Santa Clara University
School of Law

Santa Clara Law Review

Volume 37 | Number 4 Article 8

1-1-1997

Books Received

Santa Clara Law Review

BOOKS RECEIVED

Lessons from the Trial. By Gerald F. Uelmen. Kansas City, Kansas: Andrews and McMeel, a Universal Press Syndicate Company. 1996. Pp. 223. Hardcover.

After all the criticisms and discord surrounding the case of the *People v. O.J. Simpson*, *Lessons from the Trial* is the book that needed to be written. It takes all the provocative aspects of the trial and gives a perspective on them not given by the daily, play-by-play news reports. People angry or confused by the behavior of the lawyers, the focus on Mark Fuhrman, the media coverage or the verdict will want to read this book. Most important, the author cool-headedly analyzes the many reform proposals inspired by the trial. It can only be hoped that everyone will consider these proposals with the same integrity and clarity of thought before making any drastic changes.[1]

The truly surprising thing about this "O.J. book" is its personable and honest tone. As much as he openly criticizes many of the players, including himself, the author treats everyone with respect. He gives credit where due and protects the privacy and reputations of the witnesses and jurors.

The book is engagingly written, and should appeal to lawyers and non-lawyers alike, but one warning is in order: The author is a scholar, and there are a few passages too technical for the non-lawyer. I suggest the reader simply skim through them—they only last for a few paragraphs. In other places, the author's scholarly references are well explained and create the feeling that the reader is in good hands.

1. Gerald F. Uelmen is a Professor and former Dean at Santa Clara University School of Law in California. He is the co-author of two collections of legal humor, and has written a casebook on drug abuse law as well as many articles concerning drug abuse, the death penalty, legal ethics and related topics. His clients have included Daniel Ellsberg in the Pentagon Papers trial and Christian Brando.

Lessons From the Trial is laid out as a series of fifteen chapters, each teaching certain principles demonstrated in the trial. This review seeks only to briefly summarize a few of the points made.

RACE AND THE VERDICT

The author does our society a great service in his discussion of the jury's verdict. Other O.J. books have simply joined the public in bashing the jury,[2] but *Lessons from the Trial* takes the opportunity to give us a reasoned analysis. The author does not assume that the verdict was motivated by racial animosity. As he explains, such an assumption is itself racist. It is racist to assume that black Americans are without conscience and would free a murderer just because he is black. It is also racist to assume that black jurors are incapable of reasoning and therefore incapable of applying the standard of reasonable doubt. As the author explains:

> By every objective measure, it appears that the jury in the case of *People v. O.J. Simpson* did precisely what they were sworn to do. They rendered a verdict based on their evaluation of the evidence. The doubts they entertained were reasonable doubts. To say that their doubts were less than "reasonable" because nine of the jurors were African-Americans is blatant racism . . . . [When we engage in jury-bashing we] deliver the message that the value of a juror's opinions is to be measured by his or her race, and the value of a verdict is to be measured by public opinion polls.[3]

While he does not believe the jury was racist, the author does not claim race played no role. According to the author, race is "an important factor that affects [a person's] entire life experience, and life experience affects every judgment we make."[4] It is in this way that race played a role in the jury's verdict. As the author explains, it makes perfect sense that

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2. Chris Darden's criticisms in his book, *In Contempt*, are probably among the most disturbing. In the very first paragraph, he accuses the jury of delivering its verdict merely to settle some racial "score." CHRISTOPHER A. DARDEN & HESS WALTER, IN CONTEMPT 3 (1996). Later, he complains about five people who'd been dismissed from the jury, and even mentions them by name. *Id.* at 303-05. One of these jurors was dismissed for not revealing during voir dire that she had been raped and beaten by her husband. Darden not only names her, but calls her a liar. *Id.* at 304.

3. GERALD F. UELMEN, LESSONS FROM THE TRIAL 184-85 (1996).

4. *Id.* at 81.

the life experiences of jurors from South Central Los Angeles could make them open to the idea that police can lie. In fact, after Detective Mark Fuhrman's performance in the trial, the whole country has become more open to that idea.

