

BEFORE THE TOWN OF GRAND CHUTE  
LICENSING COMMITTEE

STATE OF WISCONSIN

OUTAGAMIE COUNTY

Chief Greg Peterson  
Grand Chute Police Department

Complainant

-vs.-

Arora Hospitality LLC  
Parmeet K Arora, Registered Agent  
8176 Basil Court  
Neenah, WI 54956

dba Rodeway Inn  
210 N. Westhill Boulevard  
Grand Chute, WI 54913

Respondent

---

COMPLAINT

---

I, Greg Peterson, Police Chief for the Town of Grand Chute, Wisconsin, Outagamie County, hereby file this sworn written Complaint with the Town of Grand Chute Licensing Committee and Town Clerk.

This complaint is filed pursuant to Town of Grand Chute Municipal Code Section 315-8, *Complaints seeking suspension, revocation and nonrenewal of license.*

I allege that Parmeet Arora, registered agent of Arora Hospitality LLC, dba Rodeway Inn, who has been issued a hotel/motel license at 210 N. Westhill Boulevard, is in violation of Town of Grand Chute Municipal Code Chapter 315, *Hotels and Motels*, Section 315-9, *Grounds for denial, suspension, revocation or nonrenewal of license*, which states; ***The license to operate a hotel/motel may be denied, suspended from five to 30 days, revoked, or nonrenewed for any of the following reasons:***

**Section 315-9 E (1), *Incidence of drug-related CFS, or arrests;***

From January 01, 2022 through October 15, 2022, the Grand Chute Police Department responded to 19 calls for service at 210 N. Westhill Blvd that were related to drug activity. Seven of these incidents were reported by motel employees, while twelve resulted from officer

observations or citizen complaints. Of the 19 drug related calls for service, nine resulted in at least one drug related arrest. There were 12 total drug related arrests. Three of these arrests were for drug trafficking offenses.

The following are examples of drug related investigations conducted at 210 N. Westhill Blvd.:

**G22009617** – On May 10, 2022, an officer was dispatched for a theft complaint that was said to have occurred at the Rodeway Inn. A male reported his prescription Xanax and Ritalin were stolen from his room. Three other persons who had been present in the room were contacted. The male's ex-girlfriend admitted to taking the Xanax, but not the Ritalin. It was believed that 78 Xanax pills were taken. The female was referred to the Outagamie County District Attorney's Office for theft, possessing an illegally obtained prescription, and possession w/ intent to deliver a schedule III nonnarcotic drug.

**G22013681** – On July 2, 2022, an officer was dispatched to a suspicious incident at the Rodeway Inn, 210 N Westhill Blvd. An adult male had inappropriately touched a juvenile female in a stairwell. The male was arrested for child enticement, use of a computer to facilitate a child sex crime, and possession of cocaine.

**G22017328** – On Sunday August 21, 2022, at approximately 03:05, an officer was driving through the parking lot of the Rodeway Inn, 210 N. Westhill Blvd., and observed a male lying on his back next to a van near the middle entrance to the motel. The male did not have a pulse and was not breathing. Moments later, a second subject, pulseless and not breathing, was located in the van next to the subject lying on the ground. Both subjects were transported to area hospitals and pronounced dead. Each had drugs on their person. Both were staying in a room with five other transient laborers, none of whom appeared on the motel registry. This investigation is ongoing; however, one subject was arrested for delivery of fentanyl, delivery of cocaine and possession of drug paraphernalia.

**G22021135** – On October 10, 2022, officers responded to a report of armed intruders at the motel. It was determined the person making the report was an employee of the motel, but on arrival, he could not be located. Officers eventually located the employee and his girlfriend, also an employee of the motel, in room 203. Upon entering room 203, the female employee was observed to be unresponsive and the male was exhibiting physical signs associated with being under the influence of drugs. The male employee indicated he and his girlfriend had smoked methamphetamine, which they had obtained from another employee of the motel. Officers learned all three were staying at the motel, and the person who provided the methamphetamine was staying with a fourth employee. The room the reporting person and his girlfriend were found in was a room they both had been cleaning. Officers further discovered the report of armed intruders likely stemmed from alleged death threats made by a fifth employee to the reporting person and his girlfriend. The female employee was transported to the hospital for a drug overdose, and the matter remains under investigation as of this writing.

