

ADMINISTRATIVE PANEL DECISION

The U.S. National Will Registry, Inc. d/b/a The U.S. Will Registry v. jamie
jamie, jamie
Case No. D2025-4377

1. The Parties

The Complainant is The U.S. National Will Registry, Inc. d/b/a The U.S. Will Registry, United States of America ("United States"), internally represented.

The Respondent is jamie jamie, jamie / Jamie Ryke, United States of America, represented by Soti Law Associates, India.

2. The Domain Name and Registrar

The disputed domain name <nationalwillregistry.com> is registered with GoDaddy.com, LLC (the "Registrar").

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the "Center") on October 24, 2025. On October 24, 2025, the Center transmitted by email to the Registrar a request for registrar verification in connection with the disputed domain name. On October 24, 2025, the Registrar transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain name which differed from the named Respondent (Jaime Ryke) and contact information in the Complaint. The Center sent an email communication to the Complainant on November 6, 2025, providing the registrant and contact information disclosed by the Registrar, and inviting the Complainant to submit an amendment to the Complaint. The Complainant filed amendments to the Complaint on November 3, 2025, November 5, 2025, and November 17, 2025.

The Center verified that the Complaint together with the amendments to the Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the "Policy" or "UDRP"), the Rules for Uniform Domain Name Dispute Resolution Policy (the "Rules"), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the "Supplemental Rules").

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondent of the Complaint, and the proceedings commenced on November 19, 2025. In accordance with the Rules, paragraph 5, the due date for Response was December 9, 2025. The Response was filed with the Center on

December 8, 2025. The Respondent also sent email communications to the Center on November 5, 2025, November 20, 2025, December 9, 2025, and December 10, 2025.

A supplemental Filing from the Complainant was received on December 10, 2025, and a Supplemental Filing from the Respondent was received on December 14, 2025.

The Center appointed W. Scott Blackmer as the sole panelist in this matter on December 16, 2025. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

Noting that the United States trademark registration claimed by the Complainant as grounds for the Complaint is not in the name of the Complainant or, indeed, in a name corresponding to a registered legal entity in the State of Florida, the Panel issued Procedural Order No. 1 calling on the Complainant to furnish documentation concerning its interest in the trademark and allowing the Respondent to reply.

4. Factual Background

The Complainant is a “Florida profit corporation” established under the laws of the State of Florida, United States, with a principal place of business in Fort Lauderdale, Florida. The Complainant states that it has “continuously operated since 1996 as a national will registration and document storage platform”, but this is not confirmed on the record in this proceeding.

The Complainant furnished printouts of records from the online database of the Florida Division of Corporations, showing that this corporation was established in May 2013, dissolved in September 2019, and reestablished in January 2020. The Complainant’s “Domain Portfolio” lists roughly two-dozen domain names, the earliest of which, usnationalwillregistry.org and usnationalwillregistry.com, were registered on December 10, 2011. The Internet Archive’s Wayback Machine has screenshots associated with usnationalwillregistry.com starting in May 2013 and with usnationalwillregistry.org starting in 2017.

The Complainant’s most active website at the time of this Decision is found at “www.theuswillregistry.org” (the “Complainant’s website”). Whois records show that this domain name was created on May 24, 2017. This website is headed with the name given in the caption of the Complaint and identified as the Complainant’s “d/b/a” (“doing business as” or trade name): “The U.S. Will Registry”, along with a figurative logo. It identifies the website operator as “a nonprofit corporation” “founded in 1997”, offering free will creation service and, with a partner, secure iCloud document storage, as well as a range of other related services. The Panel notes that the online database of the Florida Division of Corporations does not list a nonprofit corporation by that name, nor does it record “The U.S. Will Registry” as a registered fictitious name (“d/b/a”) of the Complainant. (“The U.S. Will Registry Inc.” was registered as the Complainant’s fictitious name in 2014, and that registration expired in 2019.)