Instead of bashing the jury, the author finds good reason to praise it. When deliberations began, the jury was 10-2 for acquittal, and apparently the two jurors who wanted to convict were quickly convinced that the other jurors' doubts were reasonable.[5] Although the jurors were criticized for deliberating only four hours, the author explains that they were simply following the law. The jurors could not have delayed delivering their verdict just because they felt it would make the public happier. To do so would have been to violate their duty not be swayed by what the public might think of their verdict. Johnnie Cochran was harshly criticized for urging the jury to "send a message" to the Los Angeles police department, but according to the author, the message the jury sent was the proper one. He saw the message as simply being this: a responsible jury will only find guilt when the prosecution's evidence is trustworthy.[6]

The author notes that while this jury acted properly, there have been many cases where innocent *blacks* were convicted because of jury racism. Unfortunately, he does not have to reach into the distant past to find an example. He relates a 1980 capital murder case in which an openly racist district attorney's office used perjured testimony and a cursory police investigation to prosecute a black defendant. The trial occurred before the Supreme Court held that jurors could not be excluded on the basis of race,[7] so the District Attorney's office was free to follow its policy of excluding all

5. The jury seems to have thoroughly understood the concept of reasonable doubt. After the trial, one juror said she thought Simpson was "probably" guilty, but that "beyond a reasonable doubt" was the standard, not "probably." *Id.* at 180.

6. On the other hand, the author is perhaps stretching a bit when he explains why one juror raised his fist in salute after the end of the trial. Some people saw it as a Black Power salute and a gesture of defiance, but the author explains it as a celebration of the "reality [that] no man's liberty will be taken by the state unless his guilt is proven beyond a reasonable doubt." *Id.* at 7. Between these two extremes, this observer saw it as an expression of relief that the trial was finally over.

7. In 1986 the Supreme Court held the Equal Protection clause prohibits a state from challenging black potential jurors merely because of their race. Batson v. Kentucky, 476 U.S. 79 (1986).

black jurors whenever a defendant was black. In what the Texas Court of Criminal Appeals would later call a subversion of justice, the all-white jury convicted and the man was sentenced to death. Shortly before his execution, new evidence came to light and the conviction was finally set aside in 1989.[8] The author finds it ironic that this case inspired no media uproar and no petition drive to change the jury system.[9] He does not suggest that past injustice against black defendants excuses injustice in their favor today. Instead he merely suggests that:

> [T]he widespread conclusion of many white Americans that justice failed when O.J. Simpson was acquitted may not be based entirely on an objective evaluation of the evidence. It may be based on unfair suspicion of the motives of the jury, which is rooted in our own racial attitudes. Before we embark on an agenda of "jury reform," we need to search our souls and ask what we are proposing to reform? Are we restricting the power of the American jury, because that power is now within the grasp of those whose motives we distrust? Where does that distrust come from?[10]

THE FOURTH AMENDMENT RIGHT AGAINST UNREASONABLE SEARCH AND SEIZURE

> *The right of the People to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.*[11]

Another important contribution this book makes is in its discussion of our basic constitutional rights. To understand the discussion of Simpson's motion to suppress the evidence gathered from his home during two police searches, it is nec-

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8. *Id.* at 191 (referring to *Ex parte* Brandley, 781 S.W.2d 886 (Tex. Crim. App. 1989)).

9. The Simpson verdict inspired a California initiative called the "Public Safety Protection Act of 1996" which would abolish the requirement that jury verdicts be unanimous. *Id.* at 184. The author notes that such a change would only shorten deliberations. If the measure had been in effect during the Simpson case, no deliberation would have been needed at all, since the jury started out 10-2 in favor of acquittal. *Id.*

10. UELMEN, *supra* note 3, at 192.

11. U.S. CONST. amend. IV.

essary to have some background. Before the Revolutionary War, general warrants were common. They allowed police to enter any colonist's home and search for anything illegal. Colonist felt that general warrants "[placed] the liberty of every man in the hands of every petty officer,"[12] and the use of general warrants was one of the reasons for the Revolution. To prevent police from simply entering a home and rummaging for anything interesting, the Fourth Amendment requires that warrants *particularly* describe any items to be seized. This requirement is designed to protect "the most comprehensive of rights and the right most valued by civilized men," the right to be let alone.[13]

Nevertheless, the right to be free from unreasonable searches was often still violated in the United States, so, in 1961, the Supreme Court established the Exclusionary Rule.[14] Under it, evidence obtained through an unconstitutional search generally cannot be used in court.[15] In addition to providing some protection against illegal searches, the Rule was also designed to protect judicial integrity. Some people believe that it is beneath the dignity of a court to use illegally obtained evidence.

