



STATE OF CALIFORNIA  
FAIR POLITICAL PRACTICES COMMISSION  
1102 Q Street • Suite 3050 • Sacramento, CA 95811

April 22, 2026

Holly J. Mitchell  
500 W. Temple Street, Ste. 866  
Los Angeles, CA 90012

**Re: Your Request for Advice**  
**Our File No. A-26-029**

Dear Ms. Mitchell:

This letter responds to your request for advice regarding the conflict of interest provisions of the Political Reform Act (the “Act”).<sup>1</sup>

Please note that we are only providing advice under the conflict of interest provisions of the Act and not under other general conflict of interest prohibitions such as common law conflict of interest or Section 1090.

Also note that we are not a finder of fact when rendering advice (*In re Oglesby* (1975) 1 FPPC Ops. 71), and any advice we provide assumes your facts are complete and accurate. If this is not the case or if the facts underlying these decisions should change, you should contact us for additional advice.

### QUESTION

Under the Act, does segmentation apply to enable you to take part in decisions related to the Locally Preferred Alternative (“LPA”) for the K Line Northern Extension (“K Line”) project where you have a disqualifying financial interest in decisions specific to the addition of a station entrance within 1,000 feet from your real property?

### CONCLUSION

Yes, based on the facts provided, it appears decisions related to the LPA for the K Line project may be segmented from decisions regarding the proposed station entrance located at

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<sup>1</sup> The Political Reform Act is contained in Government Code Sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in Sections 18104 through 18998 of Title 2 of the California Code of Regulations. All regulatory references are to Title 2, Division 6 of the California Code of Regulations, unless otherwise indicated.

Midtown Crossing. Pursuant to the segmentation provisions in Regulation 18706, you may take part in the decisions related to the LPA for the K Line project, including the location of underground tunnels located more than 800 feet from your real property, so long as the decisions regarding the proposed station entrance located at Midtown Crossing, in which you have a disqualifying financial interest, are considered first and without you taking part in any way, and the subsequent decisions will not reopen the decisions regarding the proposed station entrance located at Midtown Crossing.

### **FACTS AS PRESENTED BY REQUESTER**

In March 2026, the Los Angeles County Metropolitan Transportation Authority (“LA Metro”) Board of Directors (“Board”) will vote on the LPA for the K Line project. You are an elected Los Angeles County Supervisor for the Second District. Due to your position as a County Supervisor, you also serve as a Board member for LA Metro.

#### *LA Metro’s K Line Project*

LA Metro’s K Line project will be a transformative infrastructure project in Los Angeles County (“LA County”), potentially being the first major north-south rail line in Los Angeles. It would extend rail service from the Metro Expo/Crenshaw Station north to the Metro D Line stations currently under construction on Wilshire Boulevard, the Metro B Line, and potentially to the Hollywood Bowl. It would serve many communities, including the LAX area, South Los Angeles, Inglewood, South Bay, the Crenshaw Corridor, Mid-City, Central Los Angeles, West Hollywood, and Hollywood, allowing for further connections to points north in the San Fernando Valley via the Metro B Line. Generally, the K Line would operate entirely underground with the exception of the station entrances, which provide street-level access for riders. At the respective transfer stations, transfers between the K Line and the D and B Lines would be entirely underground and riders would be able to access both lines from any of the station entrances.

The project would improve connectivity with Metro’s rail and bus network by linking four Metro Rail lines and six of the top ten busiest bus lines in LA County. The project will be located in the cities of Los Angeles and West Hollywood.

#### *Segmentation*

Options to segment the decisions related to the LPA for the K Line project are currently being considered. In both options, the decisions related to the proposed station entrance located at Midtown Crossing would be decided first. You would recuse yourself from taking part in any way in those decisions due to you having a disqualifying financial interest in the decisions, as discussed below. Once the decisions related to the proposed station entrance located at Midtown Crossing are made, they need not be revisited and subsequent decisions related to the remaining

proposed station entrances would not alter those prior decisions. Following the decisions related to the proposed station entrance located at Midtown Crossing, you would then return and take part in the remaining decisions.<sup>2</sup>

One of the proposed options for segmenting the decisions would include taking part in decisions related to the location of underground tunnels located more than 800 feet from your real property. The only surface disruption will be at the proposed locations of the station entrances where they stage tunnel construction, but the tunnels themselves will not cause any surface disruptions. The second option for segmenting the decisions would include taking part only in decisions related to stations and tunnels located more than 1,000 feet from your real property.

### Conflict of Interest

Your real property is located between 500 and 1,000 feet (approximately 900 feet) from the proposed location of the Midtown Crossing station for the K Line project. As previously advised in the *Solis* Advice Letter, No. A-26-002, the Act prohibits you from taking part in governmental decisions relating to the LPA for the K Line project because it is reasonably foreseeable that the decisions related to the potential addition of a station entrance within 1,000 feet of your real property would have a material financial effect on the market value and income producing potential of your real property. (See Regulation 18702.2(a)(8).) The facts provided in the *Solis* Advice Letter, No. A-26-002, remain accurate and are incorporated by reference.

