



May 5, 2025

**VIA EMAIL**

Attorney General Kathy Jennings  
Delaware Department of Justice  
kathleen.jennings@state.de.us  
attorney.general@delaware.gov

Director Owen Lefkon  
Delaware Department of Justice  
Fraud and Consumer Protection Division  
owen.lefkon@delaware.gov

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

Dear Attorney General Jennings and Director Lefkon:

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 Delaware 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 Delaware's dedication to addressing junk fees<sup>2</sup> and because Delaware 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

---

<sup>1</sup> Del. Code Ann. tit. 6, § 2532; Del. Code. Ann. tit. 6, § 2513.

<sup>2</sup> *See, e.g.*, 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>.

<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 Delaware.