

**Winkel Law Office**

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November 16, 2022

First Class Mail and Email: [kayla.filen@grandchutewi.gov](mailto:kayla.filen@grandchutewi.gov)

Kayla Filen, Clerk  
Town of Grand Chute  
1900 W. Grand Chute Blvd.  
Grand Chute, WI 54913

Re: Arora Hospitality/Parmeet K. Arora-Registered Agent, d/b/a Rodeway Inn

Dear Ms. Filen:

Enclosed find Answer in the above referenced matter.

Sincerely,

WINKEL LAW OFFICE



David J. Winkel

DJW:vaw

Enc.

CC: Hardeep Singh - via email

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  
d/b/a Rodeway Inn

Respondent.

RESPONDENT'S ANSWER TO COMPLAINANT'S COMPLAINT

Respondent, Arora Hospitality LLC, by and through its attorneys, the Winkel Law Office, hereby answers Complainant's Complaint as follows:

1. **Nineteen Calls.** Respondent states that of the nineteen calls in 2022 that were related to drug activity, none of those involved motel employees. The respondent encourages the employees, and any citizens staying at the hotel, to call the police and report any illegal criminal behavior, which is exactly what happened. The respondent is now being penalized for the behavior of people respondent does not control. Respondent believes this is not fair to respondent.
2. **Incidents of Prostitution Related Calls.** The two prostitution related calls did not involve people that respondent can control. There was no evidence to respondent of these prostitution activities upon check-in of motel guests or thereafter for respondent to do anything about it.
3. **Incident of Ordinance Violations.** Municipal violations are for smoking marijuana, smoking inside the building and trespassing, fighting, and garbage overflowing. Except for the one citation, they all involved third parties uncontrollable by the Motel.
4. **Excessive Number of Calls.** These have been addressed above.
5. **Recommendations.** Respondent has used its best efforts to implement recommendations from the Licensing Committee from February and June, 2022. They tried to implement better check-in procedures, property maintenance procedures and limiting stays as set forth in the recommendations.
6. **Health Department Concerns.** Respondent has been diligently trying to address the Health Department Concerns including limiting the presents of garbage.
7. **Health Safety and Welfare of the Guests.** Respondent has been trying to address those concerns as set forth above. Respondent requests additional time to address those concerns. Respondent is in the process of interviewing hotel management firms to help with the management of the motel to

address all of the above concerns raised in the Complaint; and believes that will greatly improve the operation of the motel.

Respectfully submitted this 16 day of November, 2022.

WINKEL LAW OFFICE

By: 

David J. Winkel, SBN 1002702  
Attorney for Respondent

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