USAID
FROM THE AMERICAN PEOPLE

MILLENNIUM CHALLENGE CORPORATION
UNITED STATES OF AMERICA

Rwanda MCC Threshold Program

JUSTICE STRENGTHENING PROJECT

FINAL TRAINING REPORT

TRAINING OF TRAINERS—
JUDGMENT WRITING TRAINING COURSE
MAY 4-5, 2010

JUNE 15, 2010

This publication was produced for review by the United States Agency for International Development. It was prepared by Chemonics International. The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development, the Millennium Challenge Corporation, or the United States Government.

RWANDA MCC THRESHOLD PROGRAM
JUSTICE STRENGTHENING PROJECT

TRAINING OF TRAINERS –
JUDGMENT WRITING TRAINING COURSE
May 4 - 5, 2010

TRAINING OF TRAINERS REPORT

June 15, 2010

Author: George Muwanguzi Kalisa

Table of Contents

Training of Trainers Report 1
Annexes 5
I. Syllabus & Program 5
II. Training Materials & PowerPoint Presentations 7
III. List of Attendees 15
IV. Summary Analysis of Pre-Training Evaluations 16
V. Summary Analysis of Post-Training Evaluations 17

Training of Trainers Report

Overview

Instructor: Professor James C. Raymond
Participants: Judges of the Supreme Court, High Court & the Commercial High Court and Supreme Court Inspectors.
Venue: Top Tower Hotel
Interpretation: Kinyarwanda, French & English

Introduction

This was the second training organized by the Justice Strengthening Project (JSP) for a selected group of Supreme Court and High Court Judges in the framework of strengthening the capacity of the Institute of Legal Practice and Development (ILPD) by creating a pool of faculty who will teach as part of ILPD's Continuing Legal Education (CLE) program. This training built on the earlier Judgment Writing Training course held January 31 to February 2, 2010, serving to refresh and extend the knowledge and skills acquired by the faculty. The training also served to measure the extent to which the previous training was integrated into the trainees' practice and further prepare them for teaching the acquired skills to other judges.

A total of ten (10) participants took part in the trainings, including three (3) Supreme Court judges, four (4) High Court judges, one (1) Commercial High Court judge, and two (2) Court Inspectors. Additionally, the Head of Modules from the ILPD participated in the trainings. Of all the participants, only two (2) were female.

Training Goals

1. To model the "Five Steps" approach to teaching judgment writing;
2. To model the use of a Checklist to evaluate judgments;
3. To model the workshop method (peer review) for teaching judgment writing;
4. To distinguish between objective and subjective aspects of evaluation;
5. To distinguish between evaluating and editing;
6. To distinguish between surface editing and deep editing;
7. To distinguish between evaluating form and evaluating content; and
8. To re-write the sample judgment and discuss the results.

Training Objectives

The training primarily aims to continue preparing the faculty to teach other judges the judgment writing course. Further, the training served to assist judges in gathering examples of judgments (both before and after improvements) to be used in their own work as well as in courses they will teach.

Methodology

The training was undertaken by employing several modes of instruction, including: lectures, group discussions, individual and group writing exercises and writing workshops. Debates and discussion of presentations were made in plenary sessions.

Training Materials

Participants were given Checklists designed to provide a numeric total for the evaluation of judgments, and in particular whether a judgment is well written. These Checklists, available in both English and French, were distributed among the participants and used in a self-evaluation exercise that was done by each trainee by evaluating his/her sample judgment. This was useful for participants to identify their own strengths and weaknesses as well as to learn what the elements of a well written judgment are. It also helped Prof. Raymond to assess the participants' evolution in acquiring and applying new judgment writing skills.

The participants were then required to re-write their sample judgments or parts thereof in either English or French. These re-written judgments were sent to the instructor by email and discussed during group sessions. Finally, the re-written judgments were evaluated using the Checklist.

