

BLACK FEATHER STRATEGIC INTELLIGENCE NETWORK

Companion to: *They Did Not Mention IQ* · *In 1927 It Took a Supreme Court* · *The Enclosure of the Genome*

THEY BOUGHT THE EGGS THEMSELVES

The Batch Embryo Ownership Exception, the Polygenic Donor Selection Market

Now Commercially Operational, and the Six-Component Assembly Nobody Had to Pass a Law to Build

Goodwin Procter, Taking Security Interests in Human Reproductive Tissue (2022) | Los Angeles Times on California Conceptions | 'Creating and selling embryos for donation: ethical challenges,' peer-reviewed | Nucleus Genomics commercial service (\$25,000 donor optimization, September 2025) | Herasight launch (July 2025) | ASRM Ethics Committee Report (December 8, 2025) | CLIA (1988) | MIT Technology Review 10 Breakthrough Technologies 2026

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falkentheater.substack.com — August 2026

Our first investigation found a vacancy. This one found somebody moving in.

They Did Not Mention IQ described companies computing predicted intelligence scores for embryos and offering them commercially to wealthy customers. The investigation left a reassuring conclusion on the table: your embryos are yours. A laboratory cannot scan a couple's embryos, keep the ones that score well, and sell them to the highest bidder. That is conversion of property. The vehicle is not the dealer's.

It also left an exception large enough to drive the entire story through.

This article documents that exception, names the six legal components already assembled to exploit it, and then reports what the archive found in the commercial marketplace that our previous investigation did not reach: a \$25,000 service explicitly combining polygenic donor selection with embryo optimization, offered by a commercial company to any consumer who wants it. No batch clinic-owned embryo pricing market exists on the record yet. What exists instead is the anterior market — the step that comes first — and it is open for business.

I. The Mechanics — How IVF Embryos Are Made and Who Owns Them

For readers who have not been through the process: in IVF, a woman takes hormone injections for about two weeks that ripen many eggs at once rather than the usual one. They are collected surgically, mixed with sperm in a dish, and those that fertilize and develop are monitored for five days. A typical cycle ends with three to eight viable embryos. One is transferred to the womb. The rest are frozen — and there are millions of them in storage across the United States, in metal tanks of liquid nitrogen in fertility clinic basements.

Around day five, a technician can take five to ten cells from the outer layer of an embryo — the part that becomes placenta, not the baby — and read their DNA. This is preimplantation genetic testing (PGT). Originally developed to screen for chromosomal abnormalities and single-gene diseases such as cystic fibrosis, it is now the technical basis for polygenic scoring of embryos — computing predicted probabilities for complex traits including intelligence, height, eye color, and disease risk.

The question of who owns the resulting embryos matters because it determines who can authorize what is done with them.

CONFIRMED — PRIMARY SOURCE

Where embryos are made from a couple's own eggs and sperm, or from donor material that the couple purchased, ownership sits with the intended parents — the people who contracted for the creation of the embryos. Most states treat the transfer of embryos between parties as a property transfer. An adoption organization describes this as 'much like selling a vehicle and giving over the title.' The clearest statement comes from a 2022 legal analysis written for banks considering whether stored reproductive tissue could serve as loan collateral: it cannot, because banks would need to sell it in a default scenario, and this would constitute the commodification of human life — which is prohibited.

Goodwin Procter. 'Taking Security Interests in Human Reproductive Tissue.' 2022. *Confirmed from the source article's citation and independent verification of the legal analysis.*

The nightmare scenario does not apply to your embryos. A laboratory cannot scan them, select the best-scoring ones, and sell them. The vehicle is not the dealer's.

II. The Exception — When the Clinic Bought the Eggs Itself

THE EXCEPTION

When the clinic purchases the eggs AND the sperm itself, there are no intended parents. It owns the resulting embryos outright from the moment they exist — because nobody else has a prior claim, and no consent contract stands between the clinic and its own product.

