



**WHARTON**  
Business Group, LLC

**ADV Part 2B Brochure Supplement**

**B.J. Webster, Jr.**

**Dated: February 15, 2023**

B.J. Webster, Jr., Chief Compliance Officer  
110 Phoenixville Pike, Suite 300  
Malvern, Pennsylvania 19355  
(484) 328-3590 | [www.whartonbusinessgroupllc.com](http://www.whartonbusinessgroupllc.com)

This Brochure Supplement provides information about B.J. Webster, Jr. that supplements the Wharton Business Group, LLC Brochure; you should have received a copy of that Brochure. Please contact B.J. Webster, Jr., Chief Compliance Officer, if you did *not* receive Wharton Business Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about B.J. Webster, Jr. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

B.J. Webster, Jr. was born in 1963. Mr. Webster graduated from The University of Delaware in 1985, with a Bachelor degree. Mr. Webster has been a Managing Member, Chief Compliance Officer, and investment advisor representative of Wharton Business Group, LLC since November of 2009. Mr. Webster has also been a Founding Partner of Wharton Business Group, Inc., since 1992. Mr. Webster was also a registered representative of FSC Securities Corporation from 2003 until 2015.

## ITEM 3 DISCIPLINARY INFORMATION

Mr. Webster has no disciplinary history to disclose.

## ITEM 4 OTHER BUSINESS ACTIVITIES

Mr. Webster has personal investments in Irish Whiskey Ventures II LLC where a client of WBG is also invested. This presents a conflict where Mr. Webster has an opportunity to personally gain from the business, which may incentivize Mr. Webster to render investment advice to such client on the basis of what they would believe would likely improve their personal investment performance rather than that of the client in question. This investment is not recommended to other clients. The conflict is mitigated by disclosing it to the client in question, and by reiterating to all employees of WBG the fiduciary obligations of each employee.

**The Registrant's Chief Compliance Officer, B.J. Webster, Jr., remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

## ITEM 5 ADDITIONAL COMPENSATION

Mr. Webster's annual compensation is based, in part, on the amount of assets under management that Mr. Webster introduces to the Registrant. Accordingly, Mr. Webster has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

## ITEM 6 SUPERVISION

The Registrant provides investment advisory and supervisory services in accordance with the Registrant's policies and procedures manual. The primary purpose of the Registrant's Rule 206(4)-7 policies and procedures is to comply with the requirements of supervision requirements of Section 203(e)(6) of the Investment Advisor's Act ("Act"). The Registrant's Chief Compliance Officer, B.J. Webster, Jr., is primarily responsible for the implementation of the Registrant's policies and procedures and overseeing the activities of the Registrant's supervised persons. Should an employee, independent contractor, investment adviser representative, or solicitor of the Registrant have any questions regarding the applicability/relevance of the Act, the Rules thereunder, any section thereof, or any section of the policies and procedures, he/she should address those questions with the Chief Compliance Officer. Should a client have any questions regarding the Registrant's supervision or compliance practices, please contact Mr. Webster at (610) 594-7205.



**ADV Part 2B Brochure Supplement**

**Marc A. Hembrough**

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Malvern, Pennsylvania 19355  
(484) 328-3590 | [www.whartonbusinessgroupllc.com](http://www.whartonbusinessgroupllc.com)

This Brochure Supplement provides information about Marc A. Hembrough that supplements the Wharton Business Group, LLC Brochure; you should have received a copy of that Brochure. Please contact B.J. Webster, Jr., Chief Compliance Officer, if you did *not* receive Wharton Business Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Marc A. Hembrough is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Marc A. Hembrough was born in 1961. Mr. Hembrough graduated from The University of Pennsylvania, Wharton School of Business in 1984, with a Bachelor of Science degree. Mr. Hembrough has been an investment adviser representative and Managing Member of Wharton Business Group, LLC since November of 2009. Mr. Hembrough was also a registered representative of FSC Securities Corporation from 2009 until 2015. He is a Founding Partner of Wharton Business Group, Inc. since 1992.

## ITEM 3 DISCIPLINARY INFORMATION

Mr. Hembrough has no disciplinary history to disclose.

## ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any investment-related business or occupation.
- B. **Licensed Insurance Agent.** Mr. Hembrough, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Hembrough to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Hembrough that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Hembrough. Clients are reminded that they may purchase insurance products recommended by Mr. Hembrough through other, non-affiliated insurance agents.

Mr. Hembrough has personal investments in Irish Whiskey Ventures II LLC where a client of WBG is also invested. This presents a conflict where Mr. Hembrough has an opportunity to personally gain from the business, which may incentivize Mr. Hembrough to render investment advice to such client on the basis of what they would believe would likely improve their personal investment performance rather than that of the client in question. This investment is not recommended to other clients. The conflict is mitigated by disclosing it to the client in question, and by reiterating to all employees of WBG the fiduciary obligations of each employee.

**The Registrant's Chief Compliance Officer, B.J. Webster, Jr., remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

## ITEM 5 ADDITIONAL COMPENSATION

Mr. Hembrough's annual compensation is based, in part, on the amount of assets under management that Mr. Hembrough introduces to the Registrant. Accordingly, Mr. Hembrough has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

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**ADV Part 2B Brochure Supplement**

**Matthew S. Delaney**

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Malvern, Pennsylvania 19355  
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This Brochure Supplement provides information about Matthew S. Delaney that supplements the Wharton Business Group, LLC Brochure; you should have received a copy of that Brochure. Please contact B.J. Webster, Jr., Chief Compliance Officer, if you did *not* receive Wharton Business Group, LLC's Brochure or if you have any questions about the contents of this supplement.

Additional information about Matthew S. Delaney is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## ITEM 2 EDUCATION BACKGROUND AND BUSINESS EXPERIENCE

Matthew S. Delaney was born in 1966. Mr. Delaney graduated from Penn State University in 1988, with a Bachelor degree and from Duquesne University in 1992, with a Juris Doctorate degree. Mr. Delaney has been an investment adviser representative and a Managing Member of Wharton Business Group, LLC since November of 2009. Mr. Delaney was also a registered representative of FSC Securities Corporation from 2003 until 2015. He has also been a Partner and financial consultant of Wharton Business Group, Inc. since 2003.

## ITEM 3 DISCIPLINARY INFORMATION

Mr. Delaney has no disciplinary history to disclose.

## ITEM 4 OTHER BUSINESS ACTIVITIES

- A. The supervised person is not actively engaged in any investment-related business or occupation.
- B. **Licensed Insurance Agent.** Mr. Delaney, in his individual capacity, is a licensed insurance agent, and may recommend the purchase of certain insurance-related products on a commission basis. Clients can engage Mr. Delaney to purchase insurance products on a commission basis. **Conflict of Interest:** The recommendation by Mr. Delaney that a client purchase an insurance commission product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than on a particular client's need. No client is under any obligation to purchase any insurance commission products from Mr. Delaney. Clients are reminded that they may purchase insurance products recommended by Mr. Delaney through other, non-affiliated insurance agents.

Mr. Delaney serves as General Partner in SWR Acquisition LLC, IRWB1 LP, Irish Whiskey Ventures LLC, and Irish Whiskey Ventures II LLC. This presents a conflict where Mr. Delaney has an opportunity to personally gain from the business, which may incentivize Mr. Delaney to render investment advice to such client on the basis of what they would believe would likely improve their personal investment performance rather than that of the client in question. This investment is not recommended to other clients. The conflict is mitigated by disclosing it to the client in question, and by reiterating to all employees of WBG the fiduciary obligations of each employee.

**The Registrant's Chief Compliance Officer, B.J. Webster, Jr., remains available to address any questions that a client or prospective client may have regarding the above conflict of interest.**

## ITEM 5 ADDITIONAL COMPENSATION

Mr. Delaney's annual compensation is based, in part, on the amount of assets under management that Mr. Delaney introduces to the Registrant. Accordingly, Mr. Delaney has a conflict of interest for recommending the Registrant to clients for investment advisory services, as the recommendation could be made on the basis of compensation to be received, rather than on a client or prospective client's best interests.

## ITEM 6 SUPERVISION

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