On June 12, 2024, the Complainant issued a press release, “Revolutionizing Estate Planning: The U.S. Will Registry Unveils Groundbreaking Free Services”, announcing that “The U.S. Will Registry, a nonprofit organization and trailblazer in comprehensive estate planning solutions” is unveiling a suite of “free services” to provide access to “essential estate planning tools”. These include will creation, death notices and obituaries, and free online storage of estate planning documents, through the organization’s website at “www.theuswillregistry.org”. The Complainant furnishes a “domain portfolio” list. Some of these, such as usnationalwillregistry.com, are not associated with active websites.

The Complainant claims under United States Trademark Registration Number 7896878 (registered on August 19, 2025) for the composite mark shown on the Complainant’s website, an illustration of the scales of justice and the words “THE U.S. WILL REGISTRY” in international class 35. The registration is for the mark as shown and expressly disclaims exclusive right to the terms “THE U.S. WILL REGISTRY”. The Panel notes that this mark is registered not to the Complainant but to The U.S. Will Registry, a Florida Limited

Liability Company. However, the Panel finds no such company listed in the online database of the Florida division of corporations, nor is it listed as a registered fictitious name of the Complainant.

The Panel notes that the application for registration was filed on June 19, 2024, claiming first use in commerce as early as August 9, 2008. ¹

The disputed domain name was created on January 14, 2012, one month after the registration of the first of the Complainant's domain names. It is registered to "jamie jamie", listing "jamie" as the organization, with a postal address in the State of Michigan, United States and "[xxx]@michprobate.com" as the contact email address. The Respondent identifies himself as Jamie Ryke, a Michigan probate and estate lawyer, a partner in the law firm of Thav, Ryke & Langan. Mr. Ryke appears as "Co-Founder" on the website associated with the disputed domain name (the "Respondent's website"), which is headed "National Will Registry". The Respondent's website offers users options for creating and storing wills in a digital cloud, as well as ancillary services such as notarization with video capture.

Screenshots available from the Internet Archive's Wayback Machine show that the disputed domain name was used for a website advertising "National Will Registry" services to create and store wills from 2013 through early 2022, but it appears that this website was operated not by Mr. Ryke but by Family Archival Solutions, a company based in the State of California, with Mike Nicholas as CEO. The Response nowhere states that Mr. Ryke was the original registrant but claims only that "[t]his domain name was registered several years ago as a descriptive term, for expansion into national-scale will registry and document storage services ...".

The Complainant sent cease-and-desist letters to the Respondent in August 2025, to which the Respondent evidently did not reply.

After receiving the Complaint in this proceeding, the Respondent sent an email to the Complainant (copied to the Center) stating that the Respondent "had this idea 10 years ago". The email continued, "Feel free to contact me to buy my site from me otherwise I'm gonna hire 10 attorneys and fight you for the next 3 years." The Center inquired whether the Parties were interested in suspending the proceeding to pursue settlement. Instead, the Complainant filed supplemental pleadings arguing that the email exchange demonstrated the Respondent's bad faith and lack of more than a vague idea to produce a "will registry", to which the Respondent replied with his own supplemental filing.

5. Parties' Contentions

A. Complainant

The Complainant contends that it has satisfied each of the elements required under the Policy for a transfer of the disputed domain name.

Notably, the Complainant contends that it holds the United States trademark registration for THE U.S. WILL REGISTRY and that "the Respondent's website creates a false impression of affiliation with the Complainant's long-established and trademarked service". The Complainant contends that the Respondent is not a legal entity known by a corresponding name and that the disputed domain name does not accurately describe its services, as the Respondent does not offer any registration functionality but merely the ability to write and store individual wills.

¹Noting the general powers of a panel articulated in paragraphs 10 and 12 of the Rules, it is commonly accepted that a panel may undertake limited factual research into matters of public record, as the Panel has done in these proceedings. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition ([WIPO Overview 3.0](#)), section 4.8.