Further to the Checklist, other judgments were used as examples of both good and bad judgment writing. Also, Prof. Raymond prepared a PowerPoint slideshow on the ―Five Easy Steps" of judgment writing which was presented in English, French and Kinyrwanda.

Focus and Applications

Like the first training in judgment writing, this program focused on legal writing as a mode of thinking as well as a means of communication. Emphasis was put on selection, organization, and analysis — topics that apply equally in English and French. The ―issue-driven" approach advocated in the program can also be useful to judges in trial management - it can be a device for keeping counsel efficient and on the point, and it may result in settlement without trials. The end result will be improved judgements that are precise, well reasoned and understandable by the parties and other reading members of the public.

The nine judges trained have participated in or observed the course several times. Among those judges, Angelene Rutanza distinguished herself both in her understanding of the goals and objectives of the training as well as in her contribution to the classes. It is hard to imagine that anyone could become an expert teacher of what is essentially a new subject in a couple of short courses, but Judge Rutanza, who has formerly taught law at the university in Butare, is well along the way.

It does not yet seem clear how much time the judge-teachers will be given to participate in the training of other judges, and for this reason the materials are deliberately flexible. Each set of slides and the syllabi based on them can be used as the outline for a one-day course, a two-day course, or a two-week course, depending on how many participants are involved.

Organization of the training

All key training materials were translated from English into French by Prof. Raymond. Furthermore, there was simultaneous interpretation in the three official languages to ensure full and effective transmission of knowledge, participation and communication.

Additionally, simultaneous interpretation in English, French and Kinyarwanda was made available to ensure complete understanding between the participants and the trainer.

Training Evaluation

Prior to the training, judgments that were submitted by participants were evaluated by both JSP and participants using Prof. Raymond's Checklist. The scores marked by JSP personnel indicated that, even though the trainees had by-and-large applied the "issue-based" approach in deciding their cases, they had reneged on many of the other aspects of the training such as having a first page summarizing what the case is about and the issues to be determined, utilizing the issues in their logical sequence as headings and subheadings in the body of the judgment as well as avoiding unnecessary narrative and reporting of court proceedings.

This rather weak internalization of the principles regarding the importance of the first page and the related analytical synthesis in the judgment is fortified by the results of the pre-training evaluation conducted by the trainees[1]: 75% of the respondents found the first page of their judgments very well written. The discrepancy between the low scores found in the JSP evaluation and the high marks in the trainees' self-evaluation indicated that the key principles taught in the previous training – and particularly those relating to the importance of the first page – were not properly understood and/or applied by the participants when writing their judgments.

The post training evaluation, however, revealed a significant improvement in self assessment. After this additional training, between 50% and 65% of the participants indicated that their first page was not well written and only somewhat reflected what the case was all about. The evaluations also indicated that trainees found themselves to regularly include some irrelevant material when writing judgments. A final score of the first page re-written during the training and discussed in the groups indicated tremendous improvement in writing the first page – giving a helicopter view of the case, but also criticizing those aspects which did not comply with the principles learned during the training.

During the training participants were engaged, actively participating in the plenary and group discussions, asking questions as well as re-writing and evaluating parts of their judgments.

Finally, a good number of the trainees demonstrated that they had the knowledge, skills and abilities required to co-teach with Prof. Raymond in the judgment training that took place the following two days (May 6 and 7) for Judges of the Supreme Court, the High Court, the Commercial High Court, and the Military High Court and Inspectors of Courts. The trainees acted as breakout group leaders and helped their colleagues and Prof. Raymond in facilitating the group discussions and re-writing exercises.

[1] Note that participants were asked only to complete the first question of the pre-evaluation form as this would be the focus of the first day of training.

