



3. The present owners of the Knight's Inn have not made any major alterations to passed inspections from the Seymour Fire, Health, and Building departments consistently with only minor violations since they purchased it in 2019. This remained true until the Fire Department ordered the building closed in November 2023 without warning or opportunity to correct.
4. Most of the violations identified in the inspections were superficial and rapidly remedied, *e.g.*, smoke alarms with expired batteries or fire extinguishers that were improperly mounted.
5. The two major violations, the ones requiring considerable financial investment to rectify, are the alleged failure to install a centralized smoke alarm system and standpipe sprinkler system.
6. The Decision correctly concluded that the Knight's Inn is not required to install a centralized smoke alarm.
7. The Decision's finding that Petitioner has not maintained the Knight's Inn in a condition of equivalent quality to when the building was constructed ignores the many years in which the premises passed inspections and that the identified problems were promptly rectified.

**WHEREFORE**, Petitioner prays that the Decision will be amended to reflect that the Knight's Inn is grandfathered into the requirements of the 1985 Indiana Fire Code and is not required to install a standpipe sprinkler system throughout its entire premises.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that the foregoing was filed via U.S. Mail on the 7th day of January, 2025

A.D. and addressed as follows:

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