May 5, 2025

VIA EMAIL

Chris Mufarrige, Director
Serena Viswanathan, Associate Director
Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Ave. N.W.
Washington, D.C. 20580
cmufarrige@ftc.gov
sviswanathan@ftc.gov

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

Dear Mr. Mufarrige and Ms. Viswanathan:

A 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 nationwide being charged more than they bargained for, in violation of FTC law.[1]

Specifically, U-Haul advertises a misleadingly low moving truck rental fee and then adds on a multitude of other fees and charges throughout the reservation and rental process. This drip pricing tactic lures in consumers with an artificially low base fee, and then charges them a higher price after they have sunk their time and effort into trying to rent a moving truck for the illusory price that was advertised.[2] As one consumer succinctly put it, "prices are not accurately displayed or as advertised. Prepare for a ton of sneaky add-on fees which end up quadrupling the advertised price."[3] Unfortunately, this consumer is not alone—stories of deception and financial harm are numerous. As another U-Haul customer who was charged undisclosed fees reported, "The fees are out [of] line. They should be emphasized up front, particularly in cases where the fees are many times the rental fees. I also think most people would consider these fees exorbitant, particularly when you consider that the people paying these fees, (in most cases) are stuck and do not have a choice…"[4]

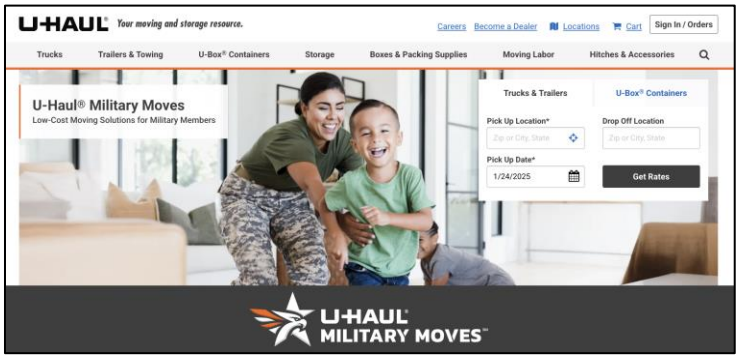
U-Haul's deceptive advertising and pricing scheme is explained more fully below.[5]

I. Background

U-Haul Holding Company (formerly AMERCO)[6] is a publicly traded company that owns U-Haul International, Inc.[7] U-Haul, one of the largest moving truck rental companies in the country,[8] has more than 23,000 locations in all 50 states and 10 Canadian provinces, and a fleet of more than 180,000 trucks.[9] Last year, U-Haul recorded more than 2.5 million one-way moving truck, trailer and container rentals.[10]

The company uses a dealership model, partnering with independent business owners across the country who rent equipment from U-Haul and then earn commission from the company by renting that equipment to consumers.[11] Pricing is set and controlled by U-Haul (not independent dealers) and nationwide quotes are provided by—and rental reservations are typically made on—the U-Haul website and/or app.[12]

Among U-Haul's target consumers are students moving to college, seniors who are downsizing, and military members transferring to new locations.[13]



To lure in these and other consumers who are moving, the company claims consumers can "save money with affordable rates starting at $19.95."[14]

But there is not a single consumer in this entire nation who will pay just $19.95 for a U-Haul truck rental as there are mandatory fees, among other costs, that the company never discloses in its marketing. Indeed, U-Haul has a history of attempting to manipulate its "affordable" rates. In 2010, the FTC, in a 5-0 Commissioner vote, filed an enforcement action against the company for inviting its competitor, Avis Budget Group, Inc., to join with U-Haul in a collusive scheme to raise and fix rates for one-way truck rentals.[15] Unfortunately, this enforcement action, which resulted in a no-fault, no-money consent order, has done nothing to stop the company from continuing to engage in deceptive pricing tactics that significantly harm consumers and honest competitors alike.[16]

II. U-Haul's Deceptive Price Advertising & Fee Scheme

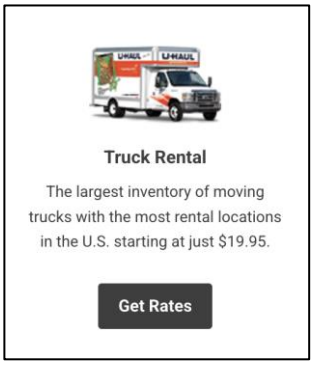
U-Haul has advertised the same truck rental price of $19.95 for more than two decades.[17]

U-Haul Website as of April 24, 2006

Today, this same price is advertised on its fleet of trucks and vans, on its website and on social media, among other places.

U-Haul Truck[18]

U-Haul Website[19]



U-Haul Social Media Platforms[20]

(Additional examples of U-Haul's price advertising are available at www.truthinadvertising.org/evidence/u-haul-price-advertising.)

However, according to vague and inconspicuous fine print, $19.95 applies only to "in-town" moves (an ambiguous term the company never defines in its price advertising[21]) and does not include "mileage/fees."

And mandatory fees that raise the cost of every U-Haul truck rental above $19.95 are never disclosed in the company's advertising, nor are the plethora of other "optional" charges U-Haul slowly drips out as consumers go through the lengthy reservation process.[22]

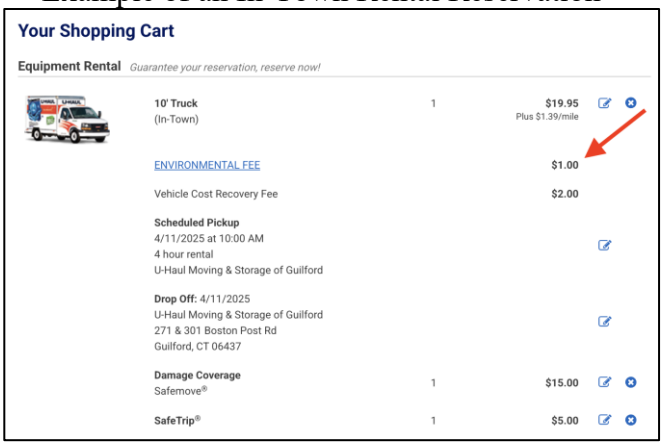
The following is a breakdown of the added mandatory and optional costs and fees that consumers incur during the U-Haul rental process.

A. Mandatory Fees Automatically Added to Shopping Cart

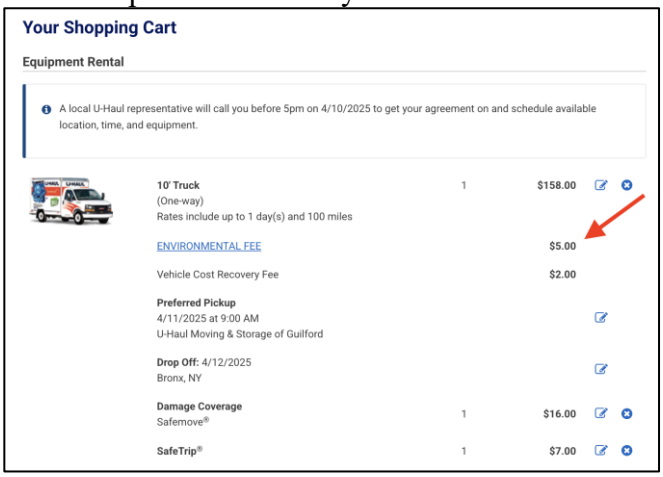
Consumers are required to navigate through more than 10 webpages and pop-up screens before they arrive at their virtual shopping cart, and when they do, two never-before-mentioned, mandatory fees are automatically added to the total cost of the rental.[23]

The first is an "environmental fee" that is added to every rental and appears to cost $1 for in-town rentals and $5 for one-way rentals.

Example of an In-Town Rental Reservation[24]



Example of a One-Way Rental Reservation



According to a pop-up box that appears when clicking on the words "Environmental Fee," this fee, which consumers are unable to opt out of, is "used to support and foster the development and maintenance of sustainable U-Haul business operations."[25] It provides no additional value to the consumer.

What is the ENVIRONMENTAL FEE?

All U-Haul Vehicle rentals are subject to an environmental fee used to support and foster the development and maintenance of sustainable U-Haul business operations. For example, operations that directly benefit our customers include, but are not limited to, the use of aerodynamic fuel-saving truck skirts, the fuel economy gauge, CNG and propane trucks, storage re-use centers, and an expanding alt-fuel propane infrastructure. The fee also partially covers operations that indirectly benefit our customers, such as energy-efficient lighting and HVAC retrofits, waste-oil heaters, water recycling units, van-body storage units, permeable ground cover and other water/energy saving projects.

The second mandatory fee is a "vehicle cost recovery fee,"[26] which is also automatically added to rentals without any explanation provided during the online reservation process as to what it is used for or why it is charged[27] and seems to range between $1 and just over $5.[28] Again, there appears to be no value-add to the consumer for this charge. [29]

Your Shopping Cart

Equipment Rental

A local U-Haul representative will call you before 5pm on 4/10/2025 to get your agreement on and schedule available location, time, and equipment.

10' Truck (One-way) Rates include up to 1 day(s) and 100 miles	1	$158.00
ENVIRONMENTAL FEE		$5.00
Vehicle Cost Recovery Fee		$2.00
Preferred Pickup 4/11/2025 at 9:00 AM U-Haul Moving & Storage of Guilford		
Drop Off: 4/12/2025 Bronx, NY		
Damage Coverage Safemove®	1	$16.00
SafeTrip®	1	$7.00

In total, these fees increase the fixed cost of all U-Haul truck rentals by at least $2 (and more than $10 for some rentals), yet neither of them is included, disclosed or explained in U-Haul's advertising.[30]

B. Fixed Administrative Fees for Tolls and Traffic Tickets

Buried on its website in a drop-down menu under frequently asked questions,[31] U-Haul reveals that it also charges a mandatory $1 administrative fee for every toll charge a consumer incurs and a $15 or $30 administrative fee for traffic tickets.

What are the administrative fees on a toll and/or ticket?

There is a $30 administrative fee for tickets and a $1 administrative fee for every toll charge against a contract. If the ticket charge is paid by the customer within seven days, that fee is reduced to $15 as a customer courtesy. If the customer has not paid within the seven days, and there is a credit card on file, the system will auto-bill the customer at the reduced administrative rate of $15 on the 8th business day.

These fees are never disclosed in any of U-Haul's advertising, during the reservation process or in the rental contract,[32] resulting in numerous consumers complaining about being blindsided by these administrative toll fees without prior warning. (Consumers have also complained about excessive toll fees and improper traffic ticket fees.[33])

C. Implicitly Necessary Insurance Fees

While personal auto insurance policies often cover rental cars, the same is not true for rental moving trucks.[34] This means that in order for consumers to have insurance coverage while driving a rented U-Haul truck, they need to purchase additional coverage, an obligation and cost that are not disclosed anywhere in the company's advertisements.

It is not until consumers proceed through the rental reservation checkout process that they are informed of this significant additional cost. Specifically, after consumers select a rental location, date and truck type, U-Haul presents consumers with a Hobson's choice: purchase insurance coverage from U-Haul (the cost of which starts at $15 and increases from there depending on the anticipated distance to be traveled and the size/type of truck rental, among other things[35]) or "immediately" pay U-Haul tens of thousands of dollars should the rental vehicle be damaged.

Damage Protection

Credit cards and most auto insurance policies do not cover damage or theft to rental equipment, even if they cover damage to rental cars. As a result, we proudly offer protection packages to relieve you of responsibility for damage to our equipment.
Please choose a protection plan.

Continue

Truck Rental Coverage

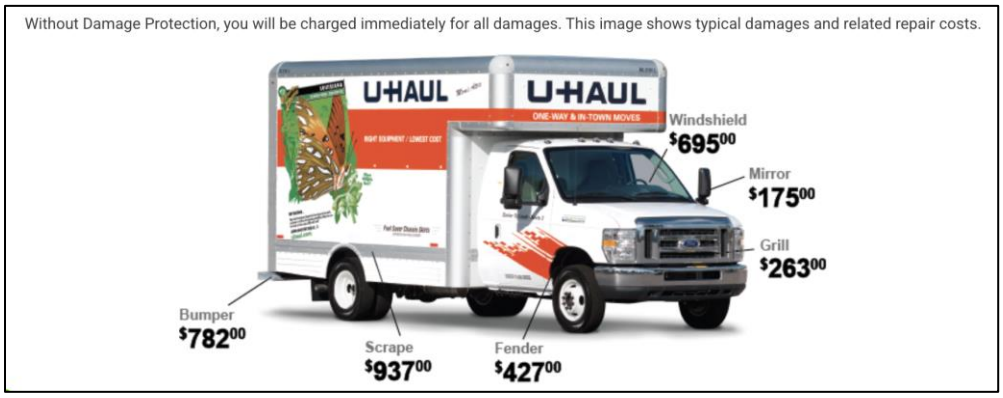
Safemove® **$32.00**
Covers accident damage and theft of U-Haul trucks; accident damage to your belongings, and includes medical/life protection for you and your passenger. *Up to $80,000 in potential benefits.*

Immediately reimburse U-Haul for damage.
The rental truck you have selected has an approximate value of up to $35,000 USD.
Credit cards and most auto insurance policies do not cover damage to rental trucks.

At the time this choice is presented, U-Haul informs consumers for the first time that "Credit cards and most auto insurance policies do not cover damage or theft to rental equipment, even if they cover damage to rental cars." U-Haul then preselects—and highlights in yellow—the insurance coverage option called Safemove, which it describes as covering "accident damage and theft of U-Haul trucks; accident damage to your belongings, and includes medical/life protection for you and your passenger."[36]

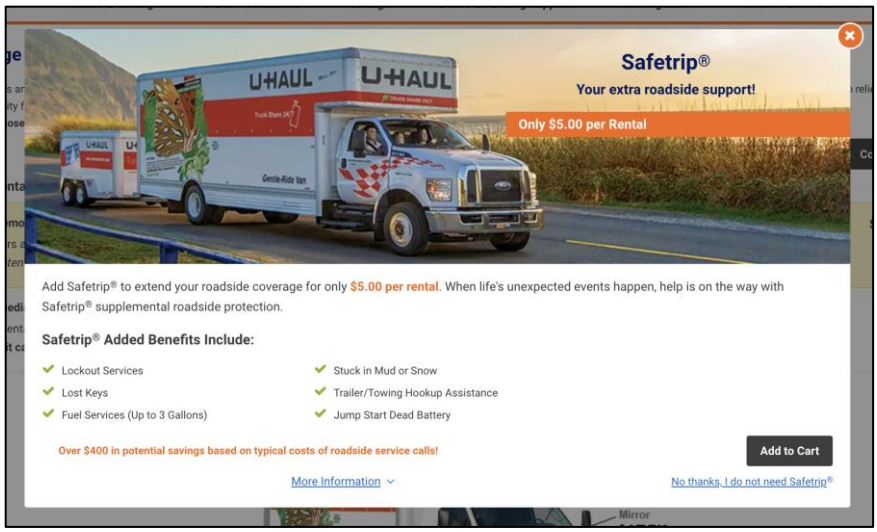
Beneath this preselected insurance option is the much less attractive option to "Immediately reimburse U-Haul for damage," along with a reminder that "[c]redit cards and most auto insurance policies do not cover damage to rental trucks."

U-Haul then features an image of a rental truck along with examples of "typical damages and related repair costs," including, among other things, $937 for a scrape on the truck, $782 for a damaged bumper and $695 for a damaged windshield, for which consumers will be "charged immediately" if they neglect to purchase the insurance.



What is missing from this page prompting consumers to purchase insurance coverage from U-Haul are the material terms and exclusions that apply, which are all but hidden in separate fine print disclosures on the U-Haul website.[37] Such terms and exclusions include, among other things, the fact that there is a $150-$250 deductible and that certain kinds of damage (e.g., mechanical damage resulting from rocking the truck when stuck in ice, snow or mud; damage from improper fuel; and damage from overloading/improper loading of equipment) are not covered.

Then, regardless of whether consumers accept or decline U-Haul's Safemove insurance, consumers are next presented with a pop-up that prompts them to purchase Safetrip "to extend your roadside coverage" to cover things like lost keys, getting stuck in the mud and jump-starting a dead battery, which Safemove apparently does not cover. The cost for Safetrip is an additional $5 to $7[38] and purportedly provides "Over $400 in potential savings based on typical costs of roadside service calls!"[39]



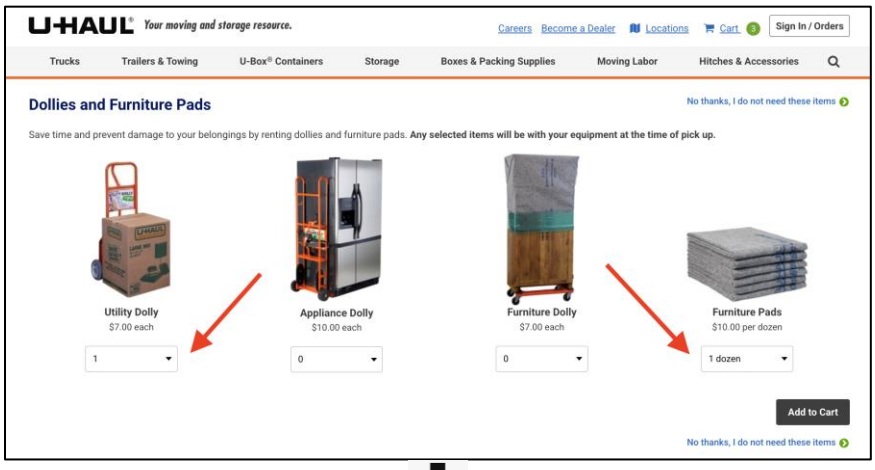
And while this additional purchase is also optional, U-Haul employs tactics to steer consumers to add Safetrip to their shopping cart, including by presenting the "Add to Cart" option in a prominent black box while relegating the "No thanks, I do not need Safetrip" option to finer, less conspicuous print beneath the Add to Cart option.

