

May 5, 2025

## **VIA EMAIL**

Attorney General Gentner Drummond Office of the Oklahoma Attorney General 313 NE 21<sup>st</sup> Street Oklahoma City, OK 73105 gentner.drummond@oag.ok.gov ConsumerProtection@oag.ok.gov Robert Carlson Senior Assistant Attorney General Consumer Protection Unit Office of the Oklahoma Attorney General robert.carlsonl@oag.ok.gov

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

Dear Attorney General Drummond and Attorney Carlson:

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 Oklahoma 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 Oklahoma's dedication to addressing junk fees<sup>2</sup> and because Oklahoma 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>&</sup>lt;sup>1</sup> Okla. Stat. tit. 15, § 753.

<sup>&</sup>lt;sup>2</sup> See, e.g., Press Release, Drummond Pushes for Proposed FTC Rule Outlawing Junk Fees (Feb. 13, 2024), <a href="https://oklahoma.gov/oag/news/newsroom/2024/february/drummond-pushes-for-proposed-ftc-rule-outlawing-junk-fees.html">https://oklahoma.gov/oag/news/newsroom/2024/february/drummond-pushes-for-proposed-ftc-rule-outlawing-junk-fees.html</a>; State Attorneys General Comment Letter to FTC regarding Unfair or Deceptive Fees NPRM, R207011 (Feb. 7, 2024), <a href="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">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</a>.

<sup>&</sup>lt;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 Oklahoma.