

Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

Filer's Information

Conway, Kellyanne E

Counselor to the President, White House

Report Year: 2018

Other Federal Government Positions Held During the Preceding 12 Months:

None

Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

/s/ Conway, Kellyanne E [electronically signed on 05/18/2018 by Conway, Kellyanne E in Integrity.gov] - Filer received a 3 day filing extension.

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

/s/ Gast, Scott F, Certifying Official [electronically signed on 09/12/2018 by Gast, Scott F in Integrity.gov]

Other review conducted by

/s/ Gast, Scott F, Ethics Official [electronically signed on 09/12/2018 by Gast, Scott F in Integrity.gov]

U.S. Office of Government Ethics Certification

Data Revised 08/13/2018

Data Revised 06/11/2018

Data Revised 06/08/2018

Data Revised 06/07/2018

Data Revised 06/05/2018

Data Revised 05/30/2018

1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	the polling company/WomanTrend	Washington, District of Columbia	Corporation	President/CEO	10/1995	1/2017
2	Trump for America, Inc.	Washington, District of Columbia	Presidential Transition Team	Senior Advisor	11/2016	1/2017
3	Family Trust #1	New York, New York	Trust	Trustee	12/2004	5/2017
4	Family Trust #2	New York, New York	Trust	Trustee	3/2012	5/2017
5	the polling company/WomanTrend	Washington, District of Columbia	Corporation	Director	10/1995	5/2017

2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	the polling company/WomanTrend (2017) See Endnote	N/A		Salary and Distributions	\$9,230
2	the polling company/WomanTrend 401(k) See Endnote	No			
2.1	BlackRock Large Cap Value Inv A (MDLVX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
2.2	BlackRock International A (MDILX)	Yes	None (or less than \$1,001)		\$201 - \$1,000
3	SEP-IRA Fidelity	No			

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
3.1	Fidelity Government Cash Reserves (FDRXX)	Yes	None (or less than \$1,001)		\$201 - \$1,000
3.2	Fidelity Contrafund (FCNTX)	Yes	\$100,001 - \$250,000		\$5,001 - \$15,000
4	the polling company/WomanTrend	See Endnote	N/A		\$1,000,001 - \$5,000,000
5	Late Night With Seth Meyers - 01/10/17	N/A		Honorarium	\$470
6	IRA	No			
6.1	Fidelity Government Cash Reserves (FDRXX)	Yes	None (or less than \$1,001)		\$1,001 - \$2,500
6.2	Fidelity Contrafund (FCNTX)	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000

3. Filer's Employment Agreements and Arrangements

#	EMPLOYER OR PARTY	CITY, STATE	STATUS AND TERMS	DATE	
1	the polling company/WomanTrend	Washington, District of Columbia	I continue to participate in the SEP IRA that was established while I was employed by the polling company. The polling company did not make contributions to the SEP IRA, and the asset has been held by me independently of the company since my January 2017 separation.	1/2003	
2	the polling company/WomanTrend	See Endnote	Washington, District of Columbia	I continued to participate in the 401k plan until I divested the assets. The plan sponsor and I did not make further contributions after my separation from the company in January 2017.	11/1999

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

(N/A) - Not required for this type of report

5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Wachtell, Lipton, Rosen & Katz, 401(k)		No			
1.1	Fidelity Limited Term Government Fund (FFXSX)		Yes	\$50,001 - \$100,000		\$5,001 - \$15,000
1.2	Dodge & Cox International Stock Fund (DODFX)		Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
1.3	Fidelity Contrafund Fund Class K (FCNKX)		Yes	\$1,000,001 - \$5,000,000		\$50,001 - \$100,000
2	Wachtell, Lipton, Rosen & Katz (law firm)	See Endnote	N/A		Partnership Share	
3	Wachtell, Lipton, Rosen & Katz, Capital Account	See Endnote	N/A	None (or less than \$1,001)	Interest	\$15,001 - \$50,000
4	IRA		No			
4.1	Fidelity Government Cash Reserves (FDRXX)		Yes	None (or less than \$1,001)		\$201 - \$1,000
4.2	Fidelity Contrafund (FCNTX)		Yes	\$100,001 - \$250,000		\$5,001 - \$15,000