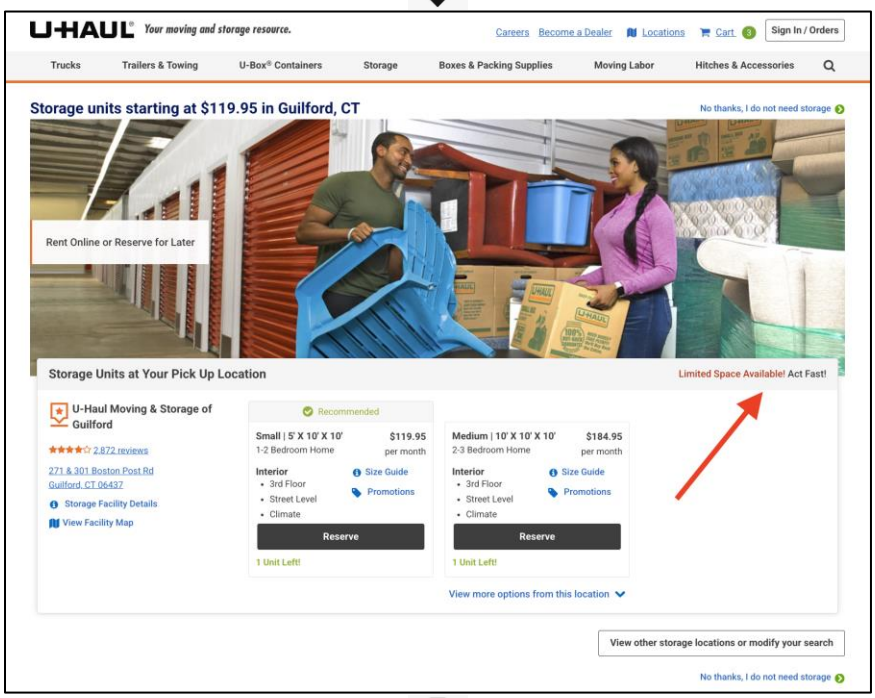
In light of U-Haul's failure to properly disclose insurance needs, terms, limitations and costs in its advertising, it's no surprise that numerous consumers have lodged complaints regarding these add-on fees, including, among other things, reports of being charged for the insurance without their consent or feeling forced to purchase it, as well as U-Haul's insurance not covering the cost of their damages.[40]

D. Fees for Tack-On Items & Services

After the pressurized marketing pitch to buy insurance, consumers reserving a moving truck online must click through numerous additional screens before they can check out, each one advertising more products and services, including dollies, furniture pads, storage units, moving boxes, packing tape, and loading and unloading services.

On some of the screens, an amount of the offered products is preselected; on other screens, there is pressure to "Act Fast!" ("Limited Space Available!"); and on each of the screens, U-Haul uses a false hierarchy to steer consumers to add additional items and services to their shopping cart by presenting the "Add to Cart," "Reserve" and "Select" options in prominent black or green boxes while relegating the "No thanks" options to finer, less conspicuous print.


U-HAUL Your moving and storage resource.
Careers
Become a Dealer
Locations
Cart 3
Sign In / Orders
Trucks
Trailers & Towing
U-Box® Containers
Storage
Boxes & Packing Supplies
Moving Labor
Hitches & Accessories
Dollies and Furniture Pads
No thanks, I do not need these items
Save time and prevent damage to your belongings by renting dollies and furniture pads. Any selected items will be with your equipment at the time of pick up.
Utility Dolly
$7.00 each
1
Appliance Dolly
$10.00 each
0
Furniture Dolly
$7.00 each
0
Furniture Pads
$10.00 per dozen
1 dozen
Add to Cart
No thanks, I do not need these items


U-HAUL Your moving and storage resource.
Careers
Become a Dealer
Locations
Cart 3
Sign In / Orders
Trucks
Trailers & Towing
U-Box® Containers
Storage
Boxes & Packing Supplies
Moving Labor
Hitches & Accessories
Storage units starting at $119.95 in Guilford, CT
No thanks, I do not need storage
Rent Online or Reserve for Later
Storage Units at Your Pick Up Location
Limited Space Available! Act Fast!
U-Haul Moving & Storage of Guilford
2,872 reviews
271 & 301 Boston Post Rd
Guilford, CT 06437
Storage Facility Details
View Facility Map
Recommended
Small | 5' X 10' X 10'
1-2 Bedroom Home
$119.95
per month
Interior
3rd Floor
Street Level
Climate
Size Guide
Promotions
Reserve
1 Unit Left!
Medium | 10' X 10' X 10'
2-3 Bedroom Home
$184.95
per month
Interior
3rd Floor
Street Level
Climate
Size Guide
Promotions
Reserve
1 Unit Left!
View more options from this location
View other storage locations or modify your search
No thanks, I do not need storage

In short, U-Haul uses a variety of deceptive tactics to lure consumers to rack up their bills with additional products and services.

E. The Drip, Drip, Drip of More Fees

A plethora of consumers have also complained about numerous other U-Haul fees they incurred unexpectedly. While some (but not all) of these fees are inconspicuously disclosed either in the midst of the U-Haul Equipment Reservation Terms and Conditions that are hyperlinked on the last screen of the reservation checkout process after consumers are prompted to enter their credit card information,[41] or in the midst of rental contract documents consumers receive after they pay for a U-Haul rental, none are disclosed in U-Haul's advertisements or during the online reservation process. Such fees include, but are not limited to, the following:

- Extra mileage fees;[42]
- Rental extension fees;[43]
- Cleaning fees;[44]
- Gas fees;[45]
- Damage fees;[46]
- Lost key fees;[47]
- After-hours service/late fees;[48]
- Wrong drop-off location fees;[49]
- Out-of-state license fees;[50] and
- Parking fees.[51]

Further, buried in the rental contract is an acknowledgement by U-Haul that there may be fees owed "that cannot be determined or are not known to [U-Haul]… at the completion of the rental" and a requirement that consumers allow U-Haul to apply "any and all charges on the credit card used to create the reservation or to pay for the rental."[52] While the contract also requires U-Haul to provide consumers with an itemized invoice of any additional charges, consumers nonetheless report being charged for fees *after* they have returned their rentals and without notice or explanation.[53]

F. Mileage

According to U-Haul, average mileage fees for "in-town" rentals are "in general" between 59 cents and 99 cents per mile driven.[54] But TINA.org found that in-town mileage fees are oftentimes higher than this range and can even go over $2 per mile.[55]

This means that for an in-town move in the Bronx, NY, for example (where the mileage is $1.99/mile for a 10' truck), with just 10 miles of driving, the cost for a U-Haul truck rental, *before* any mandatory fees or optional costs are added, is already double the illusory advertised price of $19.95. Similarly, for an in-town move in Seattle, WA (where the mileage is $1.39 for a 10' truck) with 15 miles of total driving the $19.95 cost doubles.[56] Even when the mileage cost is the lowest estimated by U-Haul (i.e., 59 cents), all it takes is 34 miles of driving to double the deceptively advertised price of $19.95.

III. U-Haul's Deceptive Pricing Causes Significant Harm

Due to the above tactics, even an "in-town" 10' truck rental driven just 10 miles with no tolls or traffic tickets, or other U-Haul add-on products or services, can cost nearly three times more than the advertised price (or more, depending on the mileage cost for the specific U-Haul location), after accounting for the mandatory fees and insurance add-ons.[57]

This jump in cost is especially problematic in light of U-Haul's target audience: consumers going through one of life's most stressful events—moving.[58] By withholding material details through the online rental process and waiting until these susceptible consumers complete the transaction at a U-Haul store before providing the contract (which also omits material information), the company constrains consumers' options at what is often a vulnerable moment. This perfect storm of time pressure and obfuscation makes it unlikely that consumers will step away from the transaction and search for a better deal elsewhere, as they feel trapped to take the deal.[59] And because some fees are never disclosed before consumers hand over their credit card information, they are effectively prevented from exercising free choice in their purchasing decisions.[60]

In fact, numerous consumers report experiencing significant financial hardship as a result of U-Haul's drip pricing scheme, as the following examples illustrate:

> When I reserved the moving truck, I was quoted a set price of $570.00 for the rental … Upon arrival at the U-Haul dealer my price changed from $570 to $770, with no explanation as to why the $200 increase. This is fraudulent, and misuse of business ethics. I am 69 year's [sic] old, and I should not be taken advantage of like this by any business.[61]
>
> U-Haul has charged us over the amount we have paid…We are now negative in our accounts, and cannot get gas, food, or pay bills because of this. We want all our money returned so we can continue to live.[62]
>
> … u-haul went into my bank account and deducted $60.12 without my permission I tried reaching out to u-haul but due to their system being down I was unable to speak with anyone to resolve the matter! this has caused my bank account to become overdrawn.[63]
>
> I recently rented a U-Haul in Minnesota and was given an estimate of $133 for 80 miles. However, I was shocked to find an additional $82 charge on my credit card without any explanation…I feel scammed and extremely frustrated. After speaking with others, I've heard this isn't an isolated incident—many people have had similar experiences with U-Haul charging them extra without proper communication. This kind of shady practice is unacceptable, and I urge others to be cautious when renting from U-Haul. Make sure to thoroughly review your charges, as they might slip in extra fees without your knowledge…[64]

> … The rental was suppose to be for $19.95 for the van for 4 hrs, $1.00 for environment fee, $11.00 for insurance, .79 for mileage which was around 18 miles, and then taxes which should have come out to around $53.95. We only used 2.5 hrs of the van usage and when my daughter returned it they would not give her a receipt. When I checked my bank account after the weekend they charged me $67.94 which shows extra charges on there. The staff was rude, unprofessional, and charged me extra fees without explaining why….[65]

These complaints are just a sampling from the thousands of consumers who have lodged complaints with various outlets, including the FTC, the Better Business Bureau, Consumer Affairs, Trustpilot and TINA.org.

And the harm of U-Haul's drip pricing is not limited to consumers—the company's deceptive practices harm honest businesses that comply with truth-in-advertising laws as well. It is a bedrock principle of FTC law that price is material to a consumer's decision about whether to purchase a good or service.[66] As such, businesses that want to compete on the true price of their offerings are undercut by businesses like U-Haul that use hidden and misleading fees to display an artificially low advertised price. Further, once U-Haul lures consumers in with its illusory $19.95 base price and the bait is taken, the company then consumes renters' time and attention, making continued searches for other rental options more costly and less likely.[67]

IV. Conclusion

Advertising a misleading, artificially low price and then adding in mandatory fees and other charges throughout the rental process is a quintessential example of bait-and-switch pricing and is a practice that falls squarely within the scope of the Commission's long history of work to protect consumers. Indeed, the issue here is not with the ultimate price U-Haul chooses to charge consumers but rather with its methodology—it must be honest with consumers from the start as truthful, timely and transparent pricing, including the nature, purpose and amount of any fees or charges imposed, is critical for consumers to make informed purchasing decisions.

Instead, U-Haul is luring in millions of consumers—including students, senior citizens and military members—with attractive but fake prices. This unabashed deception has been going on for years and has resulted in consumers—and honest businesses—suffering serious financial consequences.

As Commissioner Holyoak has stated:

> Price is an important factor in consumers' purchasing decisions. … Honest businesses that lawfully advertise actual prices are harmed when other businesses use hidden or deceptive fees; indeed, this practice undermines the ability of honest businesses to compete on price. … the Commission should not shy away

> from using its Section 5 enforcement authority to protect consumers harmed by hidden or deceptive fees or charges…[68]

The White House has also expressed outrage regarding fees that provide "minimal value" and has conveyed a strong interest in "price transparency" to protect both consumers and sellers, albeit in different industries.[69]

As a sophisticated, publicly traded company that is well aware of its obligation to avoid deceptive pricing schemes, there is simply no excuse for U-Haul's bait-and-switch pricing tactics. TINA.org urges the FTC to open an investigation into U-Haul and take prompt and appropriate enforcement action.

Sincerely,

Laura Smith, Esq.
Legal Director
Truth in Advertising, Inc.

Bonnie Patten, Esq.
Executive Director
Truth in Advertising, Inc.

Cc via email: Kristine Campbell, General Counsel, U-Haul

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[1] For purposes of this investigation, TINA.org focused on U-Haul's marketing and pricing practices as they pertain to its moving truck rentals. Similar issues may exist with respect to the company's storage unit rentals and other operations.

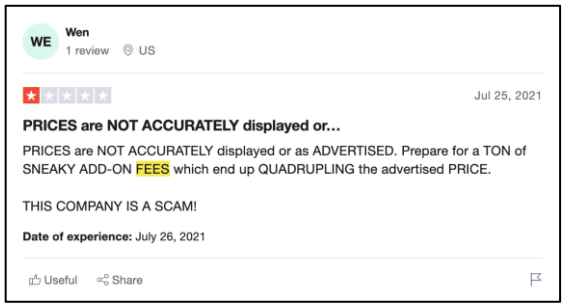
[2] As of November 2024, more than 700 consumer complaints had been filed with the FTC regarding U-Haul. *See* Letter from FTC to TINA.org re: FOIA-2025-00252 (Nov. 6, 2024); Letter from FTC to TINA.org re: FOIA-2025-00252 (Nov. 25, 2024).

In addition, as of May 1, 2025, nearly 2,200 consumer complaints had been filed with the BBB regarding U-Haul in the last three years, plus an additional 700+ customer reviews that average a 1.1 out of 5 star rating. BBB Business Profile of U-Haul International Inc., https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114. Consumers have also complained to other outlets, including Trustpilot, which shows more than 1,490 customer reviews that average a 1.3/5 star rating as of May 1, 2025; Consumer Affairs, which shows more than 1,280 customer reviews that average a 1.6/5 star rating as of May 1, 2025; and TINA.org. *See* Trustpilot Review of Uhaul, https://www.trustpilot.com/review/www.uhaul.com; Consumer Affairs U-Haul Reviews, https://www.consumeraffairs.com/movers/uhaul.html.

See also How Your $19.95 U-Haul Rental Could End Up Costing You $1200, Consumerist (Sept. 6, 2011), https://www.consumerreports.org/consumerist/how-your-1995-u-haul-rental-could-end-up-costing-you-an-extra-1200/.

There have also been several consumer class-actions filed against U-Haul regarding its fees, none of which have successfully impacted the company's practices. *See, e.g.,* TINA.org's Class-Action Tracker: U-Haul Co. of West Virginia's Environmental Fees, https://truthinadvertising.org/class-action/u-haul-co-of-west-virginias-environmental-fees/; TINA.org's Class-Action Tracker: U-Haul's Fees, https://truthinadvertising.org/class-action/u-hauls-fees/; TINA.org's Class-Action Tracer: U-Haul, https://truthinadvertising.org/class-action/u-haul/.

[3] Wen, Review on Trustpilot's Uhaul Reviews (July 25, 2021), https://www.trustpilot.com/reviews/60fe2338f9f487044c48433a.



See also, e.g., Jason, Review on Trustpilot's Uhaul Reviews (Mar. 29, 2024), https://www.trustpilot.com/reviews/66072c95f9e9276b9aa2a6dd ("there are so many hidden fees that it ends up being very expensive"); Pureglesh Solution, Review on Trustpilot's Uhaul Reviews (Aug. 17, 2024), https://www.trustpilot.com/reviews/66c00b5459127c1107fe7716 ("….scammed and extremely frustrated. After speaking with others, I've heard this isn't an isolated incident – many people have had similar experiences with U-Haul charging them extra without proper communication.").

[4] Complaint to FTC (Sept. 14, 2023).

[5] TINA.org has also notified the states of Arizona, California, Colorado, Connecticut, Delaware, Hawaii, Illinois, Maine, Massachusetts, Michigan, Minnesota, New Jersey, New York, North Carolina, Oklahoma, Oregon, Pennsylvania, Vermont, Washington and Wisconsin, as well as the District of Columbia regarding U-Haul's deceptive advertising and pricing scheme.

[6] *AMERCO Announces Transfer of Listing of Common Stock to the New York Stock Exchange – Sets Date of Name Change to U-Haul Holding Company*, U-Haul (Nov. 15, 2022), https://investors.uhaul.com/news_article.aspx?id_pdf=2625562.

[7] U-Haul Holding Company also owns Oxford Life Insurance Company, Repwest Insurance Company and Amerco Real Estate Company.

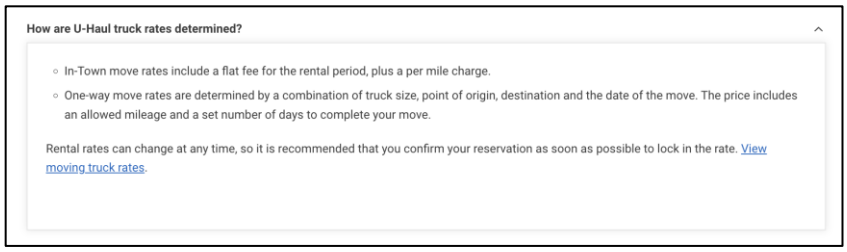
[8] Complaint at 1-2, *In the Matter of U-Haul Int'l and AMERCO*, No. 081-0157 (F.T.C., June 9, 2010), https://www.ftc.gov/sites/default/files/documents/cases/2010/06/100609uhaulcmpt.pdf.

[9] U-Haul Company History, https://investors.uhaul.com/history.aspx.

[10] *U-Haul Announces Top Growth States of 2023*, U-Haul (Jan. 2, 2024), https://www.uhaul.com/Articles/About/U-Haul-Announces-Top-Growth-States-Of-2023-30660/#:~:text=U%2DHaul%20calculates%20growth%20states,across%20the%20U.S.%20and%20Canada.

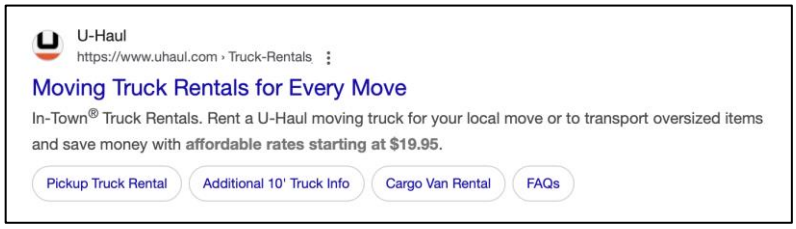
[11] U-Haul Become A Dealer, https://www.uhaul.com/Dealer/.

