



2021 Annual Report

ARIZONA



DEPARTMENT OF
INSURANCE AND FINANCIAL INSTITUTIONS



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Director's Message

Governor Ducey, Senate President Fann, and House Speaker Bowers:

Pursuant to A.R.S. § 41-3451(C)(8), the Automobile Theft Authority (ATA) Division of the Department of Insurance and Financial Institutions (DIFI) is pleased to present its annual report for Fiscal Year 2021. With the challenges of a global pandemic added to the changes that accompany agency consolidation, the ATA has remained flexible in adapting to the new DIFI structure. The ATA has leveraged the advantages of the consolidated agency and benefited from the increases in profile and attention to move the division forward.

The data included in this report covers the ATA's activities for FY21 and also includes statistics from CY20, as vehicle theft numbers are reported by the Federal Bureau of Investigation (FBI) nationally using a calendar year reporting period. Statistics presented in this way allows for using FBI data to compare Arizona with all other states.

In a year that saw significant national increases in vehicle theft, 11.8% according to FBI data, Arizona experienced a 1.2% decrease from 2019. FBI data showed 17,937 vehicles stolen in Arizona in 2020 - down from 18,151 in 2019, and estimated to represent an economic loss of \$159,388,182. Once the worst state in the nation for vehicle theft rate, Arizona has experienced a slow decline and fell from 18th in 2019 to 21st in 2020. Arizona also fell to 14th place in total thefts, compared to 11th place in 2019. We continue to be encouraged by these declining theft numbers, especially considering Arizona's population growth and increase in registered vehicles. And though the 2020 vehicle theft numbers are trending in the right direction, we are reminded of the high number of victims created by vehicle theft and associated crime, along with the heavy toll paid by law enforcement who combat these egregious, and often violent, crimes.

In addition to continuing the funding to our flagship grant programs, Vehicle Theft Task Force and Vertical Prosecution, the ATA is partnering with the Department of Public Safety to utilize the stolen vehicle occurrence and stolen vehicle recovery data within the Arizona Crime Information Center. When fully implemented this database will provide valuable information to law enforcement, policymakers and regionally with other participating states.

On behalf of DIFI's dedicated ATA staff, as well as its law enforcement and insurance industry partners, thank you for your continued support.

Respectfully,



Evan G. Daniels, Director
Arizona Department of Insurance and Financial Institutions





Our Mission

The ATA's mission is to deter vehicle theft in Arizona through a cooperative effort by supporting law enforcement activities, vertical prosecution, and public education programs.

ATA Division At A Glance

With the consolidation of the Departments of Insurance and Financial Institutions and the Arizona Automobile Theft Authority (ATA) on July 1, 2020, the ATA now exists as a division within the Arizona Department of Insurance and Financial Institutions (DIFI). Notwithstanding the changes this brought, many aspects of the standalone agency that operated for 28 years remain unchanged. The original statute, A.R.S. § 41-3451, established by the Arizona Legislature in 1992, to create a statewide effort to reduce auto theft, still guides the ATA's mission and daily activities. The 12-member Board of Directors, whose members are appointed by statute, the Governor's Office and Arizona law enforcement organizations, continues to provide guidance to ATA staff and recommendations to the DIFI Director.

As a division within DIFI, certain functions such as human resources, and financial accounting have been combined into the larger agency. These changes have streamlined the ATA and created operational efficiencies. The ATA continues to function as a stakeholder in a statewide network of law enforcement, criminal justice, and crime prevention partners working together to combat vehicle crimes across Arizona. By focusing resources in these areas, the ATA and its statewide grantees and partners continue to impact the state's vehicle theft rate.

The ATA is funded through semi-annual assessments of over 400 insurance companies writing auto policies in Arizona and receives no funding from the State's General Fund. The ATA collected approximately \$6.9 million in CY20 from the insurance industry through the assessment collection. The ATA legislative appropriation in FY21 was \$5,330,000. Over 86.4% of collected funds are issued for Law Enforcement, Vertical Prosecution and Public Awareness grant programs administered by ATA staff.

The Arizona Vehicle Theft Task Force (VTTF) remains the ATA's largest grant project at \$3,650,000 annually or 79.2% of the total ATA appropriation for grants. Legislative efforts to increase the ATA appropriation were successful this legislative session and will increase the VTTF grant for FY22 by \$693,500 - for a total grant award of \$4,343,500. This increase in appropriation enables the ATA to fund salary increases awarded to DPS detectives in the VTTF. Remaining grant funds support the ATA's Vertical Prosecution and Law Enforcement grant programs.



The ATA administers the free, statewide Watch Your Car program, sponsors free VIN etching events, and participates in community & police-based prevention projects. ATA's outreach activities were severely curtailed this year due to the pandemic; however, our message, particularly through social media, continues to encourage the public to be diligent about practicing theft prevention and utilize a multi-layered approach to safeguard property.

In FY21, the ATA initiated projects to begin establishing the foundations of what will become a statewide database to compile information regarding vehicle theft. A partnership with AZDPS to export vehicle theft and recovery data to a regional database promises to produce meaningful data to aid in criminal investigations, theft analysis and trends, and provide a comprehensive statewide vehicle theft picture.