6. Other Assets and Income

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Government Money Market Fund (SPAXX)		Yes	\$5,000,001 - \$25,000,000		\$50,001 - \$100,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
2	Fidelity NJ Municipal Money Market Fund (FNJXX)	See Endnote	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
3	Altria Group Inc	See Endnote	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$15,001 - \$50,000
4	Kraft Heinz Co	See Endnote	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
5	Pfizer Inc	See Endnote	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$1,001 - \$2,500
6	Philip Morris Int'l Inc.	See Endnote	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$50,001 - \$100,000
7	Mondelez Int'l Inc	See Endnote	N/A	None (or less than \$1,001)	Dividends Capital Gains	\$5,001 - \$15,000
8	U.S. bank account (cash)		N/A	\$100,001 - \$250,000		None (or less than \$201)
9	U.S. UTMA money market accounts (cash)		N/A	\$50,001 - \$100,000		None (or less than \$201)
10	Family Trust #1		No			
10.1	Pacific Life variable life insurance policy (split-dollar between the trust and Wachtell, Lipton, Rosen & Katz)	See Endnote	No	\$1,001 - \$15,000		None (or less than \$201)
11	Family Trust #2	See Endnote	No			
11.1	U.S. bank account (cash)		N/A	\$1,001 - \$15,000		None (or less than \$201)
12	Family Trust #3		No			
12.1	Fidelity Government Money Market Fund (SPAXX)		Yes	\$15,001 - \$50,000		\$201 - \$1,000
12.2	Fidelity Select Technology (FSPTX)	See Endnote	Yes	None (or less than \$1,001)		\$100,001 - \$1,000,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
12.3	Fidelity NJ Municipal Money Market Fund (FNJXX)	See Endnote	Yes	None (or less than \$1,001)		\$201 - \$1,000
12.4	Fidelity Contrafund (FCNTX)	See Endnote	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
13	Family Trust #4		No			
13.1	Fidelity Government Money Market Fund (SPAXX)		Yes	\$15,001 - \$50,000		\$201 - \$1,000
13.2	Fidelity Select Technology (FSPTX)	See Endnote	Yes	None (or less than \$1,001)		\$100,001 - \$1,000,000
13.3	Fidelity NJ Municipal Money Market Fund (FNJXX)	See Endnote	Yes	None (or less than \$1,001)		\$201 - \$1,000
13.4	Fidelity Contrafund (FCNTX)	See Endnote	Yes	\$500,001 - \$1,000,000		\$15,001 - \$50,000
14	Family Trust #5		No			
14.1	U.S. bank account (FCASH)		N/A	\$15,001 - \$50,000		None (or less than \$201)
14.2	Fidelity Select Technology (FSPTX)	See Endnote	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
14.3	Fidelity Contrafund (FCNTX)	See Endnote	Yes	\$250,001 - \$500,000		\$5,001 - \$15,000
15	Family Trust #6		No			
15.1	U.S. bank account (FCASH)		N/A	\$15,001 - \$50,000		None (or less than \$201)
15.2	Fidelity Select Technology (FSPTX)	See Endnote	Yes	None (or less than \$1,001)		\$15,001 - \$50,000
15.3	Fidelity Contrafund (FCNTX)	See Endnote	Yes	\$250,001 - \$500,000		\$15,001 - \$50,000

#	DESCRIPTION		EIF	VALUE	INCOME TYPE	INCOME AMOUNT
16	Antoinette Associates, LLC (holding company for non-rented personal residence)	See Endnote	N/A			
17	Fidelity OTC Port (FOCPX)	See Endnote	Yes	\$5,000,001 - \$25,000,000		\$15,001 - \$50,000

7. Transactions

#	DESCRIPTION		TYPE	DATE	AMOUNT
1	Altria Group Inc (MO)		Sale	09/18/2017	\$15,001 - \$50,000
2	the polling company/WomanTrend		Sale	09/21/2017	\$1,000,001 - \$5,000,000
3	Pfizer Inc (PFE)		Sale	09/18/2017	\$1,001 - \$15,000
4	Philip Morris Intl Inc (PM)		Sale	09/14/2017	\$50,001 - \$100,000
5	Kraft Heinz Co (KHC)		Sale	09/14/2017	\$1,001 - \$15,000
6	Mondelez Intl Inc (MDLZ)		Sale	09/14/2017	\$1,001 - \$15,000
7	Fidelity Select Technology (FSPTX)	See Endnote	Sale	09/12/2017	\$500,001 - \$1,000,000
8	Fidelity NJ Municipal Money Mkt (FNJXX)	See Endnote	Sale	05/15/2017, 09/12/2017	\$5,000,001 - \$25,000,000
9	Fidelity Contrafund (FCNTX)	See Endnote	Purchase	10/26/2017, 12/08/2017	\$1,000,001 - \$5,000,000
10	Fidelity NJ Municipal Money Mkt (FNJXX)	See Endnote	Purchase	multiple	\$1,000,001 - \$5,000,000
11	Fidelity OTC Port (FOCPX)	See Endnote	Purchase	10/16/2017, 12/08/2017	\$5,000,001 - \$25,000,000

