



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

Caleb P. Burns  
Wiley Rein LLP  
1776 K Street NW  
Washington, DC 20006

JUN 15 2018

100-44445-00000  
RE: MUR 6969  
MMWP12 LLC  
K2M, LLC  
Mark D. Kvamme  
Megan Jean Browning Kvamme  
Paul Johannsen

Dear Mr. Burns:

On October 1, 2015, the Federal Election Commission ("Commission") notified your clients MMWP12 LLC, K2M, LLC, Mark D. Kvamme, and Paul Johannsen of a complaint alleging that they had violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). The Commission on March 10, 2016, notified your client Megan Jean Browning Kvamme that her activities may fall within the scope of the alleged violations described in the complaint.

On June 7, 2018, the Commission considered the complaint but was equally divided on whether to find reason to believe your clients may have violated the Act or Commission regulations. Accordingly, the Commission closed its file in this matter. A Statement of Reasons explaining the Commission's decision will follow.

Documents related to the case will be placed on the public record within 30 days. See Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016), effective September 1, 2016.

If you have any questions, please contact Saurav Ghosh, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Mark Shonkwiler  
Assistant General Counsel