



May 5, 2025

**VIA EMAIL**

Attorney General Jeff Jackson  
North Carolina Department of Justice  
9001 Mail Service Center  
Raleigh, NC 27699  
consumer@ncdoj.gov

Kunal Janak Choksi, Director  
Consumer Protection Division  
North Carolina Department of Justice  
114 W. Edenton Street  
Raleigh, NC 27603  
kchoksi@ncdoj.gov

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

Dear Attorney General Jackson and Attorney Choksi:

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 North Carolina 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 North Carolina's dedication to addressing junk fees<sup>2</sup> and because North Carolina 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,

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

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<sup>1</sup> N.C. Gen. Stat. § 75-1.1.

<sup>2</sup> *See, e.g.*, Feb 8, 2024 Press Release, Attorney General Josh Stein Leads Bipartisan Coalition of States in Support of Eliminating Junk Fees, <https://ncdoj.gov/attorney-general-josh-stein-leads-bipartisan-coalition-of-states-in-support-of-eliminating-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* H.B. 955, Gen. Assemb., 2025 Sess. (N.C. 2025), <https://trackbill.com/bill/north-carolina-house-bill-955-nc-junk-fee-prevention-act/2715533/> (would require advertised prices to include mandatory fees); Ticket Price Transparency, N.C. Gen. Stat. § 75-44 (requiring displayed ticket prices to include all mandatory fees and the maximum order processing fee).

<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 North Carolina.