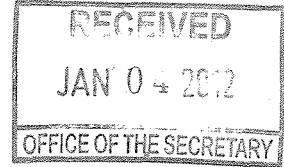


COPY

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
January 3, 2012

ADMINISTRATIVE PROCEEDING
File No. 3-14458



In the Matter of :
LEILA C. JENKINS, :
Respondent. :
_____ :

**DIVISION OF ENFORCEMENT'S OPPOSITION AND RESPONSE
TO MOTION FOR DEFAULT JUDGMENT
OF RESPONDENT LEILA C. JENKINS**

The Division of Enforcement ("Division") hereby opposes and responds as follows to a "Motion for Default Judgment Against SEC's Division of Enforcement Motion for Summary Disposition [sic]" ("Recent Motion"), filed on December 30, 2011 by Respondent Leila C. Jenkins ("Jenkins" or "Respondent"). For the reasons set forth below, the Division has properly served all filings in this matter, has not violated any order of the Administrative Law Judge ("ALJ"), has not acted in bad faith or made grievous errors, and is not otherwise in default in this proceeding. Therefore, the Division requests that the ALJ deny the Recent Motion.

1. On December 7, 2011 the Division filed a motion for summary disposition in the above-captioned matter as well as in a related proceeding captioned In the Matter of Locke Capital Management, Inc., A.P. File Number 3-14457 ("Related Proceeding") (the respondents in both matters collectively referred to herein as "Respondents"). As noted in the certificate of service to the Division's summary disposition motions in both proceedings, the Division served Respondents by overnight mail at the address in Newport, Rhode Island at which the Office of

the Secretary served the Order Instituting Proceedings (“RI Address”). The Division’s motions were delivered to the RI Address on December 8, 2011. See Exhibits 1 & 2.

2. On December 16, 2011, the Division filed oppositions to the motions for summary disposition of the Respondents in the above-captioned matter as well as in the Related Proceeding. As noted in the certificate of service to the Division’s oppositions, the Division served the Respondents by overnight mail at the RI Address. The Division’s oppositions were delivered to the RI Address on December 19, 2011. See Exhibit 3 & 4.

3. On December 15, 2011, Respondent’s representative sent an email to the ALJ complaining that she had not received the Division’s motions for summary disposition.

4. On December 16, 2011, in response to the foregoing email, the Division indicated to the ALJ and the Respondents in an email communication that, in addition to serving its motions for summary disposition and oppositions to the Respondents’ motions for summary disposition as indicated above, it would voluntarily send additional copies of the foregoing filings to Jenkins at the Metropolitan Correctional Center in New York, NY, where Jenkins is incarcerated, using an address Jenkins provided in email communications with the ALJ (“NY Address”). The Division learned that the NY Address could not receive overnight mail, so the Division attempted to send—on December 16, 2011—the foregoing filings to the NY Address by first class mail, noting on the envelopes that they were “Legal Mail,” as Jenkins had suggested in her email communications with the ALJ. The Division notified the ALJ and the Respondents of the above course of action via email on December 19, 2011. In the Recent Motion (at p.2), Respondent acknowledges receiving the Division’s oppositions to the Respondents’ motions for summary disposition (but apparently not the Division’s motions for summary disposition) at the NY Address on December 23, 2011 (or, seven days after mailing). Today (January 3, 2012) the

Division will again attempt to send its motions for summary disposition to the NY Address in hopes that they will arrive in approximately seven days (or, on or about January 10, 2012). If the ALJ is inclined to provide a brief additional time period (beyond the foregoing anticipated delivery date) to Respondents to file oppositions or responses to the Division's motions for summary disposition, the Division does not object.

5. On December 19, 2011, the ALJ issued an order in the above-captioned matter as well as in the Related Proceeding indicating in part that the Division shall serve all papers on the Respondents at both the NY Address and the RI Address. The Division has not filed or served any papers in either proceeding since the date of the ALJ's order. The Division intends to comply fully with the ALJ's order for future filings. The Division also obviously will comply fully with any additional orders the ALJ issues as to service or otherwise. However, at the current time, the Division is not in violation of any of the ALJ's orders, and Respondent's contention otherwise in the Recent Motion is false and unfounded.