Unfortunately, even the Exclusionary Rule does not do much to prevent unconstitutional searches. The Los Angeles police basically served a general warrant on June 28, 1994 in their search of the Simpson home, when they rummaged through the home for anything interesting. For example, although video tapes were not particularly described on the warrant, police seized several tapes and even watched them on Simpson's VCR. Simpson challenged the search, but did not win due to the many exceptions that have grown up

12. ELLEN ALDERMAN & CAROLINE KENNEDY, IN OUR DEFENSE 135 (1991). James Otis Jr. made this argument before the Boston superior court in 1761. *See generally id.* at 134-36.

13. Mapp v. Ohio, 367 U.S. 643 (1961).

14. Miranda v. Arizona, 384 U.S. 436, 440 (1966).

15. There are many exceptions to the Exclusionary Rule. For example, according to Nix v. Williams, 467 U.S. 431 (1984), illegally obtained evidence may be used if the police would have discovered the evidence even without the illegality. Illegal evidence is also admissible if the police obtained it relying in good faith upon a defective search warrant. United States v. Leon, 468 U.S. 897 (1984). In any case, the Exclusionary Rule only applies to substantive evidence, so illegally obtained evidence can always be used to impeach a defendant's statements made in response to cross-examination. United States v. Havens, 446 U.S. 620 (1980).

around the Exclusionary Rule. However, the author does give a good answer to those who believe that people with nothing to hide should have no objection to being searched:

> The assertion of one's constitutional right to privacy should not be construed as a concession that one has something incriminating to hide . . . . In insisting that officers of the Los Angeles Police Department respect the constraints of the Fourth Amendment, Mr. Simpson clothed himself with the same protections available to every individual, conceded to law enforcement everything to which it was lawfully and honestly entitled, and demanded judicial integrity."[16]

THE FIFTH AMENDMENT RIGHT AGAINST COMPELLED SELF INCRIMINATION

The Jury instructions in the People v. O.J. Simpson included the following:[17]

> A defendant in a criminal trial has a constitutional right not to be compelled to testify. You must not draw any inference from the fact that a defendant does not testify. Further, you must neither discuss this matter not permit it to enter into your deliberations in any way.

The right against compelled self incrimination ensures that the prosecution in a criminal case must prove the defendant guilty "by its own independent labors, rather than by the cruel, simple expedient of compelling it from [the defendant's] own mouth."[18] The right came to be protected by the Constitution because it was felt that confessions obtained through torture or psychological pressure offended human dignity and the dignity of the court.[19]

On a more practical level, compelled confessions also tend to be unreliable. There are instances of innocent people confessing to crimes to escape being beaten or killed by police.[20] People have even confessed to capital crimes because they were scared and wanted to go home.[21] Although the

16. UELMEN, *supra* note 3, at 46.
17. *Id.* 156-57.
18. *Miranda*, 384 U.S. at 460.
19. ALDERMAN & KENNEDY, *supra* note 11, at 172.
20. Laura Hoffman Roppe, Comment, *True Blue? Whether Police Should be Allowed to Use Trickery and Deception to Extract Confessions*, 31 SAN DIEGO L. REV. 729, 739-40 (1994).
21. *Id.* at 773 n.10 (1994).

right against compelled self incrimination is often seen as merely shielding the guilty, the author demonstrates that this is not the case.[22]

O.J. Simpson did not refuse to take the stand because he was unwilling to speak on his own behalf. He had undergone practice cross examinations and had spoken well for himself. Instead, he had valid strategic reasons for invoking the Fifth Amendment. He did not want to be questioned about his sixteen-year relationship with Nicole Simpson. There was a history of domestic violence, and therefore a danger the jury might convict not because they had found Simpson guilty of the murders but merely to punish him for the abuse. The defense team also felt that Marcia Clark would spend weeks on her cross-examination. With only two alternate jurors left, this raised the possibility of a mistrial, and a mistrial would have greatly harmed Simpson. While the prosecution has unlimited resources, a defendant does not. Simpson had already nearly depleted his personal fortune on his legal defense, and would face a second trial with far fewer resources.