[12] U-Haul Equipment Reservation Terms and Conditions, https://www.uhaul.com/reservations/reservationadvisements.aspx; U-Haul Truck Rentals Frequently Asked Questions, https://www.uhaul.com/FrequentlyAskedQuestions/Truck-Rentals/.



[13] College Moving: U-Haul Moving Trucks for Students, https://www.uhaul.com/Videos/Trucks-Videos/College-Moving-Moving-Trucks-For-Students/; U-Haul Helpful Tips for Moving as a Senior, https://www.uhaul.com/Tips/U-Box/Helpful-Tips-for-Moving-As-A-Senior-30469/; U-Haul Essential Downsizing Guide for Seniors, https://www.uhaul.com/Tips/U-Box/Essential-Downsizing-Guide-for-Seniors-28947/; U-Haul Military Moves, https://www.uhaul.com/Military/; Introducing the U-Haul Military Move Program, https://www.uhaul.com/Tips/Moving/Introducing-The-U-Haul-Military-Move-Program-31703/. *See also* Kristina Monllos, *U-Haul Diversifies Its Social Strategy to Tell People It's More Than Moving Trucks*, Digiday Media (Nov. 18, 2022), https://digiday.com/marketing/u-haul-diversifies-its-social-strategy-to-tell-people-its-more-than-moving-trucks/#:~:text=%E2%80%9COur%20customer%20is%20at%20every,marketing%20at%20U%2DHaul%20International. ("Our customer is at every stage in life from the young kid getting ready to go to college to the senior downsizing to Gen X moving [their] parents in with [them]," said Elnora Cunningham, director of local search and social marketing at U-Haul International.)

[14] Search results for terms "moving truck rentals," Google, https://www.google.com/ (last visited Jan. 27, 2025). *See also* search results for terms "affordable moving truck rentals," Google, https://www.google.com/ (last visited Apr. 30, 2025).



[15] FTC Case Summary of U-Haul International, Inc., and AMERCO, https://www.ftc.gov/legal-library/browse/cases-proceedings/081-0157-u-haul-international-inc-amerco-matter; Press Release, Fed. Trade Comm'n, FTC Approves Final Order Settling Charges That U-Haul Invited Its Main Competitor to Fix Truck Rental Prices (July 20, 2010), https://www.ftc.gov/news-events/news/press-releases/2010/07/ftc-approves-final-order-settling-charges-u-haul-invited-its-main-competitor-fix-truck-rental-prices.

[16] The FTC has been addressing unfair and deceptive practices in the automobile rental industry for more than 50 years. *See e.g., In Re Resort Car Rental Sys., Inc.*, 83 F.T.C. 234, 281–82, 299-300 (1973), https://www.ftc.gov/system/files/ftc_gov/pdf/Resort%20Car%20Rental%20System%2C%20Inc.%2083%20FTC%20234%20%281973%29.pdf (finding that using the name "DollarADay" misrepresented the price of car rentals in violation of section 5 of the FTC Act where a rental could not be attained for one dollar per day due to mileage, insurance and other mandatory charges), *aff'd sub. nom. Resort Car Rental Sys., Inc. v. FTC*, 518 F.2d 962, 964 (9th Cir. 1975). *See also* FTC Penalty Offenses Concerning Car Rentals, https://www.ftc.gov/enforcement/penalty-offenses/autorentals; Synopsis of Federal Trade Commission Decisions Which Are Relevant to Automobile Rental Practices (1978), https://www.ftc.gov/system/files/ftc_gov/pdf/NOPO%20Auto%20Rental%20Practices.pdf ("where specific price terms are mentioned in an advertisement, the advertisement must note, in equally conspicuous fashion, all other rental charges which the consumer may be required to pay, to ensure that the consumer will not be deceived by the advertisement as to the costs of renting the car. … The Federal Trade Commission has determined that 'bait and switch' practices are unfair or deceptive practices and are unlawful under Section 5(a)(1) of the Federal Trade Commission Act. ")

[17] U-Haul, www.uhaul.com (Apr. 24, 2006) [https://web.archive.org/web/20060424090826/http://www.uhaul.com:80/]; AnandTech, Forum (Jan. 12, 2001), https://forums.anandtech.com/threads/u-haul.437899/ (Question: "I have to move some furniture tomorrow, and there's a U-Haul place in town that has these 19.95 deals on their trucks. In the end, will it really be 19.95, or are there all kinds of hidden charges/insurance to pay?..." Answer: "$19.95 is the base rental fee. U-Haul charges a lot for mileage, and you need to return the truck with a full tank. I don't know what else they'll try to hit you for but U-Haul is good at that in my experience…")

[18] Photo taken by TINA.org.

[19] U-Haul, https://www.uhaul.com/; U-Haul Military Moves, https://www.uhaul.com/Military/.

[20] U-Haul, Facebook (Sept. 24, 2024), https://www.facebook.com/photo.php?fbid=941895887976196&set=pb.100064673804591.-2207520000&type=3; U-Haul, Facebook (Jan. 31, 2025), https://www.facebook.com/uhaul/videos/2063663990751240.

[21] On a FAQ page on its website, U-Haul specifies that "in-town" rentals are those for which the rental is returned to the same location from where it was picked up. A move within the same town but where the truck is returned to a different U-Haul rental is considered a "One-Way" rental. U-Haul Truck Rentals Frequently Asked Questions, https://www.uhaul.com/FrequentlyAskedQuestions/Truck-Rentals/. *See also* U-Haul, The Difference Between a One-Way Move & In-Town Move (Dec. 1, 2014), https://www.uhaul.com/Blog/2014/12/01/the-difference-between-a-one-way-move-in-town-move/.

What is the difference between in-town and one-way truck, towing, and trailer rentals?

One-Way truck, trailer and/or towing rentals are for one-way moves. You pick up your equipment from a rental location near your starting point, then drop it off at a different rental location near your destination.

In-Town truck, trailer and/or towing rentals are for local moves or one-time deliveries. You pick up and drop off your equipment at the same rental location.

To get started and choose a one-way or in-town truck or trailer rental, visit uhaul.com and input your pick up and drop off location(s) as well as pick up date.

[22] In addition, the advertised illusory price of $19.95 is only the purported base rate for three types of U-Haul rentals: pickup trucks, cargo vans and 10' moving trucks. The touted price does not pertain to any larger U-Haul truck rentals (e.g., 15', 20' and 26' trucks), despite marketing that displays the $19.95 price tag alongside images of larger trucks. *See, e.g.,* U-Haul, https://www.uhaul.com/.

[23] For rentals to or from certain states, including the state of Michigan, there's also a third surprise fee: a $5 "cost recovery fee."

Your Shopping Cart

Equipment Rental *Guarantee your reservation, reserve now!*

20' Truck (One-way) Rates include up to 5 day(s) and 1004 miles	1	$962.00	
Cost Recovery Fee		$3.00	
Vehicle License Recovery Fee - MI H/W Truck		$5.00	
ENVIRONMENTAL FEE		$5.00	
Scheduled Pickup 5/3/2025 at 10:00 AM Devon Self Storage			
Drop Off: 5/8/2025 Carter Building Supply Inc 1648 S Whitehead Dr De Witt, AR 72042			
Damage Coverage Safemove®	1	$96.00	
SafeTrip®	1	$7.00	

Detroit, MI to De Witt, AK

According to a pop-up that appears when clicking on the words "Cost Recovery Fee," the purpose of this fee is to "recover No Fault premiums" that may be imposed in the state of Michigan (where the owner of the vehicle involved in an accident may be liable for injury expenses, regardless of fault, when an injured party is uninsured).

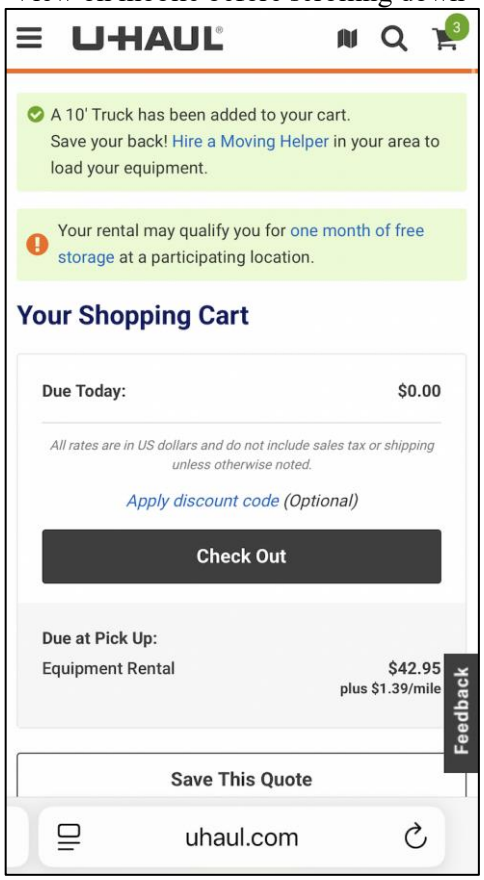
Cost Recovery Fee

In Michigan, when an injured party is uninsured and does not live with an insured relative, the owner of the vehicle involved in the incident may become liable for all reasonable expenses associated with the injury, regardless of fault. In Michigan there is no monetary cap for this liability. The purpose of this fee is to recover No Fault premiums; all fees collected will be allocated to a fund for this purpose.

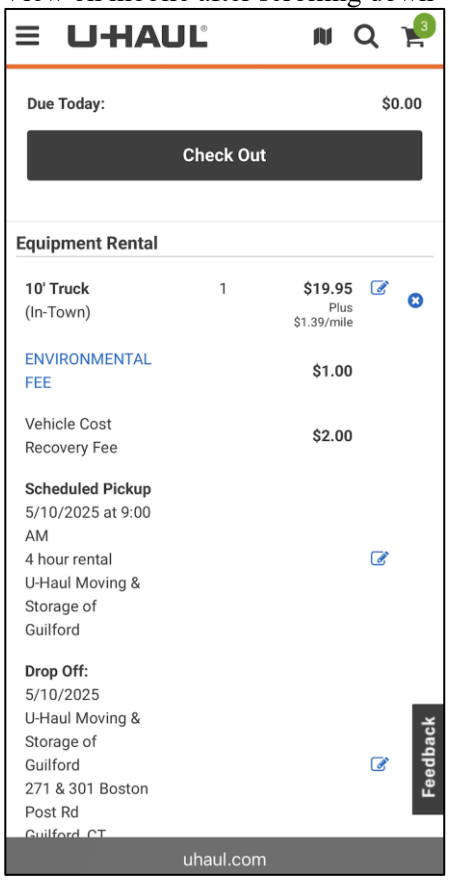
Just like the two other surprise fees, there is no way for consumers to opt-out of this previously undisclosed fee.

[24] The screenshots of the U-Haul reservation process shown in this letter were taken on a laptop computer. However, TINA.org also captured the U-Haul online reservation process on a mobile device. Of note, when making a U-Haul reservation on a mobile device, the mandatory fees are never shown to consumers unless they take the action of scrolling down beneath the "Check Out" button. *See* TINA.org's U-Haul Rental Reservation Process Database, https://truthinadvertising.org/evidence/u-haul-rental-reservation-process/.

View on mobile before scrolling down



View on mobile after scrolling down



[25] In January 2025, TINA.org reserved and paid for a U-Haul moving truck rental from a U-Haul location in Connecticut. At that time, *after* the rental was paid for, TINA.org received U-Haul rental contract information in the form of three documents: a paper U-Haul Equipment Contract, a paper Rental Contract Addendum and an emailed U-Haul Contract Rental Agreement. U-Haul Equipment Contract No. 20973024 (Jan. 14, 2025), https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Equipment-Contract_Redacted.pdf; U-Haul Rental Contract Addendum, https://truthinadvertising.org/wp-content/uploads/2025/04/Rental-Contract-Addendum.pdf; U-Haul Contract Rental Agreement (Jan. 14, 2025), https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf.

Information about the environmental fee is contained in the emailed Rental Agreement. U-Haul Contract Rental Agreement (Jan. 14, 2025), 5, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf ("**ENVIRONMENTAL FEE.** All U-Haul Vehicle rentals are subject to an environmental fee used to support and foster the development and maintenance of sustainable U-Haul business operations. For example, operations that directly benefit our customers include the use of aerodynamic fuel-saving truck skirts, the fuel economy gauge, CNG and propane trucks, storage re-use centers, and an expanding alt-fuel propane infrastructure. The fee also partially covers operations that indirectly benefit our customers, such as energy-efficient lighting and HVAC retrofits, waste-oil heaters, water recycling units, van-body storage units, permeable ground cover and other water/energy saving projects.")

Of note, U-Haul has shortened its explanation of this environmental fee over time, including removing several environmental benefit claims, including claims that its truck fleet "helps reduce hundreds of thousands of tons of greenhouse gas emissions annually" and "helps to reduce the carbon footprint of many local communities" because consumers don't have to purchase their own truck to move their belongings. *See* U-Haul's March 2015 Description of the Environmental Protection Fee, https://truthinadvertising.org/wp-content/uploads/2015/03/U-Haul-environmental-fee.pdf; *U-Haul's Hidden Fees Ad Alert*, TINA.org (May 26, 2021), https://truthinadvertising.org/articles/u-hauls-hidden-fees/.

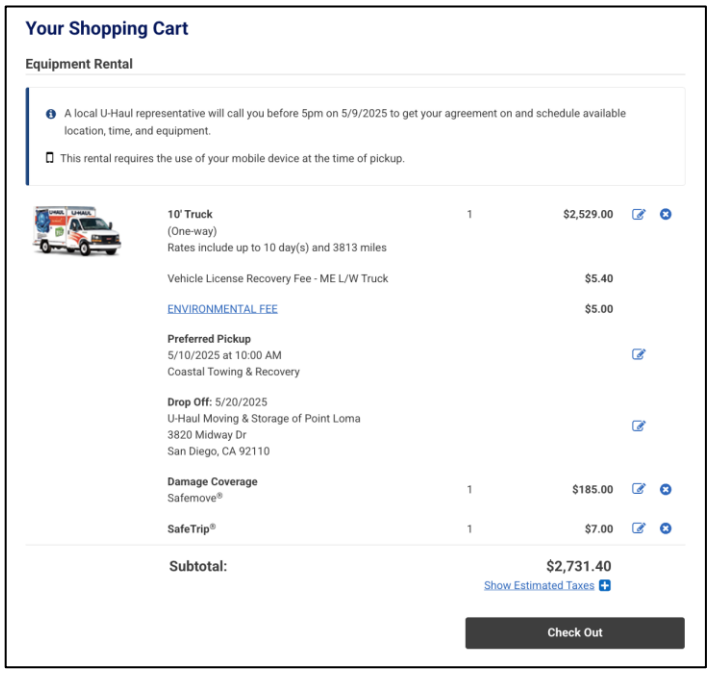
[26] For certain U-Haul rentals, this fee is called a Vehicle License Recovery Fee.

[27] While this fee is not disclosed in U-Haul's advertisements, an explanation of the fee is included in the rental contracts provided to consumers after a moving truck is reserved and paid for. U-Haul Contract Rental Agreement (Jan. 14, 2025), 6, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf ("VEHICLE LICENSE/COST RECOVERY FEE. In accordance with applicable law, rentals of U-Haul Vehicles may be subject to a Vehicle License/Cost Recovery Fee which is the estimated average per day cost incurred by Company to license, title, register, obtain number plates, and inspect its U-Haul Vehicles, and to pay any taxes owed on such U-Haul Vehicles."); U-Haul Rental Contract Addendum, https://truthinadvertising.org/wp-content/uploads/2025/04/Rental-Contract-Addendum.pdf ("Vehicle Cost Recovery Fee-- C.G.S.A. § 12-692 allows the recovery of a vehicle cost recovery fee, which as charged in this Agreement, is the estimated average per day cost incurred by the rental company for the costs to license, title, register, obtain number plates and inspect its rental trucks and to pay any taxes owed.")

Further, it is worth noting that in a 2023 blog post on its website, U-Haul seemed to suggest that Vehicle License Recovery Fees were only charged for rental cars but not for U-Haul truck rentals. *See The Rental Car Alternative,* U-Haul (July 8, 2023),

https://www.uhaul.com/Blog/2023/07/08/the-rental-car-alternative/ ("**Rental Cars** There are many rental car companies with various vehicles to choose from. However, their prices tend to fluctuate due to demand, type of vehicle, and timing. … Also, be aware of lesser-known fees rental car companies often include: … Vehicle License Recovery Fee… **U-Haul Truck Rentals** …you don't have to worry about price changes because local use of the rentals will always stay at the same base rate of $19.95. Other fees included are: • Mileage fees – extended days/miles special rates may apply • Insurance fees (optional) • Environmental fee…")

[28] Example of a rental where the Vehicle Cost/License Recovery Fee is over $5 (Trenton, ME to San Diego, CA 10' truck rental):



[29] *Vehicle License Cost Recovery Fee Definition*, Law Insider, https://www.lawinsider.com/dictionary/vehicle-license-cost-recovery-fee; Kathy Kristof, CBS News MoneyWatch.com, *29 Sneaky Fees and How to Avoid Them* (Oct. 8, 2009), https://www.cbsnews.com/news/29-sneaky-fees-and-how-to-avoid-them/.

[30] According to one consumer who was hit with these surprise fees last September,

> The company charged 2 additional fees which were not described or explained beforehand: 1) Vehicle License Recovery Fee – MI Pickup/Van - $5.00
> In the receipt paid afterwards, a description of this fee is given. However, in the Equipment Contract signed initially, there was no such description.
> 2) Environmental Fee - $1.00 There is no explanation of this fee in either the Equipment Contract or the receipt of payment. Ultimately, this company is claiming to offer a service at $19.95, but adding in $6.00 in hidden fees with no explanation or option to opt-out.

See Sept. 14, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints.

[31] U-Haul Tolls and Citations Frequently Asked Questions, https://www.uhaul.com/FrequentlyAskedQuestions/Tolls-And-Citations/. *See also* U-Haul Understanding Toll/Citation Fees, https://www.uhaul.com/Tips/Moving/Understanding-Tollcitation-Fees-32203/.

