

May 5, 2025

## VIA EMAIL

Attorney General Matthew Platkin Office of the Attorney General Richard J. Hughes Justice Complex 25 Market St., 8<sup>th</sup> Floor, West Wing Trenton, NJ 08625 matthew.platkin@state.nj.us Cari Fais, Director Division of Consumer Affairs Office of the Attorney General faisc@dca.njoag.gov AskConsumerAffairs@dca.njoag.gov

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

Dear Attorney General Platkin and Attorney Fais:

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 New Jersey 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 New Jersey's dedication to addressing junk fees<sup>2</sup> and because New Jersey 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,

Laura Smith, Esq. Legal Director Truth in Advertising, Inc.

Bonnie Patten, Esq. Executive Director Truth in Advertising, Inc.

Attachment Cc via email: Kristine Campbell, General Counsel, U-Haul <sup>1</sup> N.J. Rev. Stat. Ann. § 56:8-2.

<sup>2</sup> See, e.g., State Attorneys General Comment Letter to FTC regarding Unfair or Deceptive Fees NPRM, R207011 (Feb. 7, 2024), <u>https://www.attorneygeneral.gov/wp-</u> content/uploads/2024/02/2024.2.7-Comment-of-19-State-AGs-Unfair-or-Deceptive-Fees-Trade-<u>Regulation-RuleFinal.pdf</u>; Assurance of Voluntary Compliance, *In the Matter of Enterprise Rent-A-Car* (N.J. Att'y Gen. Oct. 14, 2021), <u>https://www.nj.gov/oag/newsreleases21/Elrac-LLC-dba-</u> <u>Enterprise-Rent-A-Car.pdf</u>; Consent Order, *In the Matter of Drivo Rent-A-Car* (N.J. Att'y Gen. Sept. 16, 2020), <u>https://www.nj.gov/oag/newsreleases20/Drivo-Consent-Order.pdf</u>.

<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 New Jersey.