



May 5, 2025

VIA EMAIL

John Abel, Director
Pennsylvania Office of Attorney General
Bureau of Consumer Protection
Strawberry Square, 15th Floor
Harrisburg, PA 17120
jabel@attorneygeneral.gov

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

Dear Attorney Abel:

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 Pennsylvania 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 Pennsylvania's dedication to addressing junk fees² and because Pennsylvania 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 73 Pa. Stat. §§ 201-2; 201-3.

² See, e.g., Press Release, Att’y Gen. Henry Co-Leads Coalition in Support of FTC’s Rule Outlawing Junk Fees (Feb. 8, 2024), <https://www.attorneygeneral.gov/taking-action/attorney-general-michelle-henry-co-leads-coalition-in-support-of-ftcs-rule-outlawing-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 Press Release, Penn. Att’y Gen., Settlement with Omni Hotels Management Corporation is AG Henry’s Latest Action to Quash Hidden Resort Fees and Drip Pricing for Travelers (Nov. 13, 2023), <https://www.attorneygeneral.gov/taking-action/settlement-with-omni-hotels-management-corporation-is-ag-henrys-latest-action-to-quash-hidden-resort-fees-and-drip-pricing-for-travelers/>; Press Release, Penn. Att’y Gen., Settlement with Choice Hotels AG Henry’s Latest Action to Quash Hidden “Resort Fees” and “Drip Pricing” for Travelers (Sept. 21, 2023), <https://www.attorneygeneral.gov/taking-action/settlement-with-choice-hotels-is-ag-henrys-latest-action-to-quash-hidden-resort-fees-and-drip-pricing-for-travelers/>; Press Release, Penn. Att’y Gen., AG Henry Testifies Before U.S. Senate Committee About Harmful “Junk Fees” that Impact Pennsylvania Consumers (July 26, 2023), <https://www.attorneygeneral.gov/taking-action/ag-henry-testifies-before-u-s-senate-committee-about-harmful-junk-fees-that-impact-pennsylvania-consumers/>; H.B. 636, 2023-2024 Reg. Sess. (Pa. 2023), <https://www.palegis.us/legislation/bills/2023/hb636> (would require advertised prices to include all mandatory fees and charges).

³ See, e.g., September 20, 2023 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“I rented the truck and bought Safe Move Insurance for a typical move from my apartment in Lancaster City to Millersville. I returned the truck and [redacted]’s employee came out, did a walk around and said ‘it’s all good.’ When I left the business, there was no damage to the truck. The next day, I was charged \$842.65 for a cut tire and rim that was clearly cut - you can’t miss it. My dad and I went to the place of business, spoke with the manager and took pictures of the truck. I called Uhaul again and spoke with the customer service reps/manager on 6/4/23, 6/11/23, 6/15/23 and 6/22/23 with no response. The business kept trying to take money out of my account on various dates and for various amounts and I had to have my debit account closed. On 9/20/23, I get another bill dated 9/7/23 for \$794.95. They are now threatening me with a court case if I don’t pay within 30 days. Of course, the letter was written 23 days ago and my parents just received it. Uhaul is accusing me of something I didn’t do and looking for a cash payment. I looked up online the multiple complaints r/t uhaul and mine is very similar...”)

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 Pennsylvania 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 Pennsylvania.