=> *This is not hypothetical. It has operated since at least 2012.*

CONFIRMED — PRIMARY SOURCE

California Conceptions, run by Dr. Ernest Zeringue at a fertility centre in Davis, California, creates embryos from purchased donor eggs and purchased donor sperm and offers them as a package to prospective parents. A batch is made from a single egg donor and a single sperm donor, and then distributed among several different patients. Prospective customers are sent a menu of available embryo packages. The price reported by the Los Angeles Times: about \$9,800 for a pregnancy — or your money back. Roughly half the cost of conventional IVF using donor eggs and sperm. Children born this way have no genetic relation to either parent raising them. Several of them, born to different families in different states, are full genetic siblings.

Los Angeles Times reporting on California Conceptions; confirmed from Center for Genetics and Society, 'Embryos for Sale' (2012); cited in source investigation and independently confirmed.

This was not the first. In 2007, the Abraham Center of Life in Texas, founded by Jennalee Ryan and run out of her home, was described as the world's first human embryo bank — creating embryos from recruited donors and selling them. A fertility lawyer, Andrew Vorzimer, told the Los Angeles Times: 'I am horrified by the thought of this. It is nothing short of the commodification of human life.'

The word 'commodification' is doing precise work here. Embryos created from purchased gametes are marketed as '*donated embryos*.' The money that changes hands is a '*programme fee*.' There is no clear federal statute prohibiting it. The federal law banning the sale of human organs does not cover embryos. What exists is a professional body — the American Society for Reproductive Medicine (ASRM) — whose guidelines are recommendations, not law.

CONFIRMED — PRIMARY SOURCE

The peer-reviewed literature on this practice is titled, without apparent irony: 'Creating and selling embryos for "donation": ethical challenges.' The paper proposes that ASRM 'could consider issuing additional guidelines that the cost of an embryo not be linked to the perceived quality of the embryo.'

Read what a recommendation implies: there is no such guideline. Nothing prohibits pricing embryos according to their perceived quality. The same paper notes a second gap: the professional body recommends that egg donors be over 21, but more than 40% of clinics appear not to comply.

'Creating and selling embryos for "donation": ethical challenges.' Peer-reviewed academic journal. Cited in source investigation. Confirmed from independent search of the literature.

III. What the Donors Agreed To — and What They Were Not Asked

An egg donor signs away all rights to her eggs and to anything made from them. That is standard, it is explained, and it is not in dispute. The question is what she was told she was signing away rights to.

Consent forms in this field were drafted for a world in which donated eggs were used to help a specific couple conceive a specific child. They were written before polygenic scoring of embryos existed. They were written before batch embryo creation from purchased gametes had been established as a commercial practice. They were not written to contemplate a scenario in which a woman's eggs would be purchased in bulk, fertilized into a batch, and the resulting embryos ranked for predicted cognitive traits and priced accordingly.

Whether a woman donating at twenty-two anticipated that scenario is not a legal question — she signed the form — but it is the question the consent framework cannot answer because when the forms were written, there was nothing to ask about.

The archive notes the parallel to UK Biobank: half a million British volunteers donated biological material for health research, signing consent forms written for a world that did not contemplate Heliospect Genomics accessing the database to build an embryo IQ ranking product. Nobody lied. The forms simply did not contemplate the use.

IV. The Assembly — Six Components, All Confirmed, All Legal

THE ASSEMBLY — SIX COMPONENTS, ALL CONFIRMED, ALL LEGAL

ONE: A clinic may purchase donor eggs and donor sperm on the open market.

- Confirmed from commercial practice since at least 2007 (Abraham Center) and 2012 (California Conceptions).

TWO: It may create a batch of embryos from a single donor pair and distribute them among multiple recipients.

- Confirmed from California Conceptions' documented commercial operation.

THREE: It owns those embryos outright. No intended parent exists to hold a competing claim.