Current Auto Theft Trends in the U.S. & Arizona

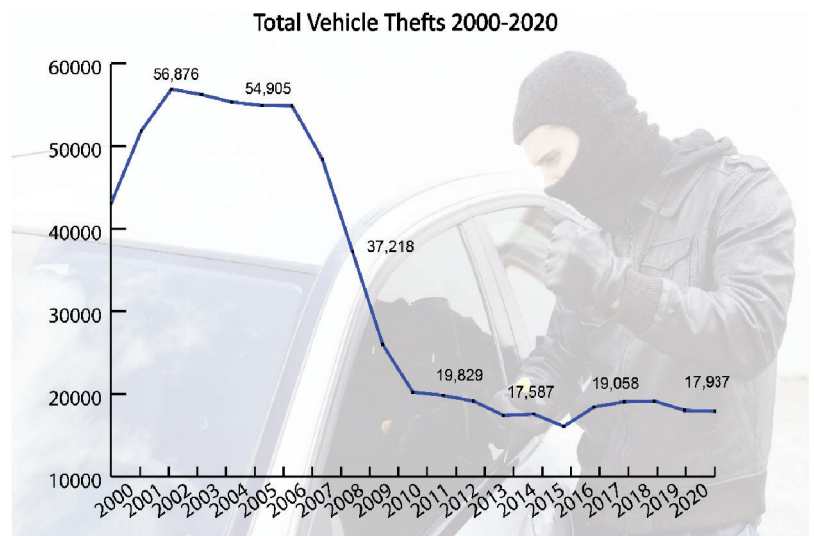
Vehicle Theft in the U.S.

Nationwide in 2020, there were an estimated 810,400 thefts of motor vehicles; an 11.8% increase from 2019. The estimated rate of motor vehicle theft in the U.S. was 246.0 per 100,000 residents and appears to be the first time the U.S. rate of motor vehicle theft exceeded the Arizona rate (241.7).

Average stolen vehicle value, a dollar figure normally determined by the FBI, was not published for CY20 and thus not available for this report.

Vehicle Theft in Arizona

In CY20 Arizona experienced a reduction of motor vehicle thefts according to the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) data. Arizona reported 17,937 stolen vehicles in calendar year 2020, a decrease of 1.2% from 2019 (18,151). According to the National Insurance Crime Bureau (NICB), Arizona ranks 14th in total number of vehicle thefts and 21st in the U.S. for the rate of vehicle theft (thefts per 100,000 residents). These figures represent decreasing theft numbers and rate for CY20.



According to stolen vehicle statistics reported by the Arizona Department of Public Safety in CY20, motor vehicle thefts in Maricopa and Pima counties accounted for 85.5% of the state's total thefts. The high percentage of vehicle theft in these counties is consistent with population centers in Arizona.

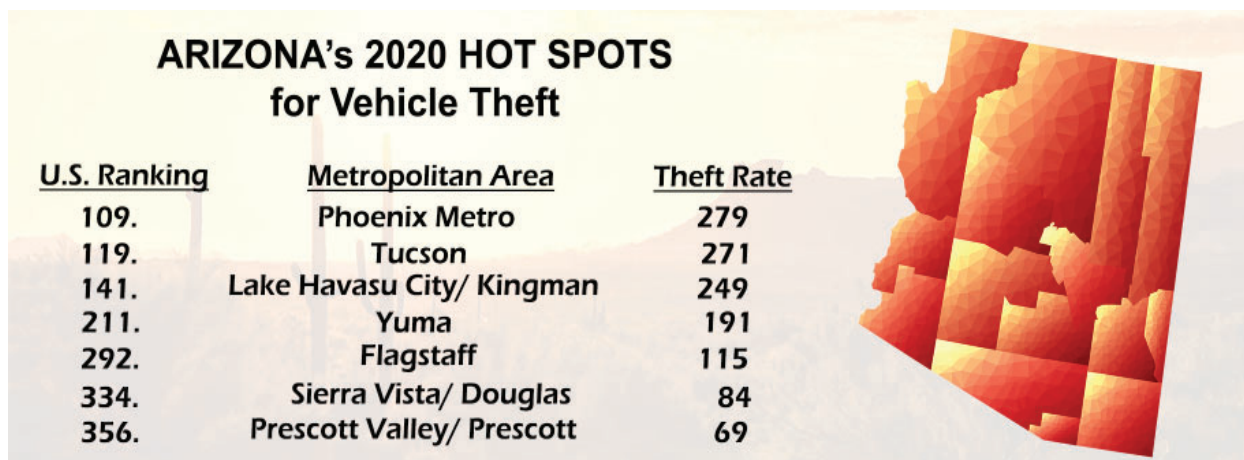
The total number of vehicle thefts in Arizona has decreased by 41.9% when comparing the number of thefts in 1992, ATA's first year, to 2020. When comparing auto thefts in 2002, Arizona's highest auto theft year, to the 2020 total, motor vehicle thefts in Arizona have decreased by 68.4%. The decline of vehicle theft numbers is even more impressive when the rapid growth of Arizona's population

and corresponding increase in registered vehicles is considered. While some vehicles are stolen as a crime of opportunity for a thief to gain quick transportation or to sell or trade to support an addiction, many are stolen by sophisticated, professional theft rings whose tactics often involve violence, financial fraud, identity theft, and international trafficking. Many crimes begin with the theft of a vehicle and are further facilitated through subsequent crimes committed with the stolen vehicle. Vehicle theft and associated crimes often turn violent and impact the quality of life and safety for Arizona communities, law enforcement, residents and visitors to Arizona. While Arizona experienced decreases in theft rates in 2020, the ATA and its partners continue to see the negative effect vehicle crimes are having in our communities.