The Complainant asserts that the Respondent acted in bad faith, as the disputed domain name “remained inactive for several years” until early 2025, after the Complainant’s “national growth following its 2024 launch of an Online Will Program”. The Complaint attaches historical analytics showing the growth in the Complainant’s online traffic in 2024 and 2025, mirrored by a “surge” in visitors to the Respondent’s website, which the Complainant attributes to the “confusing similarity” of the domain names and the service offerings. The Complainant argues that the Respondent has intentionally sought to divert Internet users for commercial gain and has revealed its bad faith by sending an email suggesting that the Complainant should buy the disputed domain name to avoid litigation.

In response to Procedural Order No. 1, the Complainant reasserted that “The Complainant has continuously operated as a will registry since 1997”. The only supporting evidence is a declaration by Stacey Miller, the Complainant’s president, who does not explain in what form “the Complainant” functioned for some 20 years before it first came into existence as a corporation in 2013, was dissolved in 2019, and was then reestablished in 2020. Ms. Miller does state, however, that “the Complainant” operated offline until “about 2008” when the website “www.theuswillregistry.org” was “developed”. (The Panel notes to the contrary that this domain name was not created until May 2017, and there are no archived screenshots of the Complainant’s associated website until October 2017.)

Further in response to the Procedural Order, the Complainant furnished a copy of a recent (December 24, 2025) filing with the State of Florida, registering THE US WILL REGISTRY as a fictitious name for five years. The Complainant also acknowledged an “administrative error” in registering the composite trademark under an incorrect name and attached a copy of its Correction Request to the USPTO (dated December 24, 2025). The Correction Request, which is pending at the time of this Decision, would change the name of the trademark owner from The U.S. Will Registry, a Florida limited liability company (which does not exist) to The U.S. Will Registry, a Florida corporation, -- which also does not exist in that precise formulation and is not the Complainant, which is The U.S. National Will Registry, Inc., a Florida corporation.

B. Respondent

The Respondent contends that the Complainant has not satisfied all three of the elements required under the Policy for a transfer of the disputed domain name.

The Respondent points out problems with the Complainant’s reliance on the registered composite mark THE U.S. WILL REGISTRY. As noted in the Panel’s Procedural Order, the Complainant is not the owner of the trademark registration. Moreover, the disputed domain name was registered in 2012, and the Complainant did not exist as a corporate entity until 2013. The claimed first use date for the mark is 1996 and the claimed first use in commerce date is 2008, both before the Complainant existed as a legal entity, but the Complainant did not discuss predecessors in interest.

The Respondent also challenges those first use dates. The Respondent observes that the Complainant filed an application to register THE U.S. WILL REGISTRY as a word mark (United States Serial No. 86313316) on June 18, 2014. The application was abandoned on March 31, 2015. The Complainant in this application claimed first use in commerce as “At least as early as” January 1, 2014. The Respondent argues that this undercuts the Complainant’s claims to first commercial use of the composite mark, which incorporates the same words, as early as 2008. The Respondent notes that the Complainant did not register a corresponding domain name, <theuswillregistry.org>, until May 24, 2017, more than five years after the disputed domain name was registered.

The Respondent notes as well that the United States trademark registration of the composite mark disclaims exclusivity for the textual element, “The U.S. Will Registry”, as inherently descriptive, one of the grounds on which the Complainant’s earlier application to register the word mark alone was refused. This also undermines a claim of confusing similarity with the disputed domain name. The Respondent claims on the contrary a legitimate interest in using the descriptive terms of the disputed domain name for a website offering relevant will creation, storage, and search services and demonstrable preparations to expand those services.

The Respondent argues that the Complainant fails to show bad faith at the time of the registration of the disputed domain name, contending that there is no evidence that the Complainant was using the mark at that time. The specimen submitted with the unsuccessful application for a word mark was from the Complainant's website at "www.willsus.com", which the Complainant did not register until November 22, 2013 (after the disputed domain name was registered). The composite mark was used with the website that the Complainant started using in 2017, and the Complainant did not register the mark until 2025. Thus, the Respondent concludes, the disputed domain name was registered without targeting the Complainant's mark or in an effort to disrupt its business or divert its customers.

