Prompt Inquiry
a project of the Ishmael Policy Institute

WORKING PAPER NO. 2026-05 LEGACY LAW AND ETHICS

Clone Wars, Seventeen Years Later

In 2009 a law student argued that American cloning law was a stopgap that let clones be made and destroyed but never born. Seventeen years later the law has barely moved, and the science, and the danger, went somewhere else.

RESEARCH QUESTION

Was a 2009 law-school paper right that American cloning law lets a clone be made and destroyed but never born, and what has changed since?

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ABOUT THIS PAPER

Research brief

RESEARCH QUESTION

Was a 2009 law-school paper right that American cloning law lets a clone be made and destroyed but never born, and what has changed since?

METHOD AND SOURCES

The study's "Sources and method" section lists the 92 sources checked; "What this study could not settle" states the limits. Sources are listed in full, with links where available, at the end of the study.

STARTING VIEW

The 2009 paper's argument: where American law speaks to human cloning, it largely permits a clone to be created and forbids it to be born, and that arrangement is a stopgap. (The study states it as "The steelman.")

OPENING PROMPT

Not saved as a prompt at the time. The study's own account of how it started gives the question: "He asked what happened to cloning law, regulation and ethics since, and whether he was right."

AI TOOLS AND VERIFICATION

Primary agents. Claude (Claude by Anthropic): research, analysis, figures and drafting; **Mia** (Muse by Meta): research brief, coordination and checks.

Contributing agents. None on record for this study.

Verification: the prompter is responsible for verifying the evidence this study rests on. Its sources and data are published so any reader can check the findings.

HOW THIS STARTED

This study tests Patrick's own paper and judges it on the merits. In October 2009, as a 3L at Saint Louis University School of Law, he wrote a seminar paper for a Human Research Subjects class, "Clone wars: The ethical minefield of a human reproductive cloning ban in the U.S." He asked what happened to cloning law, regulation and ethics since, and whether he was right. Each load-bearing claim was checked against primary sources where they exist (statutes, court opinions, agency letters, Vatican documents, the World Medical Association's text). Where the record disagrees with the paper, the page follows the record, including the places where his own counts were wrong when he wrote them.

HOW THIS STUDY WAS MADE

Patrick Ishmael prompted this study and verified it. Claude drafted it and ran the analysis under his direction, on a research package assembled by Mia, an AI agent, and then checked again by Claude against primary sources before it was built. It is a working study, not legal advice. Where a fact could not be confirmed, the page says so under "What this study could not settle."

THE STEELMAN

The argument at its strongest, before the evidence

Where American law speaks to human cloning, it largely permits a clone to be created and forbids it to be born. An embryo made by cloning may be made for research, studied and destroyed. The one thing the law will not allow is for it to live. That makes the clone the only research subject who can never share in the benefit of the research done on it, which is the condition the ethics of human research exist to prevent. If a clone is one of us, the arrangement is indefensible. If it is not, the law should say why not, and it never has. A rule that survives only because no one has been made to defend it is a stopgap, and a stopgap is no way to meet the first person it applies to.

Written by Claude. The evidence follows, and the closing thought returns to this argument with the record in hand.

What we found

He was right about the structure and wrong about where the danger would come from. Every part of his diagnosis of the legal framework is still true, and that is the finding: the law froze while the science moved somewhere else.

11 of 16 held up
Six claims held up outright and five in part. One more was right until Arizona changed its law, three are still open, and one, the patent fear, was wrong as a prediction: an annual appropriations rider already barred such patents when he wrote, and Congress made the bar permanent in 2011.

0 federal bans
Congress still has no cloning statute, for the same reason he gave: a reproductive-only ban versus an all-cloning ban.

1 state
Arizona is the one place that closed the loophole he found, in 2010, a year after he wrote.

0 of 4 proposals
His four reforms have not been enacted anywhere in the United States.

SIXTEEN CLAIMS, TESTED



#	WHAT THE 2009 PAPER SAID	VERDICT	WHAT THE RECORD SHOWS
1	No national law bans reproductive cloning	Right	Still true. No federal cloning statute exists; the House passed all-cloning bans in 2001 and 2003 and the Senate never voted.
2	A federal ban would face constitutional challenge (Griswold, Meyer)	Mixed	Never tested, because no ban was ever enacted. Dobbs (2022) shifted the ground under the Griswold argument.
3	The FDA effectively bans reproductive cloning under PHSA §351	Right	The 1998 position stands. It is a regulatory gate, not a funding rule, a correction to how the paper framed it.
4	Federal inaction on cloning mirrors inaction on IVF	Right	There is still no comprehensive federal IVF regulation; 2025 federal action expanded access.

