

IMPORTANT NOTICE

Rule 204-3 of the Investment Advisers Act of 1940 requires that an investment advisor, when entering into a management agreement, deliver to clients and prospective clients, certain information pertaining to the investment advisor and the nature of his/her business.

The information contained in this disclosure brochure contains information located in Part II of the firm's Form ADV, regarding the qualifications and business practices of Meehan Capital Management Group, Inc., (the "Advisor"). This information should be carefully considered prior to engaging the services of the Advisor.

Should you have any questions about any of the contents contained in this brochure, please contact Mr. Linwood C. Meehan III ("Trey Meehan") at your convenience at 321-221-2910 or via email at trey.meehan@meehancapital.com.

The information that is contained in this disclosure brochure has not been approved, verified or endorsed by any State or Federal securities regulatory agency, including the State of Florida Department of Financial Regulation or the United States Securities and Exchange Commission.

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DISCLOSURE BROCHURE

Meehan Capital Management Group, Inc.

Registered Investment Advisor

Updated: September 7, 2007

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DISCLOSURE STATEMENT

Meehan Capital Management Group, Inc. ("MCMG") and its principals have met the registration requirements for a Registered Investment Advisor (RIA). Regulatory agencies set forth these requirements for the protection of individual investors.

To remain in compliance with the Investment Advisors Act, we are required to deliver a written statement or "disclosure brochure" to every client prior to signing a contract for investment advisory services. The purpose of the brochure is to protect clients by disclosing important information concerning the services provided by us.

To fulfill the requirement for disclosure, we attach a written summary of Part II of our application for Investment Advisor registration (Form ADV) as a part of this brochure. All thirteen of the required categories of information that we are required to disclose are contained in this document. We offer our Disclosure Document, including Form ADV, to our clients prior to opening a new account. Additionally, any client may request a copy of the document on an annual basis. We also maintain an updated copy of the brochure on our website at www.meehancapital.com.

Fee Schedule

The following fee schedule is applicable to each account managed by MCMG. Fees are drawn in arrears each month based on the ending balance of the prior month. Amounts below each price point are subject to the percentage indicated unless otherwise stated.

<u>Billable Asset Level</u>		<u>Applicable Rate</u>
Assets between \$0 and \$100,000 are billed:	@	2.00%
Assets between \$100,000 and \$500,000 are billed:	@	1.50%
Assets between \$500,000 and \$1 Million are billed:	@	1.00%
Assets between \$1 Million and \$5 Million are billed:	@	0.75%
Assets over \$5 Million are billed:	@	0.50%

NOTICE: MCMG charges a minimum monthly, per account, billing fee of \$10 – (Each account with a monthly billing fee that exceeds \$10 is not subject to the minimum)

Advisory fee is drawn on the first business day of the month applied to the previous month's closing balance. Advisory fee is applied in the following manner: $1/12 \times \text{Applicable Rate} \times \text{Applicable Portion of Billable Asset Level}$. If client assets are being aggregated to achieve price points, MCMG will draw management fees on the individual accounts on a per account or consolidated basis as directed by client.

Hourly fee for services outside the standard fee schedule is \$250/hr. Various state regulatory bodies require the following disclosure statement: Lower fees for comparable services may be available from other sources.

NOTE: Restricted Stock holdings are not discretionary by their very nature and as such are not subject to the above fee schedule, minimum account fee and are not calculated or included in MCMG's Billable Asset Level. At the time of the sale of restricted stock, MCMG may charge a consulting fee to cover the cost of monitoring the transactions, assisting with regulatory form filings and other time consuming activities that revolve around the sale of restricted securities. Fee will be assessed at the current hourly rates when sold and will be approved by client prior to sales being completed.

MISSION STATEMENT

"To provide our clients an exceptional level of investment advice where the highest standards of ethics, integrity and professionalism are demonstrated on a daily basis."

CORPORATE PHILOSOPHY

Our Clients - Our clients' interests are the focus of everything we do. As an independent, fee-based investment advisor, we are not under the control of a broker/dealer or insurance company.

