

**INDIANA BOARD OF TAX REVIEW**  
**Small Claims**  
**Final Determination**  
**Findings and Conclusions**

**Petition:** 03-005-24-1-4-00108-25  
**Petitioner:** Bartholomew County Assessor  
**Respondent:** Glen Napier  
**Parcel:** 03-96-30-140-001.500-005  
**Assessment Year:** 2024

The Indiana Board of Tax Review issues this determination, finding and concluding as follows:

**PROCEDURAL HISTORY**

1. On June 17, 2024, Glen Napier filed a Form 130 notice contesting the 2024 assessment of his property. On January 10, 2025, the Bartholomew County Property Tax Assessment Board of Appeals (“PTABOA”) issued a Form 115 final determination reducing Napier’s assessment from \$135,000 to \$76,000 (\$34,700 for land and \$41,300 for improvements). On January 31, 2025, the Bartholomew County Assessor filed a Form 131 petition with us.
2. On February 12, 2026, our designated administrative law judge, Joseph Stanford (“ALJ”), held a telephonic hearing on the Assessor’s petition. Neither he nor the Board inspected the property. Bartholomew County Assessor Ginny Whipple represented herself and certified tax representative Milo E. Smith represented Napier. Whipple, Smith, and appraiser Jon Scheidt testified under oath.

**RECORD**

3. The Assessor submitted the following exhibits:
  - Exhibit A: Ginny Whipple’s resume`
  - Exhibit B: Statement of Professionalism
  - Exhibit C: 2024 property record card (“PRC”) for subject property
  - Exhibit D: 2023 PRC for subject property
  - Exhibit E: Lease Agreement
  - Exhibit F: Scheidt’s appraisal report for January 1, 2025
  - Exhibit G: Email from Whipple to Smith
  - Exhibit H: Scheidt’s appraisal report for January 1, 2024
4. Napier submitted the following exhibits:
  - Exhibit 1: Form 130 notice
  - Exhibit 2: Form 115 notice
  - Exhibit 3: 2024 PRC for subject property

- Exhibit 4: Form 131 petition  
Exhibit 5: Photograph of the subject property  
Rebuttal Ex. A: Statement from Glen Napier

5. The record also includes: (1) all petitions and other documents filed in this appeal, (2) all notices and orders issued by the Board or the ALJ, and (3) an audio recording of the hearing.

### OBJECTIONS

6. Both parties raised objections that our ALJ took under advisement. The Assessor objected to Napier's Rebuttal Exhibit A as hearsay. The document contains a statement that Napier purportedly texted to Smith. Napier acknowledged that the document is hearsay, and he did not argue that it fell within any recognized exception to the hearsay rule. We may admit hearsay with the caveat that if such evidence is properly objected to and does not fall within a recognized exception to the hearsay rule, we cannot base our determination of an appeal solely on that evidence. 52 IAC 4-6-9(d). We overrule the Assessor's objection and admit the exhibit.
7. We now turn to Napier's objection. At the beginning of her case-in-chief, the Assessor offered Scheidt's appraisal report for January 1, 2025, which was admitted without objection as Exhibit F. After realizing that she had offered an appraisal for the wrong year, the Assessor subsequently offered Scheidt's appraisal report for January 1, 2024 (which we have designated as Exhibit H). Napier objected to the admission of Exhibit H because the Assessor had not previously shared it with him, and he did not have sufficient time to review it. For petitions on the small claims docket, our procedural rules provide for an exchange of documentary evidence at least 5 business days before the hearing "[i]f requested not later than ten (10) business days prior to hearing." 52 IAC 4-8-2(b). Here, there is no evidence demonstrating that Napier requested an evidence exchange. We therefore overrule the objection and admit the exhibit.<sup>1</sup>

### FINDINGS OF FACT

#### A. The Subject Property

8. The subject property is located at 2331 Illinois Street in Columbus, Indiana. It consists of a 1,333-square-foot duplex with 3 bedrooms and 2 bathrooms situated on a 0.38-acre lot. The duplex has two driveways, two front stoop porches, two front doors, and two mailboxes. Napier acquired the property in November 2023, and he rents out one of the subject property's two units for \$800/month. *Whipple testimony; Scheidt testimony; Pet'r Exs. C, E, H.*

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<sup>1</sup> We also note that Scheidt's two appraisal reports are nearly identical. He relied on the same comparable sales transactions and the same gross rent multiplier in both appraisals, and he ultimately concluded to the same value for both years. This mitigates concerns of unfair surprise.

