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Title: The missing link between genetic association and regulatory function

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The genetic basis of most complex traits is highly polygenic and dominated by non-coding alleles, and it is widely assumed that such alleles exert small regulatory effects on the expression of *cis*-linked genes. However, despite availability of expansive gene expression and epigenomic data sets, few variant-to-gene links have emerged. We identified 139 genes in which protein-coding variants cause severe or familial forms of nine human traits. We then computed the association between common complex forms of the same traits and non-coding variation, revealing that most such traits are also associated with non-coding variation in the vicinity of the same genes. However, we found colocalization evidence—the same variant influencing both the physiological trait and gene expression—for only 7% of genes, and transcriptome-wide association evidence with correct direction of effect for only 4% of genes, despite an abundance of eQTLs in most loci. Fine mapping variants to regulatory elements and assigning these to genes by linear distance similarly failed to implicate most genes in complex traits. These results contradict the hypothesis that most complex trait-associated variants coincide with currently ascertained expression quantitative trait loci. The field must confront this deficit, and pursue the "missing regulation."

Modern complex trait genetics has uncovered surprises at every turn, including the paucity of associations between traits and coding variants of large effect, and the "mystery of missing heritability," where no combination of common and rare variants can explain a large fraction of trait heritability¹. Further work has revealed unexpectedly high

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polygenicity for most human traits and very small effect sizes for individual variants. Bulk enrichment analyses have demonstrated that a large fraction of heritability resides in regions with gene regulatory potential, predominantly tissue-specific accessible chromatin and enhancer elements, suggesting that trait-associated variants influence gene regulation^{2–4}. Furthermore, genes in trait-associated loci are more likely to have genetic effects on their expression levels (expression QTLs, or eQTLs), and the variants with the strongest trait associations are more likely also to be associated with transcript abundance of at least one proximal gene⁵. Combined, these observations have led to the inference that most trait-associated variants are eQTLs, exerting their effect on phenotype by altering transcript abundance, rather than protein sequence. The mechanism may involve a knock-on effect on gene regulation, with the variant altering transcript abundances for genes elsewhere in the genome (a trans-eQTL), but the consensus view is that this must be mediated by the variant influencing a gene in the region (a *cis*-eQTL)⁶. As most eQTL studies profile cell populations or tissues from healthy donors at homeostatic equilibrium, the further assumption has been tacitly made that these trait-associated variants affect genes in *cis* under resting conditions. Equivalent QTL analyses of exon usage data have revealed a more modest overlap with trait-associated alleles, suggesting that a fraction of trait-associated variants influence splicing, and hence the relative abundance of different transcript isoforms, rather than overall expression levels. Thus, a model has emerged where most trait-associated variants influence proximal gene regulation.

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Several observations have challenged this basic model. One challenge comes from the difference between spatial distributions of eQTLs, which are dramatically enriched in close proximity of genes, and GWAS peaks, which are usually distal⁷. Another comes from colocalization analyses, attempting to map shared genetic associations between human traits and gene expression. If the model is correct, most trait associations should also be eQTLs; trait and expression phenotype should thus share an association in that locus (rather than two association peaks overlapping). However, only 5-40% of trait associations co-localize with eQTLs in relevant tissues or cell types^{6,8–10}, and only 15% of genes colocalize with any of 74 different complex traits¹¹. Finally, expression levels mediated a minority of complex trait heritability¹². This has led to the suggestion that most trait-associated alleles influence gene regulation in a context-specific manner¹³—either altering expression during development or in response to specific physiological stimuli-or that they act indirectly in *trans* to affect the regulation of a small number of genes involved in trait biology (the omnigenic model^{14,15}). Without a set of true positive cases, in which the gene driving trait variation is known, it remains difficult to assess either the basic model or the proposed variations.