Our Associates - A business is only as good as its people and our people are our greatest asset. Our associates practice honesty and integrity in their daily lives. These attributes define our company and allow us to attract new associates, as well as new clients, who share these same values.

Our Culture - Our culture allows our people to enjoy coming to work every day. We believe in making the work place a comfortable atmosphere where both associates and clients feel they can openly promote new ideas, express any concerns and explore future opportunities.

Our Growth - Steady growth of our business is important for our employees, future clients, and stockholders alike. We will monitor our growth so that we do not surpass our capacity to consistently exceed our clients' highest expectations.

Quality, not Quantity - We believe that the continual pursuit of *quality* in all that we do will produce a *quantity* of new business that will satisfy even our loftiest growth expectations for the future. When a company places an emphasis on *quantity* as a measurement of performance, it is *quality* that suffers. You have our pledge that we will always place *quality* first.

Time Horizons - We look at relationships with our clients in terms of decades, not months or years. The same philosophy holds true for our investment results. We do not believe that one can judge a lifetime of investing by the results of a single investment, good or bad. The process of time is the final judge on investment performance. With our conservative, disciplined, value-oriented approach to investing, we believe that time will prove our methods correct.

Teamwork - In addition to the associates at Meehan Capital Management Group, we have relationships with multiple NASD member broker/dealer organizations, insurance companies, attorneys and accountants to insure the highest level of service to meet our clients' varied investment needs.

OVERVIEW

It is true that no two clients have the same set of goals and objectives. In order to satisfy each investor's specific needs, we tailor a portfolio focused on meeting those needs using an individualized approach to investing.

Every portfolio managed by MCMG is unique. Just as no two clients are alike, neither are their portfolios. Your portfolio will reflect a level of risk with which you are comfortable. Once your risk level has been determined, MCMG portfolio managers will work to maximize the return of your assets within your specified risk tolerance. To insure that your portfolio is managed within your risk tolerance, we evaluate portfolios on a regular basis.

Our goal is to insure that clients fully understand what we are trying to accomplish in their portfolio. We will spend whatever time is necessary to insure that every client understands exactly why we invest the way we do.

INVESTMENT PHILOSOPHY

Meehan Capital Management Group, Inc. (MCMG) is an independent, fee-based Registered Investment Advisor. The firm offers portfolio management services via in-house separate account management and/or separately managed accounts utilizing outside money managers, as well as mutual funds. Portfolios are developed and maintained based on the investment objectives of each client. The portfolios are designed to maximize return on investment while staying within each client's risk tolerance.

SEPARATELY MANAGED ACCOUNT (SMA)

A Separately Managed Account (SMA) is used for medium to larger accounts, with a minimum account value of \$100,000. In this account, clients own securities directly, which allows the MCMG Portfolio Manager (or outside manager if chosen) the ability to achieve specialized tax management and specific investment considerations. In a SMA, securities are purchased and sold by a portfolio manager based on risk measures and objectives as determined by the client. A Relationship Manager will communicate on a regular basis with each client to ensure that the portfolio is being managed in a manner that is consistent with the client's objectives.

MUTUAL FUNDS ACCOUNT

As a general rule, for accounts that are not invested in individual securities, we will select a portfolio of high quality mutual funds based on your investment objectives. All accounts with less than \$100,000 in assets are generally invested primarily in mutual funds. Once an account exceeds \$100,000 in value, clients have the option of moving to a Separately Managed Account (described above).

Exceptions to these account levels and types of management are available and require the investor to complete additional risk assessment material to determine their level of risk tolerance.

Prior to our entering any investment relationship, an investment profile will be completed and reviewed by a MCMG Relationship Manager, as well as by a MCMG Portfolio Manager. As a client, you can expect to receive a monthly statement from the custodian of your account, as well as ongoing reports and communication from their MCMG Relationship Manager. You may also feel free to contact your Relationship Manager at any time in between scheduled contacts.

