

September 1, 2021**Item I: INTRODUCTION**

The name of our firm is Empire Asset Management Company, LLC and we are registered as a broker-dealer with the SEC. We are also affiliated with Empire Financial Management Company (“EFMC”), a registered investment advisor and Empire Asset Management Insurance Agency, an insurance company registered with New York. (“EI”) It is important for you to understand that investment advisory fees and brokerage fees are different from one another. You may wish to avail yourself of free and simple tools that are available to you for the purposes of researching our firm as well as other firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides information about broker-dealers, investment advisers, and investing in general.

Is a Brokerage Account Right for You?

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you. We are a broker-dealer and provide brokerage accounts and services rather than investment advisory services. This document gives you a summary of the types of services we provide and how you pay. This document also provides specific questions you may want to ask us to understand our services in greater detail.

Item II: RELATIONSHIP AND SERVICES***What investment services and advice can you provide me?***

We provide investment advice to our clients on non-discretionary basis. If you select to open an account with us on a non-discretionary basis, we must receive your consent prior to making any transactions and you make the ultimate decisions regarding the purchase or sale of investments in your account. The nature and terms of your account will be agreed upon and memorialized in your new account agreement (“NAA”) with us. Our advice may involve us providing you with asset allocation and the selection of investments. The advice we provide is guided by your stated investment objectives (i.e., maximum capital appreciation, growth, etc.). The process we use with respect to opening and maintaining your account starts with establishing your risk tolerance and financial objectives, which will be considered when making recommendations that are suitable to you. These recommendations will primarily include equities, fixed income and cash equivalents, but may from time to time include other asset classes or products. Primary emphasis will be on large capitalization, publicly traded, domestic and international common stocks. We will review your account for the purposes of making investment recommendations, such review is not considered to be “Account Monitoring”. There is currently no minimum amount required in order to open an account with us.

We believe it is important for you to understand your account, its terms and limitations and our mutual relationship thoroughly. It is in this connection that we should have a conversation where we, at minimum, help you to understand the answers to the following questions:

****Given my financial situation, should I choose a brokerage service? Why or why not?***

****How will you choose investments to recommend to me?***

****What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?***

Item III: FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT***What fees will I pay?***

Your account will be charged a negotiable commission on each transaction in your account. In addition to the commission, you will incur brokerage fees by EAMC and other transactional costs that are assessed by our clearing firm. Such additional fees and costs are listed in periodic reports you receive from EAMC or our custodian RBC. For example, such fees may consist of: brokerage commissions or mark-ups, custodian fees, account maintenance

fees, service fees, fees related to mutual funds and variable annuities (which may be collected by our broker-dealer or insurance affiliate), and other transactional fees and product-level fees. ***You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.*** The main conflict that exists between our interests and yours is that the greater the number of transactions in your account, the greater the commissions we will collect; we, therefore, have an incentive to encourage investors to trade more often.

****Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?***

****What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?***

Standard of Conduct ***When we provide you with a recommendation***, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means. The main conflict that exists between our interests and yours is that the greater the number of transactions in your account, the greater the commissions we will collect; we, therefore, have an incentive to encourage investors to trade more often. We may receive additional compensation for certain products directly from issuers. Representatives may buy or sell the same securities which they recommend to you.

****How might your conflicts of interest affect me, and how will you address them?***

****How do your financial professionals make money?***

We make money based on our collection of commissions and fees described in **Item III** above. The commissions we assess to your account are based on providing a service on your behalf; the greater amount of transactions, the greater the commissions we collect. While we collect the commissions whether your account generates a positive or negative return, it is in our best interest for your account balance to increase.

Item IV: DISCIPLINARY HISTORY

Do you or your financial professionals have legal or disciplinary history?

Yes. However, we welcome you to visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

As a financial professional, do you have any disciplinary history? For what type of conduct?

Item V: ADDITIONAL INFORMATION

Should you wish to obtain additional materials about us and/or the services we provide, please see our Brochure that can be accessed using the link provided in **Item II** above. ***If you wish to receive a copy of this Relationship Summary or other available, up-to-date information regarding our firm, please call us at (212) 417-8247 or email us at gzeoli@empiream.com.***

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Your primary contact person at the firm is the firm's principal, Gregg Zeoli. He can be reached at either the phone number or email address listed above in **Item V**.