

Stanley Laman Group, Ltd.

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This Brochure provides information about the qualifications and business practices of Stanley Laman Group, Ltd. If you have any questions about the contents of this Brochure, please contact us at 610-993-9100. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Stanley Laman Group, Ltd. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information which a client may use to determine whether to hire or retain an Adviser.

Additional information about Stanley Laman Group, Ltd. , is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Anthony Bruno at 610-993-9100 or anthonyb@stanleylaman.com.

Additional information about Stanley Laman Group, Ltd. is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with Stanley Laman Group, Ltd. who are registered, or are required to be registered, as investment adviser representatives of Stanley Laman Group, Ltd.

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Item 4 – Advisory Business

The Stanley-Laman Group, Ltd., is a fee based investment advisor that has been in business since 1991 and is principally owned by William Stanley, James Laman, and David Eaton.

The Stanley-Laman Group, Ltd., conducts both fundamental and technical analysis to build portfolios consisting of marketable securities. Stanley-Laman Group, Ltd., also advises high net worth individuals on financial planning techniques, along with insurance advisory services and sales when appropriate within the overall financial plan.

Stanley Laman Group, Ltd., works with the client to customize an overall allocation. This portfolio allocation will consist of a combination of investments listed in item 8 and is derived from current and future needs of the client along with their prospective risk profile. The client may put restrictions on investing in certain securities or asset classes through the management agreement or investment policy statement.

As of December 31, 2014, Stanley Laman Group, Ltd. Managed \$660,196,294 in discretionary assets and \$114,755,712 in non-discretionary assets.

Item 5 – Fees and Compensation

All fee arrangements are subject to negotiation.

The specific manner in which fees are charged by Stanley Laman Group, Ltd., is established in a client's written agreement with Stanley Laman Group, Ltd. Stanley Laman Group, Ltd. will generally bill its fees on a quarterly basis. Clients are generally billed in advance each calendar quarter. Clients may also elect to be billed directly for fees or to authorize Stanley Laman Group, Ltd., to directly debit fees from client accounts. Management fees shall be prorated for each capital contribution made during the applicable calendar quarter (with the exception of de minimis contributions and withdrawals). Accounts initiated during a calendar quarter will be charged a prorated fee. There are no fees charged by Stanley Laman Group, Ltd., to terminate an account.

Stanley Laman Group, Ltd., charges fees as a percentage of assets under management represented in the following table.

ANNUAL FEE

First \$15,000,000	1.00%
Second \$15,000,000	.85%
Remaining Balance	.70%

Stanley Laman Group, Ltd.'s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third party investment managers and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer charges, electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus.

Such charges, fees and commissions are exclusive of and in addition to Stanley Laman Group, Ltd.'s fee. Stanley Laman Group, Ltd., shall not receive any portion of these other commissions, fees, and costs.

Item 6 – Performance-Based Fees and Side-By-Side Management

Stanley Laman Group, Ltd., does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

Item 7 – Types of Clients

Stanley Laman Group, Ltd. provides portfolio management services to individuals, high net worth individuals, corporate pension and profit-sharing plans, charitable institutions, endowments, foundations, trusts, estates, LLCs and corporations.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Stanley Laman Group, Ltd., Manages 13 distinct portfolios. Each portfolio utilizes a different strategy, poses a different risk profile, and acquires different securities, though some overlap of common holdings may exist. Custom or specialty portfolios can be created

at a clients' request, or to meet client risk and return objectives. A summary of current portfolio offerings is as follows:

High Growth – Equities with no limitation on Market Cap, Industry, Sector, Country or Region. Advisor may purchase or sell puts and calls to enhance or protect portfolio value as well as to engage in short-sales and other hedging techniques that it determines are in the best interest of maintaining the objective of high growth.

High Dividend & Value – Stocks of companies which pay a high dividend which the advisor believes are sustainable and/or growing. These stocks tend to cross market segments. The advisor intends to provide representation in most market sectors.

Micro – Stocks of smaller publicly traded companies which the advisor feels exhibit strong growth potential due to one, some, or all of the following factors: unique products, specialized market niches, advance technology, strong management, etc.

Fixed Income – Comprised of bonds, notes and debt issued by corporations, both domestic and foreign; governments; governmental agencies and sub-divisions; and preferred stocks.