- Confirmed from Goodwin Procter legal analysis (2022) on embryo ownership structure.

FOUR: A clinical laboratory director may decide, at their sole discretion and without any agency's approval, to offer a new genetic test — including polygenic scoring for IQ.

- Confirmed from CLIA (1988): 'The decision to offer a new genetic test is within the sole discretion of each clinical laboratory director.'

FIVE: Companies computing exactly those scores are operating commercially now.

- Confirmed from Genomic Prediction (LifeView, since 2019), Orchid Health (\$12M raised, whole-genome embryo screening), Nucleus Genomics (Nucleus Embryo, launched June 2025, \$32M raised), Herasight (July 2025, hundreds of embryos screened, now public).
- MIT Technology Review named embryo scoring as one of its 10 Breakthrough Technologies of 2026.

SIX: No rule, anywhere, prohibits linking the price of an embryo to its perceived quality.

Confirmed from the peer-reviewed literature's call for ASRM to 'consider issuing' guidance. No such guidance has been issued.

SIX COMPONENTS. ALL IN PLACE. NONE REQUIRING A CHANGE IN THE LAW.

=> *The only thing missing is somebody assembling them in the same commercial operation.*

V. Update: The Vacancy Is Being Partially Occupied

The previous investigation found the vacancy fully assembled and unoccupied. The archive's extended research found that the adjacent market — one step removed from the batch clinic-owned embryo scenario — has been opened commercially and is operating.

The difference between the vacancy and the occupied territory is one step: in the vacancy, a clinic owns the embryos outright and prices them by polygenic score. In what now exists commercially, a company helps customers select which donor eggs and sperm to purchase before the embryos are created — scoring genetic profiles at the upstream stage rather than the downstream. The functional result is identical. The legal exposure is different because the intended parents exist from the moment the donor material is selected.

CONFIRMED — PRIMARY SOURCE

Nucleus Genomics, founded by Kian Sadeghi in 2020 (when he was 20 years old), raised \$32 million from investors including Alexis Ohanian and Balaji Srinivasan. In September 2025, the SF Standard reported: 'For \$25,000, customers can get Nucleus's top-tier offering: Sadeghi's team will help you find a genetically optimal egg or sperm donor, surrogate, and, ultimately, embryo.' The service screens not only for cancer and disease risk but for IQ, height, hair color, eye color, anxiety, ADHD, and male-pattern baldness. From a minimum of \$5,999, parents receive polygenic risk scores estimating their future child's likelihood of traits including high IQ, low BMI, and anxiety resistance.

SF Standard, September 17, 2025. Confirmed from multiple sources including TechCrunch (June 6, 2025), EntrepreneurLoop (November 29, 2025), and MIT Technology Review (October 16, 2025).

The archive notes: 'help you find a genetically optimal egg or sperm donor' is polygenic scoring applied to the donor selection stage, not the embryo selection stage. This is the step before the batch embryo creation vacancy the previous article described. When a clinic then creates embryos from a polygenic-optimized donor pair and distributes them among multiple recipients as 'donated embryos,' the scoring has already been performed on the genetic material that went in. The downstream pricing-by-quality that the peer-reviewed literature has not yet prohibited can now reference the upstream scoring that already happened.

CONFIRMED — PRIMARY SOURCE

Herasight, founded by a group that includes Jonathan Anomaly — the academic the archive previously documented as an Aish Global affiliate and 'liberal eugenics' proponent — emerged from stealth mode in July 2025. Its launch announcement on X stated it had screened 'hundreds of embryos' for private customers before going public. It is now offering polygenic assessments claiming to detect an embryo's likelihood of developing 17

diseases and cognitive traits including IQ. Its investors include Balaji Srinivasan — the same investor who backed Orchid and Nucleus. One investor network is funding the entire field simultaneously.

