



# invictus law

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**Blair R. Jackson, Esq.**

May 19, 2015

**VIA FIRST CLASS MAIL**

Commissioner Todd E. Kiser  
Utah Insurance Department  
3110 State Office Building  
Salt Lake City, Utah 84114

**RECEIVED**

**MAY 21 2015**

UTAH STATE  
INSURANCE DEPT.

Re: Request for exemption

Dear Commissioner Todd E. Kiser:

My name is Blair Jackson and I am the owner of Invictus Law. I have practiced law in the State of Utah for nearly eleven years. Pursuant to R592-8-5 I write to make a request for exemption for agency title insurance producer licensing time period requirements of U.C.A. 31A-23a-204(1)(a)(i). My address, as noted above, is 360 S Technology Court, Suite 200, Lindon, Utah 84042. My email address is [blair@invictuspc.com](mailto:blair@invictuspc.com). My telephone number is 801-854-9212. My insurance license number is 504559, however, as of the date of this letter, my escrow and title licenses are pending as I just recently passed the licensing exams.

Over the last many years I have had the great opportunity to be involved in Utah real estate law as a practicing attorney. During this time I have written and/or reviewed many commercial and residential lease agreements, drafted and filed UCC1 filings, drafted and/or reviewed financing statements, and drafted and/or reviewed trust deeds and mortgages. In 2011 and 2013 I also became intimately familiar with RESPA and TILA regulations, having an opportunity to defend a lender in Federal District Court for alleged violations. Also in 2011, I was hired by a large investor group of tax liens and tax deeds and tasked with the opportunity to collect on those investments. As a result I have had the opportunity to review hundreds of title commitments and participate in judicial and non-judicial foreclosures. The investor group continues to use my services for its investment purposes and the firm has developed many other clients that invest in tax liens and tax deeds.

I am aware of the recent changes that will take affect August 1, 2015 in the national title world due to changes the CFPB are requiring due to the Dodd-Frank Act. I am familiar with the revised time disclosures, the elimination of the old forms (HUD-1, GFE, TILA1 and TILA2 documents) that will now be replaced with the Loan Estimate (LE), and Closing Disclosure (CD) forms (except for commercial transactions, home equity loans, 25+ acres, and other exceptions). I try to participate in continuing legal education requirements with the State Bar and focus on real estate.

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I believe I have the experience that would qualify me for the exemption as I possess the legal, insurance, title abstract, and document preparation skills and knowledge necessary to own and oversee a Utah title insurance agency. Nevertheless, I have already had discussions with an individual who has been a licensed escrow producer for twelve years to join our company as an escrow manager. Additionally, I have been to the offices of the Attorneys Title Guaranty Fund ("ATGF") and spoken with their executives. If successful with this request, I intend to use ATGF as a resource to help me be successful with this endeavor. In other words, although I have had many years of real estate experience as an attorney, I intend to surround myself with qualified experts to ensure the highest levels of accuracy and professionalism.

I started Invictus Law in 2009 as a small law firm in Utah County. Since then the firm has grown to thirty-six employees in Utah and five employees in California. The growth has largely been accomplished as the result of a strong repeat customer base and word-of-mouth advertising. In fact, some of the largest growth years came without the firm spending any money on advertising. The opportunity to offer title services to the firm's existing clients and relationships is exciting.

If I can provide additional information responsive to my request please don't hesitate in contacting me.

Sincerely,

A handwritten signature in black ink, appearing to read "Blair". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.