

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

### Filer's Information

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**Conway, Kellyanne**

Counselor to the President, White House

Date of Appointment: 01/20/2017

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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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 03/13/2017 by Conway, Kellyanne E in Integrity.gov]**

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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/ Passantino, Stefan, Certifying Official [electronically signed on 03/31/2017 by Passantino, Stefan in Integrity.gov]**

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Other review conducted by

**/s/ Schultz, James D, Ethics Official [electronically signed on 03/30/2017 by Schultz, James D in Integrity.gov]**

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U.S. Office of Government Ethics Certification

## 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 and CEO	6/1995	1/2017

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Government Cash Reserves	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
2	Wal-Mart Stores Inc., SEP-IRA Fidelity	No	\$1,001 - \$15,000		None (or less than \$201)
3	the polling company/Woman Trend 401(k)	Yes	\$250,001 - \$500,000		\$2,501 - \$5,000
3.1	BlackRock Large Cap Value Inv A (MDLVX)				
4	the polling company/Woman Trend 401(k)	Yes	\$100,001 - \$250,000		\$1,001 - \$2,500
4.1	Blackrock International A (MDILX)				
5	the polling company/WomanTrend (2016)	N/A	\$1,000,001 - \$5,000,000	Business Income	\$800,726
6	the polling company/WomanTrend (2017)	N/A	\$1,000,001 - \$5,000,000	Business Income	\$9,230
7	C&C Television V, LLC	N/A		Wages	\$850
8	GEP Talent Services, LLC	N/A		Wages	\$470

### 3. Filer's Employment Agreements and Arrangements

None

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

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	the polling company/WomanTrend	Washington, District of Columbia	President and CEO
2	American Conservation Union	Alexandria, Virginia	Consulting Services
3	American Principles Project	Washington, District of Columbia	Consulting Services
4	Americans for Prosperity Foundation	Arlington, Virginia	Consulting Services
5	Arlington County Public Schools	Arlington, Virginia	Consulting Services
6	Bio Springer North America	Milwaukee, Wisconsin	Consulting Services
7	Catholic University of America	Washington, District of Columbia	Consulting Services
8	Center for Medical Progress	Irvine, California	Consulting Services
9	Consumer Healthcare Products Association	Washington, District of Columbia	Consulting Services
10	Citizens United	Washington, District of Columbia	Consulting Services
11	Citizens United Political Victory Fund	Washington, District of Columbia	Consulting Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
12	Donald J. Trump for President	New York, New York	Consulting Services
13	Eric Holcomb	Indianapolis, Indiana	Consulting Services
14	Fieldstead & Co	Irvine, California	Consulting Services
15	Fleming for Louisiana	Minden, Louisiana	Consulting Services
16	FreedomWorks for America	Washington, District of Columbia	Consulting Services
17	GOP Convention Committee on Arrangements	Colombus, Ohio	Consulting Services
18	Independent Women's Voice	Washington, District of Columbia	Consulting Services
19	Indiana Energy Association	Indianapolis, Indiana	Speaking Engagement
20	Jobvite, Inc.	Burlingame, California	Consulting Services
21	Judicial Crisis Network	Washington, District of Columbia	Consulting Services
22	Kansas for Huelskamp	Fowler, Kansas	Consulting Services
23	Keep the Promise, Inc.	Austin, Texas	Consulting Services
24	King for Congress	Wall Lake, Iowa	Consulting Services
25	KTP PAC	Austin, Texas	Consulting Services
26	Laffer Associates	Nashville, Tennessee	Speaking Engagement
27	Market Council	Englewood, New Jersey	Speaking Engagement
28	Mike Pence for Indiana	Anderson, Indiana	Consulting Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
29	NOIA	Washington, District of Columbia	Speaking Engagement
30	National Republican Congressional Committee	Washington, District of Columbia	Consulting Services
31	Rod Blum for Congress	Dubuque, Iowa	Consulting Services
32	Students for Life of America	Spotsylvania, Virginia	Consulting Services
33	Tea Party Patriots	Woodstock, Georgia	Consulting Services
34	Trusted Leadership PAC	Austin, Texas	Consulting Services
35	Women's Conference for Florida	Tampa, Florida	Consulting Services
36	Trump for America, Inc.	Washington, District of Columbia	Consulting Services
37	Point 72 Asset Managment	Stamford, Connecticut	Speaking Engagement
38	Susan B Anthony List	Washington, District of Columbia	Consulting Services
39	Concerned Women for America	Washington, District of Columbia	Consulting Services
40	American Road & Transportation	Washington, District of Columbia	Consulting Services
41	527 Committee, The Presidential Coalition	Washington, District of Columbia	Consulting Services
42	Alabama Policy Institute	Birmingham, Alabama	Speaking Engagement
43	American Asso the Advancement of Science	Washington, District of Columbia	Consulting Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
44	Americans for Prosperity - Michigan	Lansing, Michigan	Consulting Services
45	Americans for Prosperity - Ohio	Colombus, Ohio	Consulting Services
46	Cambridge Analytica, LLC	New York, New York	Consulting Services
47	Center for Medical Progress	Irvine, California	Consulting Services
48	Center for Security Policy	Washington, District of Columbia	Consulting Services
49	CRC Public Relations	Alexandria, Virginia	Consulting Services
50	Duane Morris	Trenton, New Jersey	Consulting Services
51	Ending Spending	Alexandria, Virginia	Consulting Services
52	Freedom Partners	Arlington, Virginia	Consulting Services
53	Gary Palmer for Congress	Homewood, Alabama	Consulting Services
54	Hellerman Baretz Communications, LLC	New York, New York	Consulting Services
55	Highfive	Redwood City, California	Consulting Services
56	Indeed	Austin, Texas	Consulting Services
57	Innovative Advertising	Mandeville, Louisiana	Consulting Services
58	John Locke Foundation	Raleigh, North Carolina	Speaking Engagement
59	Judicial Education Project	Washington, District of Columbia	Consulting Services
60	Michigan Prosperity Project	Lansing, Michigan	Consulting Services