[32] The U-Haul Contract Rental Agreement and Rental Contract Addendum state that customers "may be charged a service fee of up to $30.00 (in addition to any fines, charges, fees, penalties, and surcharges associated with the Violation) as a result of any Violation paid by Company or its agent." This language implies that no such service fee will apply if the violation is paid directly by the customer. Further, the contract makes no reference to any $15-$30 administrative fee for tickets or a $1 administrative fee for toll charges. U-Haul Contract Rental Agreement (Jan. 14, 2025), 5, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf; U-Haul Rental Contract Addendum, https://truthinadvertising.org/wp-content/uploads/2025/04/Rental-Contract-Addendum.pdf.

[33] *See, e.g.,* Mehmet E., Review to BBB (Sept. 28, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("They charge $1 administration fee for EVERY small part of your toll trip separately. So basically for example you drive 8 miles in a toll road, totalling 4 dollars normally, you will see a administrative charge of $1 for EVERY single… part of that same single toll trip. That makes a $4 toll charge become $20 instead of $5. This is a total scam. They just charge you several times the administrative fees in a single trip. And multiply this with all the trips you do..."); Thomas S., Review to BBB (July 23, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("Buyer Beware!! … Towed a 12x16 on a toll road and U-Haul charged me a $1 administrative fee for every leg of the toll road basically doubling my charges. It was a continuous road and snapped a photo of the back of the vehicle. I called customer service and waited to speak to some live individual and of course they stated they could do nothing for me concerning administrative fees…."); Haris Q., Review to BBB (June 12, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("Reserved a truck and specifically asked a lady at front desk if there are any fines or additional fee to drive on toll roads since they are next to toll road - 99. She said there are no charges and after two week, I will get a bill for tolls and now I am stuck with almost three time the cost of Toll since they charge a dollar as an admin fee for each toll you run and even when toll is 0.45. Employees aren't well trained and have no basic knowledge. Dont get scammed, instead avoid toll or add a temporary plate on your toll account."); Jessemine T., Review to BBB (Feb. 16, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("Big scam artist. Lied about a price. Now they are trying to charge my card again. I had to order a new card because they are trying to charge it. I did not authorize them to charge my card without out my permission . Plus they trying double charge for tolls when I already paid them."); Complaint to FTC (Feb. 5, 2020) ("On the 18th of January I rented a truck and used it for moving. In the course of using the truck I drove through the 99 tunnel. Then several weeks after my rental I received a bill for the tolls from the U-Haul collections division with threatening language and financial penalties if I did not pay. When I contacted them about the fact that this was not made clear at the time of rental they falsely claimed that it was their policy and showed me language from some contract that I had never received. The contract language is also completely unclear as it says nothing about normal toll usage, only language about violations incurred. When I disputed the charge the response I received was also false information. They are charging people the maximum toll, plus violations the owner claimed were from the state, however upon talking to the corporate office it became

clear that U-Haul has already paid the tolls and this is all internal U-Haul policy and has nothing to do with state practices. If they wish to charge their customers for tolls then they had better make it clear in the contracting and rental process, which they failed to do."). *See also* Sept. 17, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a vehicle from U-Haul January ***** this year I did receive a parking ticket and paid it immediately. There was another ticket that was on the system for the sheriffs department with a different violation number and a different violation date. U-Haul decided eight months later they were going to charge my credit card fraudulently for that ticket, which resulted in a fraud alert and at eight months later, Im not thinking that its something from January that does not pertain to me now my business credit card is canceled and my business relationships have to be revisited and I have to wait for a new credit card which is a big inconvenience for me … I was forced to go online myself look for the ticket showed it was paid and also showed that their ticket that was still outstanding with a different violation date and a different ticket number that they couldve clearly had seen that I did not have the rental on this date, they decided to charge my credit card in the middle of the night, which resulted in a fraud alert And then the next day started sending emails to let me know that I have an outstanding balance and notifications on my telephone through their app when, in fact, they should have communicated with me first, and I could have alerted them that I paid my ticket and the other ticket did not belong to me. There Miss handling of this has altered my business. I am self-employed and it has halted my benders from getting paid. I am reporting this as a fraudulent charge …")

All typographical errors present in consumer complaints recited in this letter are in the original.

Of note, undisclosed toll fees have been the subject of state enforcement actions. *See e.g.,* Settlement Agreement, *Florida v. Dollar Thrifty Auto. Group*, No. 2016-2018-CV-005938 (Fla. Duval County Ct., Jan. 7, 2019), https://www.myfloridalegal.com/files/pdf/page/9B8E6D9D013832278525838A0073F068/Final+Signed+DTAG+Settlement+Agreement+1+11+19.pdf (Florida Attorney General's office reached a settlement agreement with Dollar Thrifty for charging consumers undisclosed toll fees when renting its cars).

[34] *See, e.g.,* GEICO Living's Everything You Need to Know About Rental Car Insurance, https://living.geico.com/driving/auto/car-safety-insurance/does-car-insurance-cover-rental-cars/; Nationwide's Does Car Insurance Cover Rental Cars?, https://www.nationwide.com/lc/resources/auto-insurance/articles/does-insurance-cover-rental-cars; Progressive's Do I Need Rental Car Insurance?, https://www.progressive.com/answers/rental-car-insurance/; Progressive's Does My Car Insurance Cover a Moving Truck Rental?, https://www.progressive.com/answers/does-car-insurance-cover-moving-trucks/; Nationwide's Does My Car Insurance Cover Renting a Moving Truck?, https://www.nationwide.com/lc/resources/auto-insurance/articles/does-car-insurance-cover-rental-trucks; CarInsurance.com's Is a Moving Rental Truck Covered By Your Auto Policy?, https://www.carinsurance.com/Articles/rental-trucks-insurance-coverage.aspx.

[35] U-Haul's Do I Really Need U-Haul Insurance?, https://www.uhaul.com/Tips/Safety/Do-I-Really-Need-U-Haul-Insurance-33496/.

Examples of U-Haul rental insurance fees:

Damage Protection

Credit cards and most auto insurance policies do not cover damage or theft to rental equipment, even if they cover damage to rental cars. As a result, we proudly offer protection packages to relieve you of responsibility for damage to our equipment.
Please choose a protection plan.

Continue

Truck Rental Coverage

Safemove® — **$64.00** — Most popular
Covers accident damage and theft of U-Haul trucks; accident damage to your belongings, and includes medical/life protection for you and your passenger. *Up to $80,000 in potential benefits.*

Safemove Plus® — **$109.00**
Our Premium Protection Package: This includes all the benefits of Safemove®
- **PLUS: No Deductible** for claims on **ANY** accidental damage to the U-Haul truck.
- **PLUS: $1,000,000** in supplemental liability coverage.

Immediately reimburse U-Haul for damage.
The rental truck you have selected has an approximate value of up to $35,000 USD.
Credit cards and most auto insurance policies do not cover damage to rental trucks.

(Detroit, MI to Bloomington, IN, 10' truck rental)

Damage Protection

Credit cards and most auto insurance policies do not cover damage or theft to rental equipment, even if they cover damage to rental cars. As a result, we proudly offer protection packages to relieve you of responsibility for damage to our equipment.
Please choose a protection plan.

Continue

Truck Rental Coverage

Safemove® — **$185.00** — Most popular
Covers accident damage and theft of U-Haul trucks; accident damage to your belongings, and includes medical/life protection for you and your passenger. *Up to $80,000 in potential benefits.*

Safemove Plus® — **$235.00**
Our Premium Protection Package: This includes all the benefits of Safemove®
- **PLUS: No Deductible** for claims on **ANY** accidental damage to the U-Haul truck.
- **PLUS: $1,000,000** in supplemental liability coverage.

Immediately reimburse U-Haul for damage.
The rental truck you have selected has an approximate value of up to $75,000 USD.
Credit cards and most auto insurance policies do not cover damage to rental trucks.

(Ukiah, CA to Eastport, ME, 26' truck rental)

[36] For some reservations, U-Haul also offers Safemove Plus, its "Premium Protection Package," the cost of which starts at $28, as the examples below show. U-Haul's Do I Really Need U-Haul Insurance?, https://www.uhaul.com/Tips/Safety/Do-I-Really-Need-U-Haul-Insurance-33496/.

Damage Protection

Credit cards and most auto insurance policies do not cover damage or theft to rental equipment, even if they cover damage to rental cars. As a result, we proudly offer protection packages to relieve you of responsibility for damage to our equipment.
Please choose a protection plan.

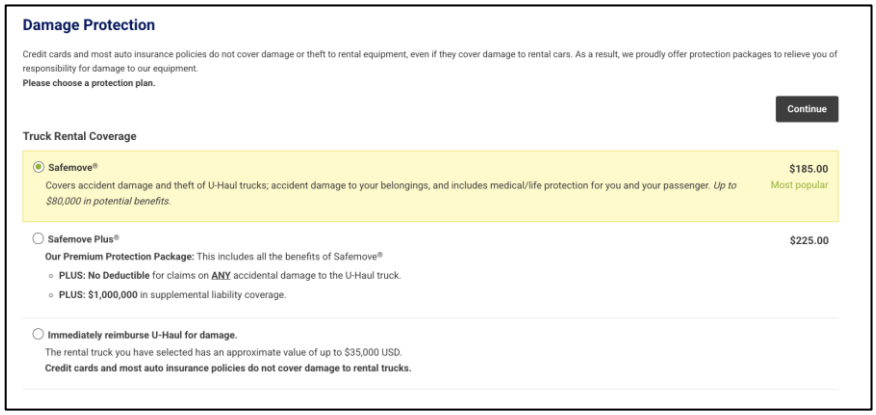
Continue

Truck Rental Coverage

Safemove® — **$15.00** — Most popular
Covers accident damage and theft of U-Haul trucks; accident damage to your belongings, and includes medical/life protection for you and your passenger. *Up to $80,000 in potential benefits.*

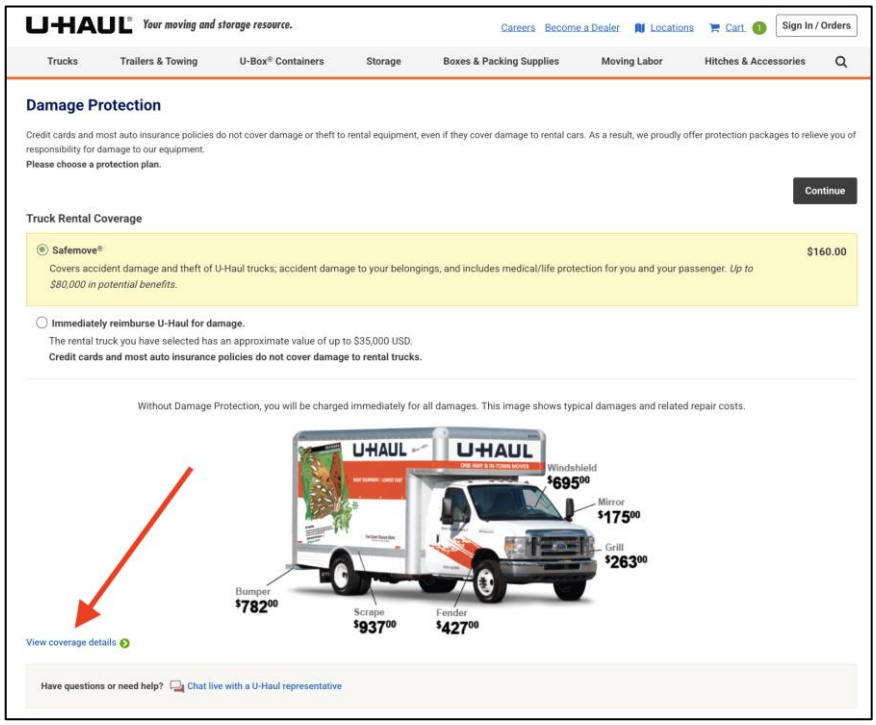
Safemove Plus® — **$28.00**
Our Premium Protection Package: This includes all the benefits of Safemove®
- **PLUS: No Deductible** for claims on **ANY** accidental damage to the U-Haul truck.
- **PLUS: $1,000,000** in supplemental liability coverage.

Immediately reimburse U-Haul for damage.
The rental truck you have selected has an approximate value of up to $35,000 USD.
Credit cards and most auto insurance policies do not cover damage to rental trucks.



According to U-Haul, Safemove Plus "includes all the benefits of Safemove…PLUS: No Deductible for claims on ANY accidental damage to the U-Haul truck. PLUS: $1,000,000 in supplemental liability coverage." As with U-Haul's Safemove coverage, more information about Safemove Plus can be found on a separate webpage regarding damage coverage. *See* U-Haul Damage Coverage, https://www.uhaul.com/DamageCoverage/.

[37] U-Haul does not clearly and conspicuously disclose the terms and limitations of its advertised insurance coverage. For starters, the option to "View coverage details" is in fine print at the bottom of the page, as shown in the screenshot below.



Consumers who happen to notice and click on this link are taken to a "Damage Coverage" webpage, where additional information regarding the insurance coverage is disclosed, including the deductible amounts. *See* U-Haul Damage Coverage, https://www.uhaul.com/DamageCoverage/. There, consumers are also told that Safemove covers "most accident damage to rental equipment," which is a slightly different message U-Haul

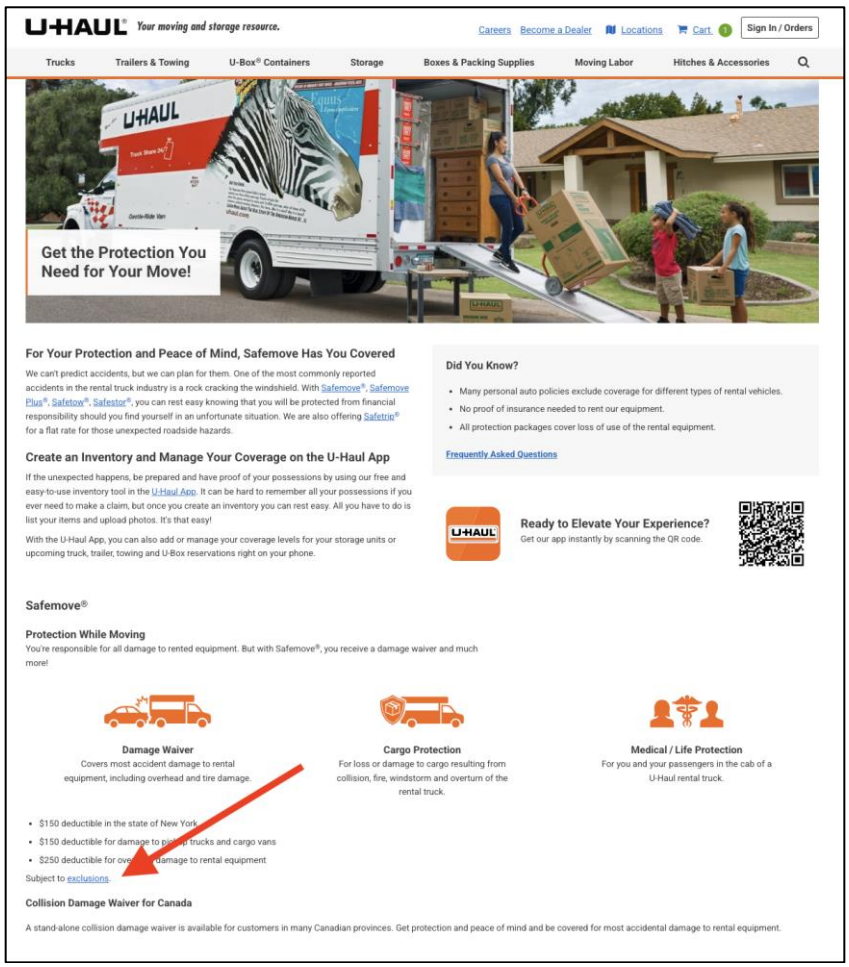
conveys at the time the preselected offer is provided during the reservation process (i.e., "Covers accident damage and theft of U-Haul trucks…")

U-Haul SafeMove page during online reservation process, https://www.uhaul.com/Reservations/SafeMove/.

vs.

U-Haul Damage Coverage, https://www.uhaul.com/DamageCoverage/.

Further, to learn about the insurance coverage's exclusions, consumers need to click on yet another inconspicuous link, as shown in the screenshot below.



Consumers who click on this "exclusions" link will then see a pop-up screen where they will be informed, for the first time during the check-out process, that U-Haul's Safemove insurance does not cover, for example, "mechanical damage including damage to the transmission or drive train as the result of attempting to rock the truck back and forth when stuck in the ice, mud or snow."

Exclusions

All exclusions are explained in the Rental Contract and Document Holder. Certificates of Coverage for Safestor® and Safehaul® can be found here.

*New York locations have a $150 Damage Waiver deductible with Safemove®.
**Other rates apply for Corporate Business Accounts.

Safemove and Safemove Plus® are subject to exclusions set forth in the U-Haul rental contract addendum. Damage caused by misuse or abuse of the equipment and off-road use are two specific exclusions not covered by Safemove or CDW. Collision with an overhead object is subject to a $250 deductible.

Safemove Plus® is not available for U-Haul pickup and van rentals.

Safemove Plus® is not available in Canada, New York, New Jersey, Nevada, Louisiana and Connecticut. Ask your local representative for details. Due to the reason of increased repair costs, Safemove, Safetow and Safemove Plus® rates are often times dynamic and vary from city to city.

Safemove, Safemove Plus®, CDW and Safetow will cover theft of your rented U-Haul equipment if neglect did not play a role in its disappearance. At no time will Safemove, Safemove Plus or Safetow cover theft of your owned motor vehicle, accessories, or personal contents in the towed trailer or rented truck.

Mechanical damage including damage to the transmission or drive train as the result of attempting to rock the truck back and forth when stuck in the ice, mud or snow, is specifically excluded with Safemove, Safemove Plus coverage. In the event you experience this situation, please call 1-800-528-0355 for assistance. For a list of other exclusions, see the rental contract addendum provided with your rental contract. These programs may or may not be in excess of what your current insurer already provides. Please check with your insurer to see if your insurance will cover rental trucks and trailers.