6. Because at the time of the Division's filing of its motions for summary disposition (on December 7, 2011) and its oppositions to Respondents' motions for summary disposition (on December 16, 2011), the ALJ had not yet issued the order (dated December 19, 2011) requiring the Division to serve all papers at both the NY Address and the RI Address, the Division's service of the foregoing to the RI Address was valid service under Rule 150 of the Commission's Rules of Practice [17 C.F.R. § 201.150]. It is the Division's position that Respondent never properly filed a change of address in accordance with Rule 102(d)(1) of the Commission's Rules of Practice [17 C.F.R. § 201.102(d)(1)].

7. Moreover, Respondent has not articulated and cannot meet the criteria for a default set forth in Rule 155(a) of the Commission's Rules of Practice [17 C.F.R. § 201.155(a)]

because none of these criteria apply to the Division. Specifically, the ALJ has not ordered the Division to cure any deficient filing, and therefore the Division has not failed to do so.

8. The Division further notes that much of the Recent Motion focuses on service of the complaint and summons in the “District Court case.” Service in that action has been fully briefed and decided upon by the District Court, and any issues concerning service can be and are being addressed in the pending appeal of that action.

9. Any remaining contentions in the Recent Motion are false and/or irrelevant to this proceeding, and the Division denies the same. The Division also denies any alleged bad faith or misconduct on its part. To the extent the ALJ would like further briefing or a hearing on any of the points in the Recent Motion, the Division will be happy to comply.


CONCLUSION

For the foregoing reasons, the Division respectfully requests that the ALJ deny the Recent Motion and any and all relief sought therein. Although the exact relief that Respondent seeks, and the basis for such relief, is not entirely clear to the Division, without limitation, the ALJ should not default the Division, should not reject any filings the Division has made, and should not grant summary disposition to Respondent based on anything set forth in the Recent Motion (or otherwise).

Respectfully submitted,

DIVISION OF ENFORCEMENT

By its attorneys,



Frank C. Huntington, Senior Trial Counsel
Naomi J. Sevilla, Senior Counsel
Boston Regional Office

33 Arch Street, 23rd Floor
Boston, MA 02110
Phone: (617) 573-8960
Fax: (617) 573-4590
Email: huntingtonf@sec.gov; sevillan@sec.gov

Dated: January 3, 2012

EXHIBIT 1



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BOSTON REGIONAL OFFICE

23rd FLOOR
33 ARCH STREET
BOSTON, MA 02110
TELEPHONE: (617) 573-8900
FACSMILE: (617) 573-4590

NAOMI J. SEVILLA
DIRECT DIAL: (617) 573-8826

December 7, 2011

VIA OVERNIGHT MAIL

Elizabeth M. Murphy
Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Matter of Locke Capital Management, Inc. (AP File No. 3-14457)

Dear Ms. Murphy:

On behalf of the Division of Enforcement, enclosed for filing in the above-referenced matter are one signed original and three copies of each of the following documents:

- 1) Division of Enforcement's Motion for Summary Disposition Against Respondent Locke Capital Management, Inc.; and
- 2) Division of Enforcement's Appendix in Support of Motion for Summary Disposition Against Respondent Locke Capital Management, Inc.

Please contact me if you have any questions. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Naomi J. Sevilla".

Naomi J. Sevilla
Senior Counsel
Division of Enforcement

Shipment Receipt

Transaction Date: 07 Dec 2011
 Tracking Number: 1ZA376E1NT90595118

1 Address Information		
Ship To: Locke Capital Management, Inc. c/o Liela C. Jenkins 270 Bellevue Avenue, #249 NEWPORT RI 028403516	Ship From: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916	Return Address: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916

2 Package Information			
Weight	Dimensions / Packaging	Declared Value	Reference Numbers
1. 2.0 lbs	UPS PAK		

3 UPS Shipping Service and Shipping Options	
Service: UPS Next Day Air	
Guaranteed By: 12:00 PM Thursday, 12/8/11	
Shipping Fees Subtotal:	23.31 USD
Transportation	20.45 USD
Fuel Surcharge	2.86 USD
Additional Shipping Options	
Deliver Without Signature	
Package 1: Deliver Without Signature	
	0.00 USD
Quantum View Notify E-mail Notifications:	
No Charge	
1 parkerl@sec.gov: Exception, Delivery	
E-mail Failure Notification: parkerl@sec.gov	

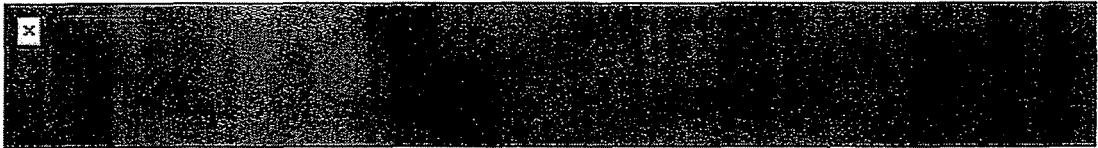
4 Payment Information	
Bill Shipping Charges to:	Shipper's Account A376E1
A discount has been applied to the Daily rates for this shipment	
Total Charged:	23.31 USD
Negotiated Total:	4.93 USD

Note: Your invoice may vary from the displayed reference rates.