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
61	National Multifamily	Washington, District of Columbia	Speaking Engagement
62	National Republican Senatorial Committee	Washington, District of Columbia	Consulting Services
63	National Rifle Association	Fairfax, Virginia	Consulting Services
64	National Right to Life Committee	Washington, District of Columbia	Consulting Services
65	National Women State Legislators	Alexandria, Virginia	Speaking Engagement
66	National Federation of Republican Women	Alexandria, Virginia	Consulting Services and Speaking Engagement
67	NUSA	Arlington, Virginia	Consulting Services
68	Open Primaries	New York, New York	Consulting Services
69	Reclaim NY	New York, New York	Consulting Services
70	Republican Governor's Association	Washington, District of Columbia	Consulting Services
71	The 2016 Committee	Vienna, Virginia	Consulting Services
72	The Catholic League	New York, New York	Consulting Services
73	The Olson Group	Alexandria, Virginia	Consulting Services
74	Young Americans Foundation	Herndon, Virginia	Consulting Services
75	Zeldin for Congress	Shirley, New York	Consulting Services

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

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Wachtell, Lipton, Rosen & Katz, 401(k)	No	Over \$1,000,000	Investment Income	\$18,429
1.1	Fidelity Limited Term Government Fund				
2	Wachtell, Lipton, Rosen & Katz, 2016 (law firm)			Partnership Share	
3	Wachtell, Lipton, Rosen & Katz, Capital Account		Over \$1,000,000		
4	Wachtell, Lipton, Rosen & Katz, 2017 (law firm)			Partnership Share	

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	Fidelity Government Money Market Fund	Yes	\$1,000,001 - \$5,000,000		\$1,001 - \$2,500
2	Fidelity NJ Municipal Money Market Fund	Yes	\$5,000,001 - \$25,000,000		\$5,001 - \$15,000
3	Altria Group Inc	No	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
4	Kraft Heinz Co	No	\$1,001 - \$15,000	Dividends	None (or less than \$201)
5	Pfizer Inc	No	\$1,001 - \$15,000	Dividends	\$201 - \$1,000
6	Philip Morris Int'l Inc.	No	\$15,001 - \$50,000	Dividends	\$1,001 - \$2,500
7	Mondelez Int'l Inc	No	\$15,001 - \$50,000	Dividends	\$201 - \$1,000



#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
8	Citibank Checking Account	No	\$500,001 - \$1,000,000		None (or less than \$201)
9	Citibank UTMA Money Market Account	No	\$15,001 - \$50,000		None (or less than \$201)
10	Citibank UTMA Money Market Account	No	\$1,001 - \$15,000		None (or less than \$201)
11	Citibank UTMA Money Market Account	No	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

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

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## 8. Liabilities

None

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## 9. Gifts and Travel Reimbursements

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

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## Endnotes

# 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 \$375 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$375 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 \$150 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).

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