Dear Professor Scott Brown,

I am writing to submit a manuscript titled "Do Bayes Factors and mixed effects models mix?" in response to the target article for the special issue on the use of Bayes Factors with mixed effects articles.

Although perhaps contrary to the central argument of the paper, I suggest that perhaps Bayes Factors are ill – suited to model comparison with mixed effects models in all but the very theoretically motivated cases. I believe that this will encourage readers to consider the purpose for which multilevel models are employed, and if that purpose is for statistical convenience, to consider alternative model comparison techniques like *k* fold cross validation.

I confirm that this work has not been published elsewhere, nor is it currently under consideration for publication elsewhere. I have no conflicts regarding this work to disclose.

Thank you kindly for organising this special issue and for your consideration of this manuscript.

Kind regards,

Dr. Lauren Kennedy

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