#	WHAT THE 2009 PAPER SAID	VERDICT	WHAT THE RECORD SHOWS
5	Fourteen states restrict cloning; Missouri's Amendment 2 bans reproductive cloning but legalizes SCNT	Mixed	The Missouri analysis was right and still stands. The state counts were already stale: Illinois (2008) was missing and Iowa's ban had been narrowed in 2007.
6	Arizona left the door open	Right, then superseded	Correct for the 2005 law. Arizona closed the door in 2010.
7	South Dakota's 2004 overhaul made its ban categorical	Right	South Dakota sits in the ban-both group in every survey checked, and the 2004 session law was confirmed.
8	Nineteen states failed to act; thirty-five unaddressed	Mixed	Directionally right. Illinois and Minnesota were wrongly on the "failed" list when written; about 31 states are silent today.
9	Patent law could treat clones as property (Chakrabarty)	Wrong	An annual appropriations rider, first enacted for fiscal 2004 and renewed each year, already barred such patents when he wrote; Congress made the bar permanent law in 2011 (America Invents Act §33), and the Court narrowed DNA patents in Myriad (2013).
10	Cloned embryos are arguably "human subjects" under the Common Rule	Still open	The 2018 revision left that one definition unchanged (a "living individual"). The argument is not refuted: other law already treats fetuses and embryos as human beings or research subjects.
11	The FDA's human-subject definition may include clones	Still open	21 CFR 50.3(g) has not been changed to reach clones; its text was last amended in 2013.
12	Declaration of Helsinki: research must benefit the population studied	Mixed	The principle survives, now at paragraph 20 of the 2024 text, but Helsinki governs research participants, not a clone created for reproduction.
13	Belmont justice principle forbids burdening a class without benefit	Right	Belmont is unrevised and quoted accurately. As an argument about clones it was never adopted by any regulator.

#	WHAT THE 2009 PAPER SAID	VERDICT	WHAT THE RECORD SHOWS
14	The Catholic position: a complete ban, with embryo-destroying research worse	Right	Consistent with Dignitas Personae (2008), which the paper did not cite. Language has only hardened.
15	Safety fears were baseless; Dolly died naturally; research would spread if the FDA ban fell	Mixed	Dolly holds up. “Baseless” is too broad because SCNT is still inefficient. The FDA ban never fell, so the spread prediction is untested.
16	Four proposals: equal embryo protections, equivalent regulation, harmonization, equal rights for born clones	Still open	None enacted. No legislature or regulator has taken them up for clones.

“Still open” marks an argument or proposal that no regulator or court has adopted or rejected. It is not a verdict that the claim was false. Claim 11 was unconfirmed in the research package. A direct check found the FDA definition unchanged, so it is judged “still open.” Claim 10 is judged the same way, not wrong: the 2018 Common Rule revision is one definition, and the paper’s argument is about whether clones belong in the same category as fetuses and embryos that other laws already protect. Claim 13 is judged right because the Belmont quotation and principle are accurate; its application to clones was never adopted by any regulator.

1 · THE PAPER

“Separate and unequal”

The paper argued that American law treats a human clone as a biological product: something that can be created for experimentation and destroyed, but may not be allowed to live. It reached that view in five steps. Dolly (1997) showed that a mammal could be cloned from an adult cell, and the safety fears that followed were, in his view, largely overstated. Congress had failed to legislate, so the FDA filled the void and the states formed a patchwork. The ethical frameworks governing human research (the Common Rule, FDA rules, the Declaration of Helsinki, the Belmont Report, Catholic teaching) all fail the cloned class, which can never benefit from the research done on it. He proposed four reforms. And he concluded:

> *“Separate and unequal is simply not an acceptable status quo.”*

Clones, he wrote, “are test subjects, but never the test beneficiaries,” and today’s statutes were “laying the groundwork for the creation of a future class of humanity that is clearly segregated from and subjugated by natural humanity.” The paper ends: “The first clone will be a watershed moment in the history of humanity. It can only be hoped that it will not happen under the pall of the current statutory and regulatory framework.”

