



May 5, 2025

VIA EMAIL

Attorney General Brian Schwalb
Office of Attorney General for the
District of Columbia
oag@dc.gov
consumer.protection@dc.gov

Director Tiffany Crowe
D.C. Depart. of Licensing and Consumer
Protection
dlcp@dc.gov

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

Dear Attorney General Schwalb and Director Crowe:

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 District of Columbia 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 the District of Columbia's dedication to addressing junk fees² and because D.C. 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., D.C. Code § 28-3904.

² See, e.g., 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 Complaint for Injunctive and Other Relief for Violations of the Consumer Protection Procedures Act, *District of Columbia v. StubHub*, No. 2024-CAB-004794 (D.C. Super. Ct. July 31, 2024), https://advance.lexis.com/f/courtlinkdocument/jobstatus/downloadfile/2a0be304-676f-4e4c-9ccd-33fbc1ba9d0/urn:contentItem:6DVM-Y923-RWJK-C15F-00000-00/0/0/d15161523e403/0/blob/DC_SUP_WAS_2024_CAB_004794_d15161523e403_Complaint_Filed (alleging that an online ticket seller misrepresents ticket prices in violation of the District of Columbia's Consumer Protection Procedures Act where the advertised prices fail to include mandatory fees); Press Release, Off. of the Att'y Gen. for the District of Columbia, Attorney General Schwalb Sues StubHub for Deceptive Pricing & Junk Fees (July 31, 2024), <https://oag.dc.gov/release/attorney-general-schwalb-sues-stubhub-deceptive>; Complaint for Violations of the Consumer Protection Procedures Act, *District of Columbia v. Marriott Int'l*, No. 2019-CA-004497 (D.C. Super. Ct. July 9, 2019), <https://oag.dc.gov/sites/default/files/2019-07/Marriott-Complaint.pdf> (alleging that a hotel misrepresents room rates in violation of the District of Columbia's Consumer Protection Procedures Act where the advertised room rates fail to include mandatory fees); Press Release, Off. of the Att'y Gen. for the District of Columbia, AG Racine Sues Marriott for Charging Deceptive Resort Fees and Misleading Tens of Thousands of District Consumers (July 9, 2019), <https://oag.dc.gov/release/ag-racine-sues-marriott-charging-deceptive-resort>; Press Release, Off. of the Att'y Gen. for the District of Columbia, Attorney General Schwalb Issues Consumer Alert on Rental Fees & Protections for DC Renters (Jan. 19, 2024), <https://oag.dc.gov/release/attorney-general-schwalb-issues-consumer-alert-1>.

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 District of Columbia.