OFFICE OF THE PROSECUTING ATTORNEY

JEFFERSON COUNTY, OHIO

JEFFERSON COUNTY JUSTICE CENTER
16001 STATE ROUTE SEVEN
STEUBENVILLE, OHIO 43952

BRYAN H. FELMET
PROSECUTING ATTORNEY

PHONE: (740) 283-1966
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RECEIVED
FEB 22 2004
CAROL A. DOYLE
BANKRUPTCY JUDGE

ASSISTANT PROSECUTORS
CRAIG J. ALLEN
MARESA R. BAES
ANTHONY A. BATTISTA III
CERRYN R. COTTRELL MARSHALL
RICHARD FERRO
BYRON R. SHAW
GARY M. STERN

CHILD SUPPORT ENFORCEMENT AGENCY
M. CATHERINE SAVAGE DYLEWSKI

INVESTIGATROR
BILL RENSI

February 18, 2004

United States Bankruptcy Court
Northern District of Illinois
Eastern Division

RE: Conseco Finance Corp., et al
CASE NUMBER: 02-B49675

Dear Clerk:

Enclosed for filing is the Response of the County of Jefferson, Ohio. Please return a time-stamped copy to this office.

The County respectfully requests that the Court permit this Response to serve as my appearance for the purpose of any future conferences, hearings, or trial in this matter. Accordingly, please incorporate this letter into the Court's file.

Thank you.

Respectfully,

Raymond A. Agresta
Jefferson County Treasurer

Cerryn R. Cottrell Marshall
Assistant Prosecuting Attorney
Jefferson County, Ohio

cc: All those listed in Certificate of Service

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:	*	Chapter 11
Conseco Finance Corp., et al	*	
	*	Case Number 02-B49675
	*	Honorable Carol A. Doyle
	*	(Jointly Administered)
Debtors	*	
	*	
	*	
	*	

RESPONSE OF THE JEFFERSON COUNTY, OHIO, TREASURER'S OFFICE

The Jefferson County, Ohio Treasurer's Office, through his attorney, Cerryn R. Cottrell Marshall, hereby files a response to the CFS Estate's Twenty-Second Omnibus Objection to Claims and Motions for payment of Administrative expense asserted against the finance company debtors (substantive objection to reclassify certain trust collateral-related claims).

The Treasurer's Office of Jefferson County, Ohio filed a Proof of Claim on March 3, 2003 for delinquent taxes on the following two (2) parcels of real estate. According to the Parcel Maintenance records of Jefferson County, Ohio:

1. Parcel Number 17-01694 was transferred to Reese Development, Inc. April 25, 2003. (exhibit A)

2. Parcel Number 07-03551 was transferred to Joseph R. Wilson, et al. January 9, 2004. (exhibit B)

However, it has come to our attention that Consenco Finance Corporation., et al, is not currently delinquent on parcel number 23-00184-009, but will become delinquent in the amount of Four Hundred Twenty-Two Dollars and 88/100 ($422.88) on February 23, 2004. (exhibit C)

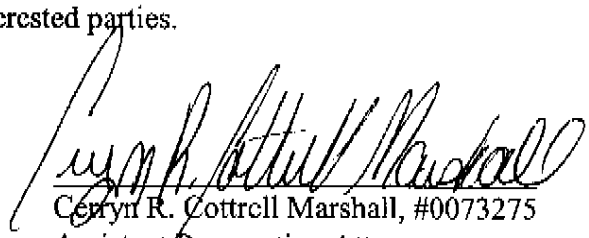
Therefore, the Jefferson County, Ohio Treasurer's Office does not oppose the relief requested by the Debtor.

Respectfully Submitted,

Cerryn R. Cottrell Marshall, #0073275
Assistant Prosecuting Attorney
Jefferson County, Ohio

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Response was served by regular U. S. Mail on this 19th day of February, 2004, to all interested parties.



Ceryn R. Cottrell Marshall, #0073275
Assistant Prosecuting Attorney
Jefferson County, Ohio

Thomas J. Augsperger
c/o Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, Illinois 60601

Greenberg Taurig, LLP
Attn: Andre Zafrani
77 West Wacker Drive
Suite 2500
Chicago, Illinois 60601

Real Property RPHIS OWNER HISTORY PUBLIC V 1.00

OWNERSHIP HISTORY SELECTION CRITERIA

PARCEL NUMBER: _____ OWNER NAME: _____
DEED NUMBER: _____ CONVEY NUM: _____
BEGINNING SALE DATE: __/__/____ ENDING SALE DATE: __/__/____