The Respondent points to the Complainant's inconsistent statements about its corporate identity and the date of first use of its mark, as well as other asserted attempts to "grab" domain names similar to the Respondent's (which are not germane to this proceeding). Consequently, the Respondent requests a finding of Reverse Domain Name Hijacking ("RDNH") against the Complainant.

Commenting on the Complainant's supplemental filings, the Respondent insists on the descriptive nature of the disputed domain name, which is clearly relevant to both of their business models but which pre-dates the Complainant's online offerings. The Respondent excuses his "emotional" email reaction to the Complaint but observes that this does not change the fact that there simply is not evidence of an established use of the Complainant's claimed mark by the time the disputed domain name was registered and in use for a relevant website. The Respondent points out the deficiencies noted above in the Complainant's efforts to reply to the Procedural Order concerning the timeline for first use of a relevant mark by the Complainant, which subverts the Complainant's allegations of bad faith on the part of the Respondent.

6. Discussion and Findings

6a. Preliminary Issue: Supplemental Filings

The Rules provide for a Complaint and Response and do not contemplate repeated amendments and supplemental filings. Paragraph 10 of the Rules gives the Panel "the authority to determine the admissibility, relevance, materiality and weight of the evidence, and also to conduct the proceedings with due expedition". Paragraph 12 provides that it is in the Panel's sole discretion to request further statements or documents from the parties. Unsolicited filings are generally discouraged and tend to be permitted exceptionally where additional supporting evidence is required, a relevant claim has not been addressed, or fairness calls for an opportunity to respond to the opposing party. WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition, ("[WIPO Overview 3.0](#)"), sections 4.6, 4.7.

Here, both Parties have submitted unsolicited supplemental filings, as well as filings in response to the Panel's procedural order. The Panel considers that the Complainant's unsolicited supplemental filings may be accepted in response to the Respondent's post-Complaint email and request for RDNH, and the Respondent may fairly be allowed to reply. Neither substantially contributed to delay in the proceedings. The subsequent filings were necessary responses to the Panel's Procedural Order.

6b. Substantive Issues

A. Identical or Confusingly Similar

It is well accepted that the first element functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the Complainant's trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

The Complainant has not yet shown rights in respect of a trademark or service mark for the purposes of the Policy. [WIPO Overview 3.0](#), section 1.2.1. However, on this record, it seems likely that with another round of Section 7 Correction Requests, the Complainant can establish to the satisfaction of the USPTO that the Complainant is indeed the party that applied for and received the registration for a composite mark including

the textual element THE U.S. WILL REGISTRY. This cannot be considered a “strong” mark, given the disclaimer of precisely those words, which may reduce the likelihood of confusion for a similar phrase. It is likely sufficient, however, to give rise to a finding of “confusing similarity” for purposes of the first element of the Policy, particularly taking into account the similarity of the associated website content.

Nevertheless, given the Panel’s finding on the third element of the Complaint, bad faith, it is unnecessary to reach a definitive conclusion on the first element. The Panel recites this analysis chiefly for its relevance to the discussion below on the Respondent’s request for a finding of RDNH.

B. Rights or Legitimate Interests

Given the Panel’s findings on the third element, below, it is not necessary to detail findings on the second element. It may be observed, however, that it will always be difficult for a complainant to establish a lack of rights or legitimate interests when a respondent has in fact been using the disputed domain name for some years to conduct what appears to be a legitimate business broadly corresponding to a descriptive term or phrase appearing in the domain name.

C. Registered and Used in Bad Faith

The Panel notes that, for the purposes of paragraph 4(a)(iii) of the Policy, paragraph 4(b) of the Policy establishes circumstances, in particular, but without limitation, that, if found by the Panel to be present, shall be evidence of the registration and use of a domain name in bad faith, such as intentionally creating confusion with a trademark to attract Internet users for commercial gain (paragraph 4(b)(iv)). However, as there must be bad faith in the registration as well as use of the disputed domain name, these instances, and any other circumstances indicating bad faith, are all predicated on the Respondent’s prior awareness of the Complainant’s trademark and the Respondent’s reasonably inferred intent to attack that mark.