Where Arizona’s Cities Rank Nationally

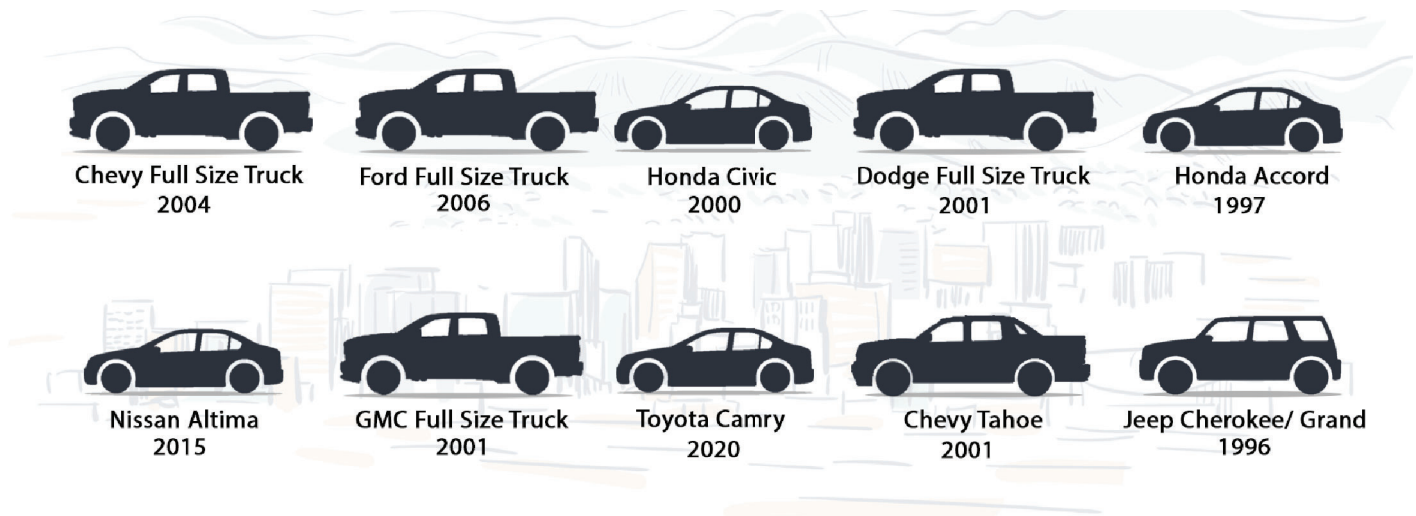
Metropolitan Statistical Areas (MSA) are population centers in the United States that are created by the federal Office of Management and Budget (OMB) for reporting purposes. MSAs allow for comparisons between larger population areas that include multiple cities, towns and unincorporated areas. MSAs can provide a broader theft perspective than single jurisdictions while reducing the number of comparators. The graphic below shows where Arizona’s MSAs rank nationally for rate of vehicle theft.

According to the National Insurance Crime Bureau “Hot Spots 2020” report, the Phoenix metro area ranks 109th in the nation for vehicle theft rate (total thefts per 100,000 residents); down from 97th in 2019. The graphic below shows where Arizona’s MSAs rank nationally for rate of vehicle theft.



Arizona's Most Stolen Vehicles in 2020

The specific vehicles listed here are Arizona's most frequently stolen vehicles. There are likely many reasons a vehicle makes this list, such as: popularity of the vehicle with thieves, a black market parts demand, or an engineering/design flaw that makes the vehicle easier to steal. Of interest for Arizona is the presence of four pick-up trucks in the top ten represented.

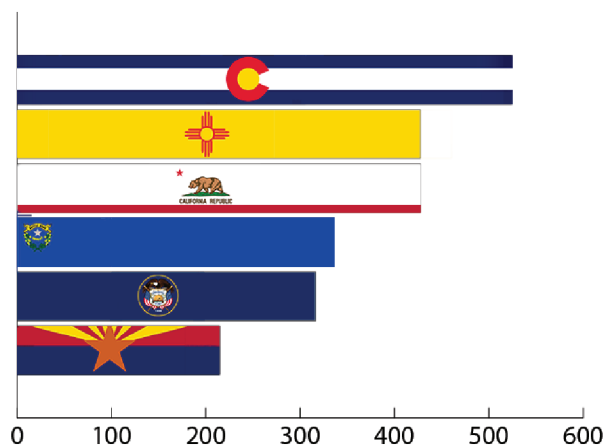


Vehicle Theft in the Southwest Region

Of the six states that make up the southwest region, three of the six experienced double digit increases in vehicle theft in 2020:

Utah	+52.7%
Colorado	+40.1%
California	+18.7%

Four of the six states, Colorado, California, New Mexico and Nevada, appear in the top nine states in the nation for rate of vehicle theft (thefts per 100,000 residents). The reasons why Arizona has been somewhat insulated from these high theft rates and overall increases is not immediately apparent but as auto theft knows no boundaries, the high theft rate within the southwest region is cause for concern. The graphic below shows the vehicle theft rankings by rate of vehicle theft (thefts per 100,000 residents).



Rate of Stolen Vehicles by State

Colorado	524.4
New Mexico	427.6
California	427.6
Nevada	336.4
Utah	316.7
Arizona	241.7

FY21 Initiatives

Contract Compliance Review (CCR) Program

The ATA recently created a best practices initiative to ensure grantee contract compliance with provisions pertaining to grants awarded by the ATA Board of Directors. The goal of the program is to confirm grantee compliance with contract awards and identify deficiencies before they become problematic or habitual. The program requires grantees to provide ATA staff with documentation that answers important questions regarding financial handling of grant funding, personnel records for grant-funded positions, and performance and other related statistics.



Grantees participate in the CCR process on an annual basis, unless the frequency of the CCR process is adjusted by the Assistant Director of the ATA/PIO division, the ATA Board of Directors, or the agency Director.

In FY21, all six Vertical Prosecution grantees had a 100% completion rate for the CCR process administered internally by ATA staff and all were determined to be fully and/or significantly compliant with the terms of the contract. Any finding less than fully compliant allows ATA staff to work with the grantee to gain full compliance in subsequent processes.

Stolen Vehicle Data Projects

In FY20, the ATA initiated a project to participate in a stolen vehicle database with the state of Colorado and, eventually, with other regional and national member states. In Arizona today, there is no statewide method to extract timely stolen vehicle data from Arizona law enforcement agencies for the purpose of crime and statistical analysis, or the ability to share information within Arizona or regionally with other states.

A partnership was established between the ATA and the Arizona Department of Public Safety (AZDPS) wherein a phased technology project was initiated to better utilize the stolen vehicle data entered into the Arizona Crime Information Center (ACIC) system; a computer system that was never intended to be a searchable database, thus making retrieval of data impractical. The project goal is to export data from ACIC, send it through a web-service, and into the established Colorado database system. The web-service will “normalize” the Arizona data and make it compatible with the Colorado system and data. The first phase of this project will seek to capture the data to pull timely statistics that will assist in identifying where the occurrence of vehicle theft is greatest, determining where stolen vehicle recoveries are occurring, their relationship to the theft, and identifying trends over a customizable time period.