## ANALYSIS

We identified, in the *Solis* Advice Letter, No. A-26-002, that you have a disqualifying financial interest in the governmental decisions relating to the LPA for the K Line project. Since your real property is located within 1,000 feet of the proposed station entrance located at Midtown Crossing, it is reasonably foreseeable that the decision would have a material financial effect on the market value and income producing potential of your real property. (See Regulation 18702.2(a)(8).) You are now seeking advice limited to segmenting the decisions at issue.

Under the Act, segmentation enables an official with a disqualifying financial interest to participate in decisions that do not reopen or affect the decision in which the official has a conflict of interest. Regulation 18706 allows for some large, complex decisions to be segmented

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<sup>2</sup> Please note, you must follow all of the recusal procedures set forth in Section 87105(a) and Regulation 18707(a). Specifically, you must, prior to the consideration of the item, do all of the following: (1) publicly identify the financial interest(s) that gives rise to the conflict of interest in detail sufficient to be understood by the public; (2) recuse from discussing and voting on the matter, or otherwise acting in violation of Section 87100; and (3) leave the room until after the discussion, vote, and any other disposition of the matter is concluded. (Section 87105(a).)

into separate decisions to enable an official with a disqualifying financial interest in one component of the series of decisions to participate in other components where no financial interest exists. Regulation 18706(a) requires all of the following conditions to apply:

- (1) The decision in which the official has a financial interest can be broken down into separate decisions that are not inextricably interrelated to the decision in which the official has a disqualifying financial interest;
- (2) The decision in which the official has a financial interest is segmented from the other decisions;
- (3) The decision in which the official has a financial interest is considered first and a final decision is reached by the agency without the disqualified official's participation in any way; and
- (4) Once the decision in which the official has a financial interest has been made, the disqualified public official's participation does not result in a reopening of, or otherwise financially affect, the decision from which the official was disqualified.

Segmentation is available only if a decision can be broken down into separate decisions that are not inextricably interrelated to a decision in which you have a disqualifying financial interest. Decisions are "inextricably interrelated" when the result of one decision will effectively determine, affirm, nullify, or alter the result of another decision. (Regulation 18706(b).)

The broadest option for segmenting the decisions includes you taking part in decisions related to the proposed location of underground tunnels located more than 800 feet from your real property. You confirmed the only surface disruption will be at the proposed locations of the station entrances where they stage tunnel construction, but the tunnels themselves will not cause any surface disruptions.

Relevant to the decisions related to the location of underground tunnels located more than 800 feet from your real property, Regulation 18702.2(a)(8) provides the materiality standard where the decision affects property over 500 feet but less than 1,000 feet from the official's real property. Under this standard, the financial effect of the decision on the official's real property is material whenever the decision would change the real property's: development potential; income producing potential; highest and best use; character by substantially altering traffic levels, intensity of use, parking, view, privacy, noise levels, or air quality; or market value. (Regulation 18702.2(a)(8)(A)-(E).) Based on facts provided, the underground tunnels will not cause any surface disruptions. As such, it is not reasonably foreseeable that the decisions related to the location of underground tunnels located more than 800 feet from your real property would have a material financial effect on your real property.

You indicate that only one of the proposed station entrances in the LPA is within 1,000 feet of your real property. The remaining proposed station entrances are all located well over 1,000 feet from your real property. Relevant to the remaining proposed station entrances, Regulation 18702.2(b) provides the materiality standard where the decision affects property over 1,000 feet from the official's real property. Under this standard, the financial effect of the decision on the official's parcel of real property is presumed not to be material. This presumption may be rebutted with clear and convincing evidence that the governmental decision would have a substantial effect on the official's property. (Regulation 18702.2(b).) However, there is no clear and convincing evidence that the decision to approve the addition of station entrances over 1,000 feet from your real property would have a substantial effect on your real property. As such, it is not reasonably foreseeable that the decisions regarding the remaining proposed station entrances would have a material financial effect on your real property.

You state that approval of the LPA for the K Line project can be broken down into separate decisions. More specifically, you indicate that decisions regarding the proposed station entrance located at Midtown Crossing are not "inextricably interrelated" within the meaning of Regulation 18706(b) with the remaining decisions related to the LPA for the K Line project.

Accordingly, if the governmental decisions involving the proposed station entrance located at Midtown Crossing are segmented and considered first, with a final decision reached without you in any way taking part in the decisions, then you may take part in the remaining decisions involving the location of underground tunnels more than 800 feet from your real property and the location of station entrances more than 1,000 feet from your real property, as long as any such decisions do not reopen the prior decisions.

If you have other questions on this matter, please contact me at [JRinehart@fppc.ca.gov](mailto:JRinehart@fppc.ca.gov).

Sincerely,

Dave Bainbridge  
General Counsel

**Jenna Rinehart**

By: Jenna C. Rinehart  
Senior Counsel, Legal Division

JR:aja