COMPANY PRINCIPAL

Linwood Clayton Meehan III, MBA

- Meehan Capital Management Group, Inc.
 - President & CEO
 - Portfolio Manager, Series 65 (Active)
- Other Businesses: First Capital Investors, Inc.
 - President & CEO
 - *Please see "Conflicts of Interests" Disclosure*
- Prior Experience
 - B.R. Chamberlain & Sons, Inc.
 - Director of Administrative Asset Management
 - Portfolio Manager
 - Meehan Electric Company, Inc.
 - Chief Financial Officer
 - DePrince, Race & Zollo, Inc.
 - Investment and Research Analyst, Intern
 - Mentorship under John D. Race, Principal
 - H&R Block Financial Advisors (formerly Olde Stockbrokers)
 - Financial Consultant & Registered Representative
 - License(s) (Expired): Series 7, Series 63
- Education:
 - M.B.A. – Rollins College, Crummer Graduate School of Business
 - B.B.A. – University of Georgia, Terry College of Business
 - Current License: Series 65
 - Prior Licenses: Series 7 & Series 63

PRIVACY POLICY

At Meehan Capital Management Group, Inc. ("MCMG"), protecting our clients' privacy is paramount; we recognize that an individual's financial matters are extremely private and sensitive in nature. Our commitment is to maintain strict standards to safeguard your personal financial information at all times, while diligently seeking to continue to bring you valuable products and services.

This information is being provided to you as required by Regulation S-P which was adopted by the Securities and Exchange Commission to modernize the laws governing the financial services industry.

Information We Collect and Share

The personal financial information we collect directly from you includes information required to communicate with you and to assist us in effectively addressing your financial needs, as well as to operate prudently in complying with the legal and regulatory requirements imposed by federal and state regulations.

Such personal financial information we may collect and share is made available to us from the following sources:

- Information received on applications and other forms, such as your name, mailing address, telephone number, e-mail address, fax number; and to identify who you are, your Social Security number.
- Information about your financial transactions with us, our affiliates, or others, such as account balance, securities trading activity, fund transfers, and checking transactions.
- Information as required by law to ascertain your experience in margin use and trading, such as your approximate annual income and net worth.
- Information we may obtain about you from a consumer reporting agency, such as your credit worthiness and credit history.

In all cases, we collect and share only personal financial information that is either required by law or necessary to provide personalized financial services to you.

Other information we may collect indirectly from you includes your IP address, browser type, and operating system used when you access our Web site. We do this through the use of cookies, which are small text files sent from the Web server to your computer. Cookies help us to know you better by providing operational data we can use to aid your interaction with our Web site and improve its navigation and usability. Standing alone, cookies, GIFs and other Web tools, as well as data derived from them, do not identify you personally - they merely recognize your browser. Unless you choose to identify yourself to us by requesting additional information through our Web site about our service, you will remain anonymous.

Our Use of Your Personal Financial Information

In the course of conducting investment advisory services on your behalf, there are occasions where we may engage affiliated and/or nonaffiliated companies to (i) service or process a financial product or service requested by you or, (ii) to maintain or service your account(s). These companies may be engaged in a related business such as mutual funds, annuities or other insurance products, consumer banking, mortgage lending, securities brokerage, investment advisory or tax, estate or financial planning. Or they may be engaged in some service such as a transfer agent, clearing or custodial firm, accounting or reporting, systems operation or marketing.

In such cases, the personal financial information we may share about you with these companies is necessary and permissible by law to administer, process, service, and enforce a transaction that you requested or authorized. We may also share some or all of your personal financial information with your legal representative, trustee or other fiduciary, or where we need to protect the confidentiality and security of our records, or to prevent potential or actual fraud, unauthorized transactions, claims or other liability, for institutional risk control or resolving customer disputes or inquiries. Also, as permissible by law, we may provide your personal financial information on request, for example, to insurance rate advisory organizations; funds guaranty agencies; agencies rating our compliance with industry standards; and our attorneys, accountants and auditors. In addition, subject to the Right to Financial Privacy Act, sharing of your personal financial information is permitted on request by a law enforcement agency, regulator, self-regulatory agency or in a public safety investigation. Such sharing of your personal financial information is also permitted on request by a consumer reporting agency in accordance with the Fair Credit Reporting Act, or to comply with federal, state or local laws, rules or regulations, including requirements of self-regulatory organizations or a subpoena or judicial process. Outside of the exceptions mentioned above and as permitted by law, we will not share your personal financial information with anyone, unless you specifically ask us in writing to do so.