Cash Management - This strategy is liquid and has a targeted modified duration of less than one year. The principal objectives are preservation of capital, maintenance of liquidity, and to have some modest return to the investor.

European Equity - The strategy aims to generate income with additional capital appreciation. In general, the weighted average price-to-earnings and price-to-book ratios of this strategy will be lower than those of the S&P Europe 350 Index. Additionally, the weighted average dividend yield of this strategy will generally be higher than the average yield of the S&P Europe 350 Index.

Risk Managed Core Equity - This portfolio takes a core equity approach with a mix of growth and value securities aimed to create an underlying portfolio BETA within 10% of 1 with the S&P 500. This portfolio invests with no restriction on market capitalization, sector, industry, or geographic location of companies held with a bias towards larger companies in order to provide liquidity in the options market. Covered call writing is used on the larger companies to increase portfolio yield. Generally the portfolio will maintain some market hedge through options, shorting, or reverse direction ETF's.

Core Equity - This portfolio takes a core equity approach with a mix of growth and value securities aimed to create an underlying portfolio BETA within 10% of 1 with the S&P 500. This portfolio invests with no restriction on market capitalization, sector, industry, or geographic location of companies held with a bias towards larger companies in order to provide liquidity in the options market. Covered call writing is used on the larger companies to increase portfolio yield.

Japan – companies based in Japan that are positioned to benefit from government stimulus and global rebound. Portfolio has the goal of income, growth, and currency diversification through stock selection.

Global Blend – The strategy aims to generate income with additional capital appreciation in global securities. The strategy focuses on companies that we believe trade below justified multiples and offer sustainability and future growth in dividends.

US Blend – The strategy aims to generate income with additional capital appreciation in US domiciled companies. The strategy focuses on companies that we believe trade below justified multiples and offer sustainability and future growth in dividends.

Mega Cap – Invests in US based companies that are trading above 75 billion in market cap.

Unconstrained Income – The strategy aims to generate high current income with a mix of stocks and bonds. The maximum stock allocation is constrained to 40% of the portfolio.

Portfolio Holdings are selected through bottoms up screening process using internally developed software designed to identify characteristics deemed attractive by our investment committee. This screening process is combined with top down research based on our view of the market, industries and sectors. This process is continually updated and refined to reflect new developments within the financial markets and global economy.

Investing in securities involves risk of loss that clients should be prepared to bear.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Stanley Laman Group, Ltd., or the integrity of Stanley Laman Group, Ltd.’s management. Stanley Laman Group, Ltd., has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

The Principals of The Stanley-Laman Group, Ltd., are also owners of Stanley Laman Group Securities, LLC, a limited purpose Broker-Dealer Registered with the Financial Industry Regulatory Authority (FINRA). Stanley Laman Group Securities, LLC, operates in the same location as Stanley-Laman Group, Ltd. and utilizes common staff and support resources.

The Stanley-Laman Group, Ltd., is the owner of SLG International Opportunities, LLC which is the general partner and manager of SLG International Opportunities, LP a partnership fund which invests in international equities on their domestic exchanges.

James J. Laman, JD, LLM, operates a specialty law firm, Law Offices of James J. Laman, LLC.

James Laman is also an owner of SEL Asset Management, LLC, an investment adviser that advises mutual funds on non-traded and traded assets such as real estate, business development companies, and equities. SEL Asset Management, LLC, operates in the same location as Stanley-Laman Group, Ltd. and utilizes common staff and support resources.

Item 11 – Code of Ethics

The Stanley-Laman Group, Ltd., has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts, the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at The Stanley-Laman Group must acknowledge the terms of the Code of Ethics annually, or as amended.

The Stanley-Laman Group, Ltd., anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which The Stanley-Laman Group has management authority to effect, and will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which The Stanley-Laman Group, its affiliates and/or clients, directly or indirectly, have a position of interest. The Stanley-Laman Group's employees and persons associated with The Stanley-Laman Group are required to follow The Stanley-Laman Group's Code of Ethics. Subject to satisfying this policy and applicable laws, officers, directors and employees of The Stanley-Laman Group and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for The Stanley-Laman Group's clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of

The Stanley-Laman Group will not interfere with (i) making decisions in the best interest of advisory clients, and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of The Stanley-Laman Group's clients. In addition, the Code requires pre-clearance of some transactions, and restricts trading in close proximity to client trading activity. Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics, to reasonably prevent conflicts of interest between The Stanley-Laman Group and its clients.

