted and will never be found.

14. Furthermore, German Umlauts such as ü/ä/ö are forbidden from being entered into the search field, though it appears that foreign citizens' property is also in the custody of the State of Ohio and so these foreign citizen names will never be found.

15. As a result, for example, a user does not have the opportunity to narrow the search,

RESULTS Your search returned 1000 unclaimed properties.

Exact name matches will be shown first, followed by properties with similar names to the one entered.

[CONTINUE TO FILE CLAIM \(0\)](#)

Display:

20 results

First Previous **1** 2 3 4 5 Next Last

To file a claim for the funds on this list, click the Claim button next to those properties you wish to claim, then click on the "Continue to File" Claim button.

Select an Action	Owner Name	Co-Owner Name	Reporting Business Name	Address	City	State	ZIP Code	Amount	Property ID
+ CLAIM ← SHARE	JOHNSON MARK		COLONIAL PENN LIFE INSURANCE COMPANY	36 WOODLAND AVE SE	MASSILLON	OH	44646	\$10 TO \$50	31922938
+ CLAIM ← SHARE	JOHNSON MARK		STATE OF TEXAS	21 SHIRLEY DR #1	CINCINNATI	OH	45217	\$10 TO \$50	782541
+ CLAIM ← SHARE	JOHNSON MARK		GREAT AMERICAN INSURANCE COMPANY	7542 ROLLING MEADOWS	WEST CHESTER	OH	45069	\$10 TO \$50	747150
+ CLAIM ← SHARE	JOHNSON MARK		UNITED PARCEL SERVICE OASIS SUPPLY CORP	2268 E 64TH STREET	CLEVELAND	OH	44103	\$50 TO \$100	3750916

by entering cities such as "München" in the city field.

Narrow your search with the following fields:

City (Optional):

Zip Code (Optional):

Property ID (Optional):

Invalid Characters:
Please only enter letters, numbers, ('), and (-).

16. Even beyond the search problems, the results themselves do not enable an owner to ensure that the property referenced is actually theirs.

17. When searching for one's property, the only fields listed include the "owner name", "co-owner name", "reporting business name", "address", "city", "state" (which should be

obviously Ohio), “zip code” (which should never be “00000” or just empty), “amount” and “property ID.”

18. Ohio’s website does not contain a description of the property (such as stocks, real-estate, office box deposit, bank safe deposit box contents, etc.), to allow the individual to confirm that it is in fact his/her property. Such a description would also help the individual determine what exactly was taken and whether it is also worth the time and effort to claim the property.

19. Ohio’s website does not provide dates of when the property was taken, which would also assist the individual determine what exactly was taken.

20. Ohio’s website does not provide detailed information about the property itself besides its value at the time it was taken or sold, which would also assist the individual determine what exactly was taken.

21. Based on my advanced understanding of websites, adding these fields would not be difficult or at all burdensome. And adding these fields would greatly assist individual property owners in determining whether or not they actually had property that escheated to the State of Ohio.

22. Moreover, to the best of my knowledge the contents of the database are not available on search engines (such as Google). Allowing the database to be crawled by search engines would also not be difficult—and would allow individuals to locate their seized property more easily from around the world. These are very simple fixes that could be made if the State of Ohio was actually desirous in returning the supposed “unclaimed” property to the owner.

23. In sum, this primitive website maintained by the State of Ohio conveys no notice from around the world. These are very simple fixes that could be made if the State of Ohio was

actually desirous in returning the approved “unclaimed” property to the owners and though it could be updated and corrected, it is seriously flawed and largely inoperable at present.

24. If the purpose of the UPL is to unite owners with their lost property and provide safety to this property for the time being, and the state of Ohio WOULD be following the respective obligations and due process, this website is plainly incapable of offering that. Feeding this information into a modern search engine software – which is widely offered to public and professional users – or using even so publicly available AI-tools and cost-free available AI-agents such as ChatGPT, Google Gemini and many others, it would be fairly easy to secure the constitutionally obligated purpose of the UPL in Ohio.

I declare under penalty of perjury under the laws of the State of Ohio that the foregoing is true and correct.

Executed on October 27, 2025, at Munich, Germany.



Jan Peters