One source of true positives is to identify genes that are both in loci associated with a complex trait and are also known to harbor coding mutations causing severe or early onset forms of related traits (e.g. related Mendelian disorders). The strong expectation is that a variant of small effect influences the gene identified in the severe form of the trait. This expectation is supported by several lines of evidence. Comorbidity between Mendelian and complex traits has been used to identify common variants associated

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with the complex traits¹⁶. A handful of genes have been conclusively identified in both Mendelian and complex forms of the same trait, including *APOE*, which is involved in cholesterol metabolism^{17,18}, and *SNCA*, which contributes to Parkinson's disease risk. Early genome-wide association studies (GWAS) found associations near genes identified through familial studies of severe disease^{19,20}, and more recent analyses have found that GWAS associations are enriched in regions near causative genes for cognate Mendelian traits in both blood traits⁸ and a diverse collection of 62 traits²¹.

To test the model that trait-associated variants influence baseline gene expression, therefore, we assembled a list of such "putatively causative" genes. We selected nine polygenic common traits with available large-scale GWAS data, each of which also has an extreme form in which coding mutations of large effect size affect one or more genes with well-characterized biology (Table 1). Our selection included four common diseases: type II diabetes²², where early onset familial forms are caused by rare coding mutations (insulin-independent MODY; neonatal diabetes; maternally inherited diabetes and deafness; familial partial lipodystrophy); ulcerative colitis and Crohn disease^{23,24}, which have Mendelian pediatric forms characterized by severity of presentation; and breast cancer²⁵, where coding mutations in the germline (e.g. *BRCA1*) or somatic tissue (e.g. *PIK3CA*) are sufficient for disease. We also chose five quantitative traits: low and high density lipoprotein levels (LDL and HDL); systolic and diastolic blood pressure; and height. We selected 139 genes harboring large-effect-size coding variants for one of the nine phenotypes (Table 1). These genes were identified in familial studies, and, for breast cancer, using the MutPanning method²⁶.

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We first examined whether these genes are more likely than chance to be in close proximity harboring variants associated with the polygenic form of each trait. In agreement with existing literature²¹, we observe a highly significant enrichment. However, in well-powered GWAS, even relatively rare large-effect coding alleles (mutations in BRCA1 which cause breast cancer, for instance) may be detectable as an association to common variants. To account for this possibility, we computed association statistics in each GWAS locus conditional on coding variants. We applied a direct conditional test to datasets with available individual-level genotype data; for those studies without available genotype data, we computed conditional associations from summary statistics using COJO²⁷. After controlling for coding variation, we still detected a highly significant enrichment of our genes under GWAS peaks. Of our 139 genes, 89 (64%) fell within 1 Mb of a GWAS locus for the cognate complex trait. After fine-mapping the GWAS associations in each locus using the SuSiE algorithm²⁸, we found that 23/139 (17%) putative causal genes are closer to the GWAS fine-mapped SNPs (posterior inclusion probability > 0.7) than any other gene in the locus, as measured from the transcription start site. Given their known causal roles in the severe forms of each phenotype, we thus suggest that the 89 genes near GWAS signals are likely to be the targets of trait-associated non-coding variants. For example, we see a significant GWAS association between breast cancer risk and variants in the estrogen receptor (ESR1) locus even after controlling for coding variation; the baseline expression model would thus predict that non-coding risk alleles alter ESR1 expression to drive breast cancer risk.

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We next looked for evidence that the trait-associated variants were also altering the expression of our 89 genes in relevant tissues. If these variants act through changes in gene expression, phenotypic associations should be driven by the same variants as eQTLs in relevant tissue types. We therefore looked for co-localization between our GWAS signals and eQTLs in relevant tissues (Supplementary table 1) drawn from the GTEx Project, using three well-documented methods: coloc¹⁰, JLIM⁹, and eCAVIAR²⁹. We found support for the colocalization of trait and eQTL association for only four (coloc), six (JLIM), and three (eCAVIAR) of our 89 putatively causative genes, even before correcting for multiple-hypothesis testing, which is not obviously better than random chance. We note that our estimates of the number of putatively causative genes with colocalization of eQTL and GWAS signal is conceptually distinct from and not directly comparable to the existing estimates of the fraction of GWAS associations colocalizing with eQTLs. This distinction matters because it illuminates the role of eQTLs in known trait biology rather than examining the locus for the presence of a colocalizing eQTL which may or may not be relevant to the complex trait.