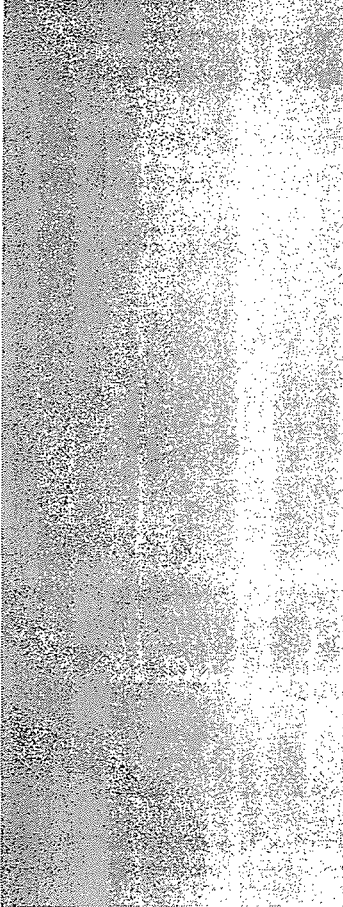
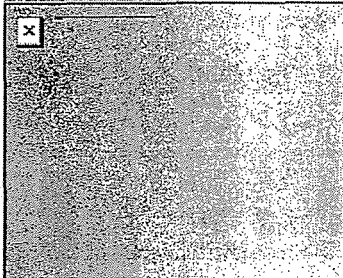
* For delivery and guarantee information, see the UPS Service Guide. To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.

Parker, Laura

From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 08, 2011 10:51 AM
To: Parker, Laura
Subject: UPS Delivery Notification, Tracking Number 1ZA376E1NT90595118



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At the request of SEC-Boston REGIONAL, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: 1ZA376E1NT90595118
Delivery Date / Time: 08-December-2011 / 10:24 AM

Delivery Location: FRONT DESK
Signed by: KATE

Shipment Detail

Ship To:
c/o Liela C. Jenkins
Locke Capital Management, Inc.
270 BELLEVUE AVE
NEWPORT
RI
02840
US
Number of Packages: 1
UPS Service: NEXT DAY AIR
Weight: 2.0 LBS

EXHIBIT 2



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BOSTON REGIONAL OFFICE

23rd FLOOR
33 ARCH STREET
BOSTON, MA 02110
TELEPHONE: (617) 573-8900
FACSIMILE: (617) 573-4590

NAOMI J. SEVILLA
DIRECT DIAL: (617) 573-8826

December 7, 2011

VIA OVERNIGHT MAIL

Elizabeth M. Murphy
Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Matter of Leila C. Jenkins (AP File No. 3-14458)

Dear Ms. Murphy:

On behalf of the Division of Enforcement, enclosed for filing in the above-referenced matter are one signed original and three copies of each of the following documents:

- 1) Division of Enforcement's Motion for Summary Disposition Against Respondent Leila C. Jenkins; and
- 2) Division of Enforcement's Appendix in Support of Motion for Summary Disposition Against Respondent Leila C. Jenkins.

Please contact me if you have any questions. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Naomi J. Sevilla".

Naomi J. Sevilla
Senior Counsel
Division of Enforcement

Shipment Receipt

Transaction Date:
Tracking Number:

07 Dec 2011
1ZA376E1NT92497720

1 Address Information

Ship To: Liela C. Jenkins Liela C. Jenkins 270 Bellevue Avenue, #249 NEWPORT RI 028403516	Ship From: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916	Return Address: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916
--	---	--

2 Package Information

Weight	Dimensions / Packaging	Declared Value	Reference Numbers
1. 2.0 lbs	UPS PAK		

3 UPS Shipping Service and Shipping Options

Service:
UPS Next Day Air
Guaranteed By:
12:00 PM Thursday, 12/8/11

Shipping Fees Subtotal:	23.31 USD	Additional Shipping Options
Transportation	20.45 USD	Deliver Without Signature
Fuel Surcharge	2.86 USD	Package 1: Deliver Without Signature
		0.00 USD
		Quantum View Notify E-mail Notifications:
		No Charge
		1 parkerl@sec.gov: Exception, Delivery
		E-mail Failure Notification: parkerl@sec.gov