The Stanley-Laman Group's clients or prospective clients may request a copy of the firm's Code of Ethics by contacting Anthony Bruno.

Item 12 – Brokerage Practices

Soft dollar benefits are not proportionally allocated to any accounts that may generate different amounts of the soft dollar benefits.

Soft dollar benefits consist of research access being granted by prime brokers through the ability to trade through the prime broker. There are no trade minimums and no guarantee that any trading be done through each of the houses. In every case Stanley Laman Group, Ltd., looks to achieve the best pricing for the clients.

Brokers are selected based on price, technology, access to markets, and best execution. Portfolio managers will aggregate securities across two or more accounts when trading in order to receive the best possible price for each particular client. The best execution is reviewed annually to make sure that the client is getting the best execution for the price paid. In certain cases, the client will suggest outside brokerage against the advice of Stanley Laman Group, Ltd.

Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with The Stanley-Laman Group's obligation of best execution. In such circumstances, the affiliated and client accounts will share commission costs equally and receive securities at a total average price.

It is The Stanley-Laman Group's policy that the firm will not affect any principal or agency cross securities transactions for client accounts. The Stanley-Laman Group will also not

cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account or the account of an affiliated broker-dealer, buys from or sells any security to any advisory client. A principal transaction may also be deemed to have occurred if a security is crossed between an affiliated hedge fund and another client account. An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment adviser, or any person controlled by or under common control with the investment adviser, acts as broker for both the advisory client and for another person on the other side of the transaction. Agency cross transactions may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer.

Item 13 – Review of Accounts

All positions are monitored throughout the day by Bradford W. Stanley, CFA, Mark R. Painter, CFA and Anthony Bruno, CFA. Market events and/or changes in the financial position of a company, state, sub-division or issuer may trigger an action.

A weekly investment meeting is held in which all positions and research is discussed. Meetings are attended by William Stanley, James Laman, Mark Painter, Brad Stanley, Anthony Bruno, Stephen Olivere, and Joenuel Ortiz.

Monthly performance and appraisal reports are prepared and mailed to each client showing return and allocation to different asset classes. Performance or allocation inconsistent with a client's goal's based on these reports can give rise to a change.

Also, each client is assigned to a relationship manager who speaks with clients and reports any changes in objectives, risk tolerance, financial position, health, etc. These changes will prompt a meeting with the client and any recommended portfolio changes will be communicated. Meetings either by phone or in person occur at least annually.

Item 14 – Client Referrals and Other Compensation

Stanley Laman Group, Ltd. may provide compensation for client referrals. This results in no additional cost to the client.

Item 15 – Custody

Stanley Laman Group, Ltd. maintains custody of certain client assets, these include:

- SLG International Opportunities, LLC is wholly owned by Stanley Laman Group, Ltd. and serves as General Partner to SLG International Opportunities, L.P.
- Employees of Stanley Laman Group, Ltd. serves in the role of Trustee or co-trustee for select client accounts.

For separately managed accounts, clients receive monthly statements from the custodian that holds and maintains client's investment assets. Stanley Laman Group, Ltd., urges clients to carefully review such statements and compare such official custodial records to the account statements that we may provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Stanley Laman Group, Ltd., usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Stanley Laman Group, Ltd. observes the investment policies, limitations and restrictions of the clients for which it advises. For registered investment companies, Stanley Laman Group, Ltd.'s authority to trade securities may also be limited by certain federal securities and tax laws that require diversification of investments and favor the holding of investments once made.

Investment guidelines and restrictions must be provided to Stanley Laman Group, Ltd., in writing.

Item 17 – Voting Client Securities

Clients may obtain a copy of Stanley Laman Group, Ltd.'s complete proxy voting policies and procedures upon request. Clients may also obtain information from Stanley Laman Group, Ltd. about how Stanley Laman Group, Ltd. voted any proxies on behalf of their account(s).

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Stanley Laman Group, Ltd.'s financial condition. Stanley Laman Group, Ltd. has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

Item 19 – Requirements for State-Registered Advisers

Not Applicable