The Complainant’s case would clearly fail if the Respondent were the original registrant of the disputed domain name in 2012, as the Complainant was not formed until 2013 and does not establish evidence of using the registered composite mark online until 2017. But, as outlined above, the historical screenshots suggest that while the Respondent may have had the idea “10 years ago”, it did not acquire the disputed domain name before 2022 at the earliest, because it was still being used by a third party for a similar service. The Panel finds it significant that the Respondent, a lawyer represented by experienced counsel, never expressly states when the Respondent acquired the disputed domain name, even while emphasizing that “the Complainant was not using its mark on the Internet at the time when the Respondent registered his domain”.

This denial of prior awareness cannot simply be taken at face value, given that the Complainant was in fact online at “www.theuswillregistry.org” by 2017 with the composite mark stamped on a website offering similar services. Nevertheless, with the burden of proof resting on the Complainant, the Panel is unable to find that the Respondent more likely than did not acquire the disputed domain name for its descriptive sense rather than in an effort to target the Complainant’s mark, which was not yet established at that time. The disputed domain name is a relevant description of the Respondent’s will-related services (the Panel is not persuaded that only the Complainant’s version of a “registry” qualifies to fit the description of “registry” services). The Panel notes that the USPTO had already rejected the Complainant’s application for a word mark as inherently descriptive and there was, at the time the Respondent probably acquired the disputed domain name, no trademark application to register the composite mark (the application was not filed until June 2024). And that registration ultimately disclaimed the textual element in any event because of its descriptiveness. The Respondent had his own, quite different, figurative logo and used the word “national” rather than “U.S.” to modify “will registry”. Moreover, the disputed domain name had been in use online by a third party since 2013 for similar services, obviously not aimed at the Complainant.

Thus, even if the Respondent could have anticipated an application to register the Complainant’s logo years later, the likelihood of confusion with the Complainant was minimal and of minimal potential value at that time for the Respondent, and potentially raises issues to be addressed in a court. On balance, it seems unlikely

that the Respondent looked at that logo and decided to acquire the disputed domain name to target the similar words in the logo, on the chance that it would be associated someday with a more successful, trademarked service.

The evidence in the case file as presented does not indicate that the Respondent's aim in registering the disputed domain name was to profit from or exploit the Complainant's trademark.

The Panel is unable to find that the Respondent registered the disputed domain name in bad faith targeting of the Complainant or its trademark rights because on this record it is not established that the Complainant had trademark rights at the time that the Respondent registered the disputed domain name. [WIPO Overview 3.0](#), section 3.8.1.

The Panel finds the third element of the Policy has not been established.

D. Reverse Domain Name Hijacking

Paragraph 15(e) of the Rules provides that, if after considering the submissions, the Panel finds that the Complaint was brought in bad faith, for example in an attempt at Reverse Domain Name Hijacking or to harass the domain-name holder, the Panel shall declare in its decision that the Complaint was brought in bad faith and constitutes an abuse of the administrative proceeding. The mere lack of success of the complaint is not, on its own, sufficient to constitute reverse domain name hijacking. [WIPO Overview 3.0](#), section 4.16.

The Panel does not find that the Complaint has been brought in bad faith and constitutes an attempt at Reverse Domain Name Hijacking. The Complaint was poorly researched and reasoned, considering that the Complainant did not assure itself or the Panel that it properly identified the ownership of the relevant trademark and its use over time and did not adequately investigate the potential interests of a party that had been operating an apparently legitimate business with the disputed domain name for a substantial period of time. However, as a matter of equity, the Panel also takes account of the Respondent's apparent equivocation concerning the timing of his acquisition of the disputed domain name, which is relevant to the issue of bad faith. In these circumstances, the Panel declines to enter a finding of RDNH.

7. Decision

For the foregoing reasons, the Complaint is denied.

/W. Scott Blackmer/

W. Scott Blackmer

Sole Panelist

Date: January 14, 2026