



May 5, 2025

**VIA EMAIL**

Laura Clinton, Consumer Protection Division Chief  
Joseph Kanada, Managing Assistant Attorney General  
Office of the Attorney General  
Consumer Protection Division  
Laura.Clinton@atg.wa.gov  
Joe.Kanada@atg.wa.gov

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

Dear Attorneys Clinton and Kanada:

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 Washington state 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 the state of Washington's dedication to addressing junk fees<sup>2</sup> and because Washington 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> See, e.g., Wash. Code § 9.04.050; Wash. Rev. Code §19.86.020.

<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> See, e.g., December 1, 2023 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“Never have I ever in my life have I been charged this much money to rent a U-Haul..When I returned it I was charged for a late fee. He asked if it was gonna be by the end of day and I thought it would be. I got it back as soon as Physically possible and drop the key off at night just like I normally do at the West Seattle U-Haul and they never charged me a \$20 late drop off fee. The other thing was that the gas was a little bit low because I was so exhausted from the day I had I really didn’t know where to pull in safely to get gas in this area so to top it off they charge me another \$80 for less than a quarter tank of gas and to top that off they charged me a cleaning fee when there is nothing left in the truck we literally cleaned out everything (it was FILTHY when I picked up) so I have no idea what the cleaning fee is for I understand charging me for mileage overage and for the gas charge but they charged above and beyond the gas charge which was also not clear to me, nor explained to me. This place is not like other U-Haul’s They are clearly just charging every single fee they can and will all and all after one whole day of moving from 10 AM to 7:30 PM cost me over \$400 so I could’ve literally hired movers for that. There are multiple complaints from other people in regards to the way they’re charging fraudulent and frivolous charges??? then they never sent me a receipt. And only knew how much they charged by checking my bank statement. Which is not ok I don’t use that card for big purchases either so it was all around scam feeling. The guy was also making us wait for 30 minutes and made us late for our own reservation and then charged us a late fee for returning it late just doesn’t make sense.”);

October 4, 2022 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) (“On September 5, 2022, I made a reservation with U-Haul to pick up a 26-foot truck in Quincy, WA and drop it off in Wenatchee, WA on September 24, 2022. We were moving my mom from the Quincy area to Wenatchee as she had to be out of the house on that date. Two days before the reservation, U-Haul changed my reservation without notifying me. The only way I noticed is because I logged into my reservation, and noticed that they now had me picking up in Kittitas, WA (completely out of my way). I had to call and get the reservation switched to where I was now picking up and dropping off in Cashmere, WA. The customer service agent indicated that the truck in Quincy had an ‘air conditioning’ issue. I told her I didn’t need air conditioning, but she was adamant that I had to switch my reservation. This added to my cost by roughly \$60 (added a significant amount of miles to my rental), and I expressed my concerns to the customer service agent. She indicated that I would not be charged more since it was U-Haul changing the reservation. Not only did I end up paying this additional \$60, but they also charged me \$11 for ‘11 extra miles’! On top of that, they charged me 13 gallons of fuel at over \$6 per gallon even though I put 7 gallons of fuel into the truck when I dropped it off. How can they legally charge over \$6 per gallon when fuel is roughly \$5 per gallon. They said I dropped it off with a quarter tank of fuel (should have been a half tank), but I question that 13 gallons equates to a quarter tank especially after I already put in 7 gallons. Additionally, I wouldn’t have needed that much fuel had they not changed my reservation! To summarize, by my calculations, I ended up paying \$330 (with fuel) for a trip that should have cost me about \$180 (with fuel) based on my original reservation. I called and talked with a customer service representative on September 29, 2022, to express my concerns (from above) and request a refund.

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She took notes and indicated that a manager would contact me. I received an email response from a manager on October 1, 2022, that stated '[redacted] After reviewing your contract information unfortunately the charges are correct due to the truck leaving at 1/2 tank of fuel and being returned with a 1/4 tank of fuel. Thank you for your feedback.' I replied back stating I disagree and I wanted to talk with his manager. To date, I have not received any more communication from U-Haul. I find U-Haul's business practices deceptive, unethical and borderline illegal. The initial switching of my reservation for an 'air conditioning' issue was sketchy and ultimately resulted in a whole bunch of extra cost to me even though I was told that would not be the case. I also highly question how they can charge someone over \$6 a gallon in gas when that's not the true market rate. U-Haul added over 50 miles to my trip, and I'm the victim of that change. I want reimbursed \$150, or a mutually agreed upon amount.");