Challenges Identified

The participants have now taken two training-of-trainers courses and co-taught with Prof. Raymond two judgment writing courses. The improvements shown demonstrate an initial internalization of the teachings, but how effectively they will be able to transmit that knowledge as faculty is not yet certain. Prof. Raymond deemed that the goal of training 9 or 10 judges may not have been met as fully as hoped, but noted that at least one judge is ready to teach the judgment writing course. Continued trainings both in judgment writing and in teaching, along with putting the training into practice, will help overcome this challenge.

The main challenge for participants in this training (and in all judgment writing trainings) is that posed by having three official languages. Most of the participants received their legal training in French, currently write their judgments in Kinyarwanda and are now being trained in English. Compounded with the current transition from a civil law tradition to a mix of civil law and common law, the scope of the problem becomes more evident. Furthermore, at the moment there seems to be no overall plan with respect to which features of each system are to be adopted. As a result, there is considerable variation in local procedure, rules of interpretation, standards of proof, the role of judges and prosecutors, etcetera – all of which point to the need for improved judgment writing, but also the challenges faced by judges when writing their decisions.

Key Recommendations

- As pointed out during the earlier training report, two days is quite short for exhausting this training. More time would be necessary to ensure that all parts of the course are covered as well as enough time for practice.

- Trainees again raised the need for written notes. Though detailed explanatory forms as well as PowerPoint slides laying down the steps were delivered, the trainees seem to be accustomed to formal written notes. The Professor endeavored to explain that the material was sufficient and the trainees are supposed to develop their own materials by re-writing their judgments – a key element to explain whenever applying this kind of new training approach.

- The earlier recommendation to concretely show how legal matters can be analyzed in this new model judgment remains applicable. Thus the need for a lawyer/judge to substantially deal with issues in a case and write a sample judgment for discussion with the judges.

- All trainees must be required to submit judgments. These need to be submitted early if they are to be translated, analyzed and properly used by the trainer during the training.

- Following on to the above, there came to light the need for regular refresher courses and administrative directions on the new approach to judgment writing style if it is to fully replace the traditional Rwandan judgment writing style.

Annexes

I. Syllabus & Program

TRAINING OF TRAINERS – JUDGMENT WRITING

DAY ONE

09:00 Welcome

09:20 Plenary Session.
Explanation of the program, its goals and objectives.
Lectures/Discussion: "Note Taking: What Do I Want to Remember," and "The Checklist Revised and Revisited"; "Writing the Perfect First Page."

10:00 Break

10:20 Participants swap judgments and apply checklist to the opening paragraphs and the headings.

11:00 Participants re-write opening paragraphs, list issues, and share their results (before & after) with the group via e-mail.

12:00 Lunch

13:00 Reading and group discussion of revisions. Participants identify before & after examples for use in their own PowerPoint slides.

14:15 Break

14:35 Lecture: "Patterns of Analysis"

15:30 Participants write the analysis of at least one issue.

16:20 Participants send revised beginnings and issue analysis to the group via e-mail.

16:30 Adjournment.

DAY TWO

09:00 Participants discuss their issue analysis in groups of three.

10:00 Break

10:20 Lecture/Discussion: "Writing an Ending"

10:45 Participants write an ending for their judgment and turn in their complete judgments via email to the group.

11:05 Small group discussion of the revised endings.

11:30 Plenary Discussion: "Re-Thinking the Entitlement"

12:00 Lunch

13:00 Participants select before & after examples and make their own slides in Kinyarwanda. These slides should include before & after examples of introduction, outlines as revealed in headings, and issue analysis. Slides are turned in via e-mail for group discussion.

14:15 Break

14:35 Demonstration and Analysis of PowerPoint slides.

15:30 Closing Discussion: "Who's Ready to Teach?"

Set up groups of three to review one another's judgments on the second Saturday of the month or some other designated date. Copies can be circulated by e-mail. Discussion can be by e-mail, conference call, or in person, depending on each group's circumstances.

Open discussion: "What problems in the system can be identified in a judgment writing program? What remedies might there be?"

16:00 Closing remarks and Certificate Ceremony.

