



May 5, 2025

**VIA EMAIL**

Attorney General Phil Weiser  
Office of the Colorado Attorney General  
AG@coag.gov

Deputy Attorney General Nathan Blake  
Office of the Colorado Attorney General  
Nathan.blake@coag.gov

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

Dear Attorney General Weiser and Deputy Attorney General Blake:

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 Colorado 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 because of Colorado's dedication to addressing junk fees<sup>2</sup> and because Colorado 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> See, e.g., Colo. Rev. Stat. §§ 6-1-105; 6-1-737.

<sup>2</sup> See, e.g., Press Release, Signed! New Law Cracks Down on ‘Junk Fees’ to Save Coloradans Money (Apr. 21, 2025), <https://www.cohousedems.com/news/signed!-new-law-cracks-down-on-%E2%80%98junk-fees%E2%80%99-to-save-coloradans-money>; 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>. See also H.B. 25-1090, 75<sup>th</sup> Gen. Assemb., 1<sup>st</sup> Reg. Sess. (Colo. 2025), <https://leg.colorado.gov/bills/hb25-1090> (would require advertised prices to be the total prices of all amounts to be paid for goods, services, or properties); H.B. 24-1151, 75<sup>th</sup> Gen. Assemb., 1<sup>st</sup> Reg. Sess. (Colo. 2024), <https://leg.colorado.gov/bills/hb24-1151> (would require advertised prices to include all mandatory and nondiscretionary fees and charges); Assurance of Discontinuance, *In the Matter of Marriott Int’l Resort Fees* (Colo. Att’y Gen., Feb. 1, 2024), <https://coag.gov/app/uploads/2024/02/Colorado-Marriott-Agreement-Fully-Signed.pdf> (settlement resolving allegations that a hotel misrepresented the price of hotel rooms in violation of the Colorado Consumer Protection Act when advertised prices did not include all mandatory fees); Assurance of Discontinuance, *In the Matter of Omni Hotels Mgmt. Resort Fees* (Colo. Att’y Gen., Sept. 21, 2023), <https://coag.gov/app/uploads/2023/10/Colorado-Omni-Agreement-Fully-Signed.pdf> (settlement resolving allegations that a hotel misrepresented the price of hotel rooms in violation of the Colorado Consumer Protection Act when advertised prices did not include all mandatory fees); Assurance of Discontinuance, *In the Matter of Choice Hotels Resort Fees* (Colo. Att’y Gen., July 17, 2023), <https://coag.gov/app/uploads/2023/09/Choice-Colorado-AOD-Final-Signed.pdf> (settlement resolving allegations that a hotel misrepresented the price of hotel rooms in violation of the Colorado Consumer Protection Act when advertised prices did not include all mandatory fees); Complaint for Permanent Injunctive, Monetary Judgment, Civil Penalty Judgment, and Other Relief, *Fed. Trade Comm’n and Colorado v. Greystar Real Estate Partners*, No. 25-cv-165 (D. Colo., Jan. 16, 2025), ECF No. 1, [https://www.ftc.gov/system/files/ftc\\_gov/pdf/greystar\\_complaint\\_-\\_filed.pdf](https://www.ftc.gov/system/files/ftc_gov/pdf/greystar_complaint_-_filed.pdf) (alleging that Greystar misrepresents the rental price of apartments in violation of section 5 of the FTC Act and the Colorado Consumer Protection Act when the advertised prices omit mandatory fees).

<sup>3</sup> 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 the state of Colorado.