**Section 315-9 E (2), *Incidence of prostitution-related CFS, or arrests;***

From January 01, 2022 through October 15, 2022, the Grand Chute Police Department investigated two incidents involving prostitution related activity at 210 N. Westhill Blvd. The following paragraphs summarize the prostitution related events.

**G22009508** – On May 09, 2022, officers responded to 210 N. Westhill Blvd. to check the welfare of a female who came to the lobby wearing only a towel and reported having her belongings stolen. During an interview she admitted to being a prostitute. She indicated she met a male on Facebook and accompanied him to the motel. She further advised that upon waking up in the morning, all of her belongings were gone.

**G22013681** – On July 2, 2022, an officer was dispatched to a suspicious incident at the Rodeway Inn, 210 N Westhill Blvd. An adult male had inappropriately touched a 10-year-old juvenile female in a stairwell. The adult male utilized a translator app on his phone to offer the juvenile \$100 for sex. The male was arrested for child enticement, use of a computer to facilitate a child sex crime, and possession of cocaine. This incident is also referred to in the previous section as it resulted in an arrest for drug possession, as well as child enticement and the use of a computer to facilitate a child sex crime.

**Section 315-9 E (3), *Incidence of multiple ordinance violations;***

From January 01, 2022 through October 15, 2022, there were eight calls for service that resulted in ordinance arrests. Three of these incidents were reported by motel employees. In addition to the incidents that were cleared with the issuance of an ordinance citation or arrest, there were an additional five minor theft complaints, 24 disturbances and 20 trespassing complaints, each of which could have qualified for an ordinance arrest. In certain instances, the perpetrators were no longer present, while in others, the officer exercised his or her discretion to pursue a different outcome.

The following are examples of ordinance violations resulting in a municipal citation.

**G22002533** – On February 03, 2022, an officer observed two individuals sitting in a parked car at the Rodeway Inn, 210 N. Westhill Blvd., smoking marijuana. Upon making contact, a small baggie of marijuana was located and one of the subjects admitted ownership. This person was issued a citation for possession of THC.

**G22007030** – On April 05, 2022, a motel employee reported someone was smoking inside of the building. The subject was taken into custody for an active warrant and issued a citation for smoking in a building.

**G22007428** – On April 11, 2022, a motel employee reported someone was knocking on motel room doors. Contact was made with the subject and it was determined he was previously trespassed from the motel. He was cited for trespassing.

**G22013108** – On June 25, 2022, officers were advised that a large fight was occurring at the Rodeway Inn, 210 N. Westhill Blvd. Upon arrival, it was determined to be a disagreement over money. One person was arrested for misdemeanor disorderly conduct and two others were issued citations for disorderly conduct and alcohol consumption.

**G22013694** – On July 02, 2022, an officer was dispatched to the Rodeway Inn, 210 N. Westhill Blvd., for a subject having a medical issue. On arrival, the officer determined the subject had been trespassed from the motel property. He was subsequently issued a citation for trespassing.

**G22013988** – On July 06, 2022, while conducting a walk-through of the Rodeway Inn, an officer smelled the odor of marijuana emanating from a room. The officer contacted the guests in the room, who handed over the marijuana. A subject was cited for possession of THC.

**G22014061** – On July 07, 2022, an officer was dispatched to the Rodeway Inn, 210 N. Westhill Blvd., on a complaint that garbage was overflowing in the dumpster area of the motel and blowing onto a neighboring property. This was identified as a reoccurring problem, and the property owner was issued a citation for a garbage disposal violation.

**G22014336** – On July 10, 2022, an officer became aware that a subject who had been trespassed from the motel and previously cited for trespassing, was on motel property and requesting an ambulance. A citation for trespassing was issued to the subject.

**Section 315-9 E (4), *Excessive number or nature of CFS;***

From January 01, 2022 through October 15, 2022, the Rodeway Inn generated 240 calls for service that were attributed to the motel. The next highest call for service count for a Grand Chute motel over the same period of time was 133 calls. The average number of calls for service per motel for all 24 motels in the town was 41.71; therefore, the Rodeway Inn's call volume was 5.75 times the average for all Grand Chute motels.