JUDGMENT WRITING IN FIVE EASY STEPS

Ecrire un jugement dans cinq étapes faciles.
Kwandika imanza mu bice bitanu byoroshye.
© 2010 James C. Raymond

1. Identify the issues and write a case-specific heading for each.

1. ***Identifier les questions en litige et élaborer un sous-titre pour chaque sujet.***
1. Erekana ibibazo maze buri kibazo ugihe umutwe ugisobanura.

2. Arrange the issues in a sequence that makes sense.

2. ***Organizer de façon logique les questions en litige.***
2. Kurikiranya ibibazo mu buryo busobanutse.

3. Write a beginning, telling the story that gives rise to the issues.

3. Écrire une introduction factuelle, donnant un contexte pour les questions en litige.
3. Andika itangiriro mu buryo bw' inkuru ngufi isobanura neza ibyo bibazo

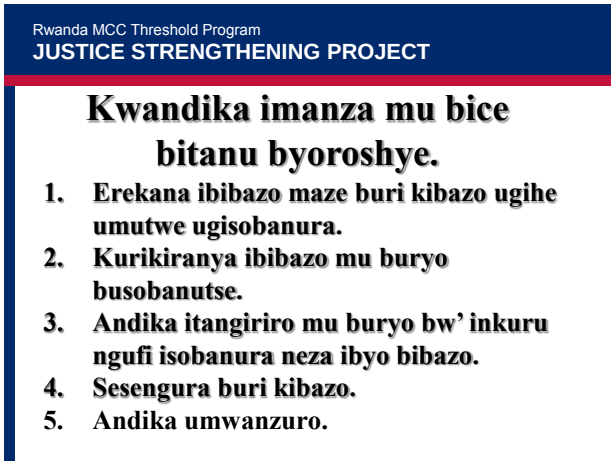
4. Analyze each issue.

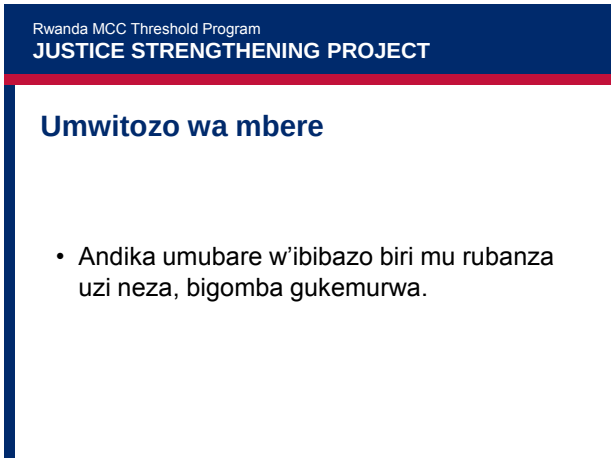
4. Analyser chaque question en litige.
4. Sesengura buri kibazo.

5. Write a conclusion.

5. Écrire une conclusion.
5. Andika umwanzuro.

Sample Slides of Professor Raymond's Power Point Presentation





NB. A complete set of Prof Raymond's PowerPoint presentation may be obtained at the JSP offices or as a separate document to this report.

A SHORT CHECKLIST FOR JUDGMENTS

©James C. Raymond 2010

1. Read the first page.

How well does your beginning provide your readers with the factual overview they need in order to understand the issues?

Not at all	Somewhat	Very Well
0	1	2

Does the beginning clearly list the issues in the order in which they will be decided?

Not at all	Somewhat	Very Well
0	1	2

Does the beginning of your judgment include information that has no relevance to the issues at hand?

Yes, a lot	A few	None at all
0	1	2

2. Now check the headings.

Do your headings echo the issues/questions listed in the introduction?

Not at all	Somewhat	Very Well
0	1	2

Does the typography clearly signal the difference between headings and subheadings?