4 Payment Information

Bill Shipping Charges to: Shipper's Account A376E1

A discount has been applied to the Daily rates for this shipment

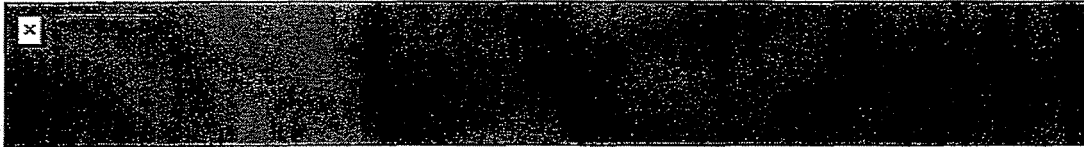
Total Charged:	23.31 USD
Negotiated Total:	4.93 USD

Note: Your invoice may vary from the displayed reference rates.

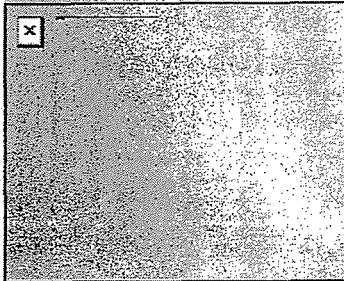
* For delivery and guarantee information, see the UPS Service Guide. To speak to a customer service representative, call 1-800-PICK-UPS for domestic services and 1-800-782-7892 for international services.

Parker, Laura

From: UPS Quantum View [auto-notify@ups.com]
Sent: Thursday, December 08, 2011 10:51 AM
To: Parker, Laura
Subject: UPS Delivery Notification, Tracking Number 1ZA376E1NT92497720



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At the request of SEC-Boston REGIONAL, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: 1ZA376E1NT92497720
Delivery Date / Time: 08-December-2011 / 10:24 AM

Delivery Location: FRONT DESK
Signed by: KATE

Shipment Detail

Ship To:
Liela C. Jenkins
Liela C. Jenkins
270 BELLEVUE AVE
NEWPORT
RI
02840
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Weight: 2.0 LBS

EXHIBIT 3



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BOSTON REGIONAL OFFICE

23rd FLOOR
33 ARCH STREET
BOSTON, MA 02110
TELEPHONE: (617) 573-8900
FACSIMILE: (617) 573-4590

NAOMI J. SEVILLA
DIRECT DIAL: (617) 573-8826

December 16, 2011

VIA FACSIMILE (202) 772-9324
AND OVERNIGHT MAIL

Elizabeth M. Murphy
Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Matter of Locke Capital Management, Inc. (AP File No. 3-14457)

Dear Ms. Murphy:

On behalf of the Division of Enforcement, enclosed for filing in the above-referenced matter are one signed original and three copies of the **Division of Enforcement's Opposition To Motion For Summary Disposition Of Respondent Locke Capital Management, Inc.**

Please contact me with any questions. Thank you.

Sincerely,

Naomi J. Sevilla (lap)

Naomi J. Sevilla
Senior Counsel
Division of Enforcement

Shipment Receipt

Transaction Date: 16 Dec 2011
 Tracking Number: 1ZA376E1NT91195085

1 Address Information		
Ship To: Locke Capital Management, Inc. c/o Liela C. Jenkins 270 Bellevue Avenue, #249 NEWPORT RI 028403516	Ship From: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916	Return Address: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916

2 Package Information			
Weight	Dimensions / Packaging	Declared Value	Reference Numbers
1. 0.5 lbs (Letter billable)	UPS Letter		

