



May 5, 2025

VIA EMAIL

Attorney General Josh Kaul
Wisconsin Department of Justice
P.O. Box 7857
Madison, WI 53707
kaulj@doj.state.wi.us

Assistant Attorney General Laura McFarlane
Chief, Consumer Protection Section
Wisconsin Department of Justice
P.O. Box 7857
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Re: U-Haul's Deceptive Price Advertising and Fee Scheme

Dear Attorney General Kaul and Attorney McFarlane:

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 Wisconsin state 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 Wisconsin's dedication to addressing junk fees² and because Wisconsin 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 Wis. Stat. §§100.18, 100.20.

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>; Press Release, Fed. Trade Comm’n, FTC and Wisconsin Take Action Against Rhinelander Auto Center for Illegally Discriminating Against American Indian Customers and Charging Unlawful Junk Fees (Oct. 24, 2023), <https://www.ftc.gov/news-events/news/press-releases/2023/10/ftc-wisconsin-take-action-against-rhineland-auto-center-illegally-discriminating-against-american>.

³ 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 Wisconsin.