9. Although Napier acknowledged that the subject property has two residential rental units, he asserted that the second unit is not habitable, and he claimed he could not afford to install another furnace and water heater to service it. However, Napier admitted that instead of installing a separate furnace and water heater for the second unit, he could simply pay for the utilities for the entire property. While Napier may prefer to have his two rental units metered separately to avoid tenant issues related to utility bills, we find that both units currently have access to a working furnace and water heater. Because Napier did not submit any evidence demonstrating that the second unit was not otherwise in a safe, clean, and habitable condition, we do not find his claim regarding its habitability credible. Our finding is further supported by Scheidt's testimony that when he inspected the subject property on September 8, 2025, both sides of the duplex contained personal property, and both units appeared to be lived in. *Scheidt testimony; Resp't Rebuttal Ex. A.*
10. In 2023, the subject property was assessed for \$122,600. In 2024, the Assessor raised the assessment to \$135,000 before the PTABOA reduced it to \$76,000 in response to Napier's appeal. *Whipple testimony; Pet'r Ex. C; Resp't Ex. 2.*

## **B. Scheidt's Appraisal**

11. The Assessor presented an appraisal prepared by Jon Scheidt, SRA, an Indiana certified residential appraiser, that estimated the market value-in-use of the subject property's fee simple interest as of January 1, 2024. Scheidt certified that his appraisal complies with the Uniform Standards of Professional Appraisal Practice ("USPAP"). *Scheidt testimony; Pet'r Ex. H.*
12. Based on the Assessor's request, Scheidt developed an income approach that relied on the GRM method to value the subject property. He started developing a GRM by searching for sales of rental homes with a similar number of units and similar amenities. Because of the limited number of transactions in the subject property's neighborhood, Scheidt expanded his search area to other competitive neighborhoods in the area. He identified the following five sales of older homes that were converted to duplexes with amenities similar to the subject property:
  - 739 Maple Street – sold in June 2023 for \$140,000 (after concessions) and had a rental rate of \$1,750/month, producing a GRM of 80;
  - 717 Reed Street – sold in August 2023 for \$142,000 and had a rental rate of \$1,650/month, producing a GRM of 86;
  - 807 Reed Street – sold in April 2022 for \$135,000 and had a rental rate of \$1,400/month, producing a GRM of 96;
  - 2131 McKinley Avenue – sold in December 2021 for \$100,500 and had a rental rate of \$900/month, producing a GRM of 112;
  - 1633 Orinoco – sold in March 2023 for \$140,000 and had a rental rate of \$1,585/month, producing a GRM of 88.

*Scheidt testimony; Pet'r Ex. H.*

13. Scheidt's five sales had an average GRM of 92 and a median GRM of 88, which he reconciled to a final GRM for the subject property of 90. He explained that unlike in a sales comparison approach, adjustments for superior and inferior characteristics are not necessary when using a GRM approach. *Scheidt testimony; Pet'r Ex. H.*
14. As a result of his exterior inspection in September 2025, Scheidt believed that the subject property's second unit was occupied. However, he credibly explained that even if only a portion of the units of a multi-unit property are rented, appraisers must still develop an opinion of market rent for any vacant units in order to complete an income approach because those units still have value even if they are vacant. Scheidt also assumed that both sides of a duplex command comparable rent. Accordingly, he concluded that the subject property's two units would generate \$1,600/month in total rent, which is within the range of rental rates for the five sales he used to develop his GRM. Applying his GRM of 90 to the subject property's potential rent of \$1,600/month resulted in a value of \$145,000 (rounded) as of January 1, 2024. *Scheidt testimony; Pet'r Ex. H.*