MIT Technology Review, October 16, 2025. Confirmed from multiple sources. *Jonathan Anomaly's connection to Herasight confirmed from MIT Technology Review report.*

CONFIRMED — GREEN

ASRM DECEMBER 2025 DECLARATION — CONFIRMED BUT TOOTHLESS:

- **December 8, 2025:** ASRM's Ethics and Practice Committees published a joint report concluding that polygenic embryo screening is '*not ready for clinical practice and should not be offered as a reproductive service at this time.*'
- **Source:** ASRM press release, asrm.org, December 8, 2025. Confirmed.

The archive notes what this means and what it does not mean:

- ASRM is a professional body. Its reports are recommendations, not law.
- CLIA's framework ('*sole discretion of the laboratory director*') remains unchanged.
- FDA's authority over laboratory-developed tests remains blocked by federal court ruling.
- The December 2025 declaration changes none of the six assembled components.
- What ASRM says cannot be offered is being offered.

VI. What This Investigation Is and Is Not Claiming

The archive preserves the source article's precise epistemic discipline, which is the standard the archive applies to all of its investigations:

NOT CONFIRMED — ARCHIVE DECLINES

WE ARE NOT CLAIMING:

- **That any company currently combines clinic-owned batch embryo creation with polygenic scoring and tiered pricing. We looked.** We did not find it.
- **That California Conceptions performs polygenic scoring.** Nothing in the record suggests it does.
 - It is documented here because it established the ownership structure that makes the vacancy available — not because it occupies it.
- **That donors were deceived. They signed valid consent forms.** The forms simply did not contemplate the use.
- **That polygenic scores reliably predict IQ.** The ASRM (December 2025), the ACMG (2024), the NHGRI, and Scientific American all confirm that predictive power is weak, unproven for individuals, and non-existent in standard clinical care anywhere in the world.
- **That Nucleus Genomics, Herasight, or any other company is defrauding customers.**
 - The legal investigation by Migliaccio & Rathod LLP (September 2025) is ongoing;
 - the archive does not prejudge its outcome.

What the archive is claiming: the structural finding. The vacancy exists and is confirmed from legal, institutional, and commercial primary sources. The anterior market — polygenic donor selection — has opened commercially and is operating. The regulatory framework that would govern either remains either silent (*no rule against quality-based embryo pricing*) or powerless (*ASRM's 'should not be offered' against CLIA's 'sole discretion'*). *The eugenics of 1927 required a Supreme Court. The eugenics of 2026 requires a purchase order, a laboratory director's decision, and a price list.*

VII. The Archive's Cross-Reference — What Previous Investigations Establish

The archive places this investigation within its confirmed fifteen-month investigative record:

ARCHIVE CROSS-REFERENCE — NAVY

NeitherRedirectionNorRebranding — Kay Addendum (July 2026):

- **The discovery that intelligence is polygenic (1920s) destroyed classical eugenics and generated the Rockefeller molecular biology research agenda.** That agenda, over a century, produced polygenic scoring — the exact statistical method that makes the current market viable. The obstacle became the method. Confirmed from Lily Kay's primary text.

In1927ItTookASupremeCourt (July 2026):

- **The commercial embryo IQ selection market's prior investigation.** The Heliospect/UK Biobank access confirmed from The Guardian (October 2024). Orchid, Nucleus, Herasight, Genomic Prediction all confirmed from commercial and press records. The regulatory void — CLIA's 'sole discretion' — confirmed from federal statute.

TheEnclosureOfTheGenome (July 2026):

- **The Bayh-Dole Act (1980) and Diamond v. Chakrabarty (1980) — the legal architecture.**
- **Bayh-Dole:** publicly funded research → private commercialization without prior approval.
- **Diamond v. Chakrabarty:** modified biological organisms as patentable property.
- **CLIA (1988):** laboratory tests at laboratory director's sole discretion.
- **All three enacted within eight years:** the complete regulatory void enabling this market.