Confidentiality and Security

When we share your personal financial information with affiliated and/or nonaffiliated parties, they are not allowed to use your personal financial information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal financial information to the performance of the specific service we have requested. We restrict access to your personal financial information to employees who need to know such information in providing products or services to you.

We maintain physical, electronic, and procedural safeguards to protect your personal financial information. Of course, even with these safeguards, we cannot guarantee that your personal financial information will always be safe from unauthorized sharing, and we assume no responsibility or liability in that event, except as and to the extent that may be imposed by law.

Miscellaneous

- We reserve the right to change this Privacy Notice at any time. In that event, we will inform you of any material changes as required by law.
- If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices described in this notice.
- Please keep this Privacy Notice for your records.
- This Privacy Notice has been established and is given in accordance with applicable federal law. It is not intended and in no event shall it be deemed to constitute an offer or agreement of any kind on our part or to impose any duty or obligation of any kind upon us except as and to the extent expressly required by law.

CONFLICT OF INTERESTS

In an effort to fully disclose any potential or perceived conflicts of interests between MCMG, its principal owners, officers, directors, employees, etc. and MCMG clients, the following Conflict of Interests form is required to be reviewed/approved by clients prior to a client’s investment into any stock or company in which an MCMG Affiliate may have a potential or perceived conflict of interest.

Disclosure Notice: Mr. Linwood C. Meehan III is the Principal owner of Meehan Capital Management Group, Inc., a Florida-based Registered Investment Advisor. Mr. Meehan is also the owner of First Capital Investors, Inc., a Capital Markets Advisory and Investor Relations firm. Due to Mr. Meehan’s business involvement with both private and public companies, he may become aware of investment opportunities of which his investors may not otherwise have knowledge. He may also have a conflict of interests when discussing potential investment opportunities with investors. Mr. Meehan may have a conflict of interests including: ownership of shares of the securities being discussed and/or compensation arrangements with the companies being discussed.

I, _____ (Client Name), understand that Mr. Meehan, through either his personal ownership of shares or through a compensation arrangement through his affiliation with either First Capital Investors or Meehan Capital Management Group, has a conflict of interests in discussing the merits of my investing in the following company:

I certify that I have been made aware of this conflict of interests and I do hereby elect to participate in the above investment opportunity. I confirm that I am an independent investor capable of making such investment decisions, have the financial capability and personal desire to take on the risks involved with such an investment and do hereby instruct Mr. Meehan to purchase _____ shares of this investment on my behalf. Should Mr. Meehan be in possession of any material, non-public information at the time that he receives this authorization, I understand that he will wait until all such information has been made public prior to my investment being made as instructed above.

Print Client Name

Date

Client Signature

Date

Linwood C. Meehan III

Date & Time Received

ANTI- MONEY LAUNDERING (AML) Policy and Guidelines

The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism ("Patriot Act") a.k.a. the Anti- Money Laundering and Anti-Terrorism Act of 2001 was enacted on October 26, 2001 in response to the September 11, 2001 terrorist attacks. It is also referred to as the International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001. It requires compliance responsibilities and due diligence procedures for "covered financial institutions" (CFIs) which now include financial advisors.

The PATRIOT Act was adopted by Congress to combat terrorism and contains anti-money laundering measures that apply to investment advisers and investment companies. The Patriot Act amends the Bank Secrecy Act to apply some of its provisions to a wider group of entities in the financial services industry. The goal of this new legislation is to enhance the US government's ability to counteract terrorist activity funding by extending existing bank anti-money laundering monitoring, reporting and record keeping requirements to covered financial institutions.

