

Bruce B. Strahan, Jr.
Bank of America Building
300 West Main Street, 2nd Floor
Denison, Texas 75020-3125

Fred O. Delin
Bank of America Building
300 West Main Street, 2nd Floor
Denison, TX 75020-3125

Thomas Budziszewski
dba Premium Income Brokers
2909 Hillcroft, Suite 575
Houston, TX 77057

EMERGENCY CEASE AND DESIST ORDER

This is your OFFICIAL NOTICE of the issuance by the Securities Commissioner of the State of Texas ("Securities Commissioner") of an EMERGENCY CEASE AND DESIST ORDER pursuant to Section 23-2 of The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2004-2005) ("Texas Securities Act").

The Staff of the Enforcement Division ("the Staff") of the Texas State Securities Board ("the Securities Board") has presented evidence sufficient for the Securities Commissioner to find that:

FINDINGS OF FACT

1. Bruce B. Strahan, Jr. ("Respondent Strahan") maintains a last known business address of Bank of America Building, 300 West Main Street, 2nd Floor, Denison, Texas 75020-3125.
2. Fred O. Delin ("Respondent Delin") maintains a last known business address of Bank of America Building, 300 West Main Street, 2nd Floor, Denison, Texas 75020-3125.
3. Tri-Forex International, Ltd. aka Tri-Forex International Ltd aka TriForex International Ltd. aka Tri-Forex Ltd. ("Respondent Tri-Forex") maintains last known business addresses of 2470 Westlake Avenue N., Suite 104, Seattle, Washington 98109 and 2400 N.W. 80th Street, #139, Seattle, Washington 98117-4449.
4. Premium Income Corp aka Premium Income Corp Account aka PIC aka Premium Income Corp. ("Respondent PIC") maintains last known business addresses of 2470 Westlake Avenue N., Suite 104, Seattle, Washington 98109 and 2400 N.W. 80th Street, #139, Seattle, Washington 98117-4449.

5. Complete Estate Services LLC aka Complete Estate Services ("Respondent Complete Estate") maintains a last known business address of Bank of America Building, 2nd Floor, 300 West Main Street, Denison, Texas 75020-3125. The registered agent for Respondent Complete Estate is CT Corporation System, 350 St. Paul Street, Dallas, Texas 75201.
6. Thomas Budziszewski, dba Premium Income Brokers, maintains a last known business address of 2909 Hillcroft, Suite 575, Houston, TX 77057.
7. Respondents are offering for sale in Texas and on Internet websites with URLs of www.premiumincomecorp.com and www.premiumbrokers.com (referencing an exclusive licensing agreement with Union Bank Inter.net aka UnionBankInter.net aka UBI.net), investments in the "Premium Income Currency Call Deposit" investment program ("the investment program") in which investors can earn 10% annually on a 5-year investment and 13.2% annually on a 10-year investment.
8. Respondents represent that the investment program does not place investors' deposits at risk, is totally non-speculative and is guaranteed.
9. The investment program has not been registered by qualification, notification or coordination and no permit has been granted for its sale in Texas.
10. Respondents have not been registered with the Securities Commissioner as dealers or agents at any time material hereto.
11. In connection with the offer for sale of the investment program, Respondents are intentionally failing to disclose the following material facts:
 - a. the identities of the principals of Respondents PIC and Tri-Forex;
 - b. the relevant risks of the investment program;
 - c. the financial experience or background of the principals of Respondents PIC and Tri-Forex;
 - d. the past record of Respondents PIC and Tri-Forex in repaying investors in the investment program; and
 - e. the assets, liabilities and profitability of Respondents PIC and Tri-Forex.
12. The statements made by Respondents in connection with the offer of the investment program, stating that the investment program does not place investors' deposits at risk and is totally non-speculative, are materially misleading or otherwise likely to deceive the public in light of Respondents failure to disclose the information set forth in Finding of Fact 11.

13. This Emergency Cease and Desist Order corrects a typographical error in Emergency Cease and Desist Order ENF-05-CDO-1580 issued on January 24, 2005 against Respondents.

CONCLUSIONS OF LAW

1. The above-described investment program is a "security" as that term is defined by Section 4.A of the Texas Securities Act.
2. Respondents are violating Section 7 of the Texas Securities Act by offering securities for sale in Texas at a time when the securities are not registered with the Securities Commissioner.
3. Respondents are violating Section 12 of the Texas Securities Act by offering securities for sale in Texas without being registered pursuant to the provisions of Section 12 of the Texas Securities Act.
4. Respondents are engaging in fraud in connection with the offer for sale of securities.
5. Respondents have made an offer containing a statement that is materially misleading or otherwise likely to deceive the public.
6. Respondents' conduct, acts, and practices threaten immediate and irreparable public harm.
7. The foregoing violations constitute bases for the issuance of an Emergency Cease and Desist Order pursuant to Section 23-2 of the Texas Securities Act.

ORDER

1. It is therefore ORDERED that Respondents immediately CEASE AND DESIST from offering for sale any security in Texas until the security is registered with the Securities Commissioner or is offered for sale pursuant to an exemption from registration under the Texas Securities Act.
2. It is further ORDERED that Respondents immediately CEASE AND DESIST from acting as securities dealers or agents in Texas until Respondents are registered with the Securities Commissioner or are acting pursuant to an exemption from registration under the Texas Securities Act.
3. It is further ORDERED that Respondents immediately CEASE AND DESIST from engaging in any fraud in connection with the offer for sale of any security in Texas.
4. It is further ORDERED that Respondents immediately CEASE AND DESIST from offering securities in Texas through an offer containing a statement that is materially misleading or otherwise likely to deceive the public.

NOTICE

Pursuant to Section 23-2 of the Texas Securities Act, you may request a hearing before the 31st day after the date you were served with this Order. The request for a hearing must be in writing, directed to the Securities Commissioner, and state the grounds for the request to set aside or modify the Order. Failure to request a hearing will result in the Order becoming final and non-appealable.

You are advised under Section 29.D of the Texas Securities Act that any knowing violation of an order issued by the Securities Commissioner under the authority of Section 23-2 of the Texas Securities Act is a criminal offense punishable by a fine of not more than \$5,000, or imprisonment in the penitentiary for not more than two years, or by both such fine and imprisonment.

SIGNED AND ENTERED by the Securities Commissioner this 25th day of January, 2005.


DENISE VOIGT CRAWFORD
Securities Commissioner