The author points out that Fuhrman invoked the Fifth Amendment to avoid opening himself up to prosecution for perjury. Fuhrman had at first testified that he had not used the term "nigger" within the prior ten years.[23] Later, Fuhrman was heard saying "nigger" at least forty-one times on tape recordings made by scriptwriter Laura McKinny.[24] Many might be offended by the author's comparing Simpson's use of the Fifth Amendment with Detective Mark Fuhrman's use of it. During the trial, it was angrily pointed out that Simpson was on trial, not Fuhrman. However, in any trial it is truly the evidence that should be judged, and Uelmen convincingly argues that the jury should have been allowed to learn enough about Fuhrman so that they could decide whether his other testimony was trustworthy. Unfortunately, the jury only heard two excerpts that did not begin to convey the depth of Fuhrman's hatred toward blacks,[25] nor

22. *See also* Hugo Adam Bedau & Michael L. Radelet, *Miscarriages of Justice in Potentially Capital Cases*, 40 STAN. L. REV 21 (1987). Of particular interest is the article's "Catalogue of Defendants" on pages 91-172 containing numerous examples of innocent people being convicted of capital crimes, many of them on the basis of their false confessions.

23. UELMEN, *supra* note 3, at 135.

24. *Id.* at 150.

25. *Id.* at 151-52.

did they get to hear any of the eighteen instances on the tapes where Fuhrman admits to planting evidence, lying to protect other officers, beating suspects to get confessions, and other police misconduct.[26] Although the author does not belabor the point, his excepts from the Fuhrman tapes demonstrate that Fuhrman hated blacks so much that any testimony he gave against a black defendant should be suspect.[27]

CONCLUSION

This review has merely touched on a little of what this book has to offer. The author intelligently discusses such issues as DNA evidence, cameras in the courtroom, and police misconduct, always putting them in the context of this fascinating case. People interested in the law will learn something about the ideals behind our legal system, practitioners will be interested in learning the strategies the defense team used, and law students will enjoy reading about a law professor in action.

Cristina Yu

Woe is I: The Grammarphobe's Guide to Better English. By Patricia T. O'Conner. New York, NY: G.P. Putnam's Sons. 1996. Pp. 227. Hardcover.

The worst aspect of reviewing a book designed to aid the grammatically challenged is the knowledge that someone will inevitably find grammatical errors in the review itself. "Ah," the critical reader will exclaim, "either the book was not that helpful, or the reviewer not too astute." In this instance the latter observation is more likely correct. Patricia O'Conner has written an enjoyable and illuminating little primer that nearly everyone other than your fifth-grade English teacher

26. *Id.* at 142.

27. These examples demonstrate Fuhrman's profound hatred of blacks. Regarding a police station in the South Central Los Angeles area Fuhrman said, "[l]eave that old station. Man, it has the smell of niggers that have been beaten and killed in there for years." *Id.* at 142. Regarding famine in Ethiopia: "Let 'em die. Use 'em for fertilizer. I mean, who cares." *Id.* at 141-42.

will find a useful companion to the dictionary, thesaurus and Strunk and White[1] already (hopefully) on his or her[2] desk.

Whether drafting a brief, delivering a closing argument, or corresponding with a client, proper grammar is as essential to being a good legal practitioner as passing the bar exam—and nearly as dreadful a reality to face. Too few attorneys are truly competent, much less skilled, at this critical element of communication. In the concluding chapter of *Woe is I* the author states a trend all too common in the legal field when she notes: "A venerable tradition, dating back to the ancient Greek orators, teaches that if you don't know what you're talking about, just ratchet up the level of difficulty and no one will ever know." Little wonder that many of the author's examples are from the legal arena!

But to say proper grammar is critical is not to say it is easy.[3] Most of us find at least some element of grammar difficult to grasp, and I dare say a great many of us find ourselves consistently haunted by more than one grammatical ghost. As Ms. O'Conner explains in the introduction of *Woe is I*, the English language possesses the largest lexicon of any language, comprised of elements of Latin, French, Italian, German, Spanish, Danish, Dutch, Portuguese, and Greek. Such diversity makes for an extremely robust and potentially powerful language, capable of conveying a multitude of ideas, feelings, and nuances. However, this versatility comes with a high grammatical price; to unlock even a portion of the English language's utility, we must first be able to use it properly.

Naturally, proper use is no easy task when you are dealing not really with just one language, but an amalgam of nearly a dozen. *Woe is I* assists the reader (more accurately, the "user") in making grammatical sense of it all while avoiding the technical jargon, sentence diagramming, and memori-

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1. WILLIAM STRUNK, JR. & E.B. WHITE, THE ELEMENTS OF STYLE (3rd ed. 1979).