The purchase of Safemove and Safemove Plus® is not required in order to rent a U-Haul truck or trailer but **many personal auto policies do not cover rental truck or trailer rentals**. However, your personal insurance policy providing coverage on an owned automobile, or other personal policy, may provide additional coverage, and to the extent, ALI may provide a duplication of coverage. You should check with your insurance carrier prior to your rental.

The protection afforded by SLI (if it is accepted), is primary to your own policies.

Safemove Plus®, an additional liability coverage, should there happen to be a bodily injury or property damage claim made against you during the course of your U-Haul rental. Safemove Plus® also provides a damage waiver, cargo protection and medical life protection for "all around" coverage. You and authorized drivers are covered while driving your U-Haul rental truck within the United States and Canada, but only if the truck is rented and returned in the United States. SLI safeguards your personal insurance policy for the first $1,000,000 of losses. Your personal auto policies may or may not cover rental trucks. Your policy should be thoroughly checked for the terms and conditions associated with rental trucks. If you are not sure of the extent of your policy's coverage, ask your insurance agent or your insurance company (U-Haul representatives and agents are not qualified to evaluate the adequacy of your personal auto policy). **No credit card companies cover rental trucks**. As with any policy, you should check the extent of the coverage carefully with the card issuer. All exclusions, terms and conditions are stated in the policy; it is important that you read the policy carefully.

Repwest Insurance Company is a United States insurance company incorporated under the laws of the State of Arizona and is licensed to sell insurance products in all states and the District of Columbia, excluding Hawaii and Canada. All products are not offered in all states. Please refer to the product pages for applicable states of coverage. The descriptions of Repwest Insurance Company's insurance products and services on this World Wide Web site are provided for your general information. The insurance products and services are subject to the terms and conditions of the policies issued. Please review your policy when received for complete information. Product availability varies by state. Repwest Insurance Company makes no representation that the content provided is applicable or appropriate for use in other locations.

Safemove, Safestor and Safetow are subject to exclusions set forth in the U-Haul rental and storage rental contract. Safemove, Safestor and Safetow are not liability insurance and each is optional.

Safemove, Safestor and Safetow are subject to exclusions set forth in the U-Haul rental and storage rental contract. Safemove, Safestor and Safetow are not liability insurance and each is optional. Some portions of these protection packages are underwritten in the USA by Repwest Insurance Company, Phoenix, Arizona. In Canada, some portions are underwritten by Chubb Insurance Company. Customers owning real or personal property may have policies that provide similar coverage elements (check your policies). Any questions, call 1-800-528-0463, ext. 672045. File a claim online or call 1-800-528-7134 (USA), 1-800-661-1069 (Canada).

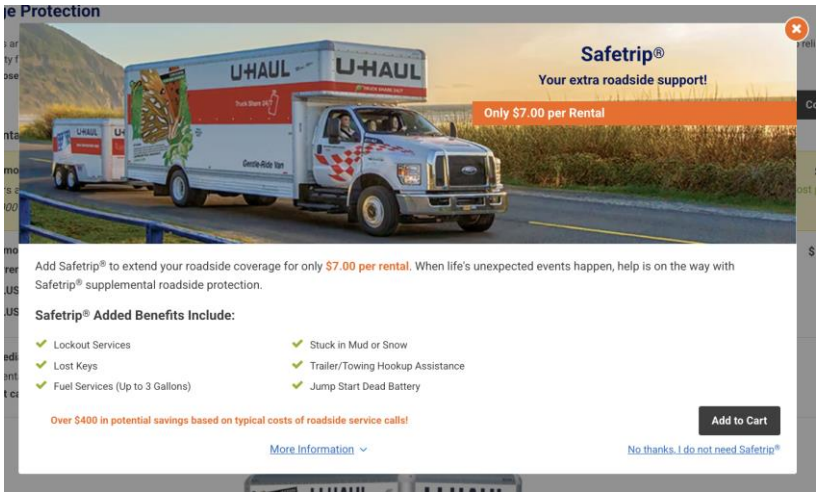
All of the protection packages cover loss of use of the rental equipment. Authorized drivers are also covered as long as they are at least 18 years of age and possess a driver's license, driver's privilege card, or other government issued driver's card.

Have questions about or need help with Safemove®, Safemove Plus®, Safetow® Safetrip®?
Contact a damage coverage specialist at Safemove@uhaul.com

However, this pop-up does not include *all* of the exclusions. In fact, the pop-up states, "For a list of other exclusions, see the rental contract addendum provided with your rental contract." But as noted previously, consumers do not receive the rental contract and addendum until after a reservation is made and paid for.

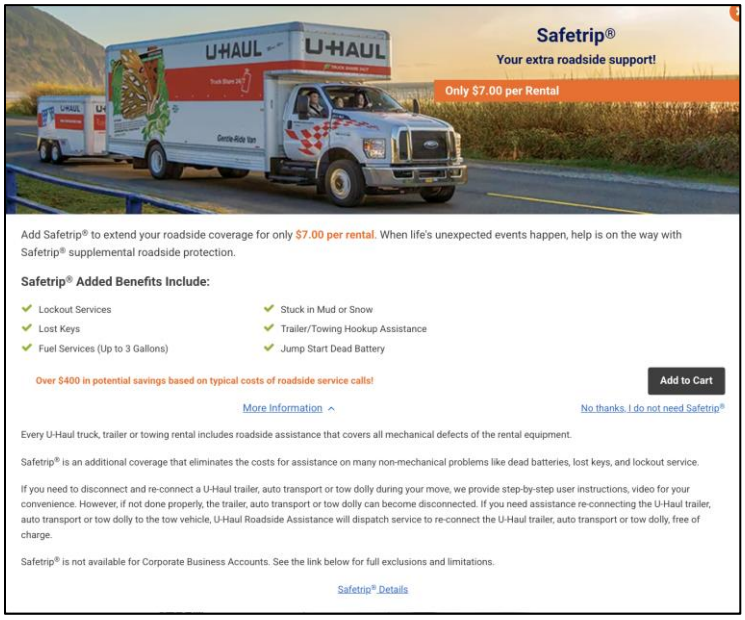
TINA.org's experience appears similar to that of other consumers. *See e.g.,* Complaint to FTC (Sept. 14, 2023) ("… in some cases U-Haul does not show you a contract at the time of rental. They will text you a contract after the fact. I believe that any reasonable person would consider these actions at the least deceptive, and most would call it fraud. The fees are out of line. They should be emphasized up front, particularly in cases where the fees are many times the rental fees. I also think most people would consider these fees exorbitant, particularly when you consider that the people paying these fees, (in most cases) are stuck and do not have a choice…")

[38] Example of a rental for which Safetrip costs $7:

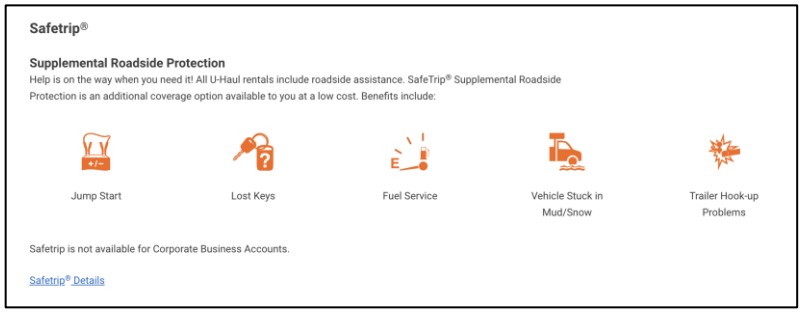


(Detroit, MI to Bloomington, IN, 10' truck rental)

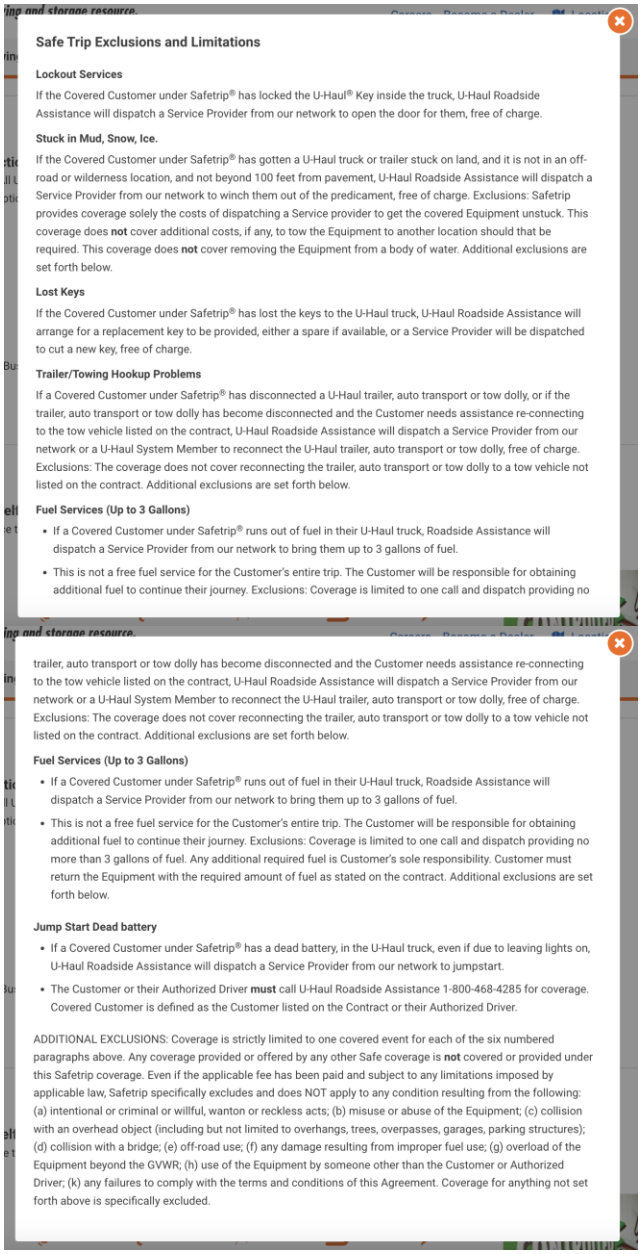
[39] Clicking on "More information" at the bottom of the screenshot shown above reveals the following additional information:



Clicking on "Safetrip Details" at the bottom of this screen leads consumers to another webpage regarding Safetrip. U-Haul Safetrip, https://www.uhaul.com/DamageCoverage/#section_safetrip.



Clicking on "Safetrip Details" at the bottom of the screenshot shown above brings up the pop-up information shown below:



Safe Trip Exclusions and Limitations

Lockout Services

If the Covered Customer under Safetrip® has locked the U-Haul® Key inside the truck, U-Haul Roadside Assistance will dispatch a Service Provider from our network to open the door for them, free of charge.

Stuck in Mud, Snow, Ice.

If the Covered Customer under Safetrip® has gotten a U-Haul truck or trailer stuck on land, and it is not in an off-road or wilderness location, and not beyond 100 feet from pavement, U-Haul Roadside Assistance will dispatch a Service Provider from our network to winch them out of the predicament, free of charge. Exclusions: Safetrip provides coverage solely the costs of dispatching a Service provider to get the covered Equipment unstuck. This coverage does **not** cover additional costs, if any, to tow the Equipment to another location should that be required. This coverage does **not** cover removing the Equipment from a body of water. Additional exclusions are set forth below.

Lost Keys

If the Covered Customer under Safetrip® has lost the keys to the U-Haul truck, U-Haul Roadside Assistance will arrange for a replacement key to be provided, either a spare if available, or a Service Provider will be dispatched to cut a new key, free of charge.

Trailer/Towing Hookup Problems

If a Covered Customer under Safetrip® has disconnected a U-Haul trailer, auto transport or tow dolly, or if the trailer, auto transport or tow dolly has become disconnected and the Customer needs assistance re-connecting to the tow vehicle listed on the contract, U-Haul Roadside Assistance will dispatch a Service Provider from our network or a U-Haul System Member to reconnect the U-Haul trailer, auto transport or tow dolly, free of charge. Exclusions: The coverage does not cover reconnecting the trailer, auto transport or tow dolly to a tow vehicle not listed on the contract. Additional exclusions are set forth below.

Fuel Services (Up to 3 Gallons)

- If a Covered Customer under Safetrip® runs out of fuel in their U-Haul truck, Roadside Assistance will dispatch a Service Provider from our network to bring them up to 3 gallons of fuel.
- This is not a free fuel service for the Customer's entire trip. The Customer will be responsible for obtaining additional fuel to continue their journey. Exclusions: Coverage is limited to one call and dispatch providing no

trailer, auto transport or tow dolly has become disconnected and the Customer needs assistance re-connecting to the tow vehicle listed on the contract, U-Haul Roadside Assistance will dispatch a Service Provider from our network or a U-Haul System Member to reconnect the U-Haul trailer, auto transport or tow dolly, free of charge. Exclusions: The coverage does not cover reconnecting the trailer, auto transport or tow dolly to a tow vehicle not listed on the contract. Additional exclusions are set forth below.

Fuel Services (Up to 3 Gallons)

- If a Covered Customer under Safetrip® runs out of fuel in their U-Haul truck, Roadside Assistance will dispatch a Service Provider from our network to bring them up to 3 gallons of fuel.
- This is not a free fuel service for the Customer's entire trip. The Customer will be responsible for obtaining additional fuel to continue their journey. Exclusions: Coverage is limited to one call and dispatch providing no more than 3 gallons of fuel. Any additional required fuel is Customer's sole responsibility. Customer must return the Equipment with the required amount of fuel as stated on the contract. Additional exclusions are set forth below.

Jump Start Dead battery

- If a Covered Customer under Safetrip® has a dead battery, in the U-Haul truck, even if due to leaving lights on, U-Haul Roadside Assistance will dispatch a Service Provider from our network to jumpstart.
- The Customer or their Authorized Driver **must** call U-Haul Roadside Assistance 1-800-468-4285 for coverage. Covered Customer is defined as the Customer listed on the Contract or their Authorized Driver.

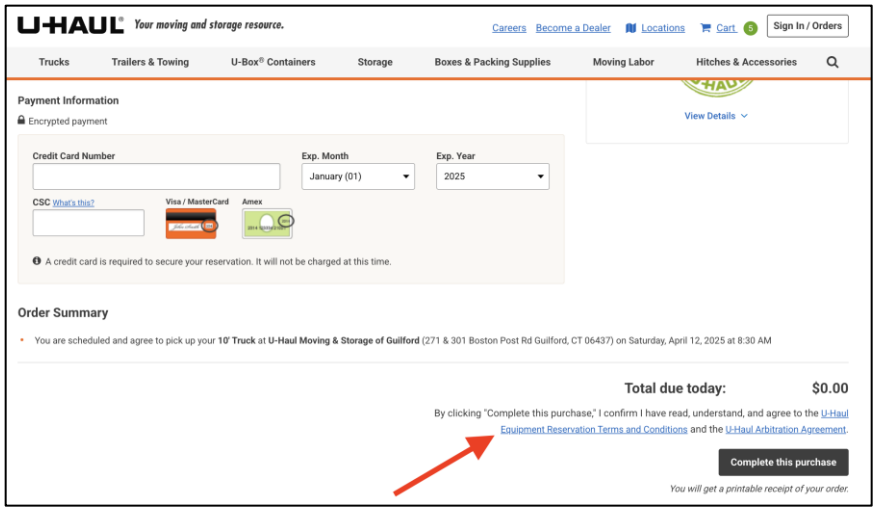
ADDITIONAL EXCLUSIONS: Coverage is strictly limited to one covered event for each of the six numbered paragraphs above. Any coverage provided or offered by any other Safe coverage is **not** covered or provided under this Safetrip coverage. Even if the applicable fee has been paid and subject to any limitations imposed by applicable law, Safetrip specifically excludes and does NOT apply to any condition resulting from the following: (a) intentional or criminal or willful, wanton or reckless acts; (b) misuse or abuse of the Equipment; (c) collision with an overhead object (including but not limited to overhangs, trees, overpasses, garages, parking structures); (d) collision with a bridge; (e) off-road use; (f) any damage resulting from improper fuel use; (g) overload of the Equipment beyond the GVWR; (h) use of the Equipment by someone other than the Customer or Authorized Driver; (k) any failures to comply with the terms and conditions of this Agreement. Coverage for anything not set forth above is specifically excluded.

