



May 5, 2025

**VIA EMAIL**

Attorney General Kris Mayes  
Office of the Attorney General  
Consumer Information and Complaints  
2005 N Central Avenue  
Phoenix, AZ 85004  
kris.mayes@azag.gov  
consumerinfo@azag.gov

Re: U-Haul's Deceptive Price Advertising and Fee Scheme

Dear Attorney General Mayes:

A recent Truth in Advertising, Inc. ("TINA.org") investigation into U-Haul Holding Company and its subsidiary U-Haul International, Inc. (collectively "U-Haul") has revealed a multifaceted, deceptive bait-and-switch pricing scheme that hides the true cost of its rentals by omitting mandatory fees and charges from advertised pricing. This results in consumers being charged more than they bargained for, in violation of Arizona state law.<sup>1</sup>

TINA.org has filed a complaint regarding U-Haul's marketing and business practices with the Federal Trade Commission (attached), but we bring this matter to your attention as well both because of Arizona's dedication to addressing junk fees<sup>2</sup> and because Arizona consumers are being impacted by U-Haul's deception.<sup>3</sup>

As such, TINA.org urges your office to open an investigation into U-Haul and take appropriate enforcement action.

If you have any questions, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink that reads 'L Smith'.

Laura Smith, Esq.  
Legal Director  
Truth in Advertising, Inc.

A handwritten signature in blue ink that reads 'B-Patten'.

Bonnie Patten, Esq.  
Executive Director  
Truth in Advertising, Inc.

Attachment

Cc via email: Kristine Campbell, General Counsel, U-Haul

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<sup>1</sup> Ariz. Rev. Stat. § 44-1522; Ariz. Rev. Stat. § 13-2203.

<sup>2</sup> See, e.g., Press Release, Attorney General Mayes Supports Federal Trade Commission’s Rule Outlawing Junk Fees (Feb. 9, 2024), <https://www.azag.gov/press-release/attorney-general-mayes-supports-federal-trade-commissions-rule-outlawing-junk-fees>; State Attorneys General Comment Letter to FTC regarding Unfair or Deceptive Fees NPRM, R207011 (Feb. 7, 2024), <https://www.attorneygeneral.gov/wp-content/uploads/2024/02/2024.2.7-Comment-of-19-State-AGs-Unfair-or-Deceptive-Fees-Trade-Regulation-RuleFinal.pdf>; *Arizona v. Dennis N. Saban*, No. CV2014-005556 (Ariz. Sup. Ct., Feb. 14, 2018), [https://www.azag.gov/sites/default/files/docs/press-releases/2018/ruling/Saban\\_s\\_Trial\\_Ruling.pdf](https://www.azag.gov/sites/default/files/docs/press-releases/2018/ruling/Saban_s_Trial_Ruling.pdf) (finding that rental car companies misrepresented the price of car rentals in violation of the Arizona Consumer Fraud Act where consumers were charged more than the advertised price due to additional fees and taxes); Press Release, Arizona Attorney General, \$1.85 Million Verdict Against Car Rental Company for Defrauding AZ Consumers (Feb. 14, 2018), <https://www.azag.gov/press-release/185-million-verdict-against-car-rental-company-defrauding-az-consumers>. See also S.B. 1167, 57<sup>th</sup> Leg., 1<sup>st</sup> Reg. Sess. (Ariz. 2025), <https://legiscan.com/AZ/text/SB1167/id/3068851> (would require advertised prices to include all mandatory fees and charges); H.B. 2122, 56<sup>th</sup> Leg., 2<sup>nd</sup> Reg. Sess. (Ariz. 2024), <https://www.azleg.gov/legtext/56leg/2R/bills/HB2122P.pdf> (would require advertised prices to include all mandatory fees and charges).

<sup>3</sup> See, e.g., March 24, 2020 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“...I rented a U-haul van from Rim Country Self Storage on March 20 for \$19.95 a day. They charged me \$79.95 a day. They said it had a third of a gas tank full and it only had a quarter of a tank. I returned it with half a tank full. It cost me \$175 to U-haul and \$51 in gas. They owed me \$60 for the over charge on the daily rate. Then the next day they charged me another \$75...”)

Please note that there have been multiple thousands of consumer complaints regarding U-Haul lodged with the FTC, the Better Business Bureau, TrustPilot, and Consumer Affairs, among other outlets. See Letter from FTC to TINA.org re: FOIA-2025-00252 (Nov. 6, 2024); Letter from FTC to TINA.org re: FOIA-2025-00252 (Nov. 25, 2024); BBB Business Profile of U-Haul International Inc., <https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114>; Trustpilot Review of Uhaul, <https://www.trustpilot.com/review/www.uhaul.com>; Consumer Affairs U-Haul Reviews, <https://www.consumeraffairs.com/movers/uhaul.html>. For the majority of these complaints, consumers’ home states are not included. As such, there may be many more consumers from Arizona who have been the victim of U-Haul’s deceptive practices.

Further, the mandatory fees and optional costs outlined in TINA.org’s complaint to the FTC (attached) are imposed at U-Haul dealerships throughout the United States, including in Arizona.