2. Did you think "their" was the proper pronoun to use with "everyone?" I did- it isn't. See Chapter 1 of *Woe is I*.

3. Note for those who have been taught, as I, that it is improper to begin a sentence with "But": There is no such rule, but enjoy your new found freedom with caution. Writes O'Conner on pages 184-85:

> Over the years, some English teachers have enforced the notion that *and* and *but* should be used only to join elements within a sentence, not to join one sentence with another. Not so. It's been common practice to begin sentences with them since at least as far back as the tenth century. But don't overdo it, or your writing will sound monotonous.

zation of seemingly nonsensical rules that caused most of us to turn our attention elsewhere around the same time we hit puberty. For the true novice, there is even a glossary describing basic terms such as "noun," "verb," and even "dictionary."[4] Organized into an introduction and ten concise chapters, all linked by a comprehensive index designed to extricate the user from a multitude of grammatical quagmires, it is hard to believe that a book packing such a punch fits between a cover only eight inches long, five inches wide and a half inch thick!

The first chapter is entitled: "Woe is I: Therapy for Pronoun Anxiety." If you do not consider yourself afflicted before reading the chapter, you might halfway through it when you realize "who" and "whom" as well as "which" and "that" are all pronouns. Still don't think you have a problem? Which is correct: *Nobody likes a dog that* bites or *Nobody likes a dog which* bites? O'Conner explains that many feel the words are interchangeable or that "which" is more refined—neither is true. In the above sentence (and more often than not generally), "that" is the correct pronoun. One of O'Conner's tricks to identify the proper choice: "if you can drop the clause without losing the point of the sentence, use *which*. If you can't, use *that*." Similar simple, and largely effective, advice follows for *who* and *whom* and other troublesome pronouns.[5]

Still feeling good? Try the second chapter, "Plurals Before Swine." Even I felt I had a pretty good grasp of this area—until I was forced to acknowledge I would call "two attorneys general" (correct form), "two attorney generals" (incorrect). Among other things, this chapter teaches that the most important root in a two-word phrase receives the plural ending. Thus, it is "Mothers-in-law like to attend courts-martial," regardless of what you might think seems correct.

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4. The definition of "dictionary" is more illuminating than you might imagine: "A book that lists words in alphabetical order and gives their meanings, pronunciations, and origins — including words that aren't legit, like *alright*. The fact that a word can be found in the dictionary doesn't mean it's all right. Read the fine print." (Not surprisingly, a glance at the dictionary fine print reveals "legit" itself is not legit).

5. Because I am certain at least some readers are curious about Ms. O'Conner's advice regarding when to use "who" and when to use "whom," here is one of her tricks: Use "who" where you could use "he" and use "whom" where you could use "him."

Troublesome news for those who, like me, think they "know" grammar because they can tell what "sounds" right.

The third chapter, "Yours truly: The Possessives and the Possessed," presents such conundrums as picking the correct expression: "He resents my going," or "He resents me going." The first is correct, the second is not. You wouldn't say "He resents me departure," would you? As O'Conner points out, the difficulty occurs when we are presented with an "ing" word (invariably a verb variation) acting as a noun.[6] The trick is to see if you can substitute a noun (such as "departure," above) for the "ing" word and then treat it accordingly.

The quandary over what verb form to use in any particular phrase is the subject of chapter four, "They Beg to Disagree: Putting Verbs in Their Place." As anyone who knows or has attempted to learn a foreign language can attest, the verb is the most complicated part of any sentence. Not only does verb form vary according to the dimension of time referred to, but it varies according to subject as well. Among the hints I found most useful in this section concerned what to do when a sentence contains both a singular and a plural subject with one verb acting on both of them, such as: "*neither the eggs nor the milk* [*was* or *were*] *fresh*." O'Conner resolves the problem simply: if the subject nearer the verb is singular, the verb is singular. Thus, it's "*neither the eggs nor the milk was* fresh," but "*neither the milk nor the eggs were* fresh."

Listing well over a hundred words, the fifth chapter, "Verbal Abuse: Words on the Endangered List" helps restore frequently misused and misspelled words to their proper place. For example, "decimate" means literally "to slaughter every tenth one," but can be used loosely to mean "destroy in part." However, "decimate" should never be used to mean "to destroy entirely." Between "farther" and "further," "farther" should be used when referring to physical distance and "further" to refer to abstract ideas or to indicate a greater extent or degree. All of O'Conner's definitions are supported by concise, helpful examples of proper and improper use. Frequent reference to this section will greatly aid those of us who tend to rely a little too much on our computer spell-checkers, as O'Conner points out: "My spell-check software software tells

6. O'Conner's glossary reminds us that such words are properly known in the grammatical trade as "gerunds." Unfortunately, knowing the correct term does not insure proper use!

me that *restauranteur* and *judgement* and *straightlaced* are spelled correctly[7] . . . . And it doesn't care how I use *affect* and *effect*, as long as they're spelled right."