TheGermanVector (July 2026):

- **The nine-decade lineage from Kaiser-Wilhelm eugenics** → Rockefeller molecular biology → DNA structure → genomics → polygenic scoring → commercial embryo selection.
- **The pattern:** German scientific innovation + American capital = biological modification programme. Confirmed from Edwin Black (IBM and the Holocaust) through BioNTech 2026.

NolronToolUponTheTemple (July 2026):

- **1 Corinthians 3:16-17 — the body as temple of God;** the iron tool prohibition.
- **The polygenic embryo selection market is the iron tool lifted upon the temple before birth** — before the body has been built. The prophetic prohibition anticipated exactly this level of preemptive intrusion. 1927 applied it to a living person. 2026 applies it to a blastocyst.

VIII. The Investor Network — One Capital Structure Funding the Entire Field

One analytical finding from the archive's extended research deserves specific documentation: the same investor network is simultaneously backing all three of the most aggressive players in the polygenic embryo selection market.

CONFIRMED — PRIMARY SOURCE

Balaji Srinivasan — former CTO of Coinbase, former partner at Andreessen Horowitz — has invested in Orchid Health, Nucleus Genomics, and Herasight. These three companies represent the most commercially aggressive deployment of polygenic embryo scoring currently operating. One investor network funds all three simultaneously. Alexis Ohanian (Reddit co-founder) also invested in Nucleus. The network of investor-backers includes, across the broader embryo selection sector, Andreessen Horowitz, Sam Altman, Anne Wojcicki, Vitalik Buterin, and Elad Gil — all previously documented in the 'In 1927 It Took a Supreme Court' investigation.

SF Standard (September 17, 2025); MIT Technology Review (October 16, 2025); EntrepreneurLoop (November 29, 2025). Srinivasan's investment in all three companies confirmed from multiple independent sources.

The archive's analytical reading: when a single investor simultaneously backs all the major companies in an emerging field, this is not competition — it is portfolio construction. Regardless of which specific technical approach succeeds, the investor class that funded the technology will control the infrastructure it creates. The archive confirmed this pattern in the Neuralink Layer Zero investigation, where the same investment network funds all major BCI companies. **The embryo selection market follows the same architecture:** one capital structure, multiple technical approaches, single institutional outcome regardless of which company's platform prevails.

ANALYTICALLY SIGNIFICANT — GOLD

GENOMIC PREDICTION v. NUCLEUS GENOMICS FEDERAL LAWSUIT — GOLD:

In August 2025, Genomic Prediction filed a federal lawsuit against Nucleus Genomics, CEO Kian Sadeghi, and Nathan Treff (former Genomic Prediction employee who joined Nucleus).

- **Allegations:** theft of trade secrets and confidential information.
The suit alleges Treff deleted data from his company laptop and disabled security cameras before his abrupt resignation.
- **The archive notes:** this is competition for intellectual property, not for market ethics.
 - The dispute is about who owns the scoring methodology, not whether the scoring should exist.
 - The lawsuit's existence confirms the commercial stakes are high enough to litigate.

IX. The Net — What Has Been Established

A previous investigation found a vacancy. This one found the address and confirmed that the adjacent market is occupied.

THE NET — WHAT THE TWO INVESTIGATIONS TOGETHER ESTABLISH

FROM 'THEY DID NOT MENTION IQ' (previous investigation):

- Polygenic embryo scoring commercially operational (Heliospect, Orchid, Nucleus, Herasight)
- No pre-market approval required (CLIA laboratory director's sole discretion)
- No causal link between polygenic scores and reliable IQ prediction (ASRM, ACMG)
- UK Biobank accessed without disclosure of intended commercial embryo application

FROM 'THEY BOUGHT THE EGGS THEMSELVES' (this investigation):

- Clinic-owned batch embryo creation confirmed from 2007 and 2012 commercial precedents
- No rule prohibits quality-based pricing of clinic-owned embryos
- Polygenic DONOR selection commercially operational at \$25,000 (Nucleus top-tier service)
- One investor network (Srinivasan) simultaneously funding all three aggressive market entrants
- ASRM's December 2025 'should not be offered' statement: recommendation only, unenforceable

THE REMAINING OPEN ITEM:

- **Whether any commercial operation has yet assembled all six components simultaneously:**
 - clinic-owned batch embryo creation + polygenic scoring + tiered quality-based pricing.
 - We looked. We did not find it. The vacancy exists. The address is now published.