Investment advisors were not originally included within CFIs. The original requirement for all Investment Advisors was to report certain suspicious currency transactions in excess of \$10,000 to the IRS. Among other things, the act requires the development of a customer identification program (CIP) including enhanced customer identification and verification obligations, and heightened due diligence for accounts held by foreign banks and individuals.

Changes to Account Applications - To comply with the CIP requirements and to the extent it is applicable to the company's business, MCMG has adopted the additional identity and verification data guidelines provided by our custodians which can be used for new accounts. Implementation of the Patriot Act requires that this additional information be provided to MCMG and custodians.

Identification Requirements include, and all Account Holders must provide, the following:

- Aliases: Are you known by another name?
- All Countries of Citizenship
- Account Holders who are Non U.S. Citizens:
 - Passport/Alien Identification Number
 - Passport/Alien Identification Country of Issuance

- For International Accounts:
 - Are you related to or associated with, a senior foreign political figure?
 - Primary Source of Funding
 - Verification Notice to Customers

Language will also be included in account opening forms that comply with the CIP requirement that clients of the firm must be adequately informed that information is being requested at account opening to verify identity.

Mr. Meehan is designated as the officer responsible for AML compliance.

DISASTER RECOVERY ASSESSMENT and POLICY

The primary objective of this assessment is to: (a) minimize the impact of any interruption to normal business activity; (b) sustain the lowest possible degree of service interruption should it occur; and (c) return to normal business activities as soon as possible.

MCMG has attempted to contemplate disaster events of all types. In assessing potential disaster, certain obvious factors are understood: The Central Florida area is prone to severe tropical weather; theme parks are generally regarded as potential targets of terrorism; computer networks and the internet's infrastructure are subject to failure, and so on. MCMG's initial response to a disaster event follows several general Emergency Steps:

- Assemble to ensure that all mission-critical decision-makers are available.
- Take steps to ensure the health and safety of MCMG personnel.
- Conduct a first-line risk analysis: ensure that critical data is stored safely and is available offsite. Determine how business operations will be affected by the event (e.g., closing of governments and financial markets).
- Determine what methods of communication are available and establish key communications.
- Protect mission-critical processes.
- In the event of cyber terrorism, block all external Internet access until it is determined that all threats have passed.

MCMG defines and groups potential disaster into four areas:

- 1) Internal system(s) malfunction and/or data loss
- 2) Internet service disruption
- 3) Acts of nature or terror
- 4) Loss of key personnel

1) Recovery from System Malfunction and/or Data Loss

MCMG maintains primary management data in house within a Local Area Network (LAN). Data resides on the network computers and is backed up on a weekly basis. Data is also kept in an offsite location via a stand alone hard drive system keeping a complete record that is backed up weekly. The potential for disaster include:

- LAN failure, single computer: briefly down to destroyed
 - a) Portfolio accounting data (on its workstation)
 - b) All other computers - unique C:/ files
- LAN failure, server: briefly down to destroyed
 - a) Email archive
 - b) CRM files
 - c) Portfolio accounting files
 - d) Shared files

Data can be restored onto any off-the-shelf PC equipped with or connected to a USB port that is connected to the external hard drive that is kept off site. All computers are protected by surge

protectors and/or battery backups. In the event of power loss, only the data input since the last "save" function has the potential of being lost, significantly reducing the potential loss.

Certain elements of portfolio management and historical market data are maintained within MCMG's data and backup storage, while other client account data is maintained at the custodian. Custodians maintain their customer account data for period in excess of 1 year. In the worst case scenario of complete data loss, including loss of all in network data, client accounts can be substantially reconstructed from data maintained at the custodian.

2) Internet / Telecommunications Service Disruption

MCMG maintains telephone services utilizing broadband "IP" telephone service, cellular phone service and a broadband internet connection.