Included in this project is an initiative to add a mandatory location data field to the ACIC computer system that records the location of stolen vehicle events and the location of stolen vehicle recoveries. The addition of this information will allow the data to be more robust in its ability to tell the story



of vehicle crime in Arizona and provide important information to other states when Arizona stolen vehicles are located outside Arizona.

In FY21, significant progress was made to move this project forward. Using a combination of grant and Interagency Service Agreement (ISA) funding to AZDPS, the ATA funded \$65,000 at the end of the fiscal year to facilitate the modification of the ACIC system to add the location data field. Additionally, funding in the amount of \$113,000 was contributed by the Task Force grant to fund the development of the web-service. Funding these two project phases in FY21 will allow for the ability to export Arizona stolen vehicle data into the Colorado system in FY22.

The final phase of this project is to explore entering into a subscription service with the database administrator through an increase in ATA appropriation. The completion of the first two phases of this project will allow ATA and AZDPS to utilize the data and demonstrate the value of real time data for investigational aid and statistical analysis.

Task Force Vehicle Replacement



In FY21, two significant decisions generated funding to replace some end-of-service VTTF vehicles. First, the consolidation of the ATA into DIFI resulted in ATA staff taking on additional duties in furtherance of the consolidated agency. With this change in staff duties, DIFI began paying a portion of the salary for ATA staff, resulting in payroll savings within the ATA operations fund. These savings were distributed to AZDPS in the form of Interagency Service Agreements (ISA) to purchase and add enforcement equipment to the new vehicles.

The second funding source for the vehicle purchase was identified through the use of internal VTTF carry-forward dollars. The VTTF has the delegated authority to carry forward unspent grant dollars into the new fiscal year for a variety of purposes to include ensuring cash flow for payroll and funding capital projects.

With this increased funding the VTTF ordered 14 enforcement vehicles in FY21. This number of vehicles exceeded the optimal number of vehicles to be purchased in a single year, but allowed the VTTF to replace a higher number of high mileage, end-of-service vehicles within the fleet. The VTTF took delivery of ten of the fourteen vehicles prior to the close of the fiscal year - the remaining four vehicles were delivered in the first quarter of FY22. The VTTF expects to place these vehicles into service in FY22 when build-up is complete. The funding strategy of using excess payroll savings within ATA to fund vehicle replacement is expected to continue in the foreseeable future.

FY21 Auto Theft Prevention Programs

With COVID protocols in place for the entirety of FY21, event availability and in-person public engagement opportunities were limited to a small number of virtual block watch speaking events and development of social media theft prevention campaigns. The ATA took the lead in creating the International Association of Auto Theft Investigators (IAATI), July campaign - *No Regrets Lock it Or Lose It*. This international campaign was promoted in multiple countries to highlight July as Vehicle Theft Prevention month. In Arizona, the campaign was supported with a declaration from the Governor's office, as well as being distributed to Arizona members of the law enforcement and criminal justice community.



Watch Your Car Program

The Watch Your Car (WYC) program's integration into the AZ MVD NOW system in FY20 created a large influx of enrollments into the program. The volume of enrollment quickly outpaced the ATA staff's ability to process the new enrollments and also depleted existing supplies of decals. The WYC program continued to function as designed for those vehicle owners enrolled in the program but new enrollments were placed on hold in February. In March, the WYC program was reviewed by the

Public Awareness subcommittee and subsequently by the full Board. The ATA Board of Directors voiced their support for the program and ATA staff made necessary adjustments to administer the program. The ATA staff developed a plan to accommodate the new enrollee processing and ordered sufficient supplies to carry the program forward in FY22. At the close of FY21, the WYC program had 17,465 enrollees.