June 10, 2022 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) ("Thank you for reviewing my consumer complaint against U-Haul Storage of Interbay, 2601 15th Ave. W., Seattle, WA 98119. Phone (206) 285-0860. On May 18, 2022, I rented a truck for four hours. The charges were to be \$29.95 plus \$1.19 per mile. I drove seven miles, so the final charge was \$39.68 before tax. On May 20, two days after I returned the vehicle, without my permission U-Haul charged me \$49.40 plus tax for what appears to be eight gallons of fuel (the e-receipt dated May 20 shows the details of these charges, page 2 below). I attach a copy of the only contract U-Haul ever emailed to me (pages 3-16 below). Apparently, there is some other contract U-Haul claims is part of this that it never sent to me and that sets out the refueling penalty if you return the vehicle without putting in fuel. I cannot prove I got gas as I have no receipt, and U-Haul produced a cartoon/drawing of a fuel gauge (p. 2) it claims proves I did not, so I won't even argue about that. My complaint is that U-Haul's fuel penalty has nothing to do with U-Hauls actual or estimated loss or damage. This is nothing but a penalty. U-Haul does not fill its trucks up with fuel before it turns them over to you. I received this truck with half a tank and was told to return it that way. A \$50 charge (more with tax) does not reflect the price of the fuel it claims I did not put in (for seven miles of driving, that would be at most ?? gallon, say \$3.00) or the cost to have someone go put gas in the tank. U-Haul has no idea in advance how much fuel I will or will not put in, and it doesn't actually have anyone go put fuel in so they can deliver the truck with a full tank to the next customer (thus, no labor charge). I'm a lawyer and I know a liquidated damage clause is supposed to be a reasonable estimate, made at the time the contract is formed, of damages that are difficult to estimate at the time. This charge is none of those things. They have no idea how much gas a customer will or will not put in, and they don't have any labor charge to fill the tank as they don't deliver the truck to the next customer with a full tank. Instead, they give themselves the ability to charge successive customers for the same fuel (that they don't put in the tank). You should ask them how many times they charge this fee to their customers before they actually have to fill the tank ??? doubling the cost of the rental for doing nothing I would imagine is a real money-maker for them. Airport rental car companies typically charge you a large per-gallon fee if you don't return the tank full, because they actually deliver the car to the next customer with a full tank. Their charge represents the cost of the fuel and their cost (they claim) to pay someone to fill the tank. U-Haul is not doing that; it's just charging a penalty. I'd like my money back, and I'd like you to stop them from doing this to other people (who are not lawyers, don't know the rules, and just pay the fee rather than fight with them).");

October 24, 2021 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) ("On 10/18/2021 My daughter who lives in Puyallup WA wanted to rent a U-Haul 10-footer from Auburn WA U-Haul for 4 hours from 7 pm to 11 pm. Since my daughter was caught in traffic with two kids in the car, I was asked to pick the truck before 7 pm to take My couch for her new apartment. Thus, I went to Auburn U-Haul agency

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where in a grocery store. When I showed up at the store a guy who was the cashier gave a phone call to another guy and let me talk about renting cab. He took a pic of my WA DL and forward it to the guy was on phone. He disgraced me saying it doesn't look like a WA licensee which I have been using 30 years in Washington. I did not give much thought as my concern was to help my daughter with two kids. The agreement was 14\$ Insurance, 19.55\$ rental and refuel Gas as used and I gave my CC details for charges. I told the store guy to show me Cab before I grab, then he said everything is fine went to grab the key from drop box nearby and gave the Key to me that now I am sure where previous renter dropped meaning never checked the Cab by U-Haul agent before giving it to another. When I opened the Cab, I saw some toys on the driving cabin. When I took Cab home and was ready to load the Couch. My Daughter open the Cabin then we saw a broken Mirror on the cabin which was dangerous. However, we were pressing for time, just let the broken mirror aside and we drove the cab to Puyallup. After four hours we came to Auburn, refilled gas for 50 miles we used which was 18\$ for V8 car that is plentiful for the amount we used. However, we got 10-15 minutes late and we dropped the car at the location we picked and dropped the key at drop box by 11.15 pm. Following day my daughter has been sent the bill to my surprise It was fraudulent, baseless, unethical, and making me sick. They have charged :50\$ cleaning fee, has put 12.30 pm as returned time, 28\$ Insurance which is twice the agreed amount, 26\$ for Gas which we already fill, usage millage as 63 almost 15miles more, and so many baseless charges (bill is attached for ref) which a desperate businessperson does with bad business ethics. They have kept broken glasses purposely or they did not clean the car before giving it to me. Since I am old lady, they wanted to scam me. This made me go through mental agony as to what has happened to American business integrity. . . .");

October 22, 2021 consumer complaint submitted to FTC (obtained by TINA.org by way of Freedom of Information Act request) ("I ordered U-haul on Behalf of my daughter footer on 10/18/21 at 6.30 PM from the above agent. They did not show us truck open before handed to us . Agent said everything is clean and good. After a long time I rented U-haul. However , they intimidate me when I gave my WA DL saying it looks like not a WA DL which is inappropriate and disrespectful as I am a resident of WA for last 30 years. However , I wanted to get my work done with truck with stated Millage in the invoice which is 48553 Mi and return using 52 Miles. When we open the truck for the first time before we load anything we saw a broken mirror lie on the trailer which was dangerous. The Guy in the Grocery store lied to us it was clean. Also , in the drive cabin there was a Doll and some kids toys. Anyway , we just kept the mirror as it is upside down making sure we don't touch it because it doesn't belong to us plus it was broken. We loaded stuff and moved stuff to said [redacted], Puyallup, WA 98375. It took us 4 Hrs to do our thing , we hit Gas station fueled 18 \$ which is the amount of Gas we used for 50 M and more than needed we refueled. We returned the truck at 11.10pm just 10 minutes late with exact the way we got it . To our surprise , this mean business has overcharged me with false details. They never gave us transparent documents . They gave us a truck with broken mirror inside pretty much hidden with bad idea in mind with no transparency. They say we returned dirty which was their broken mirror or previous user. They overcharged me 14\$ two times as insurance. 50\$ has been charged for broken glass which was in the truck belongs to them or that is their negligence. I never done anything bad in my life in terms of cheating financially . I am being older woman they probably thought I would not see my CC details and bills. I was not informed about bogus claims. I am dishearten as to how some people handle business. This is not American way of doing Business. This Broad daylight robbery and Scam to me on top of bullying me. Please Help me in this regard. I appreciate it very much as I WOULD NOT LIKE THIS TO HAPPEN TO ANOTHER . . .").

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

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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 Washington 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 Washington state.