



May 5, 2025

VIA EMAIL

Attorney General Anne Lopez
Department of Attorney General
425 Queen Street
Honolulu, HI 96813
anne.lopez@hawaii.gov

Mana Moriarty, Exec. Director
State of Hawaii
Office of Consumer Protection
mana.moriarty@hawaii.gov
ocp@dcca.hawaii.gov

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

Dear Attorney General Lopez and Attorney Moriarty:

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 Hawaii 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 Hawaii's dedication to addressing junk fees² and because Hawaii 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 Haw. Rev. Stat. Ann. §481A-3; Haw. Rev. Stat. § 480-2.

² See, e.g., Press Release, Hawai'i Joins Coalition in Support of Federal Trade Commission Rule Outlawing 'Junk Fees' (Feb. 12, 2024), <https://cca.hawaii.gov/blog/hawaii-joins-coalition-in-support-of-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. 50, 33rd Leg. (Haw. 2025), https://data.capitol.hawaii.gov/sessions/session2025/bills/SB50_.HTM (would require advertised prices to include all 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 Hawaii.