Not at all	Somewhat	Very Well
0	1	2

Are the headings listed in a logical sequence (e.g., threshold issues, like jurisdiction first, contingent issues like damages, last)?

Not at all	Somewhat	Very Well
0	1	2

3. Now read the section immediately following the introduction.

In your judgment, if the section immediately following the list of questions addresses the first issue, please add two points to the score and skip to Question 4 below.

If the section immediately following the issue deals with procedural history or other information, is it justified? I.e., does it include facts or law common to more than one issue, or unresolved questions of procedure, or laws relevant to all the issues?

Not at all	Somewhat	Very Well
0	1	2

4. Now read the analysis of the issues.

For each issue indicate whether the analysis is clear and succinct.

Not at all	Somewhat	Very Well
0	1	2

Is the analysis persuasive?

Not at all	Somewhat	Very Well
0	1	2

Is the losing party's position stated clearly and impartially?

Not at all	Somewhat	Very Well
0	1	2

Could reader unfamiliar with the case tell why the losing party lost?

Not at all	Somewhat	Very Well
0	1	2

5. Now check the ending.

Are the findings and rulings clearly indicated?

Not at all	Somewhat	Very Well
0	1	2

Would the ending be improved by a recapitulation of the reasons?

Yes	Somewhat	No
0	1	2

Would the ending be improved by adding arguments from consequence?

Yes	Somewhat	No
0	1	2

Please add all the points you awarded and provide a TOTAL: _____
(Max possible, 28)

A CHECKLIST FOR JUDGMENTS

©James C. Raymond 2010

1. Read the first page.

An effective first page does three things:

- it tells Who (Allegedly) Did What to Whom (or Who's Arguing about What) before anyone set foot in court;
- it sets out the issues to be decided in the order in which they are to be decided;
- it omits details (names, dates, procedural history, citation of laws or precedents, that have nothing to do with the issues at hand.

In other words, it sets out a ―helicopter" view of the facts, followed by a list of questions that the court needs to resolve en route to resolving the case as a whole. It does this without legal jargon and without an alphanumeric soup of citations. If possible, it refers to parties by name, resorting to their positions in court (e.g., plaintiff, defendant), only when names are not practical (e.g., when there are multiple plaintiffs or defendant).

The helicopter view should be a brief story, composed of uncontested or stipulated facts. It can also include contested facts, introducing them with words like ―allegedly" or ―Mr. Brown contends that..." to let the reader know the validity of these assertions needs to be settled at trial. The introduction should be very short, less than half a page if possible, but no more than one full page. And it should be limited to the facts we need to understand the issues that follow.

After this introductory story, the statement of issues may be in bullet point form, or they may be in paragraph form, as long as each issue is phrased succinctly enough to be used as a heading or subheading in what follows.

A conventional beginning, on the other hand—the sort of beginning we would like to avoid—starts out with a procedural history, or a copy of the charge or indictment, or reference to laws that will be applied before we have enough information to know why these laws might be relevant. A conventional beginning often includes details that have no relevance to any of the issues.

How well does your beginning provide your readers with the factual overview they need in order to understand the issues?

Not at all	Somewhat	Very Well
0	1	2

Does the beginning clearly list the issues in the order in which they will be decided?

Not at all	Somewhat	Very Well
0	1	2

Does the beginning of your judgment include information that has no relevance to the issues at hand?

Yes, a lot	A few	None at all
0	1	2

2. Now check the headings.

In a conventional judgment, headings, if they exist at all, have no apparent logic. They merely announce topics. Sometimes they seem to be added after the judgment has been written, in an effort to give it an appearance of order.

Effective headings, however, have an obvious logic. They are brief, free of legal jargon and citations. And they clearly echo the issues as listed on the first page. Things that should be dealt with first (e.g., jurisdiction, if it is challenged) come first; things that have to be dealt with toward the end (e.g., sentence, damages) come last.

Do your headings echo the issues/questions listed in the introduction?

