

No. 25-41

IN THE

**Supreme Court of the United States**

---

JAN PETERS,

*Petitioner,*

*v.*

MALIA M. COHEN, INDIVIDUALLY AND IN HER OFFICIAL CAPACITY AS  
STATE CONTROLLER OF THE STATE OF CALIFORNIA, AND AS  
TRUSTEE OF THE UNCLAIMED PROPERTY FUND,

*Respondent.*

---

**WORD COUNT CERTIFICATION**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 2,181 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed on September 19, 2025.

*Rita L. Hemenway*

Rita L. Hemenway