Disaster response considerations include:

- Phone & internet outages from Short to Long term
 - a) Web access for portfolio management operations
 - b) Model portfolio data updates
 - c) Communications

Personal cell phones are maintained by principals and staff to allow for alternative communication in the event of phone service outage. Additional phone capabilities are available through internet protocol (IP) phones that are connected into our internal phone system. These phones operate over the internet and are not connected to the traditional phone lines, thereby operating autonomously. In the event that all phone service goes down in the physical office, MCMG can instruct our phone service providers to forward calls to an offsite location that will allow communications to resume.

MCMG's website and email hosting functions are held offsite with a third-party provider that maintains real-time, redundant systems in multiple locations in the United States. Access to the data on our website and email system can be achieved from offsite locations wherever an active internet connection exists.

A widespread internet disruption affecting custodial entities and market data providers is beyond MCMG's ability to respond. In addition to following its internal response procedures, however, and until recovery, MCMG's client portfolios would substantially maintain their integrity as a result of their passive structure.

3) Acts of Nature or Terror

MCMG maintains its only office approximately 15 miles due west of downtown Orlando in Orange County, Florida.

Disaster considerations include:

- a) Office power outages from Short term (< day) to Long term (> day)
- b) Physical office damage/availability from briefly unavailable to uninhabitable but salvageable to no longer habitable and unsalvageable (e.g., fire)

In the event MCMG personnel are unable to access the office or in the event the office is damaged to the extent MCMG's client data is destroyed or irretrievable, daily operations would be handled

remotely using the backup means described above. That is, client data would be retrieved from data backup and/or reconstructed from custodian data as described. MCMG maintains usual and customary paper records. At present, paper records are not archived or duplicated remote from the MCMG office. MCMG will follow standard record retention for advisors which includes two years' data maintained on site and one year maintained off site in an easily accessible location.

Loss of Key Personnel

MCMG relies entirely on its principal, Mr. Meehan, to operate each facet of its business. The loss or incapacity of Mr. Meehan at any time would have an immediate effect on viability of the business. In the event of a situation in which Mr. Meehan is not able to operate the business, the firm would no longer be providing advisory services. Ms. Crone, in association with legal counsel and other close advisors who have appropriate knowledge of the firm's operations, would advise clients of the proper procedure for seeking the services of another advisory firm.

In any event, client assets are secure with the account custodian. Access to client accounts, as well as the security of the investments would not be in any jeopardy due to the loss of key personnel.

ADV Part II

Securities regulation requires that Registered Investment Advisors provide certain information to governing bodies known as Form ADV. This form is broken down into two parts. Part I deals with technical information which the regulators require. Part II gives information about the investment advisor and its business for the use of clients. The following information is being provided in a different format so clients can more easily understand the information located in Part II of Form ADV. While this information is on record with the appropriate regulatory agencies, it has not been approved or verified by such. A copy of the Form ADV Part II, which is on file with the regulatory agencies, is available to clients upon request.

Definitions for Form ADV Part II

1. Services and Fees
 - A. 100% of MCMG billings come from investment supervisory services.
 - B. MCMG is a Registered Investment Advisor and in some cases, depending on services provided, may refer to its services as financial planning or a similar term.
 - C. MCMG offers investment advisory services for (1) a percentage of assets under management, and (2) in certain circumstances for hourly charges.
2. MCMG generally provides investment advice to individuals, trusts, estates, charitable organizations and corporations.
3. MCMG offers advice on equity securities, warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable annuities, mutual fund shares), U.S. government securities and option contracts.
4.
 - A. MCMG uses many types and sources for analysis and implementation of its investment strategy including fundamental, charting and technical.
 - B. The main sources of information that MCMG uses includes financial newspapers and magazines, inspections of corporate activities, research material prepared by others, corporate rating services, annual reports, prospectuses, filings with the Securities and Exchange Commission, and company press releases.
 - C. The investment strategies used to implement investment advice to clients includes long-term purchases, short-term purchases, trading, short sales, margin transactions and option writing (including covered options, uncovered options or spreading strategies).
5. MCMG requires that those individuals determining or giving investment advice to clients must have a minimum of a four-year degree from an accredited college or university. Most also have an advanced degree (MBA, MS or PhD) or advanced industry certification (CFP, CFA, etc.).
6. Education and Business Background for individual(s) determining investment advice.