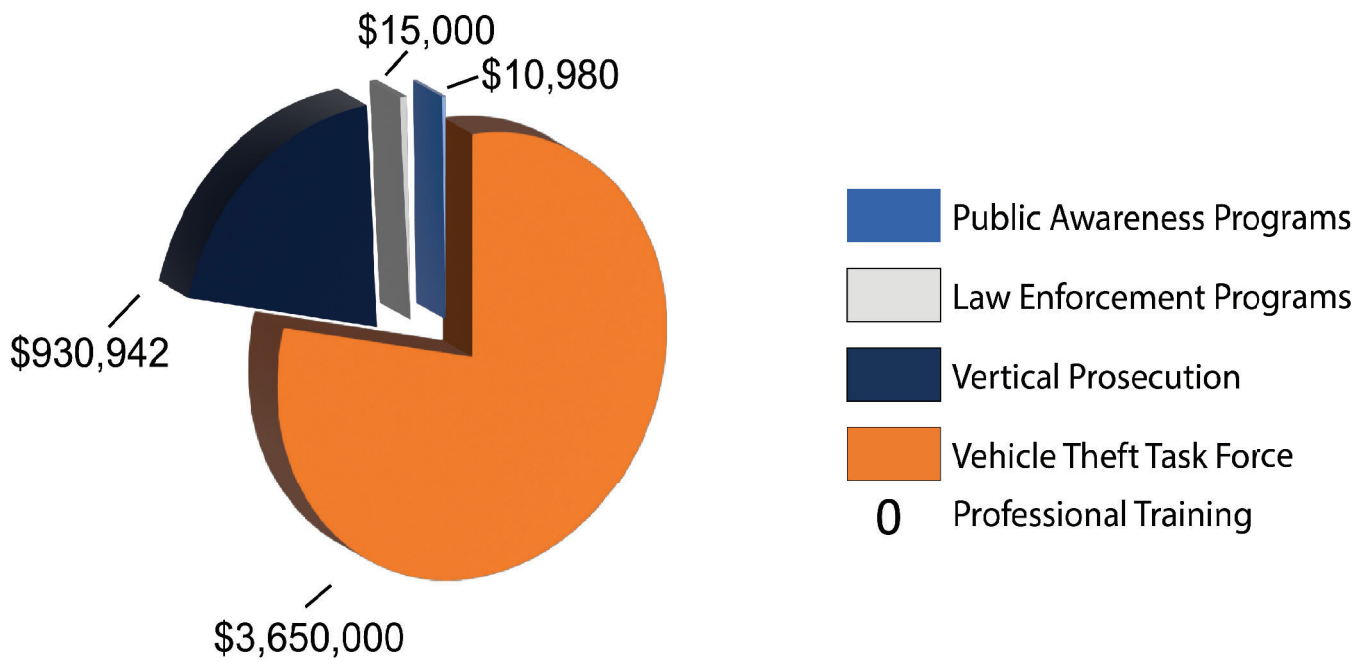


FY21 ATA Grant Programs

The purpose of ATA grant programs is to provide funding to public agencies throughout the state for law enforcement, prosecution, public awareness activities and training.

The ATA currently has five major grant programs, which include the Vehicle Theft Task Force (VTTF), Vertical Prosecution, Law Enforcement, Professional Training and Public Awareness. The programs are intended to reduce the number of vehicle thefts through law enforcement and prosecutorial efforts and to educate the public on how to more effectively protect their vehicles. The graph shows the breakdown of the categories and funding amount of ATA grants awarded in FY21.

FY21 Grant Programs



Currently, the ATA dedicates the majority of its funding in the counties of Maricopa and Pima. Statistics demonstrate a consistent history of Arizona auto thefts occurring in these two counties due to the population centers of Phoenix and Tucson. However, auto theft creates victims throughout all Arizona counties, creating a need for ATA staff to be mindful of outreach efforts needed across the state.

FY21 Arizona Vehicle Theft Task Force (VTTF) Grant

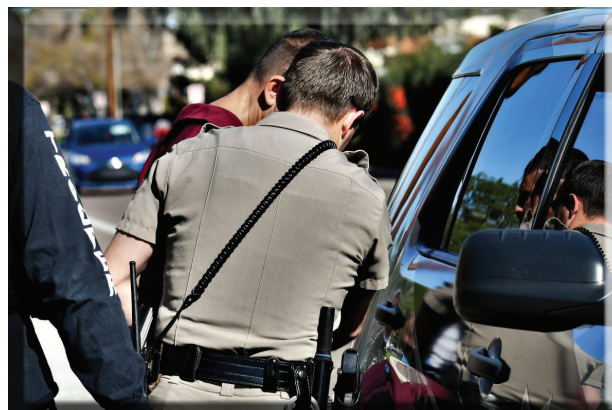
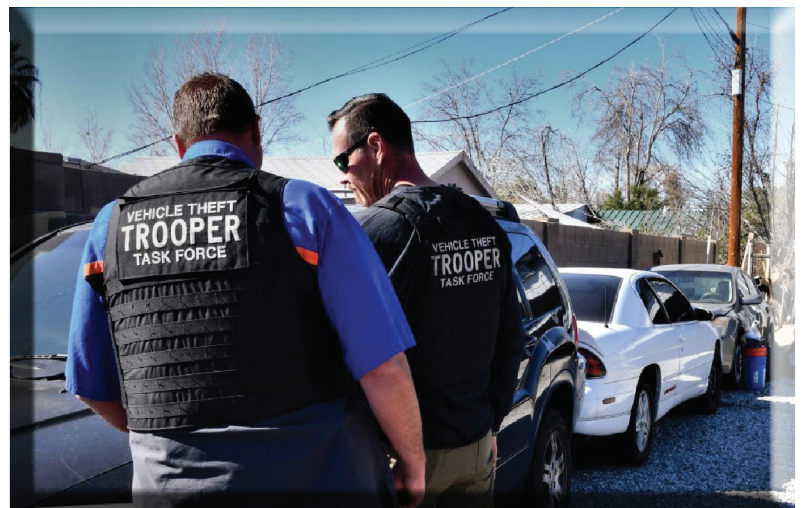
To support proactive law enforcement activities throughout Arizona, the ATA partners with the Arizona Department of Public Safety (AZDPS) to provide funding for the Vehicle Theft Task Force (VTTF). The VTTF is comprised of state, county, and local law enforcement agencies in a coordinated effort to identify, apprehend, and prosecute individuals and criminal organizations that profit from the theft of motor vehicles and related crimes.

The VTTF is the ATA's largest annual grantee (\$3.65 million - 79.2% of ATA's annual grant budget). See FY21 program results on the next page.