For those who rely on periods as the preferred form of punctuation, O'Conner offers chapter six, "Comma Sutra: The Joy of Punctuation." Using various traffic signals as metaphors for different forms of punctuation (amply illustrated by example), the author effectively teaches us the difference between, for example, a period, a comma, and a semicolon:

> If a comma is a yellow light and a period is a red light, the semicolon is a flashing red light—one of those lights you drive through after a brief pause. It's for times when you want something stronger than a comma but not quite so final as a period.[8]

Although many of us have heard such metaphors before, the author's multitude of examples greatly enhance their effectiveness. Once the reader is brought up to speed with basic punctuation, more advanced elements are discussed. It is here the reader is reintroduced to the colon, dash, and dreaded quotation mark. I hoped to find long-sought relief for my quotation mark blues within the five pages O'Conner devotes to that subject, but it seems I will suffer indefinitely. After reading *Woe is I*, *The Elements of Style*, and even the *Bluebook*,[9] I still find myself searching for an adequate explanation of proper punctuation at the closing end of a quotation in technical writing. *Woe is I* does indicate what to do with most punctuation at the end of quotations, but nearly all examples refer to dialogue, not quotations from another's work or where a word is enclosed in quotations to engender sarcasm or skepticism.

I do not dare embarrass myself by attempting to explain the concept of "danglers," but suffice to say they are as bad as they are bountiful. *Woe is I* makes short work of these grammatical grievances in chapter seven, "The Compleat Dangler: A Fish out of Water." Next, chapter eight, "Death Sentence:

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7. Perhaps Ms. O'Conner needs a new spell-checker — mine correctly identified these words as misspelled, and a good thing too, otherwise I would probably get them wrong.

8. p. 139.

9. COLUMBIA LAW REVIEW, ET AL., THE BLUEBOOK: A UNIFORM SYSTEM OF CITATION (15th ed. 1991).

Do Clichés Deserve to Die?" provides food for thought. Here O'Conner makes short and humorous work of a host of worn-out clichés that deserve to be excised from the English language.

To this day I can hear a thousand red-inked English papers echoing phrases such as: "Always place the subject of a sentence before the verb"; "Do not end a sentence with a preposition"; and the much ballyhooed, "Split infinitive — rephrase." If such criticisms sound vaguely familiar, a sense of poetic justice is provided by chapter nine, "The Living Dead— Let Bygone Rules be Gone." Here we learn that many of the grammatical "sins" endlessly taught in grade school are not really incorrect at all.[10] The author does a nice job of listing these non-rules, tracing there origins, and providing some important caveats.

O'Conner saves perhaps her best advice for the final chapter. Here the reader is presented with a list of thirteen "general principles," to assist in "writing what you mean." While most of O'Conner's principles are familiar, they are easier to remember than consistently apply. Chief among them: "Be direct" (e.g. "We concluded that Roger's an idiot," not: "Our conclusion was that Roger's an idiot."); "Don't belabor the obvious" (e.g. "I gave it away," not "I gave it away for free."); and, perhaps most importantly, "Read with a felonious mind" (i.e. when you see a writing technique that works, steal it!).

Some words of caution: First, *Woe is I* contains many examples of "bad" grammar that, while perhaps not a pitfall prior to reading, can be contagious once presented (a necessary evil in a book intended to reach a diverse audience of grammarphobes); Second, because we are unaware of many of our grammatical errors, *Woe is I* should not be merely skimmed and then allowed to gather dust. This is a book to be used again and again, not merely read. Indeed, as a desk reference, many will prefer the modern and less demanding tone of *Woe is I* to the more erudite style of Strunk and White.

This review provides merely a sampling of what *Woe is I* offers. Mindful that I have violated more than a bit of Ms. O'Conner's sage advice,[11] I conclude with what perhaps

10. Including the much maligned double-negative exemplified above!

11. "General Principle" number three comes to mind: "Don't belabor the obvious."

should have been said in the beginning and left alone: This is an excellent book, buy it.

Andrew R. Hull