



May 5, 2025

VIA EMAIL

Attorney General William Tong
Office of the Attorney General
165 Capitol Avenue
Hartford, CT 06106
Attorney.General@ct.gov

Commissioner Bryan Cafferelli
Julianne Avallone, Director, Legal Division
State of Connecticut
Department of Consumer Protection
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Re: U-Haul's Deceptive Price Advertising and Fee Scheme

Dear Attorney General Tong, Commissioner Cafferelli and Attorney Avallone:

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 Connecticut 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 because of Connecticut's dedication to addressing junk fees² and because Connecticut 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 Conn. Gen. Stat. § 42-110b; Conn. Agencies Regs. § 42-110b-18.

² See, e.g., Press Release, Attorney General Tong Supports Federal Trade Commission's Rule Outlawing Junk Fees (Feb. 8, 2024), <https://portal.ct.gov/AG/Press-Releases/2024-Press-Releases/Attorney-General-Tong-Supports-FTC-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>. See also S.B. 3, 2025 Gen. Assemb., Jan. 2025 (Conn. 2025), <https://www.cga.ct.gov/2025/TOB/S/PDF/2025SB-00003-R00-SB.PDF> (would eliminate junk fees charged on certain consumer transactions); H.B. 5558, 2025 Gen. Assemb., Jan. Sess. (Conn. 2025), <https://www.cga.ct.gov/2025/TOB/H/PDF/2025HB-05558-R00-HB.PDF> (would require advertised prices to include any and all fees); H.B. 581, 2024 Gen. Assemb., Feb. Sess. (Conn. 2024), <https://legiscan.com/CT/text/SB00015/id/2964979> (would require advertised prices for event tickets, food delivery, and lodging to include mandatory fees and charges).

³ 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 Connecticut. In fact, TINA.org's investigation into U-Haul's deceptive price advertising and fee scheme included a TINA.org staffer renting a U-Haul truck at a Connecticut location.