Linwood Clayton Meehan III – Nickname “Trey”

Education

Undergraduate – B.B.A. University of Georgia
Terry College of Business
Athens, Georgia
Focus: Management (Entrepreneurship) & Finance,

Graduate – M.B.A. Rollins College
Crummer Graduate School of Business
Winter Park, Florida
Focus: Management & Finance

Experience

1999 – Present	Meehan Capital Management Group, Inc. President & CEO
2002 – Present	First Capital Investors, Inc. President & CEO
1998-1999	B.R. Chamberlain & Sons, Inc. Director of Administrative Asset Management
1997-1998	Meehan Electric Company, Inc. Chief Financial Officer & Director of Finance
1995-1997	DePrince, Race & Zollo Mentorship, Investment Analyst
1993-1994	Olde Corporation (now known as H&R Block Financial) Registered Representative

7. Meehan Capital Management Group, Inc. is not involved in any other business other than giving investment advice. However, Mr. Meehan offers insurance products, on some of which he may receive sales commissions at standard rates and may assign those commissions to the firm. Additionally, Mr. Meehan owns and operates First Capital Investors, Inc., a capital markets advisory and investor relations firm. In this capacity as a consultant and investor to both private and publicly traded companies, Mr. Meehan may become aware of investment opportunities that he may potentially discuss with clients. Mr. Meehan may have ownership in and/or compensation arrangements with these companies. Due to a potential conflict of interests, Mr. Meehan requires that any client who wishes to invest in a company where there may exist a conflict of interest must first sign a Conflict of Interests Disclosure Form.
8. The firm is not registered as any type of broker/dealer, futures commission merchant, commodity pool operator or commodity trading adviser and has no arrangements that are material to business with such.
9. MCMG, its directors, owners, employees and employee family members may participate in the investment process and buys or sells securities that MCMG may also recommends to clients. To avoid potential conflicts of interest, for a client to purchase any security that presents a potential conflict of interest, a Conflict of Interest Disclosure Form is required to be reviewed and approved by the client before the transaction is completed. If securities are being sold as part of a large block transaction, shares held by MCMG affiliates are processed along with client shares and are distributed by percentage of ownership and at an average price.
10. At the present time, MCMG does not maintain a minimum dollar value of assets for starting or maintaining an account to be managed with the firm. In order to cover costs, however, each account with MCMG is subject to a minimum monthly billing fee of \$10.
11. A. Linwood C. Meehan III reviews accounts on a regular and continuous basis. Each account is managed independently of other accounts, therefore sales, purchases, and investment style will depend on the characteristics of each investor and their portfolio requirements.

- B. The company strives to communicate with each client at least quarterly, or more frequently as necessary. Some clients, depending on the level of activity in the accounts, will be contacted more or less often.

Contacts are made via telephone, facsimile, e-mail, letters, newsletters, statements, as well as personal meetings.

- 12. A. Except in cases where a conflict of interest may be present, MCMG maintains the authority to determine, without obtaining specific consent to buy or sell securities, the amount to bought and/or sold and the commission rates to be paid. If the purchase is related to a security where a conflict of interest exists, a Disclosure Form must be filed.
 - B. The firm may use a number of broker/dealers for custody and transactions, but will use other firms upon client request, if feasible.
- 13. A. MCMG does not receive any economic benefit from a non-client in connection with giving advice to clients.
 - B. MCMG currently has no referral arrangements with anyone outside the company. However, in the future, MCMG may directly or indirectly compensate certain persons for client referrals. These individuals include certain CPAs, attorneys and insurance professionals with which MCMG may have referral agreements.
- 14. MCMG does not fall under the Balance Sheet requirement, as it does not hold as custodian any client funds or securities or require prepayment of more than \$500 in fees per client for 6 or more months in advance.

(End of Document)

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