

STATE OF OKLAHOMA  
MUSKOGEE COUNTY  
FILED OR RECORDED

BEFORE THE COUNTY BOARD OF EQUALIZATION  
MUSKOGEE COUNTY

2026 MAY 27 PM 12: 56

In re the protest of  
**DOWN QUARK SYSTEMS, LLC,**  
Applicant.

) Case No. 2026-02  
)  
) Tax Account No. 510164068



ORDER

NOW, on this 27 day of May, 2024, the above numbered and styled cause comes before the County Board of Equalization of Muskogee County upon the formal appeal of the applicant, **Down Quark Systems, LLC**. Present is the Applicant, **Down Quark Systems, LLC**, by and through **Charles Long** and **Jeff Shamma**. Also present is the County Assessor, **Ron Dean**, in person and with counsel **John Tyler Hammons**.

Having reviewed the evidence submitted herein and receiving the argument of the parties, **IT IS FOUND** by the Board of Equalization of Muskogee County as follows:

1. On or about March 13, 2026, the Applicant, Down Quark Systems, LLC, rendered Form 901 to the Muskogee County Assessor's Office demonstrating business personal property located within Muskogee County as of January 1, 2026.
2. Such Form 901 demonstrated the Applicant's original cost of the subject business personal property to be \$370,276,929, the occurring entirely within calendar year 2025.
3. On the basis of the information contained in said Form 901, the Muskogee County Assessor computed a fair cash value of \$316,543,696, utilizing a 5-year economic life for the business personal property.
4. The Muskogee County Assessor notified the Applicant on March 25, 2026, of the fair cash value determination.
5. On April 22, 2026, the Applicant timely filed an objection to the Muskogee County Assessor's fair cash value determination via Form 974 seeking an informal hearing with the Muskogee County Assessor to dispute such fair cash value determination.
6. On April 24, 2026, the Muskogee County Assessor held an informal hearing with the Applicant concerning the Muskogee County Assessor's fair cash value determination.
7. The same day, the Muskogee County Assessor issued Form 975 adjusting its fair cash value determination to \$259,193,848 after applying a 3-year economic life and timely notified the Applicant of the same.

8. On May 7, 2026, the Applicant timely filed an objection to the result of the Muskogee County Assessor's informal hearing via Form 976 seeking to appeal the Muskogee County Assessor's April 24, 2026, determination to County Board of Equalization.

9. On May 27, 2026, this Board held a hearing concerning the Applicant's formal appeal.

10. This Board has jurisdiction over this appeal pursuant to 68 OS 2877 to "confirm, correct, or adjust the valuation of real or personal property."

11. This Board is entitled to rely upon the publications adopted by the Oklahoma Tax Commission Ad Valorem Division. 68 OS 2875.

12. To determine the fair cash of the business personal property contained within the Applicant's year 2026 Form 901 is expressed as the following formula:

***(Purchase Price x Applicable Trending Factor) = Replacement Cost New***

***(Replacement Cost New x Applicable Depreciation Rate) = Fair Cash Value***

13. The original purchase price of the business personal property included within the Applicant's year 2026 Form 901 to be \$370,276,929 as evidenced by the admission of the Applicant.

14. In accordance with the Oklahoma Tax Commission Ad Valorem Division's 2026 Business Personal Property Valuation Schedule, the applicable trending factor for business personal property acquired in calendar year 2025 is 1.0000.

15. Multiplying the purchase price by the applicable trending factor produces a Replacement Cost New of \$370,276,929.

16. In accordance with the Oklahoma Tax Commission Ad Valorem Division's 2026 Business Personal Property Valuation Schedule, the business personal property contained within the Applicant's year 2026 Form 901 are appropriately classified as "Data Processing Equipment" and, in accordance with the 2026 Business Personal Property Valuation Schedule, has an economic life of 5-years. For business personal property acquired in calendar year 2025 with a 5-year life, the applicable depreciation factor is 0.85.

17. Multiplying the Replacement Cost New by the applicable depreciation factor produces a Fair Cash Value of \$314,735,389.

**NOW, THEREFORE, PREMISES CONSIDERED, IT IS ORDERED BY THE BOARD OF EQUALIZATION OF MUSKOGEE COUNTY:**

- A. The Muskogee County Assessor is directed to correct the fair cash value of the business personal property for the Applicant to be **\$314,735,389**.
- B. The Muskogee County Assessor shall cause a copy of this order to be served upon the Applicant at its address of record.
- C. The Board intends this order to be a final order for the purpose of 68 OS 2880.1.

**IT IS SO ORDERED.**

**COUNTY BOARD OF EQUALIZATION  
MUSKOGEE COUNTY**



*[Handwritten Signature]*  
Acting Chair

**Attest:**

*[Handwritten Signature]* for Polly Irving  
**Secretary**

**CERTIFICATE OF MAILING**

I, Reyna Benavides, do hereby certify that on the 27<sup>th</sup> day of May, 2026, a true and correct copy of the foregoing was sent by placing the same in the US Mail, postage prepaid thereupon, to the following:

Muskogee County Assessor  
400 W Broadway  
Muskogee, OK 74401

Down Quark Systems, LLC  
251 Little Falls  
Wilmington, DE 19808

*[Handwritten Signature]*