



May 5, 2025

VIA EMAIL

Attorney General Aaron Frey
Office of the Maine Attorney General
6 State House Station
Augusta, ME 04333
Aaron.Frey@maine.gov
Attorney.General@maine.gov

Christina Moylan
Chief of Consumer Protection Division
Office of the Attorney General of Maine
6 State House Station
August, ME 04333
Christina.moylan@maine.gov

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

Dear Attorney General Frey and Attorney Moylan:

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 Maine 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 Maine's dedication to addressing junk fees² and because Maine 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 Me. Stat. tit. 10 § 1212; Me. Stat. tit. 5 § 207.

² *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>. *See also* H.P. 268, 132 Me. Leg., 1st Reg. Sess. (Me. 2025), <https://legislature.maine.gov/legis/bills/getPDF.asp?paper=HP0268&item=1&snum=132> (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 Maine.