A different way to identify potential causative genes under GWAS peaks using gene expression is the transcriptome-wide association study design (TWAS)^{30–32}. This approach measures local genetic correlation between a complex trait and gene expression. Though not designed to avoid correlation signals caused by LD³³, the approach has higher power than colocalization methods in cases of allelic heterogeneity or poorly typed causative variants³⁰. We used the FUSION implementation of TWAS,

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which accounts for the possibility of multiple cis-eQTLs linked to the trait-associated variant by jointly calling sets of genes predicted to include the causative gene, to interrogate our 89 loci³².

FUSION included our putatively causative genes in the set of genes identified as likely relevant to the GWAS peak in 42/89 (47%) loci. Genes were often identified as hits in multiple tissues, but with an inconsistent direction of effect—that is, increased gene expression correlated with an increase in the quantitative trait or disease risk in some tissues, but a decrease in others. This may indicate that different tissues have relevant genes that are different, but still called within the same joint set. Because of this possibility, and the known biological role of many of our genes, we restricted our results to tissues with established relevance to our traits. Only 9/89 (10%) genes were identified by FUSION when we restricted the analysis to relevant tissues, and of these, only five had a direction of effect on the complex trait consistent with what is known from hypomorphic and amorphic Mendelian mutations. This fact, combined with the inconsistent direction of effect across tissues, may indicate that even when putatively causative genes fall within a set of genes jointly called by TWAS, their baseline expression may not be mediating the association.

Our results so far are consistent with trait-associated variants altering the regulation of causative genes in ways that are not well-represented by steady-state gene expression measurements. We thus tried to find fine-mapped GWAS variants that appear in regulatory sites within +/- 1 Mb windows around the transcription start sites (TSS) of our

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putatively causative genes. We found that 73 fine-mapped variants with a high posterior probability of association (PIP > 0.7) to a trait fall within a narrow peak of H3K27ac, H3K4me1, or H3K4me3 chromatin modification features. Despite our 1 Mb window, all identified features are located within a 100 kb window around the transcription starts sites of 27/89 (30%) putatively causative genes (two of these genes, *ATG16L1* and *CARD9*, are putatively causative for both CD and UC). Extending our search to include not only fine-mapped variants within chromatin modification features, but also those within 500 bp of features, identifies only two additional putatively causative genes. Restricting our analysis to chromatin features in relevant tissues, 46 fine-mapped variants fall within chromatin features, corresponding to 24 putatively causative genes.

Combining activity and proximity signals, we evaluated an "activity-by-distance" measure, a simplified version of the "activity-by-contact" method³⁴. Activity-by-distance uses linear distance along the genome instead of the chromatin contact frequency between feature and TSS. Among the fine-mapped variants that fall inside chromatin modification features, 17 variants appear in the feature with the highest activity-by-distance score in the locus, corresponding to 11 genes.

Next, we relaxed the requirement of proximity to a specific feature and selected all enhancer regions annotated by the ChromHMM³⁵ method in any measured cell or tissue type. Overall, within +/- 1 Mb windows of our putatively causative genes 120/335 fine-mapped variants fall in an enhancer region (i.e. enhancer, bivalent enhancer, genetic enhancer) highlighted by ChromHMM's core 15-state model. These enhancers

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correspond to 43 putatively causative genes. Restricting our analysis to relevant tissues, 51/335 fine-mapped variants fall in enhancers, corresponding to 26 putatively causative genes.

In sum, we observe that fine-mapped variants appear near sites of regulatory activity—suggested by the presence of activating chromatin marks—for a sizable minority of our loci. However, 54/89 (61%) putatively causative genes, no fine-mapped variants are associated with regulatory regions according to either chromatin marks or ChromHMM. Furthermore, because we connect regulatory features to genes based solely on proximity, it is possible that our finding of 35 genes represents an over-estimate.

Overall, our results do not support the assertion that most common non-coding variants associated with human traits alter baseline gene expression in trait-relevant tissues. Several explanations may account for this: incorrect assumptions, lack of statistical power, biological context, and alternative regulatory mechanisms. We discuss each below.