[40] *See, e.g.,* Complaint to FTC (Oct. 5, 2024) ("I made a reservation for a pickup truck rental online at uhaul.com Uhaul offers an optional damage coverage for $15 but when I went to the Concord store to pickup the rental I was told that the coverage is not optional and I was forced to pay for the coverage even though I have insurance of my own. This is classic bait and switch. On top of this, Uhaul gains unfair advantage over the competition by advertising lower rates."); Bonni F., Review to BBB (June 11, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("We needed to help a friend with a local move. We rented a U-haul for three (3) days, the company charged us for four (4) days. They said nothing about insurance and then they charged an added out of know where fee for

insurance that we did NOT ask for. As a company they should (and do) have their own insurance. We also have our own insurance so why would we pay for a third insurance service. That is a (swear-word) scam!! Then they charged our account three times twice before we took the truck and then a final huge amount after we returned the truck. ALL three charges went through and put our account into the RED. … Reading all of these negative reviews I wonder if U-Haul just does all of these added charges in the hopes that half of their customers will not notice because they are so stressed and busy moving. Those that do notice are just too tired to fight the lair charges. I think the Attorney General of each state need to look very closely at U-haul and their unfair and (I think) fraudulent ways and activities."); May 31, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("Placed reservation … on 5/22/2024 and picked up on 5/25/2024 and upon pickup of 10 ft moving truck. The reservation was then redone completely causing me to be billed a new rate and safe drive or whatever the insurance is was added without my consent causing excess charges around $50 more than quoted and locked in during original reservation where the total shouldve been $163 instead of the $234.96 at end of rental that I had less than 12 hours total time. … I called and spoke with uhaul rep … on 5/27/2024 stating I would receive a call back from area manager … who has yet to contact me back … and still awaiting contact from uhaul like promised. When called back again for third time (5/31/2024) was told by rep if I dont hear back by COB today to contact uhaul back again and U-Haul will escalate again. This is a lot of work as a paying customer for me to be doing to correct the theft committed by uhaul fixed for U-Hauls fraudulent charges!"); Mark S., Review to BBB (Apr. 15, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("I booked a van for 1 week rental, and was quoted 330$ for the rental. When I went to pick it up the store clerk refused to give me the keys unless I paid about 112 extra for Insurance. This was not in the rental agreement, but had to pay it since I'd be stranded there with no vehicle and no way to work for the week. He wasted 1 hr of my time arguing, I talked to 2 customer service reps who said nothing can be done, and I sent 2 emails to customer service that have been ignored. Absolutely atrocious customer service and less than ethical practices. -5 stars."); Mar. 8, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("Hi Uhaul! I just rented a 26' truck and auto transport.. and unfortunately the entire process has been quite a bit of a mess, and ended up costing me quite a bit more than I was expected after talking to several employees. … Almost every step of the way I was hit with unexpected news.. … Turns out there's a $30/day for the insurance, even though the truck was just sitting outside my new house being unloaded. The uhaul rep said 'Thats how they get you! They don't tell you about that part!' which set a bad tone.Unfortunately, the whole experience just seemed pretty negative. … I just didn't expect the extra days to double that cost.If there's anything that can be done about even the extra $30/day for insurance, it would be much appreciated. I do see now (after talking to uhaul) that it's on the contract, but the most I was told was $40/day for the truck, $20 for the trailer and $11 for insurance."); Complaint to FTC (May 23, 2022) ("I reserved a truck online and declined additional insurance coverage. Contract rate was $19.95 plus mileage for a 4-hour rental that was to be returned after-hours by agreement with the man at the store who gave me the keys and told me how to return it. I returned the truck in good condition with slightly more gas than was in it when I started the rental. My final invoice billed me for $28 in insurance, $39.90 for the rental, and an 'environmental fee' of $2.00. Mileage was accurate (8 miles), so my bill should have been just about $31 plus tax. Instead, my total charge was somehow $89.57. I called and spoke to the man at the store the next day, who said he would fix it and text me back with how much he was refunding. He never did. I then called today and was routed to a customer service line … On Friday May 20, I got an email with an arbitrarily determined $50 refund listed (no precision in calculation of adjusted taxes). I fear that this is happening on a regular basis to people given how seamlessly it took place and how

multiple factors contributed… Without my numerous calls and patience, I don't think they would have ever followed up for me and other people must be getting ripped off with these practices."); Complaint to FTC (Jan. 13, 2022) ("I made an online reservation for an U-Haul auto transport trailer … My online reservation clearly showed that I declined the optional insurance coverage. When I arrive at the scheduled pick-up time, they tried to charge me for the optional insurance coverage. They did not ask if I wanted insurance and they automatically added it, but I luckily did the math in my head and caught the fraudulent charge. Edward was sitting nearby and said the system always adds it anyway whether it was declined online or not. What that tells me is that management clearly understands that the system will add charges without the customer knowing about it and that U-Haul employees do nothing about it. How many people have they taken advantage of …?"). *See also* Jan. 16, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("Rented October 24th 2023 Brought Back October 25th 2023 I was notified of damage Nov 13 2023 I have rented from uhaul ********** atleast 10 times a year. I needed a pickup truck so had to go to this one to get one.No problem getting it or to drop off. Then 2 weeks later I get a letter that I caused damage to the bumper and they were charging me $140 even though I bought the insurance.Insurance dosen't cover trucks with a removable hitch.I returned the truck without any damage. How can they take 2 weeks to tell me I had damaged it.So then I called the main office they agreed it was unusual that they didn't notify me right away.They said I would be able to dispute it but the person that would make the decision is the district manager. He is also the owner of that particular Uhaul. He is a dirtbag con artist. So obviously he said I was guilty.Now I get a letter that they are seeking collections on me for the damage.So they con me into buying insurance that dosen't even cover the vehicle and then they probably damaged it themselves and try to get me for it.Now they sent me to collections for the damage I didn't cause.")

[41] The screenshot below shows where these terms can be found during the U-Haul moving truck online reservation process:



[42] Extra mileage fees are mentioned in U-Haul's terms and conditions and post-payment contracts provided to consumers. U-Haul Equipment Reservation Terms and Conditions, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Equipment-Reservation-Terms-and-Conditions.mp4; U-haul Contract Rental Agreement, 3, (Jan. 14, 2025), https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf; U-Haul Rental Contract Addendum, https://truthinadvertising.org/wp-

content/uploads/2025/04/Rental-Contract-Addendum.pdf (**"EQUIPMENT RETURN; DISPOSAL OF CARGO** Customer is solely responsible to ensure return of Equipment …within the allowed mileage stated . . . Customer understands and agrees any operation of Equipment outside of the … allowed mileage stated is without Company's consent and additional charges will be assessed."). These fees are also mentioned in an FAQ webpage. U-Haul Truck Rentals Frequently Asked Questions, https://www.uhaul.com/FrequentlyAskedQuestions/Truck-Rentals/ ("Can I purchase additional miles on my one-way move? Yes. The fee is $1.00 per mile if you exceed the allowed mileage.")

Numerous consumers have complained about being charged such fees even when they did not exceed the reserved mileage. *See, e.g.,* Sept. 18, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("… When I returned the truck I was informed that I went over the miles, & I disagreed … on 09/17/24 u-haul went into my bank account and deducted $60.12 without my permission"); Sept. 5, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("Uhaul took advantage of my son and my credit card. They are stating we drove this uhaul for 280 miles. When my old location is .02 miles away and the new address. 01 miles away. They are abusing the system and applying extra charges to consumers. When I reach out to corporate they have the same location to take up my concerns…."); Sept. 2, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("… The total amount of mileage between my previous address and new address was 32 miles …On August 30, 2024 I received an alert from my credit card that $815.36 was charged by u haul.. I called U-Haul and spoke with a representative and it was told to me that the reason for the charge is because I drove 700 miles over I advised the young lady that thats is not true … No one reached back out to me and I need this matter to be resolved immediately.. From my understanding all the u haul truck have tracking devices and I ask that they track this truck from point A to point B.."); Aug. 31, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a Uhaul and was charged twice for the trip, then Uhaul came back and charged me 240 dollars by making up charges when I didnt go that far in mileage and only had the truck 2 days. I tried to talk to Uhaul they denied to refund …."); Zach B., Review to BBB (Aug. 29, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("Fraudulently changed the starting mileage on the van so they could charge me an extra $50 for 100 extra miles. The math does not add up. Despicable business practices. Theyve done it to several people as well. They lie to your face and claim your money is theirs."); Aug. 26, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("…I have been significantly overcharged for a truck rental on 7/27. I had the truck from 10am to about 2:45pm and went approximately 10.5 miles (I have several records on my cell phone than confirm my location throughout the day). I have been charged $699.71 (actual charge was $964.63 but they applied a $295.02 credit for an unknown reason) for going 795 miles. The truck was in my possession from approximately 10:00am to 2:40pm. It is physically impossible for me to have driven the truck that for in that amount of time. …I have called customer service 4+ times and visited the store in person before finally speaking with the general manager who refused to acknowledge there is a discrepancy in timeline and mileage charges on my receipt."); Complaint to FTC (May 5, 2024) ("I only rented a U-Haul for 4 days and was upsold from the one I had reserved to a 26ft box truck and only went a distance of about 50 100 miles total for ALL the trips It's literally impossible for me to have used that much mileage in a 4 day span let alone a week. I would like a full refund if THIS is how they're going to conduct

business."); Mar. 20, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("On 3/2/24 I rented a U-Haul to move. I knew the exact mileage from U-Haul to my old apartment and from my old apartment to my new apartment and back to U-Haul. I inputted that mileage in my rental to have an exact amount. … We drove exactly 66 miles. I have an app that shows the exact miles. They charged me for driving 179 miles and I asked them how. There is no way possible way. I showed them my app that showed me leaving their store to go to my old place and then my new and back to them. It has the times and all. They absolutely refused to listen to me and told me that their mileage is correct…."); Complaint to FTC (Dec. 21, 2022) ("On November 19th 2022 at 9:32 am I rented a truck in U-Haul West Palm Beach. … I drove the truck around 25 miles. I returned after 7.5 hours. Nobody checked the truck. After that day U-Haul sent me a message saying I used the truck for 240 miles and I have to pay U$285. My complaint is How U-Haul can Affirm I used the truck for 240 miles if nobody makes a pre or post inspection?. If this is my case, how many people before me suffer the same problem.? I used the truck inside the city limits I made two travels from my old home to the new place, distance is 4.7 miles (4.7 x4) plus the distance from U-Haul store to the old house (0.9 miles) and then returned to the U-Haul store (4.8 miles) To get a total of 24.5 miles. I am demanding the non-payment of this invoice because I never used the truck as U-haul claims and also because nobody inspected the truck before or after using it. How can U-haul claim that no one used the truck after I delivered it? I already had $98 dollars deducted from the rental of the truck and that is what I used…."); Complaint to FTC (July 31, 2022) ("At 9:16 am on July 27, 2022, I rented Pickup … from U-Haul…. I was asked if I was going more than 50 mls, I explained to them that Ill be going a lot less than 50 mls. So they listed that Ill be going 50 mls. … The total distance I drove was approximately 12.9 miles. Yet when I return the vehicle the U-Haul attendant spent all of 6 minutes in the vehicle, then told me that the total distance I drove was 110 miles. I worked alone and I have pictures of my load and pictures of the 2.5 hrs I spent unloading the items from the U-Haul to my truck. This is a scam, especially when that vehicle is equipped with a GPS device. This means that U-Haul had the capability of tracking their vehicle every second of the day….")

[43] Rental extension fees are mentioned in U-Haul's terms and conditions and post-payment contracts provided to consumers. U-Haul Equipment Reservation Terms and Conditions, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Equipment-Reservation-Terms-and-Conditions.mp4; U-Haul Contract Rental Agreement (Jan. 14, 2025), 3, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf; U-Haul Rental Contract Addendum, https://truthinadvertising.org/wp-content/uploads/2025/04/Rental-Contract-Addendum.pdf. (**"EQUIPMENT RETURN; DISPOSAL OF CARGO** Customer is solely responsible to ensure return of Equipment at the time … agreed to . . . . Customer understands and agrees any operation of Equipment outside of the time agreed … is without Company's consent and additional charges will be assessed."). These fees are also mentioned on an FAQ webpage. U-Haul Truck Rentals Frequently Asked Questions, https://www.uhaul.com/FrequentlyAskedQuestions/Truck-Rentals/ ("Can I purchase additional days on my one-way move? Yes. However, it's critical for you to plan this in advance with your pickup location so that your rental contract will be accurate and so that scheduling for other families at your destination can be adjusted. The prepaid fees for extra days are outlined below: U-Haul trucks - $40 per day…")

Consumers have complained of being charged rental extension fees without notice. *See, e.g.,* Complaint to FTC (Sept. 14, 2023) ("A little over a month ago I rented a truck from U-Haul in Denton Texas. I needed the truck for an extra day and was surprised to find that there was a $65.00 penalty for extending the rental an extra day. I felt cheated since no mention was made either verbally or in the contract that I was given at the time of rental, but I was stuck so I paid the

fee. A month later I needed a trailer so when I went back to U-Haul I asked twice if there would be a penalty for extending the rental, and twice I was told that there would be no penalty. Two days later, when I called to extend the rental for one day, I was charged over one hundred dollars for extending the rental on a $29.95 per day trailer…")

[44] Cleaning fees are mentioned in U-Haul's post-payment contracts provided to consumers. U-Haul Contract Rental Agreement (Jan. 14, 2025), 4, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf; U-Haul Rental Contract Addendum, https://truthinadvertising.org/wp-content/uploads/2025/04/Rental-Contract-Addendum.pdf. ("Customer agrees to be fully responsible to Company, or their affiliated entities and agents, for all charges relating to the rental of Equipment that may be incurred by Customer, any Authorized Driver, or any Unauthorized Driver that Customer or any Authorized Driver allowed to operate Equipment, including charges and fees for …cleaning…."). *See also What to Expect When Returning a Moving Truck*, U-Haul (Aug. 21, 2013), https://www.uhaul.com/Blog/2013/08/21/what-to-expect-when-returning-a-moving-truck/.

Consumers have complained of being charged cleaning fees even when the truck was dirty when it was originally rented or when the truck was returned clean. *See, e.g.,* Sept. 5, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a U-Haul and had a very bad experience. They tried to charge me … a $1000 cleaning fee. When i picked up the truck, it was not clean at all, the check engine light was on, and gas cap warning light as well. I have pictures to prove this. … We swept the back of the truck, rinsed it down, and wiped down the interior. I am very confused how $1000 would be justified for cleaning in this scenario. The manager said that the dust in the engine bay caused it to break down which is confusing since the check engine light was already on and also said the truck was very muddy, which it was before we picked it up…."); Aug. 20, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("Bogus charges and fraud alert. I rented a U-Haul and documented the condition before and after with videos. Also of the mileage driven and gas used and put back in. My charge was suppose to be 62$ roughly the next few days pass and I notice a charge for 165$ I call to find out they charged me a 50$ cleaning fee because of some loose debris and I mean very little you take a broom and the debris is gone. Also they charged me for extra miles driven that is also inaccurate considering I drove and documented 30 miles in total and there saying I drove over 50+ miles. So 30$ for that. Then they said I left the tank below where it was when I received it which I didnt I stopped to put 10$ in before returning it and it brought it over where it was which was also documented. This business must be scamming people left and right and people just left to deal and accept the fraudulent charges."); TexasDachshundMom, Review to BBB (Mar. 19, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("..agent felt it necessary to impose $25 charge for an alleged muddy footprint in the truck?! Picture of alleged muddy footprint is the ultimate joke! Again, not acceptable! Rent from someone else!"); Complaint to FTC (Apr. 18, 2022) ("I rented a uhaul at the end of March in order to move all of my belongings out of a rental property … 2 days after I returned the equipment I had $227 dollars taken out of my account, despite their being more money in the account present at the time, I received no emails or updates or a receipt until nearly 2 weeks after I was charged. They are now claiming that the vehicle was dirty on the inside, and I didn't return it with the same amount of gas. My problem being that this is not what happened. I know for a fact that I filled the tank back up and that the van was no messier than when I received it. I have 2 different people who can attest to this fact and one of them watched me get everything out and clean it up before locking the doors and returning the keys. …")

[45] Gas fees are mentioned in U-Haul's terms and conditions and post-payment contracts provided to consumers. U-Haul Equipment Reservation Terms and Conditions, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Equipment-Reservation-Terms-and-Conditions.mp4; U-Haul Rental Contract Addendum, https://truthinadvertising.org/wp-content/uploads/2025/04/Rental-Contract-Addendum.pdf ("Customer agrees to verify U-Haul Vehicle's fuel level before leaving the premises and return it with the same amount of fuel. Customer agrees to pay a $4.50 per gallon convenience fee for the estimated fuel not replaced and an additional $30.00 service fee if returned with less than 1/4 tank."); U-Haul Contract Rental Agreement (Jan. 14, 2025), 5, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf ("**EZ-FUEL℠. Self-Refueling:** Return the U-Haul Vehicle with the same fuel gauge reading as indicated on the U-Haul Equipment Contract. Estimated gallons needed to return to the same fuel reading is below the gauge on the U-Haul Equipment Contract. Be sure to verify that the level is the same as when dispatched. **EZ-FUEL℠ Service:** Let Company refuel at an agreed upon per gallon price as indicated on the U-Haul Equipment Contract. Fuel will be charged based on the estimated reading below the gauge on the U-Haul Equipment Contract. U-Haul Vehicles returned with less than 1/4 tank of fuel are subject to an additional $30 service fee. Company does not reimburse for excess fuel purchases above the dispatch reading. Full is at the line on the gauge. Filling until the fuel pump click off is usually over full. **Example Gauge:** This truck has a 40 gallon tank and takes Unleaded fuel. REMEMBER! Customer agrees to verify the fuel level of the U-Haul Vehicle before leaving the premises.")

Consumers have complained about being charged gas fees even when the gas in the truck was replenished before return. *See, e.g.,* Natalie S., Review to BBB (Oct. 3, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("I cannot award any stars to this review. I have never been treated so poorly in my life! Uhaul over charged me then, added charges after I turned i the truck early. They said I was late bc the place I dropped it on Saturday was closed until Monday. It wasn't checked in until the afternoon on Monday. I should not have to pay a late fee bc no one works on weekends, seems ludicrous to me! Then they said we were 2 gallons short for gas. We returned it exactly where it was rented to us. How can you tell that a truck that holds 40 gallons, is 2 gallons short...really?! DO NOT RENT FROM THESE INCOMPETENT PEOPLE!!"); June 26, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("U-haul … deducted an unauthorized amount of $120.53!! The agent on the phone said I drive extra miles and brought the truck empty which isnt true. The address of the location was wrong do we had to drive around to find the place. And I picked up the van with 70 miles until empty not the full tank as the agent mentioned on the phone."); June 11, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a truck, it had issues, and I returned it exactly the same as I rented it with 1/4 gas and they c Lied and said less gas and charged me 80 for 3.5 gallons of gas, I would like that bill removed and a refund of my entire rental due to the fact that this has affected me greatly since."); May 13, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I went to uhaul to rent a truck and trailer for a quick round trip to move a car. … I was quoted on the phone $76.99 and gave my credit card information and reserved the truck and trailer. When I got to the uhaul site…charged me $153 when I told her the exact mileage I needed to use the equipment. … rented the truck to me on empty and highlighted where the gas gauge was before I took the truck. Upon returning it, I filed the gas above where it was when I took it and I went exactly the mileage I stated I needed which was 90 miles round trip. *****

insisted I went 4 miles over and did not replace the gas. Both accusations were untrue. For the past month ***** has tried charging my credit card 20 random amounts. I had to call the card company and have my card canceled and get a new one. When I call and ask her why she keeps trying to charge me random amounts daily she hangs up on me. My card has been canceled but I get daily messages that's she's trying to push a charge through. I want to stop her. I went on ****** reviews after I rented this truck only to see about 500 complaints all similar to my story. Overcharging , continue to charge many different amounts to customers , very rude and unprofessional."); May 7, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a truck from U-Haul …for a few hours on 4/28. When I picked up the vehicle the agent told me that the gas was full and I had to return it with a full tank. He had not been to the vehicle yet and told every customer before me the same thing. When I got into the vehicle and started to drive away I noticed the the tank was in fact NOT full, but at 5/8 of a tank. Prior to returning the vehicle I refilled about 5 gallons which brought the tank to approx 3/4 of a tank, MORE than I used. When I dropped off the truck he said they would just email me a receipt. 15 minutes later I received a receipt showing they charged me $52.25 (10 gallons) for gas because the tank was not full. Mind you, I drove about 40 miles, so anyone with an ounce of common sense could figure out that 40 miles would never use 10 gallons or nearly half a tank of gas. Reached out to the location twice but still no refund"); victoriya kouz, Review on Trustpilot's Uhaul Reviews (Mar. 29, 2023), https://www.trustpilot.com/reviews/642458fd79e5c48de8350d49 ("Rented a truck to move a TV stand on the 16th and almost 2 weeks later I'm charged $250 dollars for extra fees of not filling up gas (which we did to full!!), going over miles and damages which were all false!! Just stole our money after all time!!").