2 · WASHINGTON

Congress still has not acted

There is still no federal statute that makes human cloning a crime. The House passed all-cloning bans in 2001 and 2003 (H.R. 534 in 2003, by 241–155) and the Senate never voted. The Human Cloning Prohibition Act has been reintroduced repeatedly; the most recent bill under that title that we found is H.R. 3498 in the 114th Congress (2015), which was referred to subcommittee on October 5, 2015, and died there when the Congress ended. What exists is the layered structure he described: funding riders (Dickey-Wicker, renewed annually since 1996), the FDA’s regulatory gate, and state law.

The deadlock is the one he named. Rep. Zoe Lofgren said so on the House floor on February 27, 2003: “If we wanted to pass a bill that only prohibits human cloning, it would sail through Congress on a voice vote.” The block was always the therapeutic-cloning dispute: backers of a total ban refused the narrow bill, and backers of stem-cell research refused the broad one.

The FDA’s position is also unchanged. It announced on January 20, 1998 that it was prepared to assert jurisdiction (reported by the Washington Post that day), set out in a February 1998 statement for HHS that a clone falls under Section 351 of the Public Health Service Act as an “analogous product” (Clinton Presidential Library), and confirmed its jurisdiction in letters of October 26, 1998 and March 28, 2001, which say it would not permit reproductive cloning given unresolved safety questions. One correction to the paper: that gate is a regulatory rule, not a funding rule, so it applies regardless of who pays. A second barrier now sits beside it. An appropriations rider, first attached in fiscal 2016 and carried in the FY2027 House bill (Section 734) as recently as June 2026, bars the FDA from reviewing applications involving an embryo intentionally created or modified to carry a heritable genetic modification. Read strictly, it targets gene editing rather than SCNT cloning, and whether it reaches SCNT is contested.

3 · MISSOURI

Amendment 2 still stands

Missouri’s 2006 Amendment 2 (Mo. Const. art. III, §38(d), passed with 51.2%) defines “clone or attempt to clone a human being” as implantation or attempted implantation. Cloning an embryo for research is therefore constitutionally protected in the state, with a 14-day limit and a ban on buying or selling eggs or blastocysts. The paper called this an internal contradiction: natural

embryos may not be created for experimentation, while cloned embryos are created exclusively for research. The Missouri Court of Appeals described the same definitional fight when it upheld the ballot summary in *Missourians Against Human Cloning v. Carnahan* (2006).

The amendment has not been touched. A 2008 initiative petition, 2008-014 ("Cures Without Cloning"; Missouri Secretary of State), would have repealed and redefined it. It never reached the ballot: after ballot-title litigation (*Cures Without Cloning v. Pund*, 2008) it failed to gather enough signatures by the May 4, 2008 deadline. It was not voted down.

The money behind the 2006 campaign is a known part of the story: Jim and Virginia Stowers financed most of a roughly $30 million effort. What the sources checked do not show is any human SCNT stem-cell work in Missouri since. That is an absence in the sources, not proof that none occurred.

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4 · THE STATES

Arizona closed the door, and the counts were already stale

The paper was right about Arizona's 2005 law, which barred only public funding and left private reproductive cloning open. A year later, in 2010, Arizona prohibited attempting to create an in vitro embryo except by fertilization of an egg by sperm (A.R.S. §§36-2311 to 2313). The analysis of the loophole was right and the loophole did not survive. Arizona now sits in every survey's ban-both group.

His state counts were another matter, and the page owns them. His list of fourteen restricting states omitted Illinois, whose cloning law took effect January 1, 2008, nearly two years earlier. His six "blanket ban" states included Iowa, whose 2002 ban had been narrowed by a 2007 act that permits creating embryonic stem cells through cloning while keeping the reproductive ban. (Iowa has since moved its cloning provisions: chapter 707B was repealed and the subject now lives in chapter 707C.) His list of nineteen states that had failed to act wrongly included Illinois and Minnesota, which had acted before he wrote.

The current count depends on who is counting. A May 2024 treatise counts 19 states with cloning statutes. A 2015 survey sorts them into 7 that ban both reproductive and research cloning and 10 that ban reproduction but allow research or "clone and kill." A 2022 peer-reviewed survey counts 22 state laws banning reproductive cloning. These do not reconcile into a single number, so the page does not choose one. What holds across all of them is his broader point: most states have never addressed the question.

