



March 17, 2025

SENT VIA E-MAIL ONLY

Cloudflare, Inc
registrar-abuse@cloudflare.com

Re: *Infringement of WFG[®] and WFG National Title Insurance Company[®] Registered Marks*

To Whom It May Concern:

This letter is sent to advise you that Williston Financial Group LLC (“WFG”) owns a number of U.S. trademarks and service marks, specifically including the USPTO registered WFG[®] mark (Registration No. 4,372,515, issued July 23, 2013) and the USPTO registered WFG National Title Insurance Company[®] mark (Registration No. 4,379,546, issued August 6, 2013) (individually and collectively, the “Marks”), which are in full force and effect.

It has come to WFG’s attention that Cloudflare, Inc. is the registrar of the domain name wfg-title.com, created January 24, 2025 (the “Domain Name”), which incorporates WFG’s registered WFG[®] Mark and is confusingly similar to WFG’s registered WFG National Title Insurance Company[®] Mark. WFG has not authorized the registration of its Marks as part of the Domain Name, is not affiliated, connected or associated with the Domain Name, and does not sponsor or endorse the Domain Name.

Domain Nameservers: JASMINE.NS.CLOUDFLARE.COM LLEN.NS.CLOUDFLARE.COM

This Domain Name is currently being used to perpetrate fraud and other criminal activity, claiming to be “The Official Source for WFG Title Information” instructing consumers to click a malicious link purported to protect them against data breaches and cyberattacks. Certain individuals have registered infringing domain names, such as the Domain Name, for the purpose of engaging in attempted wire fraud and other criminal activity by using domain names which are likely to cause confusion with genuine and authentic WFG domains. The WFG family of businesses provide title insurance and real estate settlement services, making WFG a natural target for such criminals attempting to use the WFG name to provide incorrect wire instructions to attempt to misdirect and steal funds from real estate transactions, among other criminal behavior.

WFG has expended considerable resources to promote and protect its Marks, and must continue to do so. The relevant public recognizes and associates the distinctive WFG[®] Mark and WFG National Title Insurance Company[®] Mark with WFG. The registration of the Domain Name not only violate WFG’s intellectual property rights, but creates an unacceptable opportunity for criminals to attempt to target WFG’s valued clients.

As WFG understands that Cloudflare, Inc. may not have been aware of the actions of these individuals or advised of the infringement, WFG hereby provides Cloudflare, Inc. with notice and requests that you immediately shut the infringing Domain Name down and cease and desist all such use.

WFG looks forward to your cooperation in resolving this matter quickly. Please contact the undersigned no later than 5:00 p.m. PT on March 19, 2025 to provide notice that you agree to cooperate immediately with the demands set forth in this letter.



This letter is sent without prejudice to WFG's rights and claims, all of which are expressly reserved.

Sincerely,

Kati Robertson

Kati Robertson
Senior Vice President/Associate Counsel
Williston Financial Group LLC