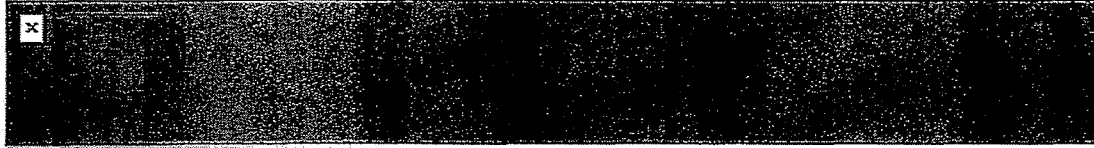
3 UPS Shipping Service and Shipping Options																						
Service: UPS Next Day Air Guaranteed By: 12:00 PM Monday, 12/19/11	<table style="width: 100%; border: none;"> <tr> <td style="width: 30%;">Shipping Fees Subtotal:</td> <td style="width: 10%; text-align: right;">19.15 USD</td> <td style="width: 60%;">Additional Shipping Options</td> </tr> <tr> <td>Transportation</td> <td style="text-align: right;">16.80 USD</td> <td>Deliver Without Signature</td> </tr> <tr> <td>Fuel Surcharge</td> <td style="text-align: right;">2.35 USD</td> <td>Package 1: Deliver Without Signature</td> </tr> <tr> <td></td> <td></td> <td style="text-align: right;">0.00 USD</td> </tr> <tr> <td></td> <td></td> <td>Quantum View Notify E-mail Notifications:</td> </tr> <tr> <td></td> <td></td> <td style="text-align: right;">No Charge</td> </tr> <tr> <td></td> <td></td> <td>1 parkerl@sec.gov: Exception, Delivery E-mail Failure Notification: parkerl@sec.gov</td> </tr> </table>	Shipping Fees Subtotal:	19.15 USD	Additional Shipping Options	Transportation	16.80 USD	Deliver Without Signature	Fuel Surcharge	2.35 USD	Package 1: Deliver Without Signature			0.00 USD			Quantum View Notify E-mail Notifications:			No Charge			1 parkerl@sec.gov: Exception, Delivery E-mail Failure Notification: parkerl@sec.gov
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		0.00 USD																				
		Quantum View Notify E-mail Notifications:																				
		No Charge																				
		1 parkerl@sec.gov: Exception, Delivery E-mail Failure Notification: parkerl@sec.gov																				

4 Payment Information	
Bill Shipping Charges to:	Shipper's Account A376E1
A discount has been applied to the Daily rates for this shipment	
Total Charged:	19.15 USD
Negotiated Total:	4.35 USD

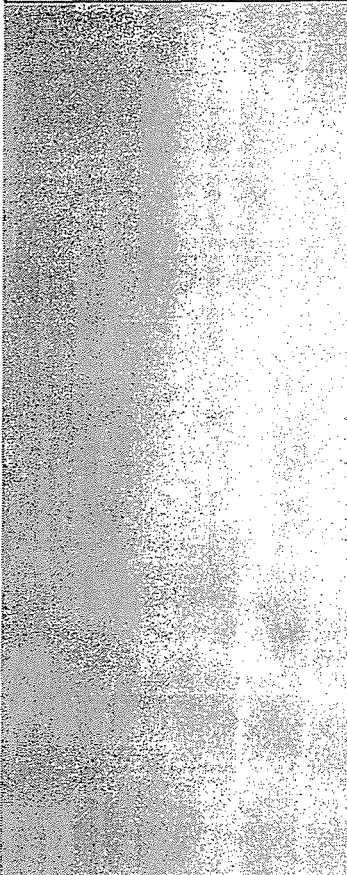
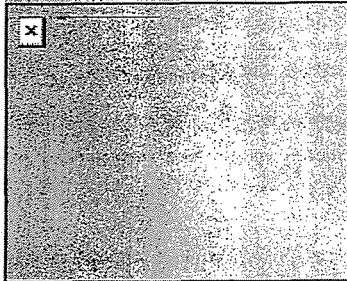
Note: Your invoice may vary from the displayed reference rates.

Parker, Laura

From: UPS Quantum View [auto-notify@ups.com]
Sent: Monday, December 19, 2011 9:31 AM
To: Parker, Laura
Subject: UPS Delivery Notification, Tracking Number 1ZA376E1NT91195085



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Important Delivery Information

Tracking Number: [1ZA376E1NT91195085](#)
Delivery Date / Time: 19-December-2011 / 9:09 AM

Delivery Location: OFFICE
Signed by: STUB

Shipment Detail

Ship To:
c/o Liela C. Jenkins
Locke Capital Management, Inc.
270 BELLEVUE AVE
NEWPORT
RI
02840
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Weight: 0.5 LBS

EXHIBIT 4



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
BOSTON REGIONAL OFFICE

23rd FLOOR
33 ARCH STREET
BOSTON, MA 02110
TELEPHONE: (617) 573-8900
FACSIMILE: (617) 573-4590

NAOMI J. SEVILLA
DIRECT DIAL: (617) 573-8826

December 16, 2011

VIA FACSIMILE (202) 772-9324
AND OVERNIGHT MAIL

Elizabeth M. Murphy
Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Matter of Leila C. Jenkins (AP File No. 3-14458)

Dear Ms. Murphy:

On behalf of the Division of Enforcement, enclosed for filing in the above-referenced matter are one signed original and three copies of the **Division of Enforcement's Opposition to Motion For Summary Disposition Of Respondent Leila C. Jenkins.**

Please contact me with any questions. Thank you.