Incorrect assumptions: it is possible that our putatively causative genes may simply not be causative in complex trait forms. This would invalidate our underlying premise that they should be targets of trait-associated variants in the common, complex forms of phenotypes. This implies that in the vast majority of cases, a common variant associated with the polygenic form of a trait near a gene known to cause a severe form

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actually targets a different gene. For instance, the risk alleles driving the breast cancer GWAS signal near *BRCA2*, do not alter *BRCA2* expression in breast tissue, but instead influence another gene. This would also explain why 42 putatively causal genes do not fall near a GWAS peak. The implication is that the underlying biological causes of an extreme phenotypic presentation are different from the causes of the polygenic form across all nine of the traits we have studied. This, to our minds, stretches credulity given the highly significant enrichment of our genes near significant GWAS loci for cognate phenotypes. We suggest it is more likely that our putatively causative genes are relevant but influenced in some other way by polygenic risk alleles. More parsimonious explanations for the 42 genes are that currently available GWAS are incompletely powered, and thus have not detected association with alleles in those loci; or that strong purifying selection acting on noncoding regions of these genes is preventing noncoding variants from reaching population frequencies detectable by GWAS.

Lack of statistical power: it is possible that complex trait GWAS are insufficiently powered to allow accurate fine-mapping and hence accurate colocalization; that eQTL studies do not detect all eQTLs; that epigenetic studies do not identify all elements; or that colocalization and regulatory element mapping methods lack power to detect overlaps. However, we have ascertained GWAS associations at genome-wide significance, and fine-map the majority of these signals using a Bayesian approach; and the GTEx Consortium eQTL studies have reached saturation for eGene discovery⁶.

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The upper bound on the power of colocalization methods, under near-ideal circumstances, is 66% at P < 0.01 (Barbeira et al. 2020). Under more typical conditions, the portion of GWAS peaks which colocalize with an eQTL is 25% or higher^{9,10,29}. As not all GWAS peaks will share a causative SNP with a *cis*-eQTL, these estimates represent a lower bound on power, with empirical power likely to be much higher. Given our assumption that putatively causative genes are mediating association signals, we would expect that 25% of these associations would colocalize, and that in each case, the gene they colocalize with is our putatively causative gene. We would thus expect at least 22/89 (25%) of putatively causative genes near a polygenic trait association signal to have a colocalizing eQTL in relevant tissue. Here, we report all associations without correcting for multiple testing, so we would expect substantially more colocalizations. We thus cannot attribute the absence of such events to lack of power. This conclusion is supported directly by our analyses: coloc explicitly tests the hypothesis that GWAS and eQTL signals are distinct, and finds strong statistical support for this hypothesis in three times as many loci as it finds evidence for colocalization. This suggests that, in many cases, genetically induced changes to baseline expression of putatively causative genes do not translate into downstream phenotypic effects. At the same time, most GWAS peaks over these genes are not eQTLs in available tissues.

The power of TWAS is comparable to colocalization methods in cases of a single typed causative SNP. Its relative power increases in cases of poorly-typed SNPs, allelic heterogeneity, or apparent heterogeneity (when multiple SNPs tag a single untyped

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causative SNP)³⁰. Thus, the paucity of TWAS signals in the correct tissue and with the correct direction of effect cannot be explained by low power.

Biological context: causative eQTLs may only manifest in certain developmental windows, under specific conditions, or in a crucial cell subpopulation. We used data from the GTEx project, which profiled bulk post-mortem adult tissue samples. If causative eQTLs are only present in early development, or under specific exposures or conditions not applicable to the GTEx donors, they would not be captured in these contexts, even though *cis*-eQTLs have been detected for essentially every gene in the genome in the GTEx data⁶.