The call for service per room ratio for the Rodeway Inn from January 01, 2022 through October 15, 2022 was 2.29 CFS per room. The average calls for service per room ratio for all 24 hotels in the town during this period of time was .47 CFS per room; therefore, the Rodeway Inn's calls for service per room ratio was 4.87 times the average for all Grand Chute motels.

The 240 calls for service attributed to the Rodeway Inn from January 01, 2022 through October 15, 2022 included 33 disturbances, 6 domestic violence incidents, 14 suspicious incidents, 32 welfare checks, 8 theft complaints, 37 assists, 13 E-911 hang-up calls, and 27 trespassing incidents. The average of all 24 hotels in each of these call categories is 5.92 disturbances, .67 domestic violence incidents, 3.13 suspicious incidents, 6.54 welfare checks, 1.92 theft complaints, 5.57 assists, 2.58 E-911 hang-up calls, and 3.17 trespass complaints. The remaining calls, while considerable in number, do not directly relate to a public safety or criminal conduct issues. They include medical calls, public assists, lost/found property, etc.

**Section 315-9 F, *Noncompliance with federal or state law or Town of Grand Chute Municipal Code.*;**

Prior to the renewal of their current license to operate the Appleton Inn (now known as the Rodeway Inn), the Town of Grand Chute Licensing Committee met with Parmeet Arora, registered agent for Arora Hospitality LLC. This meeting occurred on February 02, 2022. Ms. Arora was made aware of an increase in calls for service to her motel property and was provided with a list of recommendations designed to reduce the incidence of calls for service. Several of the recommendations required her to rectify situations that were noncompliant with sections of the Town of Grand Chute Municipal Code, as well as various Wisconsin statutes. The recommendations included:

1. **Install secure entry into the side and rear doors of the motel** – as required by Department of Agriculture, Trade and Consumer Protection Administrative Code (ATCP), Section 72.15(1), interpreted by the Outagamie County Health Department.
2. **Develop and implement a reliable method of recording registered guests and visitors** – as required by Department of Agriculture, Trade and Consumer Protection Administrative Code (ATCP), Section 72.16.
3. **Remove gambling/gaming machines located in the hotel's lobby**– as required by Section 945.04(1m)(b), Wisconsin Statutes.
4. **Have operational video cameras in the motel lobby and parking lot** – as required by Town of Grand Chute Municipal Code, Chapter 315 – Hotels and Motels, Appendix A.
5. **Limit guest stays at the motel to no more than 29 consecutive days** – as outlined in the Town of Grand Chute Municipal Code, Chapter 315 – Hotels and Motels, Section 315-2, and supported by Department of Health Services Administrative Code, Section 195.03(12) and (19).
6. **Reliably perform all property maintenance normal and customary for the operation of a hotel/motel, including timely removal of refuse** – as required by Town of Grand Chute Municipal Code, Section 423-7, Exterior property standards, Department of Health Services Administrative Code, Sections 195.10(8) and 195.14(4), and Department of Agriculture, Trade and Consumer Protection Administrative Code (ATCP), Sections 72.10(8)(a) and 72.15(4).
7. **Ensure the fire alarm system is repaired and in working order** – as required by Department of Health Services Administrative Code, Section 195.14(1), and Department of Agriculture, Trade and Consumer Protection Administrative Code (ATCP), Section 72.14(1).
8. **Rectify violations identified by the Outagamie County Health Department, including insect infestation, garbage disposal, securing of fire-rated doors, fire alarm repair, and proper room cleaning** – as required by Department of Agriculture, Trade and Consumer Protection Administrative Code (ATCP), Sections 72.10(8), 72.14(1), 72.15(2), and 72.15(3).

During February 02, 2022 meeting, Ms. Arora agreed to work on accomplishing the recommendations and suggested they could be achieved in a two-month period, which the Committee accepted. Over the months that followed, Ms. Arora demonstrated progress toward fulfilling the recommendations, and on May 17, 2022, the Licensing Committee recommended

approval of the license for Rodeway Inn based upon this progress. This recommendation was subsequently approved by the Town Board on June 07, 2022. While compliance was eventually achieved with respect to some of the aforementioned recommendations, shortly after approval of the license, the Rodeway Inn fell out of compliance with several others. These include:

1. Arora Hospitality has not secured the entrances to the motel as outlined in #1, above, and remains in violation of ATCP, Section 72.15(1). During an inspection of the property on September 12, 2022, it was observed neither the side nor rear door provided for secure entry. This was also noted during a lodging inspection conducted by the Outagamie County Health Department on June 15, 2022, July 7, 2022, July 18, 2022, July 25, 2022, August 12, 2022 and August 25, 2022. The Health Department noted during their July 18 inspection that Arora Hospitality provided a copy of a service order indicating three keyless locks would be installed by September 30, 2022. As of September 30, the keyless locks had yet to be installed, though an invoice was provided to a health inspector on September 30 indicating locks had been ordered on September 28, 2022. This information resulted in the Health Department scheduling another inspection for October 14, 2022 to determine whether the motel had achieved compliance. This would constitute the eighth health inspection since June 15, 2022. On October 09, 2022, an officer spoke with the front desk clerk at the motel regarding the installation of card-reader locks on the side and rear door. Not only had the locks not been installed, the employee informed the officer that for the prior two weeks the device used to program cards to allow access to individual rooms had been broken. As such, guests could not be issued cards to gain access to their rooms and had to be keyed in by an employee of the motel each time they left the room.
2. Arora Hospitality has not developed and implemented a reliable method of recording registered guests and visitors as outlined in #2, above, and remains in violation of ATCP Section 72.16. Examples that support this finding include:

**G22013960** – On July 06, 2022, during a disturbance/theft investigation, a female subject was determined to be staying in the motel but was not a registered guest. Motel staff advised that no one was registered in the room she was staying in and she should not be there. The female advised a motel staff member gave her the key to the room. She was subsequently arrested for the theft of \$5,000.00 cash from another motel guest and possession of an illegally obtained prescription.

**G22015229** – On July 23, 2022, a female reported to have been sexually assaulted by multiple suspects in a room that was not registered to any person.

**G22017328** – On August 21, 2022, during a death investigation involving two subjects who overdosed on motel property, it was determined the victims were staying in a room with five other subjects. The motel had no record of any of the individuals staying in the room. The subject who was registered to the room was staying in another room and only knew the identity of one of the subjects. A room key card was also found on one of the deceased victims and the motel did not have the ability to determine which room the card was associated with.

3. Arora Hospitality has not limited guest stays to no more than 29 consecutive days, as outlined in #5, above. As previously stated, this is required by Town of Grand Chute Municipal Code, Section 315-2, and supported by ATCP Section 72.03(12) and (19), which establishes a motel as a place where sleeping accommodations are offered for pay to transients, who are defined as persons who travel to a location away from their permanent address for a short period of time for vacation, pleasure, recreation, culture, business or employment. In addition to allowing for stays longer than 29 days, the motel has knowingly rented to subjects who do not have a permanent address, therefore operating outside the purpose of a motel. Examples that support this finding include:

**G22015157** – On July 22, 2022, an officer responded to assist a subject who advised the motel had knowingly allowed them to reside at the motel since July 15, 2022 and was expelling them from the property. The individual advised the officer the motel knew he did not have a permanent residence when they rented to him and his mother. According to the guest, he was being expelled to make room for another guest who booked a room during the Experimental Aircraft Association (EAA) Airventure event in Oshkosh.

4. Arora Hospitality has not reliably performed all property and maintenance normal and customary for the operation of a hotel/motel, including timely removal of refuse, as outlined in #6, above. During exterior and interior inspections conducted by the Outagamie County Health Department on June 15, 2022, July 7, 2022, July 18, 2022, July 25, 2022, August 12, 2022 and August 25, 2022 the following violations were observed:

--A large hole in the dry wall was observed in room 131 and a damaged door was observed in room 230, in violation of ATCP 72.15(2).

--Several mattresses were observed stacked by the garbage dumpster in violation of ACTP 72.10(8)(a). This was also a violation of the Town of Grand Chute Municipal Code, and a citation was issued to Arora Hospitality LLC for a garbage disposal violation.

--Fire rated doors leading to the second floor that are not controlled by a central activation of the fire alarm system were observed propped open. The pull station positioned on the east side of the building on the first-floor hallway was observed blinking red and the cover was removed. Both of these are violations of ATCP 72.14(1).

--During a September 12, 2022 inspection of the property by the Grand Chute Police Department and Building Inspector, observations were made of substantial mold growth on the walls and furniture in one room, broken windows, broken fencing, holes in the siding, graffiti on the outdoor shed, rank growth of vegetation, and rubbish and garbage throughout the parking lot and next to the building.

