



May 5, 2025

**VIA EMAIL**

Attorney General Charity Clark  
Office of the Vermont Attorney General  
109 State Street  
Montpelier, VT 05609  
ago.info@vermont.gov

Assistant Attorney General Christopher Curtis  
Office of the Vermont Attorney General  
109 State Street  
Montpelier, VT 05609  
christopher.curtis@vermont.gov

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

Dear Attorney General Clark and Attorney Curtis:

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 Vermont 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 Vermont's dedication to addressing junk fees<sup>2</sup> and because Vermont 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> Vt. Stat. tit. 9, § 2453.

<sup>2</sup> *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>.

<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 Vermont.