Sincerely,

Naomi J. Sevilla (lap)

Naomi J. Sevilla
Senior Counsel
Division of Enforcement

Shipment Receipt

Transaction Date: 16 Dec 2011
 Tracking Number: 1ZA376E1NT92825713

1 Address Information		
Ship To: Liela C. Jenkins Liela C. Jenkins 270 Bellevue Avenue, #249 NEWPORT RI 028403516	Ship From: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916	Return Address: SEC-Boston REGIONAL Naomi Sevilla 33 Arch Street 23rd FL BOSTON MA 02110 Telephone:6175738916

2 Package Information			
Weight	Dimensions / Packaging	Declared Value	Reference Numbers
1. 0.5 lbs (Letter billable)	UPS Letter		

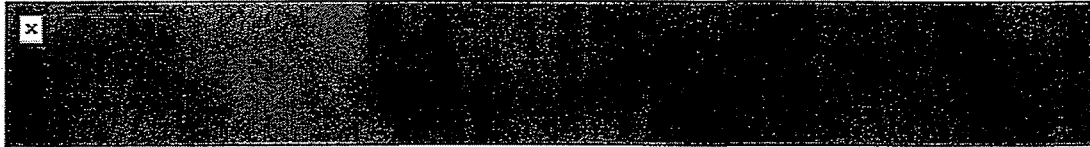
3 UPS Shipping Service and Shipping Options	
Service: UPS Next Day Air	
Guaranteed By: 12:00 PM Monday, 12/19/11	
Shipping Fees Subtotal:	19.15 USD
Transportation	16.80 USD
Fuel Surcharge	2.35 USD
	Additional Shipping Options
	Deliver Without Signature
	Package 1: Deliver Without Signature
	0.00 USD
	Quantum View Notify E-mail Notifications:
	No Charge
	1 Parkerl@sec.gov: Exception, Delivery E-mail Failure Notification: parkerl@sec.gov

4 Payment Information	
Bill Shipping Charges to:	Shipper's Account A376E1
A discount has been applied to the Daily rates for this shipment	
Total Charged:	19.15 USD
Negotiated Total:	4.35 USD

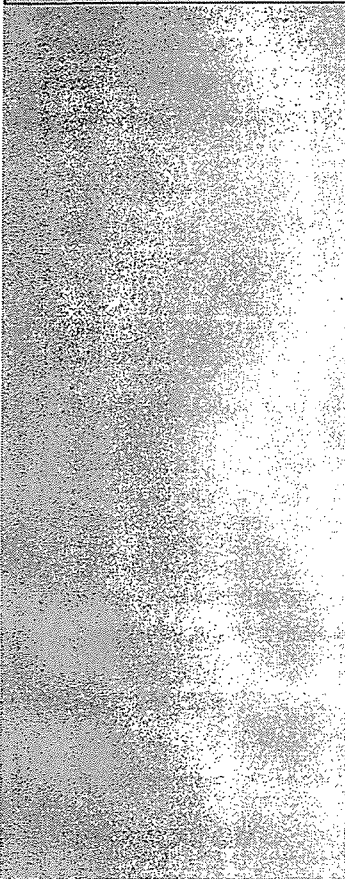
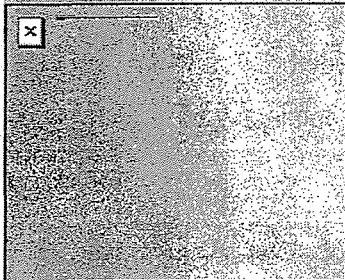
Note: Your invoice may vary from the displayed reference rates.

Parker, Laura

From: UPS Quantum View [auto-notify@ups.com]
Sent: Monday, December 19, 2011 9:31 AM
To: Parker, Laura
Subject: UPS Delivery Notification, Tracking Number 1ZA376E1NT92825713



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Tracking Number: 1ZA376E1NT92825713
Delivery Date / Time: 19-December-2011 / 9:09 AM

Delivery Location: OFFICE
Signed by: STUB

Shipment Detail

Ship To:
Liela C. Jenkins
Liela C. Jenkins
270 BELLEVUE AVE
NEWPORT
RI
02840
US
Number of Packages: 1
UPS Service: NEXT DAY AIR
Weight: 0.5 LBS