[46] Damage fees are mentioned in U-Haul's terms and conditions and post-payment contracts provided to consumers. U-Haul Equipment Reservation Terms and Conditions, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Equipment-Reservation-Terms-and-Conditions.mp4; U-Haul Contract Rental Agreement (Jan. 14, 2025), https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf. ("Customer agrees they are responsible for any loss or damage to Equipment, including loss or damage caused by any Authorized Driver, and any remaining portion of their estimated charges will be applied toward the loss or damage if Damage Waiver, Safemove®, Safetow®, or Safemove Plus® is not purchased. Customer's failure to return Equipment as herein agreed will result in Company incurring damages. Customer expressly authorizes Company or its agent to apply any and all additional charges, including for lost rental revenue and loss or damage, on the credit card used to create the reservation or to pay for the rental. Customer understands and agrees failure to pay for loss or damage may result in Company or its agent reporting Customer to one or more credit reporting and/or collection agencies. … Customer agrees to be fully responsible to Company, or their affiliated entities and agents, for all charges relating to the rental of Equipment that may be incurred by Customer, any Authorized Driver, or any Unauthorized Driver that Customer or any Authorized Driver allowed to operate Equipment, including charges and fees for … Equipment damage….")

Consumers have complained about being charged damage fees despite the absence of any damage or despite the damage preexisting the rental reservation. *See, e.g.,* June 1, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("The franchise owner fraudulently took $100 from my bank account after I received a perfect score from the van return. He claimed damage for a missing plastic decal on the gas tank door that had never been installed (snap on type decoration)…"); Complaint to FTC (May 15, 2024) ("I rented a vehicle at U-Haul. … I returned

the vehicle with a sales rep who looked over the vehicle and said I was all good. He sent me my final receipt at that point. I checked my bank account the next day and noticed that U-Haul had charged me an additional 160.88 that was never brought to my attention. I then called customer service who at 9:37am Tuesday morning sent me an updated receipt and said that U-Haul is claiming I damaged the vehicle. Never once did I get any notice about damage when I returned the vehicle with the representative, nor did I receive any information from the office until I made a call to customer service to dispute the charge. I did not receive a call in regard to the damage until today, Wednesday when the manager … said his staff was negligent and did shoty work checking the vehicle and that the general manager then did an inspection and added on $400 worth of damage. I told the manager I was disputing the charge as there was not any damage to the vehicle nor was I made aware of it when I returned the vehicle with his staff. He said he cannot justify refunding the money because they have pictures of the truck bed being damaged and asked me what I loaded into the bed. I told him an ottoman and couch from rc willey. I too have images of the truck with date and time stamps, and there is not one ounce of damage to the vehicle. U-Haul has threatened to pursue this matter without following standard procedures of notification when I returned the vehicle. I have a witness who was also with me during the process and they too said there was not any damage to the truck. U-Haul has now begun to harass me for the damage that I can prove is not valid."); Apr. 16, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("U Haul rental is charging me for a $79 damage to the vehicle which that is a lie. I never damage the vehicle. I have been calling and complaining them about but they just don't care. They are stealing people's money if you don't get the coverage insurance when you rent the pick up when I don't needed for moving something about 10 miles and no more than 3 hours rental."); Mar. 6, 2024 Complaint for BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("…I had the truck for maybe 2 or 3 hours and returned it without issue or incident. I received a receipt from UHAUL for the rental. Later on, after reviewing my credit card statement, I noticed I was charged a $150+ damage fee. I called UHaul and they claimed I caused damage to their truck, which did not occur. I disputed the charge through the credit card company and they concluded it was fraudulent, credited me the charge, and never paid the fee..."); Teresa N., Review to BBB (Feb. 13, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("…I was accused of scratching the doors of the rental truck and another truck This is a crime I want a serious investigation on this matter I call HHAUL team and ask me to wait until the store manager investigate previous damage to that truck has been reported I was charged $250 more just because with out the right proof that I committed the damages I left 100 dollars on that box I was even supposed to get a reminder since I returned the truck in a very short time little bit after 6 pm I had it for closed to 2 hours Please help me find the person that is trying to scam me I did not damage your vehicle!!!"); Feb. 2, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("… This morning, I woke up to see a charge for $477.95. After calling U-Haul, I was told I damaged the side view mirror in which I know is completely false. … I called again to see if I can view the cameras and was told I couldn't unless I had a police report. … I believe this was a complete setup and scam to get someone to pay for a damage that was clearly done after the vehicle was returned..."); Jan. 16, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("The date was December 4, 2023.I was charged $188.56 for damages.I rented a truck to move locally and was charged for the rental as expected. I paid $87.54 for the rental of the truck. The nature of the dispute is that they charged me $188.56 for damages the next day when I returned the truck.I went back to the U-Haul numerous times for a month to speak with the manager or anyone who could help with the issue. I did not damage the truck.They said they

reviewed the cameras and I had damaged the truck. The truck had damage to it when I left the premises. They never did a walk-around or inspection when I rented the truck to verify any previous scratches or dents. They are unwilling to do anything to find out how the truck was damaged before my rental. I would like my $188.56 returned…"); Jan. 11, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a pickup truck on 12/23/23. I did opt to take their insurance. No one went over the condition of the truck with me before leaving the lot. I returned the truck on 12/24/23 on time. The technician went over the mileage, checked the truck's condition, and confirmed that we returned the hitch that I rented with the truck. I agreed to and signed for an amount of $116.28 for which I received an e-mailed receipt showing I returned the truck on 12/24/23. On 12/26/23 I received a text message stating that my contract was not closed and I needed to contact the U-haul about my overdue equipment. At this time they charged my credit card an additional $196.73 and e-mailed another receipt showing that I returned the truck on 12/26/23. After several days of calling and revisiting the store, I finally reached the manager, … who informed me that there was damage to the tailgate. I disagreed with him as I inspected the truck before returning it and did not see any damage. Also, their technician did not see or mention any damage when I returned the vehicle. They did not show me proof of any damage. I'm not sure it even exists. I feel they scammed me out of $196.73. I am looking for a refund of $196.73.").

[47] Lost key fees do not appear to be disclosed in either the Terms and Conditions or the rental contracts. Consumers have complained about being charged a lost key fee even when the consumer returned the key in a marked drop-box, or an excessive fee charged for a lost key. *See, e.g.,* Aug. 26, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("…placed the car keys in the slot in the door where it says 'key box'. The next day I received a call from that office saying they could not find the car keys. Three days later I received a bill for $617 which included three days of rental and a lost key fee. … I have contacted the U-Haul office … multiple times asking them to look into my issue and ask for a recalculation. All my requests were ignored, I also contacted customer support by phone, my call was transferred to the office where I rented the car. When I was in the above-mentioned office and asked to show the recordings from the cameras from August 10 after 20:36, I was refused, citing a lot of work. I was refused to recalculate the bill in this office…"); Feb. 7, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a U-Haul and bought insurance. During the…move a key was lost, very cheap basic key, U-Haul only option they would give was to pay them 350 dollars for a key… This is extreme bad business and I do think this such a price … it should be illegal and at the very least it should announced vet loudly at the point if sale and two key given so this one 2 dollar key is not so detrimental to the finances of the working class.")

[48] After-hours service/late fees are mentioned in U-Haul's terms and conditions and post-payment contracts provided to consumers. U-Haul Equipment Reservation Terms and Conditions, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Equipment-Reservation-Terms-and-Conditions.mp4; U-Haul Contract Rental Agreement (Jan. 14, 2025), 3-4, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf (**"AFTER-HOURS RETURN.** Customer understands and agrees Equipment returned after business hours must be checked in using the U-Haul Mobile Application or at uhaul.com/share. Customer understands and agrees that failure to check in Equipment in this manner will result in a $20 convenience fee being charged. … Customer agrees to be fully responsible to Company, or their affiliated entities and agents, for all charges relating to the rental of Equipment that may be incurred by Customer, any Authorized Driver, or any

Unauthorized Driver that Customer or any Authorized Driver allowed to operate Equipment, including charges and fees for …late or unreturned Equipment, … late returns…")

Consumers have complained about being charged late fees or after-hour return fees despite returning the rental on time. *See, e.g.,* Natalie S., Review to BBB (Oct. 3, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("I cannot award any stars to this review. I have never been treated so poorly in my life! Uhaul over charged me then, added charges after I turned i the truck early. They said I was late bc the place I dropped it on Saturday was closed until Monday. It wasn't checked in until the afternoon on Monday. I should not have to pay a late fee bc no one works on weekends, seems ludicrous to me! Then they said we were 2 gallons short for gas. We returned it exactly where it was rented to us. How can you tell that a truck that holds 40 gallons, is 2 gallons short...really?! DO NOT RENT FROM THESE INCOMPETENT PEOPLE!!"); Sept. 17, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("On Friday August 30 I got a 9ft van, booked for two hours from 3 to 5. I returned this van at 4:40, firmly before 5pm which is when that specific UHaul branch closed, and to return the truck I asked one of the workers for instructions, to which she said 'just leave the keys in the truck and we'll handle it'. I further push asking whether there is anything else I need to do to return it and she said 'no, you're good.' Then, I see later that I get a $20 'after hours service fee' tacked onto my bill. When I call UHaul to ask about it, a call center woman … says that she will file a Customer Action File … and that I will get a response in 3 business days. This was on September 2nd, it is now September 16 and I have emailed and still gotten no response. I returned the truck before 5pm, and when I walked into the store there were roughly 6 people waiting to do business - in no way were they closed nor after hours. I would at least expect an actual response to the action file."); Aug. 21, 2024 Complaint on BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("… I returned the truck one day early on Saturday at 4:35 pm. Again the location was closed with no one to assist me. I was not given instructions on how to return the truck. The following Monday I reached out to ask about closing out the reservation and getting charged. I was told the location would do it 'once they got around to it'. When they finally did they charged me a $20.00 after hours service fee. I called to file a complaint, was given a confirmation number and told that I would receive a call from management within 72 hours. No response. I have emailed customer service twice. No response. … I cannot get a response from the company."); Khalid B., Review to BBB (Apr. 8, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("If I could give a zero I would usually Im not the type to leave reviews, but this most recent experience has been terrible. I rented a trailer from them and that let me get finish up the next day with the trailer without any additional charges which I really appreciated but sent me a charge anyway with a late fee, I called thinking it was an easy to fix solution and that there was an error and was promised a call back. I never got a call back but they stated I was left a message and given a call back and they refunded me ***** and I thought they resolved the issue. They then charged me today an additional 56 dollars and Change which is the last amount of money I have for the next 2 weeks to get to and from work and now they are talking about 3-5 days to get back my money and they will give me the difference because of THEIR mistake this has to be the worst experience I have ever had with this company and I dont want to do business with them any longer"); Complaint to FTC (May 23, 2023) ("Consumer state that dropped her U-haul back on time and was still charged $20 in late fees."); Complaint to FTC (June 12, 2021) ("I rented a truck to move two pieces of furniture for my in laws. I picked up the truck at 1pm and returned the truck around 3:15pm the same day. When I went inside to drop off the keys the manager told me that I could just leave the keys with him since he had two trucks ahead of me to check in. The next day I received my receipt that I've attached and there is a $20 charge for after

hours service and it shows I checked the truck in at 5pm. I don't know if there are cameras at that location but my brother in law who drove me home went to the TD bank after we were finished and I'm sure they have footage to prove we arrived in a regular passenger car. This is an extremely deceptive practice.")

[49] Wrong drop-off location fees are mentioned in U-Haul's post-payment contracts provided to consumers. U-Haul Contract Rental Agreement (Jan. 14, 2025), 4, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf ("Customer agrees to be fully responsible to Company, or their affiliated entities and agents, for all charges relating to the rental of Equipment that may be incurred by Customer, any Authorized Driver, or any Unauthorized Driver that Customer or any Authorized Driver allowed to operate Equipment, including charges and fees for …Equipment returned to an incorrect location…")

Consumers have complained about being charged such fees despite permission from U-Haul to return the rental to a different location. *See, e.g.,* Sept. 5, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("I rented a U-Haul and had a very bad experience. They tried to charge me with a $325 wrong drop-off fee … The truck ended up breaking down multiple times. First, the truck wouldn't start due a dead battery. We had it jumped and made it home. Then, the truck would not start at all and had to get it towed. I think we were wrongly charged for the tow/wrong drop-off location as it should be included in this case since it was towed. …"); July 10, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("Hello I moved out of my home on feb 29th , I returned this truck as of 10:26 pm on feb 29th 2024 , I get a call from the U-Haul saying i returned it to the wrong location but the guy told me I can return it to that location I had this truck for a total of 3 hours paid for the bigger truck then still wen back to get a small one I told the guy this use it as the gas once I return , Ive contacted corporate requested all calls from U-Haul and they still havent sent me anything this balance is not true and I will not be paying a balance if I didnt use the service for that periodt of time this is a scam and I have contacted the corporate office multiple times I was told 5 different prices I was owed and eventually they went with the highest this is a scam"); June 26, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("Called in to customer service about dropping off at different location as marked down. Agent OK'd drop off at [the] location and instructed me on how to check in at the location over the phone. Next day, [U-Haul] service agent … told me that there would be a wrong location charge and does not take accountability for agent instructing us to drop vehicle off their. This morning, I was called by an extremely rude person telling me they were going to charge me $350 for wrong location and would not listen to me. This was extremely fradualant behavior and absolute horrible customer service."); Duncan S., Review to BBB (May 16, 2024), https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/customer-reviews ("0 stars I rented a truck for a quick move across town, just a couple hours, but it turned into a 24 hour FIASCO. As soon as I put in gas, the gas tank began leaking all over the concrete right there at the pump. Called roadside and waited an hour. The tech did not speak any English, glued the tank, gave us a thumbs up, and left. Put in more gas and it leaked AGAIN. Called again. Waited over an hour and the same tech came out and glued it again. He left without saying anything and left a mess underneath the truck with the trash from his repair. We called roadside and they sent him out a 3rd time. It's been multiple hours at this point. While messaging with roadside assistance, they were saying they would have someone come drain the gas tank and weld it so it would be repaired properly. We expressed concern, not wanting them to

weld a leaky gas tank in front of our house with my items in the truck and gas all over the ground. They eventually assured us that they would have someone pick it up, with our items still inside, drive it to a secondary location to weld, and then bring it back. Tech comes back a 3rd time and instead tries to glue the tank. Came back in the morning and began driving our truck and it leaks AGAIN. The truck was actively leaking fuel on the road. Thankfully we were able to get it to my second location and unload my items. We then took it to a location that was closer and returned it there because it was still actively leaking fuel. The first time I called roadside, they informed me that if the truck couldn't be repaired or if it was going to take long, we would get a new truck. I begged for hours to get a new truck but the service representatives kept refusing. I was told to submit my gas receipts and they would reimburse me for the gas. Haven't. They are charging a $200 fee for dropping it off at a different location. Uhaul wasted hours of my time, endangered my belongings, and endangered the lives of myself and other people on the road.").

[50] Out-of-state license fees do not appear to be disclosed in the terms and conditions or rental contracts. Consumers have complained about being charged such fees without proper notice. *See, e.g.,* Jan. 5, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("… I rented a moving van from U-haul and was told it was $32.78 for the rental with a $60 deposit for a total of $92.78. When I returned the van … I was told that I wasn't getting my $60 deposit back since I used an out of state license to book … I would have never rented the van if I knew it was going to be almost $100…")

[51] U-Haul refers to fees incurred for traffic violations in the post-payment contracts provided to consumers but does not mention improper parking fees if there is no traffic violation incurred. U-Haul Contract Rental Agreement (Jan. 14, 2025), 5, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf (**"VIOLATIONS.** Customer agrees to park only where legally permitted. If Customer or any Authorized Driver incur any citation or parking, moving, towing, or toll violation ("Violation") in connection with the rental or use of Equipment, Customer acknowledges and agrees Customer is financially responsible for all fines, charges, fees, penalties, and surcharges (including toll surcharges and towing, storage, and related fees) associated with the Violation, notwithstanding the Violation may not have been issued directly to Customer or any Authorized Driver.").

Consumers have complained about being charged such fees despite no notice and no options to park in a different location. *See, e.g.,* Sept. 20, 2024 Complaints to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints ("…returned the truck … following morning found that I was charged … a penalty of $150 + tax in addition … there was no explanation about the penalty charge on the receipt … I had to visit the location to further findout that I was charged $150 for blocking a passage to the gated area for the back of the business!- there was no prior mentioning about this kind of fine or education or warning about it in the contract or by the staff – the business doesn't have proper space to return the truck so there was no room to park a truck – I was told that I have to return the truck by 11 pm there was no customer service station opened neither call center – I'm being penalized for something that I was not offered explanation about … tried to contact the manger of the location which didn't solve the issue and insisted that it was my mistake , she even suggested that I was working across the street and could have parked the truck there which is not true neither professional …")

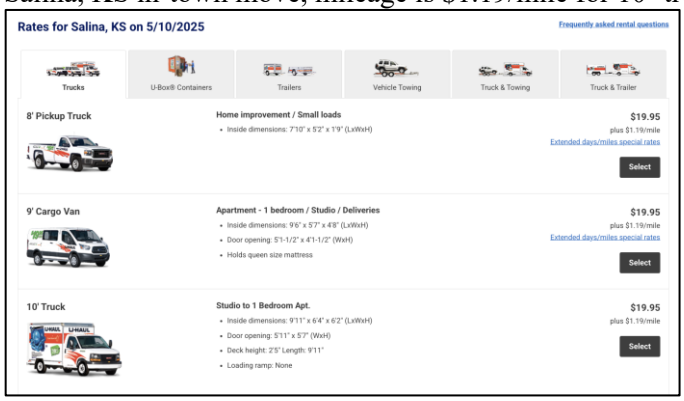
[52] U-Haul Contract Rental Agreement (Jan. 14, 2025), 4, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Contract-Rental-Agreement-emailed_Redacted.pdf.