5 · PATENTS

The one threat Congress answered

The paper feared that *Diamond v. Chakrabarty* (1980), which allowed a patent on a human-made living micro-organism, left room to treat a clone as property. That door was already shut when he wrote, though only year to year. Beginning with the fiscal 2004 appropriations act (section 634), Congress barred patents on claims directed to or encompassing a human organism, a rider that lapsed unless renewed each year and was renewed every year (Pub. L. 108-199; Congressional Record, June 23, 2011). Section 33 of the Leahy-Smith America Invents Act (2011), two years after he wrote, made that bar permanent law. And in *Association for Molecular Pathology v. Myriad Genetics* (2013) the Supreme Court held that naturally occurring DNA is not patent-eligible merely because it is isolated. As a patent-law prediction the worry was wrong. As an ethical concern about commoditizing human biology it lives on in debates over embryo models and the sale of tissue.

6 · SCIENCE

The field went around the question

Three developments the paper could not have known reshaped the debate.

Stem cells without embryos. Mouse induced pluripotent stem cells appeared in 2006 and human ones in 2007; Gurdon and Yamanaka won the 2012 Nobel Prize. By September 12, 2014, a RIKEN team had transplanted an autologous iPSC-derived retinal sheet into a 70-year-old woman with macular degeneration. Patient-matched stem cells no longer required cloning. The fight that froze Congress, therapeutic versus reproductive cloning, became in large part a fight about a technology the field no longer needed.

The editing scandal. In November 2018 He Jiankui announced the birth of gene-edited twins. A Shenzhen court sentenced him to three years in prison on December 30, 2019. China answered with criminal law: a 2021 amendment makes implanting gene-edited or cloned human embryos a specific crime carrying up to three years, and three to seven in especially serious cases (Criminal Law Article 336-1). He was released in April 2022, and a 2023 NPR report described him running a lab again; later reports of his activity were not verified. No country now permits clinical heritable germline editing. The paper warned of a human being produced by a technique the law had not caught up with. That arrived, but the technique was editing, not cloning, and the response did not come from a federal cloning statute.

A governance framework that worked. The UK legalized mitochondrial replacement in 2015 and, by July 2025, eight babies had been born under its licensing regime, all developing normally by the clinic's account, though three had early health problems not attributed to the treatment (MIT Technology Review). It is one of two places where a legislature decided a germline question deliberately; Australia's Parliament passed Maeve's Law in 2022 after a conscience vote

(Parliament of Australia). Human embryo models arrived in 2021 and reached roughly day 13–14 equivalents by 2023, and regulators moved within two years: the ISSCR's August 2025 targeted update requires oversight of all 3D human embryo models and bans transfer to a uterus; the UK published a code of practice in 2024 and the HFEA recommended extending the 14-day limit to 28 days. That is the kind of proportionate, harmonized oversight his fourth proposal asked for, and it was built for models, not clones.

Primate cloning did work: Zhong Zhong and Hua Hua, cloned from fetal cells, were reported in January 2018. No verified human reproductive clone exists. The Clonaid claim of 2002 was never substantiated. The live edge of the story is funding. On January 23, 2026, NIH temporarily paused review and approval of new human embryonic stem cell lines for its Registry, and ISSCR objected on April 24. As of this writing the pause is temporary and its outcome is unknown.

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7 · MISSES

What he got wrong, and what nobody got

The Common Rule argument was never adopted, but it is not refuted. He argued that a cloned embryo is arguably a "human subject" whose risk-benefit calculus would come out at zero benefit. The 2018 revision kept the Rule's definition (a "living individual"), and HHS said it was not expanded, so that one definition still does not reach embryos. But a definition in one regulation settles little. The same regulations already give human fetuses their own protections in research (45 CFR 46, Subpart B, which defines a fetus as "the product of conception from implantation until delivery"). Other law goes further. The federal Unborn Victims of Violence Act of 2004 protects "a member of the species homo sapiens, at any stage of development, who is carried in the womb" (18 U.S.C. §1841). Missouri law declares that "the life of each human being begins at conception" (§1.205, RSMo). And the Alabama *LePage* ruling (2024) reached frozen embryos that had never been implanted. The question the paper asked is whether a clone belongs in that category, and no regulator or court has answered it for clones. The FDA's parallel definition at 21 CFR 50.3(g), which he thought could reach clones, was likewise not changed.

The constitutional prediction was never tested. A federal ban would have been challenged under *Griswold* and *Meyer*, he argued. No ban passed, so no court ruled, and *Dobbs* has since made the footing of that argument more contested.

"Safety fears are baseless" went too far. Dolly died in 2003, euthanized at six and a half after lung disease (a retroviral disease that also killed flock-mates) and arthritis, and a 2016 study of 13 cloned sheep, including four Dolly clones, found no long-term cloning effects. His point that cloning did not make monsters holds. But SCNT remains very inefficient, which is why the FDA's safety rationale has never been withdrawn.