Single-cell RNA sequencing (scRNA-seq) studies have identified some eQTLs present in only a subset of the cell types captured in bulk-tissue analysis, but these appear to be limited—van der Wjist et al. found that 60% of cell type-specific eQTLs replicate in bulk-tissue analysis, and their use of scRNA-seq found only 13% more eQTLs than bulk-tissue analysis³⁶. It has also been posited that cell type-specific eQTLs may be enriched in disease association³⁷. Additionally, genes causal for disease tend to have more enhancers, which may lead to more complex spatiotemporal expression³⁸. Nonetheless, using this tendency to explain the many putatively causative genes whose expression was not linked to GWAS requires us to believe most genes both have *cis*-eQTLs that do not show up in bulk-tissue analysis, and lack those *cis*-eQTLs which do show up in bulk-tissue analysis. Additionally, nearly all genes identified through

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proximity to a fine-mapped variant chromatin mark peak were identified in relevant tissues, suggesting that our selection of tissue is correct.

A new cell-type TWAS method, which leverages large sample sizes for human bulk tissues and high-resolution mouse scRNA-seq data to infer cell-type-specific gene expression for each GTEx sample with respect to each Tabula Muris cell type under an empirical Bayes framework and produce gene expression prediction models at cell-type resolution, found no additional disease-associated gene in type II diabetes, and only one, targeting *FGFR2*, in breast cancer (albeit not in breast mammary tissue; Huwenbo Shi and Alkes Price, unpublished correspondence). This argues against context-specific eQTLs being the most prevalent effect of trait-associated variants.

It is possible for eQTLs to change or disappear over the course of development³⁹. Because colocalization and TWAS methods rely on eQTL-mapping, such dynamic eQTLs present a potential blind spot. Chromatin marks provide an orthogonal source of information generally. Furthermore, because chromatin marks within a tissue—especially H3K4me3—can remain stable across developmental time⁴⁰, they provide specific value in addressing this blind spot.

Alternative regulatory mechanisms: finally, it is conceivable that most non-coding trait-associated variants act not on expression levels, but on other aspects of gene regulation. For example, splicing QTLs (sQTLs) are enriched in GWAS peaks to the same extent as eQTLs^{41,42}. However, only 29% of our trait-associated variants that are

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highly likely to be causal (fine-mapping posterior probability > 0.7) fall in introns, despite introns composing 45% of the genome⁴³. Thus sQTLs do not immediately appear as a viable hypothesis to explain the majority of trait-associated variation.

We thus have to explain the observation that putatively causative genes are often near GWAS signals driven by non-coding variants, and that these genes are influenced by baseline eQTLs in relevant tissues, but that trait-associated variants are not driving those eQTLs. This result questions the basic assumption that trait variants act by perturbing baseline gene expression, so that eQTLs in GWAS peaks are necessarily relevant to the mapped trait. That these genes are more likely than chance to be near such non-coding trait-associated variants suggests that both the structure and regulation of these genes is relevant to complex traits. However, our results demonstrate that the mechanism by which our genes influence complex traits is generally not their baseline expression.

Regardless of the root cause, our results have consequences for efforts to uncover the biology underlying human traits by linking variants to molecular function through baseline expression measurements. These variant-to-function methods are currently the most common computational strategies for identifying the biological significance and therapeutic potential of non-coding genetic associations. Though they have successfully identified many genes of biological consequence and clinical promise, most causative genes likely go undiscovered. Given the difficulties many tissues present in obtaining expression data across diverse developmental and environmental contexts, the

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limitations of examining baseline expression may present a difficult obstacle to overcome.

There are limited mechanistic models to explain the function of non-coding variants besides their action as *cis*-eQTLs. Besides sQTLs, another possibility is *trans*-eQTLs that are not mediated by a *cis* effect on a gene, such as variants affecting CTCF binding sites³⁷, but this fails to explain the enrichment in GWAS signal near putatively causative genes. Though it is likely that power and context play a role in the lack of overlap we observe, for the reasons above it seems improbable that they explain it entirely. Cumulatively, our analysis shows that whilst gold standard genes are often the closest to a genetic association, more sophisticated analyses incorporating functional genomic data fail to identify them as relevant to the trait in meaningful numbers. There are currently no prominent models to fill this gap, but we must remember that complex trait genetics has overturned our assumptions time and time again.