[53] *See infra* notes 62-65.

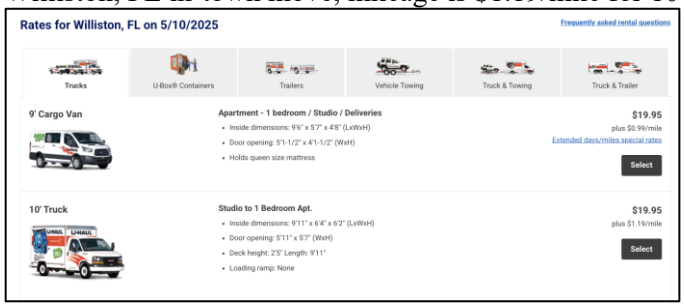
[54] U-Haul's How to Estimate the Mileage Fees for Your Move, https://www.uhaul.com/Tips/Moving/How-To-Estimate-The-Mileage-Fees-for-Your-Move-26768/.

[55] The following shows U-Haul's in-town mileage fees from a sampling of a dozen locations throughout the United States as of April 30, 2025. Note: Mileage fees fluctuate over time and also vary depending on the day of the week. *See* U-Haul's How to Estimate the Mileage Fees for Your Move, https://www.uhaul.com/Tips/Moving/How-To-Estimate-The-Mileage-Fees-for-Your-Move-26768/.

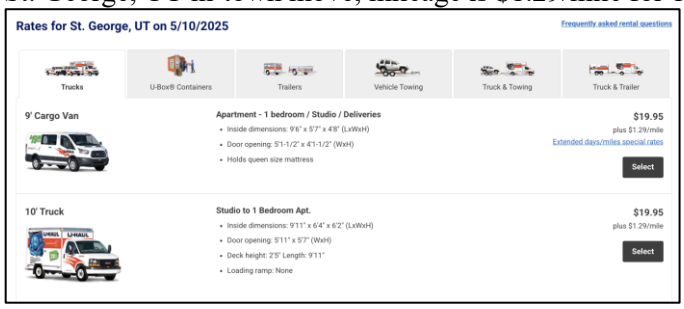
Salina, KS in-town move, mileage is $1.19/mile for 10' truck rental on May 10, 2025:



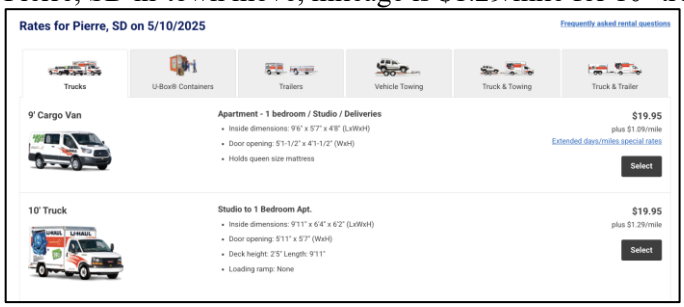
Williston, FL in-town move, mileage is $1.19/mile for 10' truck rental on May 10, 2025:



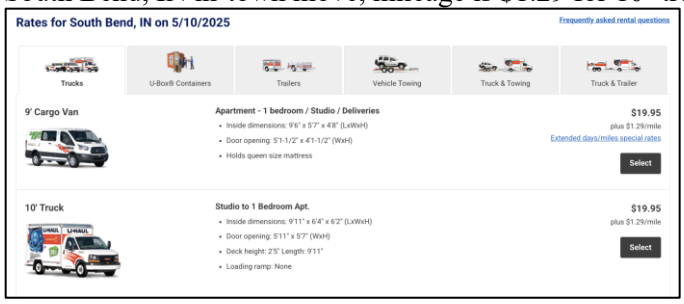
St. George, UT in-town move, mileage is $1.29/mile for 10' truck rental on May 10, 2025:



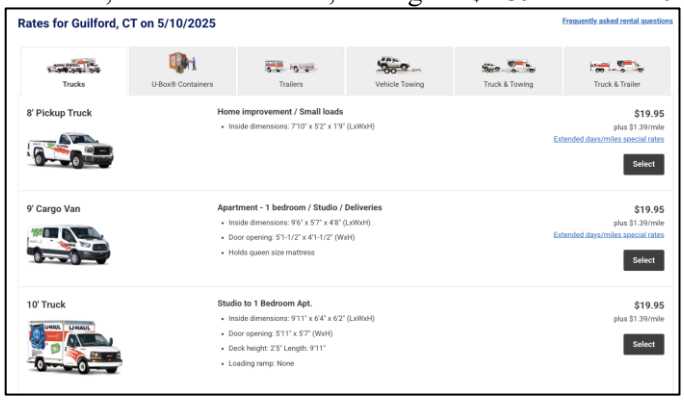
Pierre, SD in-town move, mileage is $1.29/mile for 10’ truck rental on May 10, 2025:



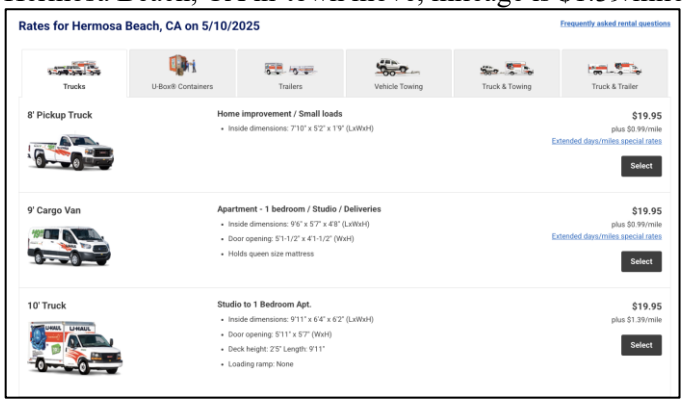
South Bend, IN in-town move, mileage is $1.29 for 10’ truck rental on May 10, 2025:



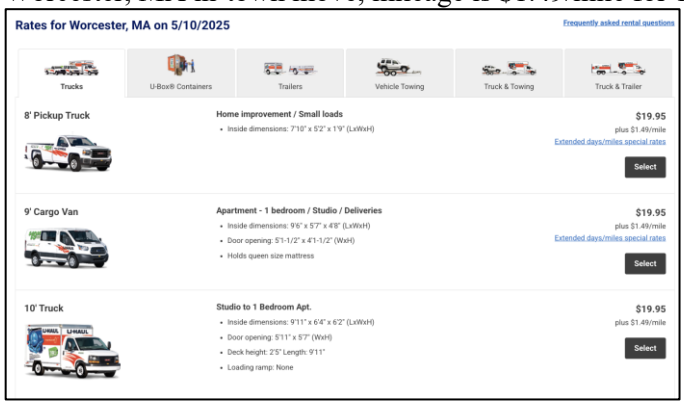
Guilford, CT in-town move, mileage is $1.39/mile for 10’ truck rental on May 10, 2025:



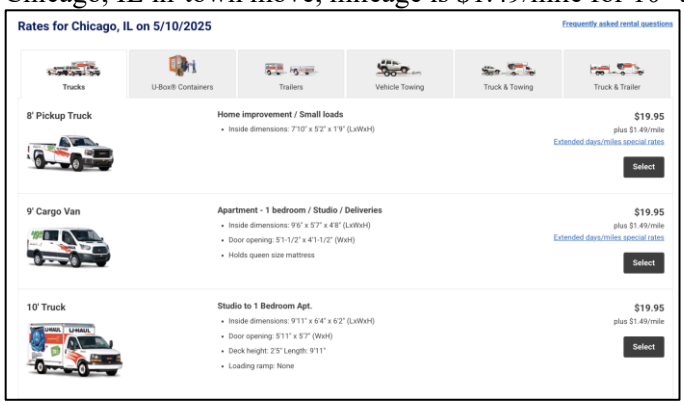
Hermosa Beach, CA in-town move, mileage is $1.39/mile for 10’ truck rental on May 10, 2025:



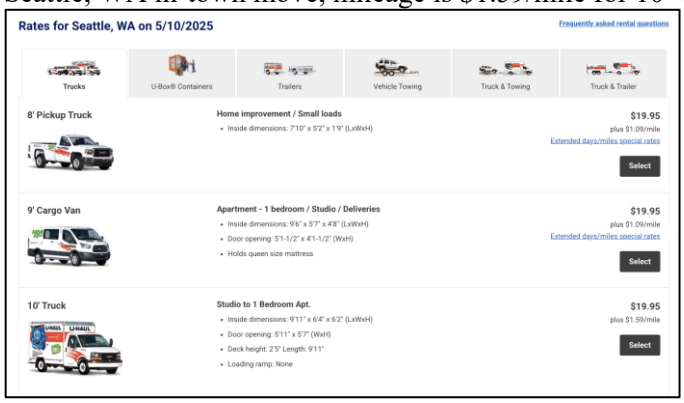
Worcester, MA in-town move, mileage is $1.49/mile for 10’ truck rental on May 10, 2025:



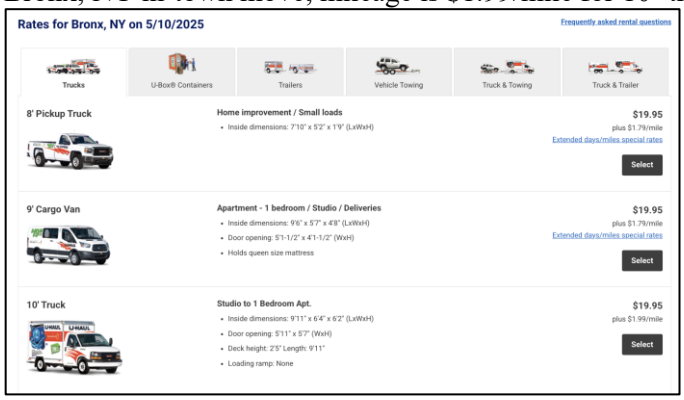
Chicago, IL in-town move, mileage is $1.49/mile for 10’ truck rental on May 10, 2025:



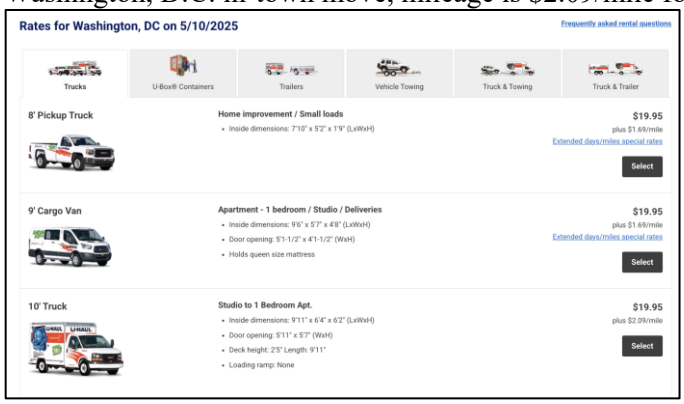
Seattle, WA in-town move, mileage is $1.59/mile for 10’ truck rental on May 10, 2025:



Bronx, NY in-town move, mileage is $1.99/mile for 10' truck rental on May 10, 2025:

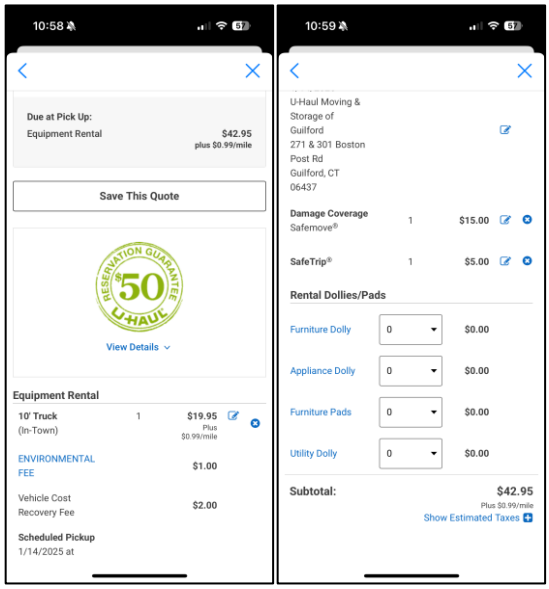


Washington, D.C. in-town move, mileage is $2.09/mile for 10' truck rental on May 10, 2025:



[56] *See* Complaint to FTC (Aug. 8, 2022) ("The business is knowingly lying and underpricing mileage rates for U-Haul rentals and then putting higher rates in their contracts (What the associates say the rates are in store are not the rates they're putting in their contracts when signing them). Also, they are overcharging on additional fees with terms, not in the contract.")

[57] On January 13, 2025, a TINA.org representative made an online reservation for the following day for a 10' U-Haul moving truck to be used for an "in-town" move. TINA.org's reservation included a $15 Safemove insurance purchase, a $5 Safetrip purchase, and U-Haul's mandatory $1 environmental fee and $2 vehicle cost recovery fee. The price quoted online was $42.95 plus $0.99/mile as shown in the screenshots below:



On January 14, 2025, at the U-Haul location specified in the online reservation, the U-Haul store clerk asked for an estimated mileage (the TINA.org representative estimated 10 miles). The clerk then prompted the TINA.org representative for payment for a total of $56.21 (the original $42.95 quoted, plus $9.90 for mileage, plus $3.36 in taxes). U-Haul Equipment Contract No. 20973024 (Jan. 14, 2025), 1, https://truthinadvertising.org/wp-content/uploads/2025/04/U-Haul-Equipment-Contract_Redacted.pdf.

[58] *Survey Finds Moving Is More Stressful For Many Than Getting Divorced, Having Kids*, CBS News – Minnesota (Oct. 1, 2020), https://www.cbsnews.com/minnesota/news/survey-finds-moving-is-more-stressful-for-many-than-getting-divorced-having-kids/;
Jon Patrick Hatcher, *How to Manage the Stress of Moving*, Psychology Today (July 18, 2023), https://www.psychologytoday.com/us/blog/state-of-anxiety/202307/how-to-manage-the-stress-of-moving.

[59] Consumers are also susceptible to the sunk-cost fallacy, the irrational "tendency to continue an endeavor once an investment in money, effort, or time has been made," rooted in the "maladaptive . . . desire [of people] not to appear wasteful." Hal R. Arkes & Catherine Blumer, *The Psychology of Sunk Cost*, 35 Org. Behav. & Hum. Decision Processes 124, 124-25 (1985). *See also* Dan Pilat et al., *Why Are We Likely to Continue With an Investment Even If It Would Be Rational to Give It Up?*, The Decision Lab, https://thedecisionlab.com/biases/the-sunk-cost-fallacy.

[60] *See FTC v. Am. Screening, Ltd. Liab. Co.,* 105 F.4th 1098, 1104 (8th Cir. 2024) (noting that "because the seller's misrepresentation tainted the purchasing decision . . . the consumer has lost the chance to avoid the purchase entirely, and is stuck with one that he did not intend to make"); *see also Donaldson v. Read Magazine, Inc.,* 333 U.S. 178, 189 (1948) ("People have a right to assume that fraudulent advertising traps will not be laid to ensnare them."); *Spiegel, Inc. v. FTC*, 494 F.2d 59, 62 (7th Cir. 1974) ("[I]ndividuals in society have a right to be told the truth so that their choices among products, or, as in this case, among offers, can be understandingly made.").

[61] Feb. 3, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints.

[62] Aug. 6, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints.

[63] Sept. 18, 2024 Complaint to BBB's U-Haul Business Profile, https://www.bbb.org/us/az/phoenix/profile/truck-rentals/u-haul-international-inc-1126-13114/complaints.

[64] Pureglesh Solution, Review on Trustpilot's Uhaul Reviews (Aug. 17, 2024), https://www.trustpilot.com/reviews/66c00b5459127c1107fe7716.

[65] svlambo, Review on Trustpilot's Uhaul Reviews (Feb. 22, 2024), https://www.trustpilot.com/reviews/65d6c4f731d71cb428649c93.

[66] 16 C.F.R. § 464 (2024), https://www.ftc.gov/system/files/ftc_gov/pdf/r207011_udf_rule_2024_final_0.pdf.

[67] *See* Hal R. Arkes & Catherine Blumer, *The Psychology of Sunk Cost*, 35 Org. Behav. & Hum. Decision Processes 124, 124-25 (1985); Dan Pilat et al., *Why Are We Likely to Continue With an Investment Even If It Would Be Rational to Give It Up?*, https://thedecisionlab.com/biases/the-sunk-cost-fallacy.

[68] Statement of Commissioner Holyoak on Trade Regulation Rule on Unfair and Deceptive Fees, FTC Matter No. R207011 (Dec. 17, 2024), https://www.ftc.gov/system/files/ftc_gov/pdf/holyoak-statement-re-unfair-or-deceptive-fees-rule.pdf.

[69] Executive Order on Combatting Unfair Practices in the Live Entertainment Market (Mar. 31, 2025), https://www.whitehouse.gov/presidential-actions/2025/03/combating-unfair-practices-in-the-live-entertainment-market/. *See also* Fact Sheet: President Donald J. Trump Announces Actions to Make Healthcare Prices Transparent (Feb. 25, 2025), https://www.whitehouse.gov/fact-sheets/2025/02/fact-sheet-president-donald-j-trump-announces-actions-to-make-healthcare-prices-transparent/.