5. Arora Hospitality LLC has not corrected the insect infestation identified by the Outagamie County Health Department and outlined in #8, above.

--During a June 15, 2022 inspection by the Health Department, several cockroaches were observed exiting rooms 150 and 151. Neither of these rooms had been cleaned, and they contained excess garbage, empty food containers, and cat litter, even though the rooms were vacated a week earlier. Arora Hospitality was given until July 05, 2022 to provide the Health Department with the name of a pest control company and the scope of the work to be performed to rectify the problem. Additionally, the owner was to provide a written plan to address bed bugs within the facility.

The Health Department report from a subsequent inspection conducted on July 07, 2022 revealed no progress and extended the date for submission of required documents to July 15, 2022.

A Health Department report generated following a July 18, 2022 inspection mentioned "dirty and stained furnishing littered with cockroach excrement" in rooms 150 and 151, and, "[s]everal live cockroaches were seen crawling on the walls and ceilings." The report did note the "[o]wner had a pest control company treat 20 rooms for spiders that included room 151, which was also treated for cockroaches." This report also stated, "service records shall be retained and provided to Outagamie County Public Health when requested."

During a follow-up inspection conducted on August 12, 2022, the Health Department noted, "[a]n inspection of rooms 230, 150, and 151 was conducted during the visit and no live cockroaches or bedbugs were observed," however, the report also states, "[m]ultiple request were made to the owner to provide pest control service records. To date, there are no official pest control reports and only an email confirming the information above from the pest control company."

Another inspection was conducted on August 25, 2022. The report prepared following this inspection noted the Health Department still had not received the "official pest control reports," and "several live cockroaches were observed in the first and second floor main hallways." A report documenting an inspection conducted on September 30, 2022 noted, "[r]eviewed pest control records from the pest control service dated September 9<sup>th</sup> and September 15, 2022." The report went on to say, "[o]n September 15<sup>th</sup> the following rooms were treated for bed bugs and no bedbug activity was found: 106, 111, 134, 143, 151, 225, 238, and 249. The following rooms had bedbug and roach activity found: 126, 142, 205, 226, 241, and 253." There is no indication the Health Department ever received pest control records prior to those provided for the September 09 and 15 treatment, even though their June 07, 2022 inspection report indicated Arora Hospitality LLC was to "immediately clean the rooms and contact a pest control



company to evaluate and eliminate the presence and harborage of insects and/or rodents.”

In addition to the observations made during the Health Department inspections, indications of the insect infestation noted above have also been made by police officers. The following examples reinforce the observations made by health officials.

**G22014573** – On July 14, 2022, an officer responded for a dispute regarding a motel bill. The subject requested to move to a different motel due to a cockroach infestation, but the management would not refund the room fee.

**G22016262** – On August 26, 2022, while assisting a guest of the Rodeway Inn, the officer observed cockroaches in the subject’s room. The person informed the officer he had been in two other rooms that also contained cockroaches.

**Section 315-9 G, *Good cause in the discretion of the Town Board showing that the operation of the hotel/motel is such that has, is, or will negatively impact the health, safety and/or welfare of its guests, the residents or businesses of the surrounding community, or the Town due to any of the foregoing factors listed above.;***

Numerous examples exist, some of which have already been presented, that demonstrate the manner in which the Rodeway Inn is operated negatively impacts the health, safety, and/or welfare of its guests and the residents or businesses of the surrounding community. The examples include:

**G22000892** – On January 14, 2022, during a crime prevention walk-through of the Rodeway Inn, an officer discovered a homeless individual who was not a registered guest sheltering in the middle vestibule of the motel and also located a subject unconscious due to alcohol consumption in the middle stairwell.

**G22013238** – On June 27, 2022, an officer responded to a welfare check at the BP gas station located at 3640 W College Ave, adjacent to the parking lot of the Rodeway Inn. The attendant reported a subject, who appeared to be intoxicated, had been in the store for 3-4 hours and would not leave after multiple requests. An investigation determined the subject was staying at the Rodeway Inn.