### ANALYSIS

#### **A. The Assessor has the burden of proving the property's true tax value.**

15. Generally, the taxpayer has the burden of proof when challenging a property's tax assessment unless the property's assessment "increased more than five percent (5%) over the property's assessment for the prior tax year." Ind. Code § 6-1.1-15-20(b). In this case, the Assessor argued that the burden of proving the subject property's value should be on Napier because the assessment *did not* increase by more than 5% between 2023 and 2024. The Assessor is correct that the burden-shifting statute does not apply, but that only means that the assessment "as last determined by an assessing official or the county board," in this case the PTABOA determination, is presumed to equal "the property's true tax value." I.C. § 6-1.1-15-20(a). Consequently, as the party challenging the PTABOA's final determination, the Assessor has the burden of rebutting that presumption and proving the subject property's true tax value. As Napier also challenges the PTABOA determination, he bears the same burden.

#### **B. The Assessor made a case for increasing the property's 2024 assessment.**

16. We are the trier of fact in property tax appeals, and our charge is to "weigh the evidence and decide the true tax value of the property as compelled by the totality of the probative evidence" before us. I.C. § 6-1.1-15-20(f). Our conclusion "may be higher or lower than the assessment or the value proposed by a party or witness." *Id.* Regardless of which party has the initial burden of proof, either party "may present evidence of the true tax value of the property, seeking to decrease or increase the assessment." I.C. § 6-1.1-15-20(e).
17. True tax value does not mean "fair market value" or "the value of the property to the user." Ind. Code § 6-1.1-31-6(c), (e). Instead, it is determined under the rules of the

Department of Local Government Finance (“DLGF”). I.C. § 6-1.1-31-5(a); I.C. § 6-1.1-31-6(f). The DLGF defines true tax value as “market value-in-use,” which it in turn defines as “[t]he market value-in-use of a property for its current use, as reflected by the utility received by the owner or by a similar user, from the property.” 2021 REAL PROPERTY ASSESSMENT MANUAL at 2.

18. To meet its burden of proof, a party “must present objectively verifiable, market-based evidence” of the property’s value. *Piotrowski v. Shelby Cty. Ass’r*, 177 N.E.3d 127, 132 (Ind. Tax Ct. 2021) (citing *Eckerling v. Wayne Twp. Ass’r*, 841 N.E.2d 674, 677-78 (Ind. Tax Ct. 2006)). For most real property types, neither the taxpayer nor the assessor may rely on the mass appraisal “methodology” of the “assessment regulations.” *PIA Builders & Developers, LLC v. Jennings Cty. Ass’r*, 842 N.E.2d 899, 900 (Ind. Tax Ct. 2006). This is because the “formalistic application” of the procedures and schedules from the DLGF’s assessment guidelines lacks the market-based evidence necessary to establish a specific property’s market value-in-use. *Piotrowski*, 177 N.E.3d at 133.
19. Market-based evidence may include “sales data, appraisals, or other information compiled in accordance with generally accepted appraisal principles.” *Peters v. Garoffolo*, 32 N.E.3d 847, 849 (Ind. Tax Ct. 2015). Relevant assessments are also admissible, but arguments that “another property is ‘similar’ or ‘comparable’ simply because it is on the same street are nothing more than conclusions ... [and] do not constitute probative evidence.” *Marinov v. Tippecanoe Cty. Ass’r*, 119 N.E.3d 1152, 1156 (Ind. Tax Ct. 2019). The “gross rent multiplier method” is the “preferred method” for valuing properties, like the subject property, that have four or fewer rental units. Ind. Code § 6-1.1-4-39(b). Finally, the evidence must reliably indicate the property’s value as of the valuation date. *O’Donnell v. Dep’t of Local Gov’t. Fin.*, 854 N.E.2d 90, 95 (Ind. Tax Ct. 2006). For 2024 assessments, the valuation date was January 1, 2024. Ind. Code § 6-1.1-2-1.5(a).
20. The Assessor presented a USPAP-compliant appraisal prepared by Scheidt and requested we increase the 2024 assessment to reflect his concluded value. Scheidt relied on the GRM method in estimating the subject property’s value to be \$145,000 as of January 1, 2024.
21. The GRM method is a direct-capitalization technique for converting gross rent into a valuation opinion by applying the relevant multiplier (the GRM). See APPRAISAL INSTITUTE, THE APPRAISAL OF REAL ESTATE, 473-74 (15th ed.)<sup>2</sup> (discussing the gross-income and gross-rent multipliers). It eliminates the complex value adjustments required by the sales-comparison approach by assuming differences between the properties are reflected in their respective rental rates. However, to derive and apply a reliable GRM for valuation purposes, the analyzed properties must still be comparable to the subject property and to one another in terms of physical, geographic, and investment characteristics. *Id.*