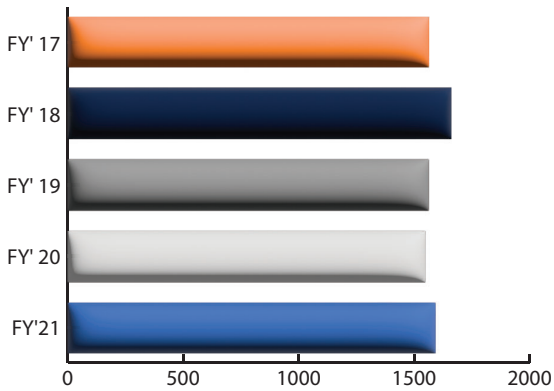
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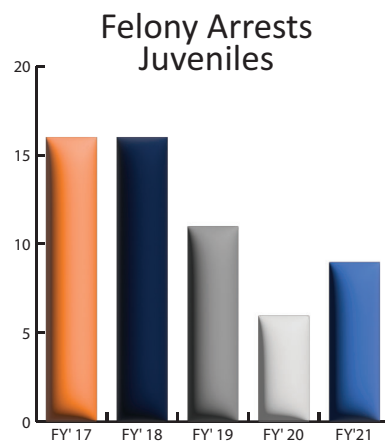
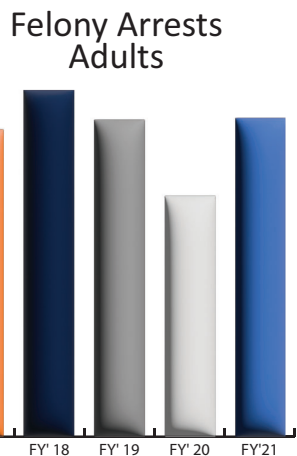
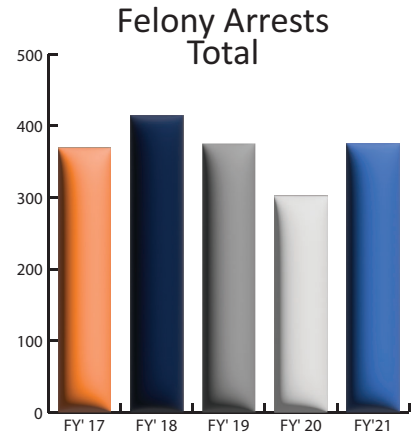
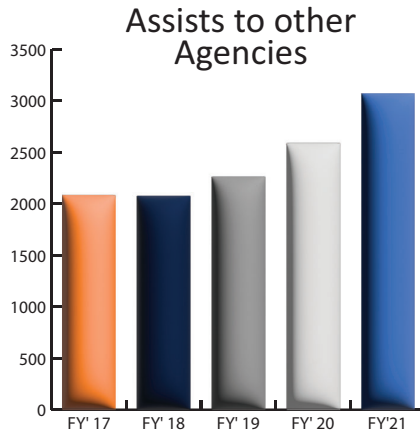
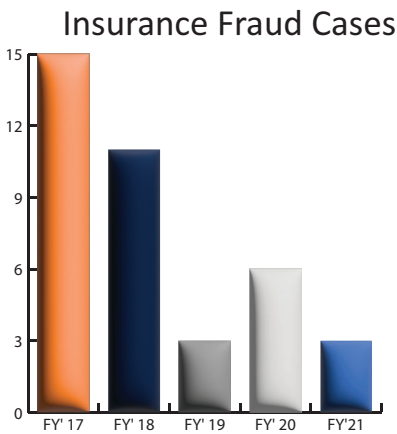
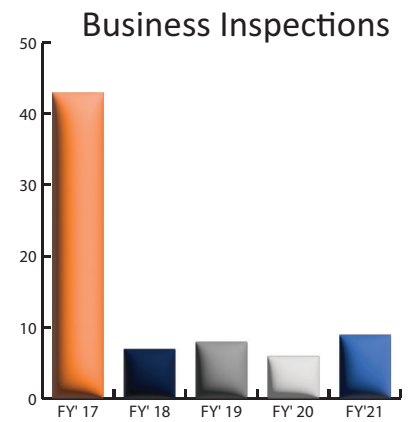
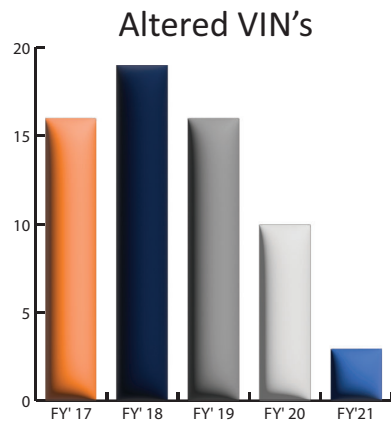
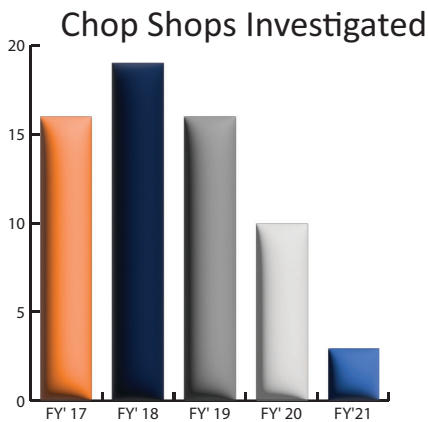
**VEHICLE THEFT
POLICE
TASK FORCE**



