

## Go light on heavy connectors

One of the easiest ways to significantly improve all forms of legal writing is to replace heavy logical connectors with lighter ones (or none at all, where appropriate). Unfortunately, the myth persists that it is grammatically incorrect to start a sentence with the coordinating conjunctions *and*, *but*, and *so*. It's a notion that every reputable authority on writing scoffs at. If you believe it, you will surely weigh down your prose and slow down your reader. So (not *accordingly*) here's a handy short list. The ones on the left are not off limits, of course. But (not *however*) prefer the ones on the right; more often than not, they should work to provide a brisk transition. Judge for yourself in the before-and-after example.

|  |                          |
|--|--------------------------|
| however  | but                      |
| further, in addition                                   | and                      |
| consequently, accordingly                              | so, thus                 |
| nevertheless, nonetheless                              | yet, still, even so, but |
| notwithstanding  | despite                  |
| due to the fact that, for the reason that, inasmuch as | because, since           |

### Original

This claim should have been raised on direct appeal. **Therefore**, this claim is procedurally barred unless Petitioner can show cause and prejudice for his failure to raise it on direct appeal or that he is actually innocent. Petitioner has neither alleged nor shown any cause or prejudice for the default. **Further**, Petitioner has not asserted that he is actually innocent. **Consequently**, this claim is procedurally barred.

**Additionally**, even if Petitioner's claim was not procedurally barred, he is not entitled to relief. The Supreme Court held in *Beckles v. United States*, 137 S. Ct. 886 (2017), that the advisory guidelines are not susceptible to constitutional vagueness challenges such as the one in *Johnson*. **Furthermore**, even if *Johnson* were applicable to Petitioner's case, his two prior convictions of resisting arrest with violence and two prior convictions of possession of cocaine with intent to distribute are qualifying convictions pursuant to §§ 4B1.1 and 4B1.2 of the United States Sentencing Guidelines. [Citations omitted.] Thus, Petitioner has at least two prior felony convictions that qualify for career offender sentencing. **Accordingly**, Petitioner's claim is denied.

### Revised

This claim should have been raised on direct appeal. **So** it is procedurally barred unless Petitioner does one of two things: (1) shows cause and prejudice for not having raised it or (2) asserts his innocence. He hasn't even alleged cause and prejudice, and has not asserted his innocence. **Thus**, his claim is procedurally barred.

Even if it were not, he is not entitled to relief. The Supreme Court held in *Beckles v. United States*, 137 S. Ct. 886 (2017), that the advisory guidelines are not susceptible to constitutional vagueness challenges such as the one in *Johnson*. **And** even if *Johnson* applied here, Petitioner's prior convictions — two for resisting arrest with violence and two for possessing cocaine with intent to distribute — are qualifying convictions under United States Sentencing Guidelines 4B1.1 and 4B1.2. [Citations omitted.] Because Petitioner has at least two prior felony convictions that qualify for career-offender sentencing, his claim is denied.

Three heavy connectors are replaced with lighter ones, and three are eliminated. Besides that, 27 words are cut; the first paragraph adds a signpost; and the second paragraph uses an em-dash to advantage (not to mention getting rid of *pursuant to* — an automatic edit). The example does not have a sentence-starting *however*, but my practice is simple: never use one.

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