



OFFICE OF THE ATTORNEY GENERAL
CONNECTICUT

JOSEPH GASSER
ASSISTANT ATTORNEY GENERAL

Phone: +1 860-808-5400

April 8, 2025

By U.S. Mail & Email

Jean Sera
Senior Vice President, General Counsel,
Chief Compliance Officer & Corporate Secretary
Legal Department
Avis Budget Group
379 Interpace Parkway
Parsippany, NJ 07054
Jean.Sera@avisbudget.com

Re: *Consumer Protection Inquiry: Denial of Service to Connecticut Consumers*

Dear Ms. Sera:

The Consumer Protection Section of the Office of the Connecticut Attorney General is conducting an inquiry into complaints that Avis Budget Group vehicle rental locations in Florida may be improperly refusing service to certain licensed Connecticut residents and may be failing to disclose this fact before accepting consumers' deposits or personal information.

As of the date of this letter, the websites of Avis, Budget, and Payless suggest that they will refuse to rent vehicles to Connecticut consumers in Florida if they have certain Connecticut driver licenses, including licenses imprinted with "Not for Federal Identification," claiming such licenses are "not valid for identification purposes" and not "recognized by the State of Florida to drive a vehicle on public roads."¹ These statements appear only on FAQ pages on the Avis, Budget, and Payless websites but do not appear to be prominently displayed to consumers when making vehicle reservations or providing personal information or payment details.

It appears that these statements may be based on a misapplication of Florida Statute § 322-033(2), which purports to reject "licenses issued by another state exclusively to undocumented immigrants." To the contrary, Connecticut driver licenses imprinted with "Not for Federal Identification" have been issued since at least 2011 to Connecticut residents who are citizens or otherwise documented residents of the United States. They are valid driver licenses and **are not** "issued by another state exclusively to undocumented immigrants."

¹ <https://www.avis.com/en/customer-service/faqs/usa/requirement-for-renting>;
<https://www.budget.com/en/help/usa-faqs/license-requirements>;
<https://www.paylesscar.com/en/customer-service/faq/global/requirements-for-renting>.
165 Capitol Avenue
Hartford, Connecticut 06106

To the extent Avis Budget Group has a policy or practice of refusing service to Connecticut consumers without a basis in law, and/or not clearly and conspicuously disclosing such policy and practice to Connecticut consumers, this may represent a violation of the Connecticut Unfair Trade Practices Act, Conn. Gen. Stat. § 42-110b *et seq.* (CUTPA).

To assist in our inquiry, please provide responses to the following requests by email to the undersigned at joseph.gasser@ct.gov before the close of business **April 25, 2025**:

1. Identify and provide a copy of all policies and procedures of the Avis Budget Group or any of its subsidiary or related car rental entities related to rental of vehicles to Connecticut residents in light of Florida Statute § 322-033(2), including any “Hotsheets” circulated to rental locations.
2. Identify the legal basis underlying any policies and procedures provided in response to the previous request.
3. Identify and provide a copy of all notification(s) by Avis Budget Group disclosing to Connecticut consumers that they may be denied service in Florida based on Avis Budget Group’s interpretation of Florida Statute § 322-033(2), and identify at what point in the transaction the consumer is shown such notification(s).
4. Identify and provide a copy of all documentation, including complaints, correspondence, reports, and other documents, related to each instance that Avis Budget Group or any of its subsidiary or related car rental companies has denied service to a Connecticut resident based on Florida Statute § 322-033(2).

Please feel free to contact the undersigned with any questions about this letter.

Very truly yours,

/s/ Joseph Gasser

Joseph Gasser

JEG: