



Business Continuity Plan

I. Emergency Contact Persons

The firm will provide FINRA with the contact information for the two emergency contact persons: (1) name; (2) title; (3) mailing address; (4) email address; (5) telephone number; and (6) facsimile number through the FINRA Contact System (FCS). Italo D'Alfonso will promptly notify FINRA of any change in this information through FCS (but no later than 30 days following the change) and will review, and if necessary update, this information within 17 business days after the end of each calendar year.

Italo D'Alfonso,
(305) 529-4700 (office)
(305) 484-0103 (cell)
IDAlfonso@miurusa.com
IDAlfonso@gmail.com

Richard Pinango
(305) 529-4704 (office)
(305) 922-3546 (cell)
rpinango@miurusa.com

II. Firm Policy

Our firm's policy is to respond to a Significant Business Disruption (SBD) by safeguarding employees' lives and firm property, making a financial and operational assessment, quickly recovering and resuming operations, protecting all of the firm's books and records, and allowing our customers to transact business. In the event that we determine we are unable to continue our business, we will assure customers prompt access to their funds and securities.

A. Significant Business Disruptions (SBDs)

Our plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only our firm's ability to communicate and do business, such as a fire in our building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, or a wide-scale, regional disruption. Our response to an external SBD relies more heavily on other organizations and systems, especially on the capabilities of our clearing firm.

B. Approval and Execution Authority

Mr. D’Alfonso, CEO, Chief Compliance Officer, and Principal is responsible for approving the plan and for conducting the required annual review. Mr. D’Alfonso has the authority to execute this BCP.

C. Plan Location and Access

Our firm will maintain copies of its BCP plan and the annual reviews, and the changes that have been made to it for inspection. An electronic copy of our plan is located on in the Business Continuity Plan folder located on the C: drive.

III. Business Description

Description	Code
Broker or dealer retailing corporate equity securities over-the-counter	BDR
Broker or dealer selling corporate debt securities	BDD
Mutual fund retailer	MFR
U.S. government securities broker	GSB
Put and call broker or dealer or option writer	PCB
Non-exchange member arranging for transactions in listed securities by exchange member	NEX
Trading securities for own account	TRA
Broker or dealer involved in a networking, kiosk, or similar arrangement with a bank, savings bank or association, or credit union	BNA
Broker or dealer involved in a networking, kiosk, or similar arrangement with an insurance company or agency	INA

Miura's client base is comprised of domestic and international retail, high net worth and institutional customers. The firm does not intend to participate in any market making.

Miura's minimum net capital requirement is \$100,000 in accordance with SEC Rule 15c3-1.

Our clearing firm is Pershing LLC Global Securities Services ("Pershing"), 201-413-2552 (www.Pershing.com) One Pershing Plaza, Jersey City, NJ 09739.

IV. Office Locations

A. Office Location #1

Our Location #1 Office:
 1395 Brickell Ave, Suite #1560
 Miami, FL 33131
 (305) 529-4700

Our employees may travel to that office by means of foot, bus, or car. We engage in order taking and entry at this location. This is where all books and records are maintained.

B. Office Location #2

Our Location #2 Office:

450 Lexington Ave
New York, NY 10017
(212) 994-1850

Our employees may travel to that office by means of foot, car, subway, train, bus. We engage in order taking and entry at this location.

V. Alternative Physical Location(s) of Employees

In the event of an SBD, we will move some of our staff from affected offices to the unaffected office location. If our office locations are not available to receive any staff, the firm will then operate from location #2. Mr. D'Alfonso other phone number 305-484-0103. If conditions are not safe for employees to leave their residences, they may work from home in case of a SBD.

VI. Customers' Access to Funds and Securities

Our firm does not maintain custody of customers' funds or securities, which are maintained at our clearing firm, Pershing, LLC. In the event of an internal or external SBD, if telephone service is available, our registered persons will take customer orders or instructions and contact our clearing firm on their behalf, and if our Web access is available, our firm will post on our website (www.miurusa.com) that customers may access their funds and securities that will include contact information. The firm will make this information available to customers through its disclosure policy.

If SIPC determines that we are unable to meet our obligations to our customers or if our liabilities exceed our assets in violation of Securities Exchange Act Rule 15c3-1, SIPC may seek to appoint a trustee to disburse our assets to customers. We will assist SIPC and the trustee by providing our books and records identifying customer accounts subject to SIPC regulation.

VII. Data Back-Up and Recovery (Hard Copy and Electronic)

VIII.

Our firm maintains its primary hard copy books and records and its electronic records at:

1395 Brickell Ave, Suite #1560
Miami, FL 33131
(305) 529-4700 (office)

Mr. D'Alfonso, the firm's CEO and CCO, is responsible for the maintenance of these books and records. Our firm maintains various document types and forms that are not transmitted to the clearing firm: (please refer to the firm's Written Supervisory Procedure's for a list of documents maintained).

There is a back up copy of the BCP plan at Italo D'Alfonso home address that is maintained electronically on his computer and in hard copy.

In the event of an internal or external SBD that causes the loss of our paper records, we will physically recover them from our back-up site. If our primary site is inoperable, we will continue operations from our back-up site or an alternate location. For the loss of electronic records, we will either physically recover the storage media or electronically recover data from our back-up site, or, if our primary site is inoperable, continue operations from our back-up site or an alternate location.

IX. Financial and Operational Assessments

A. Operational Risk

In the event of an SBD, we will immediately identify what means will permit us to communicate with our customers, employees, critical business constituents, critical banks, critical counter-parties and regulators. Although the effects of an SBD will determine the means of alternative communication, the communications options we will employ will include our website, telephone voice mail, and secure email. In addition, we will retrieve our key activity records

B. Financial and Credit Risk

In the event of an SBD, we will determine the value and liquidity of our investments and other assets to evaluate our ability to continue to fund our operations and remain in capital compliance. We will contact our clearing firm, critical banks and investors to apprise them of our financial status. If we determine that we may be unable to meet our obligations to those counter-parties or otherwise continue to fund our operations, we will request additional financing from our bank or other credit sources to fulfill our obligations to our customers and clients. If we cannot remedy a capital deficiency, we will file appropriate notices with our regulators and immediately take appropriate steps.

X. Mission Critical Systems

Our firm’s “mission critical systems” are those that ensure prompt and accurate processing of securities transactions, including order taking, entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities. Pershing provides the systems.

We have primary responsibility for establishing and maintaining our business relationships with our customers and have sole responsibility for our mission critical functions of order taking and entry. Our clearing firm provides, through contract, the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

Our clearing firm contract provides that our clearing firm will maintain a business continuity plan and the capacity to execute that plan. Our clearing firm represents that it will advise us of any material changes to its plan that might affect our ability to maintain our business. If we reasonably determine that our clearing firm has not or cannot put its plan in place quickly enough to meet our needs, or is otherwise unable to provide access to such services, our clearing firm represents that it will assist us in seeking services from an alternative source. [See attached Pershing BCP Disclosure]

Recovery-time objectives provide concrete goals to plan for and test against. They are not, however, hard and fast deadlines that must be met in every emergency situation, and various external factors surrounding a disruption, such as time of day, scope of disruption and status of critical infrastructure—particularly telecommunications—can affect actual recovery times. Recovery refers to the restoration of clearing and settlement activities after a wide-scale disruption; resumption refers to the capacity to accept and process new transactions and payments after a wide-scale disruption. Our clearing firm has the following SBD recovery time and resumption objectives: recovery time period and resumption time of 4 hours or less.

Italo D’Alfonso will periodically review our clearing firm’s capabilities to perform the mission critical functions the clearing firm has contracted to perform for our firm.

A. Our Firm’s Mission Critical Systems

1. Order Taking

Describe how your firm will handle order taking in the event of an SBD.

Currently, our firm receives orders from customers via telephone or in person. During an SBD, either internal or external, we will continue to take orders through any of these methods that are available and reliable, and in addition, as communications permit, we will inform our customers when communications become available to tell them what alternatives they have to send their orders to us. Customers will be informed of alternatives through our website. If necessary, we will advise our customers to place orders directly with our clearing firm at:

Pershing LLC
P.O. Box 2065
Jersey City, New Jersey 07303-2065
Fax number (201) 413-5368

2. Order Entry

Currently, our firm enters orders by recording them on paper and electronically and sending them to our clearing firm electronically or telephonically. Alternatively, we place customer orders through Pershing NetEX 360. We have contacted Pershing and were told that, under its BCP, we can expect services within 4 hours or less.

In the event of an internal SBD, we will enter and send records to our clearing firm by the fastest alternative means available, which may include fax, or phone. In the event of an external SBD, we will maintain the order in electronic or paper format, and deliver the order to the clearing firm by the fastest means available when it resumes operations. In addition, during an internal SBD, we may need to refer our customers to deal directly with our clearing firm for order entry.

3. Order Execution

Pershing executes our orders. (See Mission Critical Systems provided by our clearing firm)

4. Other Services Currently Provided to Customers

We do not have any other services available to our customers.

B. Mission Critical Systems Provided by Our Clearing Firm

Our firm relies, by contract, on our clearing firm to provide order execution, order comparison, order allocation, customer account maintenance and/or access and delivery of funds and securities.

XI. Alternate Communications Between the Firm and Customers, Employees, and Regulators

A. Customers

We now communicate with our customers using the telephone, email, our website, fax, U.S. mail and in-person visits at our firm or another location. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. For example, if we have communicated with a party by email but the Internet is

unavailable, we will call them on the telephone and follow up where a record is needed with paper copy in the U.S. mail.

B. Employees

We now communicate with our employees using telephone, email, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party. We will also employ a call tree so that senior management can reach all employees quickly during an SBD. The call tree includes all staff home and office phone numbers. We have identified persons, noted below, who live near each other and may reach each other in person:

The person to invoke use of the call tree is Italo D’Alfonso

Caller	Call Recipients
Italo D’Alfonso	Foreign Associates and registered reps, compliance, CFO, traders.
Arlene Vargas	Operations, receptionist, other office personnel

C. Regulators

We are currently members of the following self-regulatory organizations (SROs), and are also regulated by the SEC, FINRA and state securities regulators]. We communicate with our regulators using telephone, email, fax, U.S. mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use the means closest in speed and form (written or oral) to the means that we have used in the past to communicate with the other party.

FINRA Florida
Boca Center Tower 1
5200 Town Center Circle, Suite 200
Boca Raton, FL 33486
Phone: (561) 443-8000
Fax: (561) 443-7995

SEC Miami Regional Office
801 Brickell Ave., Suite 1800
Miami, FL 33131
Phone: (305) 982-6300
e-mail: miami@sec.gov

California
Department of Business Oversight
1515 K Street
Suite 200
Sacramento, CA 95814-4052
(866) 275-2677
(916) 322-1559 (Fax)

Colorado
Division of Securities
1560 Broadway
Suite 900
Denver, CO 80202
(303) 894-2320
(303) 861-2126 (Fax)

Connecticut
Department of Banking
260 Constitution Plaza
Hartford, CT 06103-1800
(860) 240-8230
(860) 240-8295 (Fax)

Florida
Office of Financial Regulation
200 East Gaines Street
Tallahassee, FL 32399-0372
(850) 410-9500
(850) 410-9748 (Fax)

Georgia
Office of Secretary of State
Securities Division
2 Martin Luther King, Jr., Drive, SE
Suite 313, West Tower

Atlanta, Georgia 30334
(404) 654-6023

Illinois
Office of the Secretary of State
Securities Department
69 West Washington Street, Suite 1220
Chicago, IL 60602
(312) 793-3384
(312) 793-1202 (Fax)

Massachusetts
Securities Division
One Ashburton Place, Room 1701
Boston, MA 02108
(617) 727-3548
(617) 248-0177 (Fax)

New York
Office of the Attorney General
Investor Protection Bureau
120 Broadway
23rd Floor
New York, NY 10271
(212) 416-8222
(212) 416-8816 (Fax)

Pennsylvania
Pennsylvania Department of
Banking and Securities
17 North 2nd Street, Suite 1300
Harrisburg, PA 17101-2290
(717) 787-2665
(717) 783-5125 (Fax)

Texas
State Securities Board
208 East 10th Street
5th Floor
P.O. Box 13167
Austin, TX 7870
(512) 305-8300
(512) 305- 8310 (fax)

XII. Critical Business Constituents, Banks, and Counter-Parties

A. Business constituents

We have contacted our critical business constituents (businesses with which we have an ongoing commercial relationship in support of our operating activities, such as vendors providing us critical services), and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of a SBD to them or our firm. Our major suppliers are:

Pershing, LLC

MyTech

B. Counter-Parties

We have contacted our critical counterparties, such as other broker-dealers or institutional customers, to determine if we will be able to carry out our transactions with them in light of the internal or external SBD. Where the transactions cannot be completed, we will work with our clearing firm or contact those counterparties directly to make alternative arrangements to complete those transactions as soon as possible.

XIII. Regulatory Reporting

Our firm is subject to regulation by: the SEC, FINRA, and state securities regulators where we are registered. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, email and the Internet. In the event of an SBD, we will check with the SEC, FINRA and other regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us.

XIV. Disclosure of Business Continuity Plan

Attached is our written BCP disclosure statement we provide customers at account opening. We also post the disclosure statement on our website and mail it to customers upon request.

[<https://www.miurausa.com/wp-content/uploads/2019/11/Bus-Continuity-Plan.pdf>]

XV. Updates and Annual Review

Our firm will update this plan whenever we have a material change to our operations, structure, business or location or to those of our clearing firm. In addition, our firm will review this BCP annually, to modify it for any changes in our operations, structure, business or location or those of our clearing firm.