#	DESCRIPTION		TYPE	DATE	AMOUNT
12	Dodge & Cox International Stock Fund (DODFX)	See Endnote	Purchase	10/25/2017, 12/19/2017	\$250,001 - \$500,000
13	Fidelity Contrafund Class K (FCNKX)	See Endnote	Purchase	10/25/2017	\$500,001 - \$1,000,000
14	Fidelity Limited Term Government Fund (FFXSX)		Purchase	quarterly	\$1,001 - \$15,000
15	Fidelity Limited Term Government Fund (FFXSX)		Sale	10/25/2017	Over \$1,000,000
16	Fidelity Select Technology (FSPTX)	See Endnote	Purchase	04/12/2017	\$15,001 - \$50,000
17	Fidelity Government Money Market Fund (SPAXX)	See Endnote	Purchase	quarterly	\$50,001 - \$100,000

8. Liabilities

None

9. Gifts and Travel Reimbursements

Endnotes

PART	#	ENDNOTE
2.	1	Earnings for services prior to 1/20/17 appointment.
2.	2	This 401(k) has been closed and the underlying assets have been divested on or about 4/6/2017.
2.	4	The polling company/WomanTrend has been divested on or about 9/21/2017.
3.	2	401(k) assets were disclosed in Part 2 of prior report but arrangement was inadvertently omitted from Part 3.

PART	#	ENDNOTE
5.	2	As of 12/31/2017, he was no longer a partner at the law firm.
5.	3	As of 12/31/2017, he was no longer a partner at the law firm. Capital was returned to him in 2017.
6.	2	This asset has been divested. See Part 7 for information about transactions on 5/15/2017 and 9/12/2017.
6.	3	This asset has been divested. See Part 7 for information about transaction on 9/18/2017.
6.	4	This asset has been divested. See Part 7 for information about transaction on 9/14/2017.
6.	5	This asset has been divested. See Part 7 for information about transaction on 9/18/2017.
6.	6	This asset has been divested. See Part 7 for information on transaction on 9/14/2017.
6.	7	This asset has been divested. See Part 7 for information about transaction on 9/14/2017.
6.	10.1	Trust and my spouse's employer, Wachtell, Lipton, Rosen & Katz, co-owned a Pacific Life variable insurance policy. The selection of investments was handled exclusively by Wachtell, and Wachtell will not disclose the specific investments. As of midnight on January 1, 2018, the Trust no longer had an interest in the face amount of the policy. Its sole interest was valued between \$1,000 and \$15,000, which was subsequently paid out to my children in 2018.
6.	11	Additional underlying assets are not reportable.
6.	12.2	See Part 7 for information on transaction on 9/12/2017.
6.	12.3	See Part 7 for information on transaction on 9/12/2017.
6.	12.4	See Part 7 for information about transaction on 10/26/2017.
6.	13.2	See Part 7 for information on transaction on 9/12/2017.
6.	13.3	See Part 7 for information about transaction on 9/12/2017.
6.	13.4	See Part 7 for information about transaction on 10/26/2017.
6.	14.2	See Part 7 for information on transaction on 9/12/2017.
6.	14.3	See Part 7 for information about transaction on 10/26/2017.
6.	15.2	See Part 7 for information on transaction on 9/12/2017.
6.	15.3	See Part 7 for information about transaction on 10/26/2017.

PART	#	ENDNOTE
6.	16	Sole asset of LLC is not reportable.
6.	17	See Part 7, Line 12.
7.	7	Transaction amount is aggregate of sales over several accounts on 9/12/2017.
7.	8	Transaction amount is aggregate of sales over several accounts on 5/15/2017 and 9/12/2017
7.	9	Transaction amount is aggregate of initial purchases over several accounts on 10/26/2017 and distribution/reinvestments exceeding \$1000 on 12/8/17.
7.	10	Includes quarterly distributions/reinvestments exceeding \$1000 for Quarter 1 and Quarter 2.
7.	11	Includes initial purchase on 10/16/17 and distribution/reinvestment exceeding \$1000 on 12/8/17.
7.	12	New in spouse's 401k with initial purchase on 10/25/17 (see Part 5, Line 1.2), and distribution/reinvestment exceeding \$1000 on 12/19/17.
7.	13	New in spouse's 401k with initial purchase on 10/25/17 (see Part 5, Line 1.3).
7.	16	Transaction amount is aggregate of distribution/reinvestment purchases over several accounts.
7.	17	Transaction amount is aggregate of purchases over several accounts.

Summary of Contents

1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

5. Spouse's Employment Assets & Income and Retirement Accounts

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

6. Other Assets and Income

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

7. Transactions

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

8. Liabilities

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

9. Gifts and Travel Reimbursements

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

Pursuant to the Paperwork Reduction Act, as amended, an agency may not conduct or sponsor, and no person is required to respond to, a collection of information unless it displays a currently valid OMB control number (that number, 3209-0001, is displayed here and at the top of the first page of this OGE Form 278e).