Figures

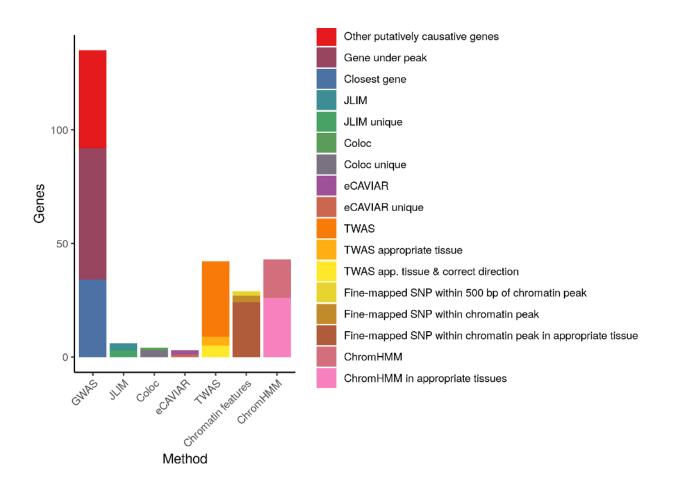
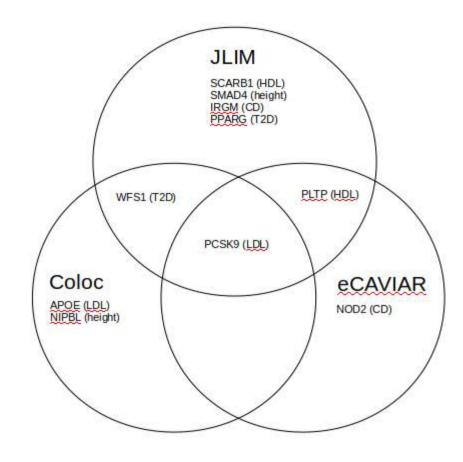


Figure 1. Putatively causative genes identified by each method.

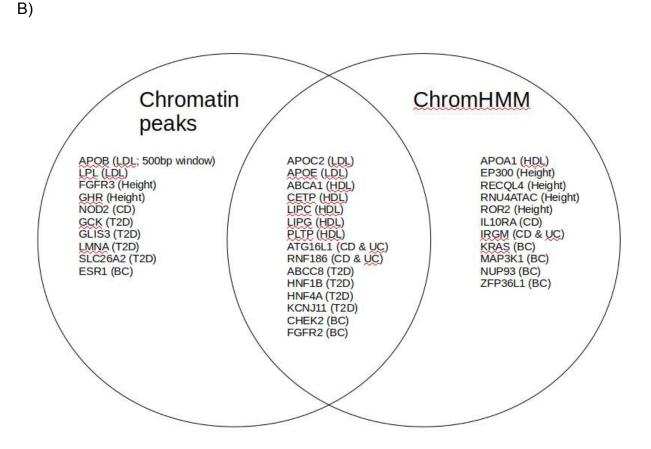
The leftmost column displays the entire set of putatively causative genes, along with the subset near a linkage peak, and its subset of genes closest to the peak. For JLIM, Coloc, and eCAVIAR, the portion of genes that were the only gene to colocalize in their locus is noted. The numbers for these methods represent nominal significance thresholds. For TWAS results, the subsets of genes which are in an appropriate tissue in the right direction are indicated.

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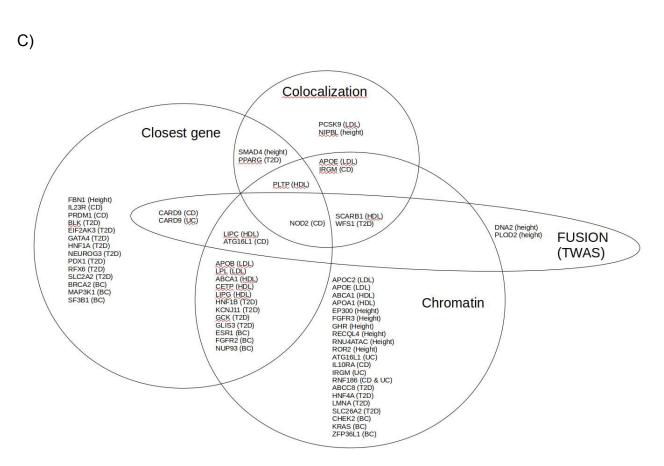


Figure 2. Genes identified as associated with a complex trait by each method.

