



May 5, 2025

VIA EMAIL

Attorney General Dan Rayfield
Oregon Department of Justice
1162 Court St. NE
Salem, OR 97301
dan.rayfield@doj.oregon.gov
AttorneyGeneral@doj.oregon.gov

Claudia Groberg, Chief Counsel
Oregon Department of Justice
Civil Enforcement Division
1162 Court St. NE
Salem, OR 97301
Claudia.groberg@doj.oregon.gov

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

Dear Attorney General Rayfield and Chief Counsel Groberg:

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 Oregon 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 Oregon's dedication to addressing junk fees² and because Oregon 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 Ore. Rev. Stat. §§ 646.607.1, 646.608.

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>.

³ See, e.g., Apr. 24, 2025 E-mail from Oregon Department of Justice to TINA.org Regarding Public Records Request (stating that the Department has received approximately 100 consumer complaints related to U-Haul); Oregon Department of Justice, Consumer Complaints Database, <https://justice.oregon.gov/consumerssearch/> (showing 45 consumer complaints regarding U-Haul, including complaints described as “Inaccurately calculated a bill or debt, a portion of which the complainant does owe,” “Unauthorized use of a credit card,” “False or misleading representation of terms of sale,” “False or misleading description of quality, quantity, or nature of goods or services,” “Complainant suffered damage/injury beyond the original transaction – ‘consequential’ damages,” “Acted unconscionably,” “Charging excessive price,” “Charged more than the stated amount in the contract,” “General allegation of unlawful conduct,” and “Any other unfair or deceptive conduct in an offer or in advertising”).

Please note that there have also 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 Oregon 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 Oregon.