From: Michael Wu

Proposal: 1432 (RIN 7100 AD 82) Reg. V V - Proprietary Trading and Certain Interests In, and Relationships

Subject: Volcker Rule -- Prohibitions and Restrictions on Proprietary Trading and Certain Interests In, and R

Comments:

Dear Ms. Karen Barr, IAA General Counsel,,

This is Michael Wu. I have a question on proprietary trading (Ref. S74111-274), which I need your advice.

I am one of millions of victims of Risk Transfer products of the Prudential Insurance Company of America (PICA).

The Prudential Fund Series (The Fund) has three discretionary client accounts: (1) the entrusted Advanced Series Trust (AST) of Prudential Variable Annuities (VA) Customers, (2) the private unaffiliated mutual fund (also know as Variable Insurance Trusts, or VITs) of the Prudential Insurance Company of America (PICA), and (3) junk bond fund (also known as Target Date Funds or Similar Investment Options, or private Broker-Dealer self-Offering, or BDOs) of Prudential Retirement Insurance and Annuity Company (PRIAC).

AST Investment Services, Inc. (ASTI) whose direct parent is Prudential Annuities, Inc. and Prudential Investments LLC (PI) are the two investment advisers. ASTI and PI hire several sub-advisers per SEC Rules in order to detect potential market-timing activities. Some sun-advisers are ASTI and PI affiliates. Sub-adviser is paid 0.45% for AuM under $100M and 0.40% for AuM over $100M.

Prudential Investment Management, Inc. (PIM) is investment manager of BDOs accounts of PRIAC, and separate accounts of PICA and Prudential Annuities Life Assurance Corporation (PALAC). PIM is also a sub-adviser of AST and VITs.

PICA is the investment adviser and Prudential Investments LLC (PI) is the sub-adviser and investment manager of The Fund. The Fund has 12 portfolios and PI hires seven sub-advisers (Jennison Associates LLC, Prudential Investment Management, Inc. (PIM), Quantitative Management Associates LLC, LSV Asset Management, Marsico Capital Management, LLC, T. Rowe Price Associates, Inc., and William Blair & Company LLC) as portfolio managers to help manage said 12 portfolios.

PICA has general accounts and separate proprietary accounts, which are not disclosed explicitly. Our understanding is that PICA proprietary accounts are: (1) the 64 PICA Omnibus accounts, which PICA registered with 64 unaffiliated Mutual Fund Companies and (2)(a) the 64 PI sub-accounts of the private VITs, and (b) the 64 ASTI sub-accounts of the

entrusted AST in underlying 64 PICA Omnibus accounts, which Prudential Financial Companies operate with the explicit
intent to conceal the activities from other individuals, usually because it is being done (by the perpetrator) without the other individuals' knowledge or consent. (ps. Prudential Financial Companies commingled PICA private VITs with the entrusted
AST in underlying 64 PICA Omnibus accounts without the knowledge or consent of Prudential VA customers.). Prudential
Financial, Inc. (PFI) is the shareholder of said 64 ASTI sub-accounts of the entrusted AST in underlying 64 PICA Omnibus
accounts and 138 PI accounts of PICA private VITs, of which 64 are PI sub-accounts in undrlying 64 PICA Omnibus
accounts. I.e., each PICA Omnibus account has two sub-accounts: (1) one is ASTI sub-account of the entrusted AST, and
(2) the other one is PI sub-account of PICA private VITs.

PI provides research to PICA separate accounts of affiliates the following four products: (1) Group Life Insurance, which allows
PI to use contract values of Group Life Insurance to buy shares of VITs, (2) Annuities, which allows PI to allocate Contract Values
of Annuities to VITs, i.e., allows PI to use VITs to buy shares of AST from her Annuities affiliate (i.e., ASTI), (3) Individual Life Insurance, which allows
PI to use contract values of Individual Life Insurance to buy shares of VITs, and (4) Retirement Products,
which allows PI to use contract values of Group Variable Annuities to buy share of VITs.

Besides, Prudential Prospectus has a fraudulent "Predetermined Mathematical Formula", which has nothing except a projected
Annual Income Amount 'P', which is derived from the predetermined Return of Equity (ROE) of PFI. (ps. Executive Officers of PFI
already predetermined ROE of 2012 to be 13% to 14% during PFI 4Q2011 Earnings Call held on 2/9/2012.)

With the framework ready are described above, PI directs numerous in-house, after-market-hours, two-sided, self-hedging
"Benefit Fund Transfers" between ASTI sub-accounts and PI sub-accounts in underlying 64 PICA Omnibus accounts without
the involvement of underlying unafflicated Mutual Fund Companies and all Prudential VA customer far after the market is over
by using PICA private VITs and PRIAC BDOs as hedge funds as highlighted in Attachment 8. Trade Misallocation Scheme
Based on Churning and Embezzlement, Attachment 24. How Prudential Insiders Help Customers Grow and Protect
Wealth, Attachment 28. Prudential Embezzlement of Benefit Fund Transfer (Partial), and Attachment 28d. How
Predetermined Mathematical Formula Works for the Projected 'P', which transferred billions of dollars from the ASTI
sub-accounts of the entrusted AST to the PI sub-accounts of PICA private VITs in underlying 64 PICA Omnibus accounts
annually for the past five plus years. It will transfer more than 15 billions in 2012 because their Assets under Management
increased from about $600B as of 12/31/2011 to $943B as of 07/26/2012 due to their phony guarantees on their VA
products with Highest Daily Lifetime / Living Benefit Features.

All information compiled in this e-mail is from Prudential Prospectus,
Brochure, Financial Report, Notice, News, SEC
Investment Adviser Public Disclosure (IAPD) FORM ADV of Prudential investment
advisers, and public websites
including SEC and FIRNA.

Our question for you, Ms. Karen Barr, is:

Is said in-house, after-market-hours, two-sided, self-hedging "Benefit
Fund Transfers"
based on churning and embezzlement of Prudential Financial Companies a
Proprietary
Trading, which should be prohibited and restricted?

Please advice.

Michael Wu