

Comment from Sean Croston in response to Request for Information for *Disclosure of Agency Legal Materials*
May 16, 2022

Thanks for the outreach. Several years ago I drafted but never finalized a paper on a related topic since I switched jobs. Anyway I thought some of it could be interesting background for your team:

https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2320133

Feel free to use or discard at your pleasure.