



May 5, 2025

VIA EMAIL

Attorney General Rob Bonta
Office of the Attorney General
California Department of Justice
P.O. Box 944255
Sacramento, CA 94244
Rob.Bonta@doj.ca.gov

Deputy Attorney General Daniel Osborn
Office of the California Attorney General
Consumer Protection Section
1300 "I" Street
Sacramento, CA 95814
Daniel.Osborn@doj.ca.gov

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

Dear Attorney General Bonta and Deputy Attorney General Osborn:

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 California state law.¹

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 California's dedication to addressing junk fees² and because California consumers are being impacted by U-Haul's deception.³

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

¹ See, e.g., Cal. Civ. Code §1770(a)(29); Cal. Bus. & Prof. Code §17500.

² See, e.g., Comment Letter to FTC regarding Unfair or Deceptive Fees NPRM, R207011 (Feb. 7, 2024), <https://oag.ca.gov/system/files/attachments/press-docs/2.7.24%20Comment%20letter%20re%20FTC%20Junk%20Fees%20rule%20-%20CA%20AG.pdf>.

³ See, e.g., April 14, 2021 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“On March 27th, 2021, at 10:49 AM, we leased a U-haul truck 20; feet under original Order 24633341 from San Luis Obispo, Ca. 93401 to Greenfield, Ca. 93927. To confirm my reservation, March 27th, at 11:30 AM, I called U-Haul, located at San Luis Mini Storage, San Luis Obispo, Ca, d they communicated that my reservation could be not processed because U-haul didn’t have trucks. The only truck of 26... ft would be available next Monday, March 29th, at 5:00 pm. Because that option was not good for me, U-Haul San Luis Obispo, suggested me to call Regional U-Haul on the phone:(818)-988-7008 (Address:15838 Strathern St, Van Nuys, CA91406-1363 to arrange my reservation. On the same day, at 12:30 pm I called Regional U-Haul phone (818)--988-7008, for help. Then Regional U-Haul (Van Nuys, Ca) offered me the only available small truck 10 ft (half size of what I originally rented), picking up the U-haul truck from Soledad, Ca driving to San Luis Obispo, Ca and returning back, dropping off the truck in Soledad, Ca.U-haul requested upfront the deductible deposit of \$ 144.00 Ca. tax toward the mileage cos. Based onround-trip and over 300 driven miles, U-Haul falsely offered me 30 miles free included in the deposit 40 cents for each additional mile US \$ 1 environmental fee charged wrongly the US \$ 14.00 insurance, I didn’t need insurance because we were a full insurance covered drivers. My deductible deposit should be the US \$157.69. U-Haul wrongly charged the US \$174.55.U-Haul falsely offered me 40 cents for each additional mile and charged me the US \$1.39 bringing my cost to the US \$508.74. U-Haul charged me for the driven 336 miles, the total of US \$ 508.74 instead of the US \$ 147.25 that would be deducted from my deposit. U-Haul violated its own contract, and didn’t offer me 30 free miles, and not offered the promised 40 cents per additional mile. U-Haul abused and charged me the wrong deposit of US \$174.55 instead of the US \$ 144 per day, US \$ 5.00 instead of US \$1 environmental fee, additional fees of US \$ 14.00 for Insurance that we didn’t need because we were full coverage drivers to the third party,US \$ 19.95 that were included in the deposit, late fees of an extra US \$30.00 on April 7, 2021, violating the deadline on April 8, 2021.U-Haul stole out of my bank the total amount of the US \$ 614.75 instead of the US \$ 147.25 (with the US \$1 environmental fees included) was my liability for the 336 miles, overcharging me the amount of the US \$ 467.30. My liability is: 336 miles x US \$ 0.40 US \$ 1 (environmental cost) 135.40 x 8.75 CA Tax US \$147.25. U-haul charged me in two bank transactions the total of the US \$ 614.55 - US \$ 147.25 (my liability on the offered contract) US \$ 467.30. Please help me and my money will be returned to my bank in the amount of the US \$ 467.30. Also, the rented truck was in bad mechanic condition. When we were driving it, the truck was doing huge noise, retrocessing. It seems to be manufacturer defect. Thank you very much for all your support!”);

July 31, 2022 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“At 9:16 am on July 27, 2022, I rented Pickup BPB94M from U-Haul at 2701 N Wilson Way, 95205 Stockton CA. I was asked if I was going more than 50 mls, I explained to them that Ill be going a lot less than 50 mls. So they listed that Ill be going 50 mls. I then drove 2.5 miles to my home for my tools. Which incidentally was right off Wilson Way. I got to [redacted], at around 10:00 am, which was 3.9 miles away and my 2nd stop. I spent 2.5 hrs removing items from 2 sheds which I took back to my home at [redacted] at about 12:45 pm. I then called U-Haul about extending the time by 4 hrs. Removing the items from the U-Haul to my

pickup truck which was parked in my driveway was my next task. This took me approx 2.5 hrs to complete. I then returned the vehicle to the same location at 2701 N Wilson Way, Stockton CA 95205. at 3:39 pm. The total distance I drove was approximately 12.9 miles. Yet when I return the vehicle the U-Haul attendant spent all of 6 minutes in the vehicle, then told me that the total distance I drove was 110 miles. I worked alone and I have pictures of my load and pictures of the 2.5 hrs I spent unloading the items from the U-Haul to my truck. This is a scam, especially when that vehicle is equipped with a GPS device. This means that U-Haul had the capability of tracking their vehicle every second of the day. They also have the means of going back to Wednesday, July 27, 2022 9:16 am to Wednesday, July 27, 2022.”);

October 21, 2024 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“...I rented a U-Haul pickup truck on July 14, 2024 from their San Francisco location on Bryant Street. When I returned it, their app was malfunctioning and I was not able to submit photos of the condition of the truck. When I asked the representative at the office, they said the truck was fine and that there would be no charges. Several weeks later I received a letter from Repwest regarding damage to the U-Haul truck on July 17 (which, you will note, was not the day I rented it). The amount was not specified, nor were any details about the claim. I denied that I caused any damage ... and requested more information. Repwest did not have any information and referred me to U-Haul. I called the U-Haul office, as well as requesting and emailing the manager, and never received a response. On October 10, Repwest sent me a letter threatening to send a claim to collections, and claiming they had not received a response from me, which is factually incorrect. This is a harrasing tactic for damage I did not cause, and Repwest and U-Haul are fraudulently attempting to have me use my insurance to pay for damage that they caused by threatening to send my case to collections.”)

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 California 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 California.