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<sup>2</sup> We take official notice of this publication. 52 IAC 4-6-11 (allowing the Board to take official notice of publications, including any relevant edition of The Appraisal of Real Estate).

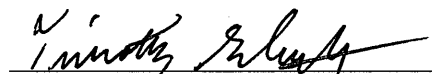
22. Napier argued that the subject property's assessment should be based on the rent he actually receives from the one unit that is being rented. He does not think he should be taxed for income he does not receive, or what he might rent the vacant unit for in the future. However, Napier's claim regarding the habitability of the second unit is not credible, and his preference that the two rental units be metered separately to avoid tenant issues related to utility bills does not change the fact that both are capable of being rented out. Additionally, as Scheidt convincingly explained, under the income approach appraisers must still develop an opinion of market rent for any vacant units because even vacant units have value. Thus, we conclude that Scheidt properly valued the subject property based on its capacity to generate market rent from both units. We also conclude that Scheidt made the reasonable assumption that both sides of the subject property were capable of generating the same monthly rent as no argument was presented to rebut his conclusion.
23. Because Napier did not meaningfully challenge any other aspects of Scheidt's appraisal, we find his opinion of value credible.<sup>3</sup> Scheidt is an experienced and qualified appraiser who complied with USPAP and applied generally accepted valuation methodology to estimate the subject property's market value-in-use as of the relevant January 1, 2024, valuation date. He relied on good substitutes for the subject property to develop his GRM analysis, and he offered credible explanations for the decisions he made regarding his selection of a GRM and monthly rental rate. Thus, we conclude that Scheidt's appraisal is sufficient to prove the subject property's true tax value by a preponderance of the evidence. Because Napier did not present any valuation evidence of his own, our inquiry ends there.

### CONCLUSION

24. We find by a preponderance of the evidence that the subject property's true tax value on January 1, 2024, was \$145,000. We therefore order its 2024 assessment changed to that amount.

Date: MAY 28, 2026

  
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Chairman, Indiana Board of Tax Review

  
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Commissioner, Indiana Board of Tax Review

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Commissioner, Indiana Board of Tax Review

<sup>3</sup> Although Napier also argued that the Assessor failed to support "key elements of various GRM analysis," and mentioned our decision in *Merle H. & Mary C. Hochstedler v. Elkhart Cty. Ass'r*, IBTR Pet. Nos. 20-015-21-1-5-00781-22, et al. (May 13, 2024), he did not develop the argument further.

**- APPEAL RIGHTS -**

You may petition for judicial review of this final determination under the provisions of Indiana Code § 6-1.1-15-5 and the Indiana Tax Court's rules. To initiate a proceeding for judicial review you must take the action required not later than forty-five (45) days after the date of this notice. The Indiana Code is available on the Internet at <<http://www.in.gov/legislative/ic/code>>. The Indiana Tax Court's rules are available at <<http://www.in.gov/judiciary/rules/tax/index.html>>.