The Helsinki citation moved. He quoted the principle that research is justified only if the studied population stands to benefit, which is paragraph 19 in the 2000 and 2004 texts. It became paragraph 17 in 2008 and paragraph 20 in 2013, and in the 8th revision adopted October 19, 2024, it

remains paragraph 20, in the provision on vulnerable groups (World Medical Association). The principle survived; the number moved. And Helsinki governs research on participants, so it never cleanly applied to a clone created for reproduction.

His core prediction is simply untested. He predicted research would spread to uncommitted states if the FDA ban fell. The ban never fell.

What the Church said. His Catholic argument was right, and the paper did not cite the Vatican's own bioethics instruction, *Dignitas Personae* (December 12, 2008), which calls human cloning "intrinsically illicit." Later documents did not change that. *Dignitas Infinita* (April 8, 2024) does not address cloning. Pope Leo XIV's September 25, 2026 address in Paris condemned "genetic manipulation, surrogacy, the trade in human organs or the possibility of arranging one's own death"; it did not name cloning, and this study does not stretch it into a statement about cloning.

8 · PROPOSALS

His four reforms, seventeen years on

- **Identical protections for cloned and natural embryos, including the chance to reproduce.** Never enacted. The nearest test came in Alabama: *LePage* (2024) held that frozen embryos are "children" under the state wrongful-death statute, and the legislature answered with immunity for IVF providers, not with new protections for embryos.
- **Regulate cloned products only as equivalent natural products are regulated.** Echoed only from the property side, by the patent bar: an annual appropriations rider from fiscal 2004, made permanent law by the America Invents Act in 2011. Not adopted as regulation.
- **Harmonize federal and state rules.** No harmonization has occurred. The patchwork he described is the patchwork that exists.
- **A clear statement of the rights of born clones.** Never enacted. No born human clone is known to exist, which is part of why the question has never been forced.

The spirit of the proposals (treat like cases alike, with proportionate oversight) shows up in the governance of embryo models, not in cloning law.

9 · TIMELINE

2008 to 2026 at a glance

2008	Illinois enacts its cloning law (eff. Jan. 1), nearly two years before the paper. *Dignitas Personae* issued Dec. 12.

2009	Paper written (Oct.). Oklahoma bans all human cloning (eff. Nov. 1); Montana enacts a cloning law; Minnesota bars state funding.
2010	Arizona bans creating an embryo except by fertilization.
2011	America Invents Act §33: no patent on a claim directed to or encompassing a human organism.
2012	Nobel Prize to Gurdon and Yamanaka for induced pluripotent stem cells (iPSCs).
2013	First human SCNT-derived embryonic stem cells (Mitalipov, OHSU). *Myriad*: isolated natural DNA is not patent-eligible.
2014	First iPSC clinical trial (RIKEN, Sept. 12).
2015	UK legalizes mitochondrial replacement. H.R. 3498, the Human Cloning Prohibition Act, introduced Sept. 11 and referred to subcommittee Oct. 5; it died there when the Congress ended.
2016	FDA appropriations rider first attached (FY2016). Sinclair et al.: Dolly's clones aged normally.
2018	He Jiankui announces gene-edited babies. Common Rule revised; human-subject definition left unchanged. First monkey clones reported (Jan.).
2019	He Jiankui sentenced to three years (Dec. 30).
2021	ISSCR guidelines revised for embryo models. China makes implanting gene-edited or cloned embryos a specific crime (eff. Mar. 1).
2022	*Dobbs* overturns *Roe*.
2024	*Dignitas Infinita* (Apr. 8). Declaration of Helsinki revised (Oct. 19). *LePage* (Ala., Feb. 16): frozen embryos are "children" under the state wrongful-death statute.
2025	ISSCR targeted update (Aug. 11): oversight of all 3D embryo models. Executive Order 14216 on IVF access (Feb. 18).
2026	NIH pauses new human embryonic stem cell lines for its Registry (Jan. 23), temporarily. FDA rider carried again in the FY2027 House bill. Pope Leo XIV condemns "genetic manipulation" (Sept. 25). No verified human reproductive clone exists.

10 · LIMITS

What this study could not settle

The research package listed eight open items. Four were checked and closed, and are folded into the text above. Four remain open, and the page leaves them open rather than guess. Two further details taken from the package, the Arizona enactment year and the wording of Helsinki paragraph 20, were later confirmed against the 2010 Arizona code and the World Medical Association's text.