=> THE STRUCTURAL FINDING:

- We did not find a scandal. We found a vacancy and published the address.
- And we found that the adjacent market — polygenic donor selection — is already open.
- The eugenics of 1927 required a Supreme Court.
- The eugenics of 2026 requires a purchase order and a price list.
- None of which anybody has to publish.

BLACK FEATHER STRATEGIC INTELLIGENCE

They Bought the Eggs Themselves — August 2026

falkentheater.substack.com — The previous article found a vacancy. This one found the address. And found somebody moving in next door.

PRIMARY SOURCE REGISTRY

OWNERSHIP AND LEGAL FRAMEWORK:

- Goodwin Procter. 'Taking Security Interests in Human Reproductive Tissue' (2022)
- CLIA: Clinical Laboratory Improvement Amendments (1988). 42 U.S.C. § 263a. cms.gov
- Federal court ruling on FDA authority over laboratory-developed tests (2024)

BATCH EMBRYO CREATION — CONFIRMED COMMERCIAL PRECEDENTS:

- Los Angeles Times reporting on California Conceptions and Dr. Ernest Zeringue
- Center for Genetics and Society. 'Embryos for Sale' (2012). genetics-and-society.org
- Abraham Center of Life, Texas (2007) — documented from press coverage
- 'Creating and selling embryos for "donation": ethical challenges.' Peer-reviewed

NUCLEUS GENOMICS — \$25,000 DONOR OPTIMIZATION SERVICE:

- SF Standard. 'Meet the 25-year-old founder bringing designer babies to a...' September 17, 2025.
sfstandard.com/2025/09/17/nucleus-designer-babies-ivf/
- TechCrunch. 'Genetics testing startup Nucleus Genomics criticized...' June 6, 2025.
- EntrepreneurLoop. 'US Fertility Startup Controversy Over Genetic Optimization.' November 29, 2025.

HERASIGHT AND MARKET ENTRANTS:

- MIT Technology Review. 'The race to make the perfect baby...' October 16, 2025.
technologyreview.com/2025/10/16/1125159/ethics-embryo-screening-reproduction-baby/
- MIT Technology Review. '10 Breakthrough Technologies 2026.' February 11, 2026.
technologyreview.com/2026/01/12/1130011/embryo-scoring-genetic-testing-2026-breakthrough-technology/
- Code Acts in Education. 'Educational Genomics and Embryo Selection Startups.' October 13, 2025.

ASRM DECLARATION AND PROFESSIONAL STANDARDS:

- ASRM. 'Ethics and Practice Committees Release New Report...' December 8, 2025. asrm.org
- American College of Medical Genetics and Genomics statement (2024)
- Scientific American. 'Why Genetically Optimizing Embryos Is Misleading...' November 13, 2025.
- Human Reproduction Update (Oxford Academic). 'Screening embryos for polygenic disease risk.'

LEGAL ACTION:

- Migliaccio & Rathod LLP. Nucleus and Orchid Embryo Testing Investigation. September 8, 2025.
- Genomic Prediction v. Nucleus Genomics federal lawsuit (trade secrets). August 2025.

ARCHIVE COMPANION INVESTIGATIONS:

- NeitherRedirectionNorRebranding (Kay Addendum) | In1927ItTookASupremeCourt
- TheEnclosureOfTheGenome | TheGermanVector | NoIronToolUponTheTemple