



May 5, 2025

VIA EMAIL

Attorney General Letitia James
Office of the NYS Attorney General
The Capital
Albany, NY 12224
letitia.james@ag.ny.gov

Jane M. Azia, Bureau Chief
Bureau of Consumer Frauds and Protection
New York State Attorney General
28 Liberty Street
New York, NY 10005
jane.azia@ag.ny.gov

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

Dear Attorney General James and Attorney Azia:

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 York 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 New York's dedication to addressing junk fees² and because New York 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 N.Y. Gen. Bus. Law § 350; N.Y. Gen. Bus. Law § 350-a; N.Y. Gen. Bus. Law § 349.

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>; Press Release, N.Y. State Att’y Gen., Attorney General James Secures More Than \$1 Million from Netspend for Charging Illegal Fees and Misleading New Yorkers (Jan. 30, 2025), <https://ag.ny.gov/press-release/2025/attorney-general-james-secures-more-1-million-netspend-charging-illegal-fees-and>; See also N.Y. Arts & Cult. Aff. Law § 25.07 (requires the disclosure of the total price of tickets, including all ancillary fees, and the portion of ticket prices that represent service charges, surcharges, or other fees); S.B. S363, 2025-2026 Legis. Session (N.Y. 2025), <https://www.nysenate.gov/legislation/bills/2025/S363> (would require sellers to display total prices that include all mandatory fees); Assemb. B. A1821, 2025-2026 Legis. Session (N.Y. 2025), <https://www.nysenate.gov/legislation/bills/2025/A1821> (would require advertised prices to clearly and conspicuously display a total price that includes all mandatory fees); S.B. S7783A, 2023-2024 Legis. Session (N.Y. 2023), <https://www.nysenate.gov/legislation/bills/2023/S7783/amendment/A> (would require sellers to display total prices that include all mandatory fees).

³ See, e.g., April 20, 2024 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“Uhaul Ithaca over charged me with a bunch of fees that I was not responsible. They couldn’t provide evidence when I requested them. After I told the branch manager that I took photos she hung up on me and charged me another fee. After all the charges were paid and posted on my credit card, I received a letter from their credit collection department saying I still owe them those fees (transaction date and amount were not accurate or consistent with previous fees)”);

April 18 2024 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“I rented a Uhaul van to transport furniture from Newburgh, NY to Brooklyn, NY. Uhaul is charging me for tolls (above is just one) yet when I vew the bill for these tolls, it shows other vehicles than the one I drove. Trying to resolve with customer service is fruitless. Additionally, my NY State Ez-pass was on the windshield yet failed to register any charge – that’s a first for this Ez-pass. . . . Consumer’s Requested Relief: Refund for first charge and any subsequent charges until they can coherently explain the charges - for example, why is a different license plate numbers displayed on the bill than the license plate actually on the vehicle I was driving? There are two charges for the exact same time stamp showing two different vehicle identifications. . . . The bill is incomprehensible: Equipment number is randomly identified in other parts of the bill as license plate number. There are two different contract numbers on the bill. There are other errors too many to list here. I am writing you because this could be a cause for class action. In addition I don’t want them to charge my account until they can fully explain an incomprehensible bill.”)

Please note that there have been multiple thousands of consumer complaints regarding U-Haul lodged with the FTC, the Better Business Bureau, TrustPilot, and Consumer Affairs, among other outlets. See Letter from FTC to TINA.org re: FOIA-2025-00252 (Nov. 6, 2024); Letter from FTC to TINA.org re: FOIA-2025-00252 (Nov. 25, 2024); BBB Business Profile of U-Haul International Inc., <https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114>; Trustpilot Review of Uhaul, <https://www.trustpilot.com/review/www.uhaul.com>; Consumer Affairs U-Haul Reviews, <https://www.consumeraffairs.com/movers/uhaul.html>. For the majority of these complaints,

consumers' home states are not included. As such, there may be many more consumers from New York who have been the victim of U-Haul's deceptive practices.

Further, 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 York.