A) Positive results for each of the three colocalization methods. B) Positive results for each of the two chromatin methods. C) Positive results for all methods, collapsing A) to "colocalization" and B) to "chromatin."

Phenotype	Genes
LDL	АРОВ
	APOC2
	APOE

	LDLR
	LPL
	PCSK9
HDL	ABCA1
	APOA1
	CETP
	LIPC
	LIPG
	PLTP
	SCARB1
Height	ANTXR1
	ATR
	BLM
	CDC6
	CDT1
	CENPJ
	COL1A1
	COL1A2
	СОМР
	CREBBP
	DNA2
	DTDST

EP300
EVC
EVC2
FAM157B
FBN1
FGFR3
FKBP10
GHR
KRAS
NBN
NIPBL
ORC1
ORC4
ORC6L
PCNT
PLOD2
PTPN11
RAD21
RAF1
RECQL4
RIT1
RNU4ATAC
ROR2

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	SLC26A2
	SMAD4
	SMC3
	SOS1
	SRCAP
	WRN
Blood pressure (systolic and diastolic)	KCNJ1
	SLC12A1
	SLC12A3
	WNK1
	WNK4
Crohn disease	ATG16L1
	CARD9
	IL10
	IL10RA
	IL10RB
	IL23R
	IRGM
	NOD2
	PRDM1
	PTPN22
	RNF186

CARD9
0/11(00
IL23R
IRGM
PRDM1
PTPN22
RNF186
ABCC8
BLK
CEL
EIF2AK3
GATA4
GATA6
GCK
GLIS3
HNF1A
HNF1B
HNF4A
IER3IP1
INS
KCNJ11
KLF11

	LMNA
	NEUROD1
	NEUROG3
	PAX4
	PDX1
	PPARG
	PTFA1
	RFX6
	SLC19A2
	SLC2A2
	WFS1
	ZFP57
Breast cancer	AKT1
	ARID1A
	АТМ
	BRCA1
	BRCA2
	CBFB
	CDH1
	CDKN1B
	CHEK2
	CTCF

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ERBB2
ESR1
FGFR2
FOXA1
GATA3
GPS2
HS6ST1
KMT2C
KRAS
LRRC37A3
MAP2K4
MAP3K1
NCOR1
NF1
NUP93
PALB2
PIK3CA
PTEN
RB1
RUNX1
SF3B1
STK11
TBX3

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TP53
ZFP36L1

Table 1. Putatively causative genes

Supplementary methods

Identifying coding variants

Because many variants can fall within coding sequences in rare splice variants, coding SNPs were selected based on the pext (proportion of expression across transcripts) data⁴⁴. Two filters were used. First, genes were considered only if their expression in a trait relevant tissue was at least 50% of their maximum expression across tissues. Second, variants were considered only if they fell within the coding sequence of at least 25% of splice isoforms in that tissue.

GWAS

For height, LDL cholesterol, and HDL cholesterol, GWAS were performed using unrelated individuals of European ancestry from UKBB. The GWAS was run in Plink 2.0⁴⁵, using age, sex, BMI (for LDL and HDL only), 10 principal components, and coding SNPs as covariates.

Conditional analysis

Analysis of breast cancer, Crohn disease, ulcerative colitis, and type II diabetes used publically available summary statistics. The summary statistics were corrected for

coding SNPs using an LD reference panel of TOPMed subjects of European ancestry⁴⁶. These subjects were identified with FastPCA^{47,48} and extracted using bcftools⁴⁹.

Colocalization

JLIM⁹ was running using GWAS summary statistics and GTEx v7 genotypes and phenotypes. Coloc¹⁰ was run using GWAS and GTEx v7 summary statistics. eCAVIAR²⁹ was run using GWAS and GTEx v7 summary statistics, and a reference dataset of LD from UKBB⁵⁰ (Weissbrod et al. 2021).

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