PARCEL ID	TRNFR DATE	OWNER NAME
17-01694-000	09/03/2003	REESE HEATH A
17-01694-000	04/25/2003	REESE DEVELOPMENT INC
17-01694-000	01/15/2003	CONSECO FINANCE SERVICING
17-01694-000	05/17/1995	KNIGHT JOSEPH A & SHERI B
17-01694-000	08/06/1993	CANFIELD TIMMY L

SALES INFORMATION

CONVEY #: 861 DEED:
VALID: SOURCE: TYPE: LB EX:
AMT: 26,000 PAR: 1 SYSTEM: T

<NEXT><PREV><F7-RESUME FIRST SCREEN><PF3-PRINT SCREEN> 18-Feb-04

EXHIBIT A

Real Property RPHIS OWNER HISTORY PUBLIC V 1.00

OWNERSHIP HISTORY SELECTION CRITERIA

PARCEL NUMBER: 07-03551- OWNER NAME: _____

DEED NUMBER: _____ CONVEY NUM: _____

BEGINNING SALE DATE: __/__/____ ENDING SALE DATE: __/__/____

PARCEL ID	TRNFR DATE	OWNER NAME
07-03551-000	01/16/2004	BERRY MICHAEL S
07-03551-000	01/09/2004	WILSON JOSEPH R JR &
07-03551-000	07/24/2002	CONSECO FINANCIAL SERVICE
07-03551-000	05/29/1997	TERRY RICHARD & CRYSTAL
07-03551-000	01/01/1990	MILLER JOHANNA B

SALES INFORMATION

CONVEY #: 44 DEED:

VALID: SOURCE: TYPE: LB EX:

AMT: 25,000 PAR: 1 SYSTEM: T

<NEXT><PREV><F7-RESUME FIRST SCREEN><PF3-PRINT SCREEN> 18-Feb-04

EXHIBIT B

18-Feb-04 PARCEL MAINTENANCE TAX YEAR : 2004 V 1.00

Parcel : 23-00184-009
Tax dis : 23 ROSS TWP-EDISON LSD
School : 4102 EDISON LSD
Map # : 23-3100-003J0
Bk/p id :
Own Nm1 : CONSECO FINANCE SERVICE
Own Nm2 : CORP.
Own Ad1 : 1400 TURBINE DR
Own Ad2 : RAPID CITY SD 57703

Sort By : CONSECO FINANCE SERVICE

Class : 561 Ex: Rate Cd: 2

Land :	18700	6550
Impr :	55500	19430
Total :	74200	25980
Cauv :	0	0

Deed Vol/Pg: 0577/0255
Neigh Cd : 00400 Acres 6.707

Adjusts : SPE
Bnk/Forcl: Suspend Code:
Contract :
Data/Code:
Escrow No:
Mail Acct:
Mail Nm1 : CONSECO FINANCE SERVICE
Mail Nm2 : CORP.
Mail Ad1 : 1400 TURBINE DR
Mail Ad2 : RAPID CITY SD 57703

New Const: Division:
Cert Delq: Remarks:

Legal 1: 3-11-31 5-A-9 LAND 6.7067
Legal 2: MAP-23-31-3J
Legal 3: SPLIT
Legal 4:
Loc Adr: 2683 CH 59
Maint Date : 07/11/03 A 08/05/03 T
D:Act C:Act F:Act

Action,Parcel: _____

EXHIBIT 2

REAL PROPERTY JEFFERSON Tax Detail - Real PUBLIC V 1.00

23-00184-009 CONSECO FINANCE SERVICE 3-11-31 5-A-9 LAND 6.70

44026-5 Cer Yr CORP. MAP-23-31-3J

Prior Delq	Adj-Del	December	Adj-Dec	June	Adj-Jun	
0.00	0.00	617.67	0.00	617.67	0.00	ReCharge
		154.75	0.00	154.75	0.00	Credit
0.00		462.92		462.92		Subtot
		0.00	0.00	0.00	0.00	Homestd
		46.29	0.00	46.29	0.00	Rollbck
		0.00	0.00	0.00	0.00	Reduct
0.00		416.63		416.63		Subtot
0.00	0.00	0.00	0.00	0.00	0.00	Int/Pen
0.00		0.00		0.00		Re Paid
0.00		416.63		416.63		Re Owed
0.00		0.00		0.00		Sa Paid
0.00		6.25		0.00		Sa Owed
0.00		422.88		416.63		Tot Owed
0.00		0.00		0.00	0.00	Tot Paid
0.00<-Delq		422.88<-First		839.51<-Full yr		Tot Owed
					0.00	Surplus
					0.00	Prorata

Paid dates :

Adds/Rems #: 18-Feb-04

RPDET

Tax Year: 2003

Parcel: _____