Recovered Stolen Vehicles

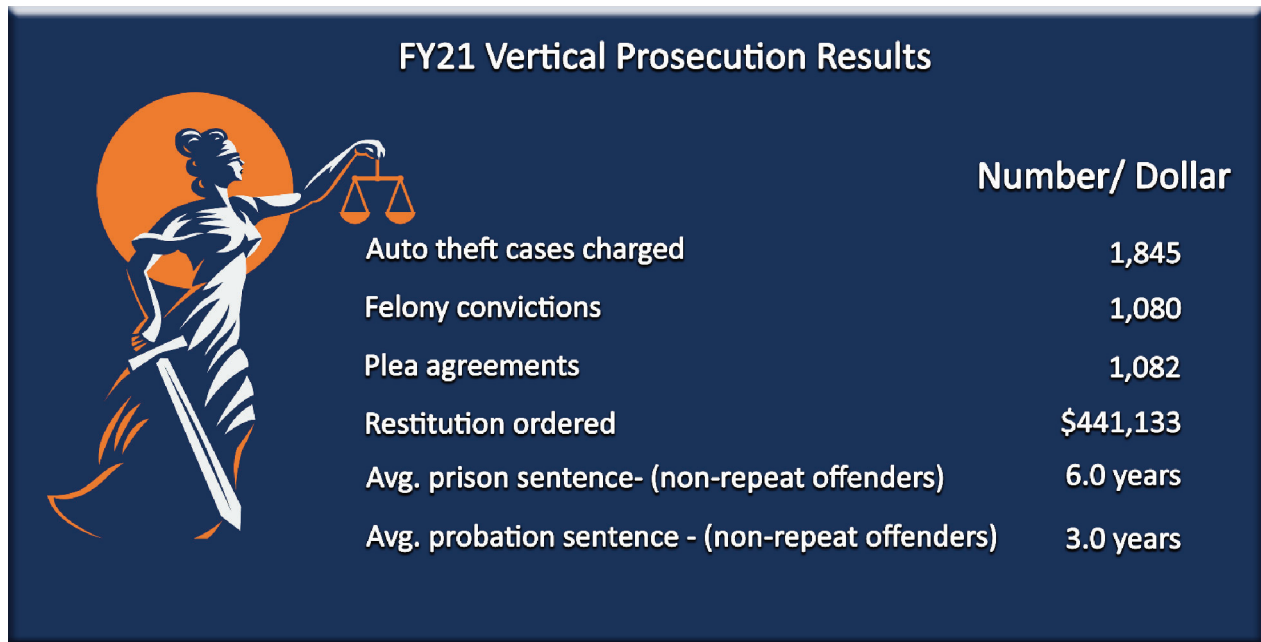


Estimated Value Of
Recovered Vehicles
\$24,287,331



FY21 Vertical Prosecution Grant Program

Vertical prosecution is an effective prosecution model reinforcing the efforts of the VTTF, regional auto theft detectives, and patrol officers. The concept of vertical prosecution suggests better prosecution outcomes when the same attorney (or small unit) handles the case from beginning to end (charging to trial/sentencing). The Vertical Prosecution program is the second largest ATA grant funding expenditure at \$930,942, and pays for eight vertical prosecutors in six participating counties.



Law Enforcement Grant Program

Law Enforcement grants from the ATA fund valuable equipment and technology used by law enforcement agencies within their jurisdictions to deter and reduce auto theft and related criminal activity. These grants are also a very effective means of placing resources in smaller and more rural areas of the state, such as the communities near the international border and along the Colorado River. The ATA is able to concentrate those limited resources in areas with the greatest or expanding need.

Over 86.4% of ATA's appropriated budget provides grant funding to public agencies throughout Arizona for law enforcement, prosecution, public awareness and training initiatives. These programs are intended to reduce the number of vehicle thefts through law enforcement efforts and to educate the public on effective prevention strategies. In FY21, total grant funding expenditures totaled \$4,607,392.

FY21 Law Enforcement Grants Awarded - \$25,980

In January, the ATA provided funding to three Law Enforcement Grant projects utilizing the remaining (local) grant funds prior to the end of the fiscal year. The three agencies listed below submitted proposals for auto theft investigation and detection equipment to combat vehicle crimes in their jurisdictions.



Glendale Police Department - \$10,980
Cottonwood Police Department - \$10,000
La Paz County Sheriff's Office - \$5,000

The Glendale Police Department utilized their grant award to purchase theft deterrent equipment consisting of steering wheel locks and a VIN etching machine; investigative equipment in the form of GPS covert trackers; and public education and outreach give-away items.

The Cottonwood Police Department and the La Paz County Sheriff's Office requested Flock Safety LPR (license plate reader) camera systems for deployment in high traffic areas to assist with stolen vehicle detection and recoveries, wanted persons, stolen license plates and drug activities, all an extension of vehicle crime.

The Flock LPR system is a stationary, self-contained system that reads license plates and provides a digital image of the vehicle. The camera system alerts dispatch consoles of a hit on the system and provides an image of the plate and vehicle. The system also sends messages to cell phones of officers notifying them of the hit on the system with the information and images. The cameras can be installed anywhere with the use of solar power and LTE connectivity. The ATA is excited to partner with these agencies as they implement innovative technologies to combat vehicle theft and related crime.



Financial Report

For the Year Ended June 30, 2021

Automobile Theft Authority Fund

The Automobile Theft Authority Fund is a special revenue fund established by the Arizona Legislature and is the only operating fund of the Automobile Theft Authority. The ATA does not receive any tax dollars or appropriations from the state's general fund. All revenues received by the Authority, including investment income and monetary gifts, are deposited in the Automobile Theft Authority Fund, with the exception of court ordered awards. Expenditures of the Authority are appropriated by the legislature and paid from collected monies in the fund.

Revenue

The revenue of the ATA is derived from a statutorily authorized semi-annual assessment of \$.50 cents per vehicle insured under a motor vehicle liability insurance policy issued by the insurer on motor vehicles weighing 26,000 pounds or less gross vehicle weight (GVW). Current year revenue collections from insurance assessments for the fiscal year ending June 30, 2021 were \$ 6,904,610, an increase of \$161,547 or 2.4% from the prior year. All excess cash is invested with the State Treasurer and the Authority earned \$32,198 in investment income during the current fiscal year.



Online Premium Tax for Insurance (OPTins)

OPTins is an electronic filing solution, facilitating premium tax, surplus lines tax, assessments and other state-specific tax filings. In January of 2021, the semi-annual assessment for ATA was migrated to OPTins.

The purpose for this move is to align the ATA assessment with the rest of DIFI's insurance payments, eliminating the cost of maintenance for the ATA assessment website, and increased efficiency for ATA staff as all payments are now made electronically. ATA will save approximately \$2,000 annually with the elimination of the ATA assessment website.