**G22014573** – On July 14, 2022, an officer responded for a dispute regarding a motel bill. The subject requested to move to a different motel due to a cockroach infestation, but the management would not refund the room fee. The concern regarding the presence of cockroaches has been identified on numerous occasions. In addition to this incident, on August 26, 2022, an officer observed cockroaches in a guest’s room. The person informed the officer he had been in two other rooms that also contained cockroaches. During an inspection by the Outagamie County Health Department on June 07, 2022, several cockroaches had been observed in two rooms that contained garbage, empty food containers, cat litter, and pet food. These rooms had been vacant for a week, but had not been cleaned. During a follow-up inspection on July 18, 2022, health inspectors noted

“several dirty and stained furnishings littered with cockroach excrements.” Additionally, “[s]everal live cockroaches were seen crawling on the walls and ceilings.” The presence of the cockroaches was deemed a violation of ATCP Section 72.15(3), and an order was issued to rectify the problem. In an August 12, 2022 report from the Health Department, inspectors noted, “[m]ultiple requests were made to the owner to provide pest control service records.” A follow-up report from August 25, 2022 stated, “[t]o date, there are no official pest control reports.”

**G22015157** – On July 22, 2022, an officer responded to assist a subject who advised he had knowingly been allowed to reside at the motel since July 15, 2022, but was being expelled to make room for a guest in town to attend the EAA Airventure event. The individual was otherwise homeless and had no permanent address to return to after being expelled from the motel.

**G22015229** – On July 23, 2022, a female reported she was sexually assaulted by multiple suspects in a room at the Rodeway Inn. No one was registered in the room in which the alleged assault occurred, and motel staff advised they had no knowledge anyone was in the room. Although the details of the assault are still under investigation, multiple individuals admitted to being in the room. The motel had shown an inability to track and identify who is staying in the motel—a violation of ATCP Section 72.16. This problem was brought to the attention of Arora Hospitality during a Licensing Committee meeting on February 02, 2022, and a commitment was made to rectify the problem within two months. No corrections had been made as of the date of this incident.

This investigation also revealed the suspects were able to gain access to the room by entering the motel through an unsecure door—a violation of ATCP Section 72.15(1). This concern was brought to the attention of Arora Hospitality during a Licensing Committee meeting on February 02, 2022. At that time, the agent for Arora Hospitality suggested the situation could be resolved within two months. On June 07, 2022, the same concern was identified during an inspection conducted by the Outagamie County Health Department. At that time, Arora Hospitality was given 30 days to correct the problem. During a follow-up inspection on July 18, 2022, the inspector was advised the work would be completed by September 30, 2022. As of September 30, no such corrections have occurred.

**G22017328** - On August 21, 2022, at approximately 03:05 hours, an officer was driving through the parking lot of the Rodeway Inn, 210 N Westhill Blvd., when he observed a male lying on his back next to a van near the middle entrance of the motel. The male did not have a pulse and was not breathing. CPR was started, then a second subject sitting in the van next to the subject lying on the ground was also determined to be pulseless and not breathing. Both subjects were transported to area hospitals and pronounced dead from drug overdose. The investigation revealed these individuals, and several other subjects, were staying together in a room at the Rodeway Inn, but the motel had no record of their identity. A room key card was also found on one of the deceased victims, though motel staff did not have the ability to determine which room the card was associated with. Similar to incident G22015229, above, this represents a violation of ATCP Section 72.16.

In addition to the aforementioned examples that establish how the operation of the Rodeway Inn has negatively impacted the health, safety and/or welfare of its guests and the residents or businesses of the surrounding community, the high demand for police service at this location also diminishes the ability of the police department to direct resources elsewhere in the community, thereby negatively impacting the safety and welfare of the Town overall. This is reflected in not only the 240 calls for service during the period in question, but in the estimated 303 hours of committed time invested by public safety officials in response to the calls for service.

In light of the above information, I request the Licensing Committee present to the Town Board a recommendation for revocation of the hotel/motel license issued to the respondent for operation of the Rodeway Inn, 210 N. Westhill Blvd., Grand Chute.

Dated this 03 day of November, 2022.

  
\_\_\_\_\_  
Greg Peterson, Chief of Police

State of Wisconsin,  
Outagamie County,  
Town of Grand Chute

Subscribed and sworn to before me, this

3 day of November, 2022

  
\_\_\_\_\_  
Notary Public, State of Wisconsin  
My Commission Expires 7/6/26