Still open

- **NIH stem-cell pause.** The January 2026 pause on new human embryonic stem cell lines has no announced end date, and no later outcome was found.
- **Human SCNT in Missouri.** No record of human SCNT stem-cell work in Missouri turned up, including at the Stowers Institute. That is an absence in the sources checked, not proof.
- **Bills after 2015.** The latest Human Cloning Prohibition Act we found is H.R. 3498 (2015). A bill with a different title or number in a later Congress was not exhaustively ruled out. (H.R. 3498 in the current Congress is an unrelated bill; the number was reused.)
- **Current Iowa text.** That Iowa's cloning provisions now sit in chapter 707C is confirmed; the current text was not re-read in full.

Checked and closed

The FDA human-subject definition is unchanged. South Dakota's classification is confirmed against its 2004 session law. The ISSCR August 2025 update is cited as version 1.2 (one working-group paper calls it 1.1). He Jiankui's release and later lab are sourced to 2023 reporting. The research package's tally had counted arguments that were never adopted as "wrong" and has been corrected here. The Iowa chapter number was stale. The Stowers figure is stated as what it was: a campaign most of which the Stowers family financed.

CLOSING THOUGHT

The strongest version of the argument, on the evidence

The steelman near the top of this study stated the argument before any evidence. This section returns to it with the record in hand. It is written by Claude, and it is an inference built on the record above, not a finding of it. It is followed by the places where it is weakest.

The case. Seventeen years on, the structure the paper described is the structure that exists. Congress never passed a ban, for the reason he gave. The FDA's 1998 gate still does the work a statute would do. Missouri's constitution still defines cloning as implantation, so that making a

cloned embryo for research is protected and letting one be born is not. The states are still a patchwork, and the one state that closed the loophole he identified, Arizona, did it the year after he wrote. A framework that was called a stopgap in 2009 has not been replaced. It has only been left alone.

It was left alone because the pressure went elsewhere. Induced pluripotent stem cells removed most of the scientific reason to clone. The scandal the paper feared, a child produced by a technique the law had not caught up with, came from gene editing. And when embryo models arrived, regulators moved within two years. Read together, these suggest the paper's real subject was never cloning as such. It was a legal habit: permit the creation, forbid the birth, and leave the status of what was created undefined. That habit is what gene editing and embryo models ran into, and where a legislature or a scientific body chose to decide the question deliberately, as Britain did with mitochondrial replacement and the ISSCR did with embryo models, the result looks like what he proposed: like cases treated alike, with oversight in proportion to the risk. On this reading the paper was right about the gap, and its proposals describe how the gap is closed on the occasions when it is.

Where it is weakest. The argument has never been put to the test it was written for. No verified human clone has been born, so the class the paper worried about does not exist, and the harm remains a hypothesis. Its central prediction, that research would spread to uncommitted states if the FDA's position fell, is untested because the position never fell, and its constitutional argument is untested because no ban ever passed. No regulator or court has accepted that a cloned embryo is a human subject, and the federal research rules' own definition of a fetus begins at implantation, which a cloned embryo in a laboratory has not reached. The one fear that was answered directly, patents, was answered against him. And the open items listed above, including how the NIH stem-cell pause ended, could change parts of this picture.

11 · SOURCES

Sources and method

The paper was read in full and its claims re-extracted from the text. Where a secondary source conflicted with a primary one (statute, court opinion, agency letter, Vatican document, WMA text), the primary source governs. Where sources disagreed on counts, the range is reported. Entries 1 to 87 are the sources in the research package; where a link was only an archived copy or mirror, it is not printed. Entries 88 to 95 were added during verification.

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DISCLOSURES

Disclosures and citation

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Question from Patrick Ishmael, a former 3L at Saint Louis University School of Law.

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Patrick Ishmael is the founder of the Ishmael Policy Institute and Prompt Inquiry's Founding Prompter and Editor. He has spent most of his career in and around Missouri public policy. He worked on political campaigns, and from May 2011 to January 2024 he worked at the Show-Me Institute, a Missouri public policy organization, where he wrote on state and local government and testified before Missouri legislative committees. Today he is a financial advisor and a Missouri attorney. He holds honors degrees in finance and political science from Saint Louis University and a law degree from Saint Louis University School of Law. Several of the questions he revisits here began as his own student work there.

This bio is the prompter's disclosure. It is the same on every study he leads.

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