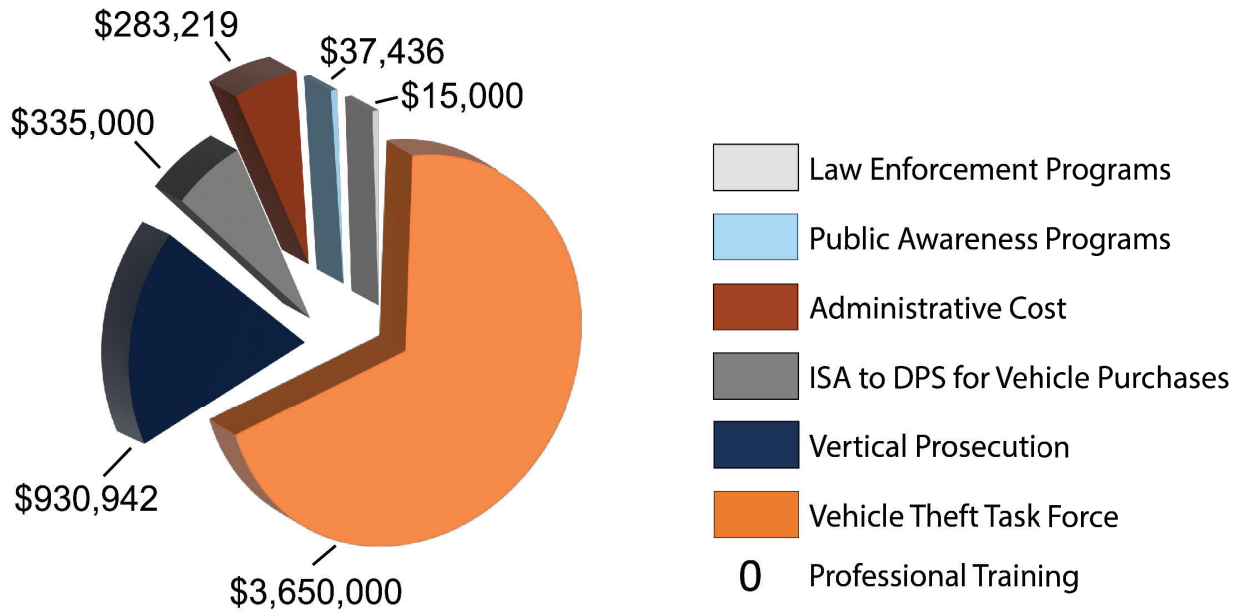
Expenditures

Total expenditures for the current year were \$5,251,597, an increase of \$20,394 from the total expenditures from the previous year of \$5,231,203. Arizona Revised Statute, A.R.S. §41-3451.H states:

The costs of administration shall not exceed ten percent of the monies in the fund in any one year so that the greatest possible portion of the monies available to the authority is expended on combating motor vehicle theft.

Accordingly, the Automobile Theft Authority tightly controls its administrative costs. For the fiscal year ending June 30, 2021, the Authority was in compliance with this statute with costs of administration being 3.60% of the monies in the fund. The ATA's administrative costs as a percent of total expenditures for the fiscal year were 5.30%. The ATA ended the year with investments in the amount of \$7,718,624 deposited with the State Treasurer.

FY21 Appropriated Expenditures



Revenue Forecast

The ATA reviewed and analyzed the revenue collection trends for the previous five years in determining revenue projections. There are two collection periods per fiscal year. As the population of the state has continued to grow, the revenue collected by the ATA has also grown. For the fiscal year ending June 30, 2022 (FY22), ATA is projecting a revenue growth of 2.00% (over the previous year), this means the anticipated revenue for FY22 is projected to be \$7,042,702 (\$138,092 over the revenue received in FY21). The ATA conducts a review of each assessment that is submitted. The goal of the review is to verify any decreases over 10% and the cause for the decrease.

FY21 ATA Financial Overview

ATA Beginning Fund Balance	\$6,033,405
Revenue Collected:	
Assessment Revenue	\$6,904,609
Fines, Forfeitures & Penalties	\$9.00
Investment Income Interest	\$32,198
Total	\$6,936,816
Expenditures:	
DPS Task Force Grant	\$3,650,000
DPS ISA for Vehicle Purchases	\$335,000
Vertical Prosecution	\$930,942
Administrative Cost	\$283,219
Public Awareness Program	\$37,436
Law Enforcement Program	\$15,000
Total	\$5,251,597
Ending Fund Balance	\$7,718,624

ATA Board of Directors

The ATA Board of Directors includes twelve (12) members, appointed by the Governor and other organizations; representatives include: two police chiefs, two sheriffs, two county attorneys, two insurance industry representatives, two members of the general public, and the Directors of the Arizona Department of Public Safety and Arizona Motor Vehicle Division.



Board Chair
Chief Michael Soelberg
Gilbert Police Department



Board Vice-Chair
Kent Volkmer
Pinal County Attorney



Director Heston Silbert
AZ. Department of Public Safety



Director Eric Jorgensen
AZ. Motor Vehicle Division



Sheriff Paul Penzone
Maricopa County



Sheriff Joseph A Dedman, Jr.
Apache County



Chief Frank Alanis
Superior Police Department



Allister Adel
Maricopa County Attorney



Robert E.M. Smith
Public Member



Brian Wright
Travelers Insurance



Bradley Conley
GEICO Insurance



Joe Brosius
Public Member

ATA Staff



James McGuffin
Assistant Director



Frank Ceballos
Administrative Services Officer II



Ann Armstrong
Grants Administrator



Amanda O'Halloran
Communications Coordinator

*Thank you to all who answer the call to make
a difference in Arizona*



Officer Jason W. Judd

Sergeant Ernest Quintero

Officer Alfonso Murrieta

Officer Bryan Brown

Officer Tyler Britt

Officer Joseph Henry Montgomery

Officer Byron Don Shields

Special Agent Jimmie John Daniels

Officer Christopher Farrar

Officer Jeremy Brinton

Officer Ginarro Allen New

Officer Ruben Facio

Supervisory Agent Daniel P. Cox

ARIZONA



DEPARTMENT OF
INSURANCE AND FINANCIAL INSTITUTIONS



An Equal Employment Opportunity Agency

AATA.Az.Gov

AzWatchYourCar.com

100 N. 15th Avenue, Suite 261

Phoenix AZ 85007

Tel: 602-364-AUTO (2886)

Toll Free: 1-888-668-4433

State of Arizona

Arizona Automobile Theft Authority

Persons with disabilities may request materials be presented in an alternative format by contacting the ADA Coordinator at (602) 364-3100. Requests should be made as early as possible to allow time to procure the materials in an alternative format.