Not at all	Somewhat	Very Well
0	1	2

Does the typography clearly signal the difference between headings and subheadings?

Not at all	Somewhat	Very Well
0	1	2

Are the headings listed in a logical sequence (e.g., threshold issues, like jurisdiction first, contingent issues like damages, last)?

Not at all	Somewhat	Very Well
0	1	2

3. Now read the section immediately following the introduction.

Normally it is possible to move directly from the introduction to the analysis of the first issue. Often, however, judges put all sorts of information about the history of the case (which we probably don't need) or the evidence heard, before they get around to analyzing the issues.

This sort of information in this place merely distracts the readers.

Factual details and citations of law should be deferred to the analysis of the issues to which they are relevant.

Information like this can be justified before the analysis of issues in only three situations:

- when there are facts common to more than one issue;
- when the same law applies to more than one issue;
- when there are questions of procedure that still need to be resolved.

Otherwise they are there simply because they are part of the record and the judge feels obliged to include them, even though they are irrelevant to the issues at hand,

In your judgment, if the section immediately following the introduction addresses the first issue, please add two points to the score and skip to question 4 below.

If the section immediately following the issue deals with procedural history or other information, is it justified? I.e., does it include facts or law common to more than one issue, or unresolved questions of procedure, or laws relevant to all the issues?

Not at all	Somewhat	Very Well
0	1	2

4. Now read the analysis of the issues.

An issue is by definition an argument, and the judge must either tell us or clearly imply each side's position.

For questions of law, it is often possible to begin with the losing party's position, followed by an indication of the flaw in that position. Normally it is not necessary to give the winning party's position, because it is likely to be the same as the court's.

For questions of fact, it is usually necessary to give first one party's position, then the others, then the court's position, *with reasons*. This last part is most important and can be quite difficult: revealing why you prefer one position over the other, especially since many grounds for finding of fact have turn out to be unreliable (e.g., eye-witness identification, demeanor of a witness).

In civil cases, you need to say *why* you find one party's evidence more credible than the other's.

In criminal cases, it's the prosecutor's evidence you should be regarding with a skeptical eye, not the defendant's. You must determine whether the prosecutor's evidence, *in itself*, proves the defendant's guilt beyond a reasonable doubt, regardless of what the defendant says or fails to say.

For each issue in your judgment, indicate whether the analysis is clear and succinct.

Not at all	Somewhat	Very Well
0	1	2

Is the analysis persuasive?

Not at all	Somewhat	Very Well
0	1	2

Is the losing party's position stated clearly and impartially?

Not at all	Somewhat	Very Well
0	1	2

Could reader unfamiliar with the case tell why the losing party lost?

Not at all	*Somewhat*	*Very Well*
0	*1*	*2*

5. Now check the ending.

In a simple case, it may be sufficient to say simply ―For the reasons above, the Court finds that ... and orders that...

In a complex case, it may be helpful to recapitulate the reasons before announcing the finds and the orders.

In a controversial case, or in a case in which the law is not entirely clear, it may be useful to bolster the conclusion with an argument from consequence. A typical argument from consequence begins with a phrase like ―To rule otherwise would be to invite . . . ―followed by a list of patently unacceptable consequence that would ensue if the judge had ruled otherwise.

This device can also be used to assure the reader that certain negative consequences will NOT occur. If, for example, the public might be confused if a guilty verdict is remanded because of a procedural defect in the trial, it may be wise to remind the readers that remanding a case does not set accused person free. Or if it does, to explain why in sticking to the rules of procedure we protect everyone from government repression or overzealous prosecution.

Answer the following questions about your judgment.

Are the findings and rulings clearly indicated?

Not at all	Somewhat	Very Well
0	1	2

Would the ending be improved by a recapitulation of the reasons?

Yes	Somewhat	No
0	1	2

Would the ending be improved by adding arguments from consequence?

Yes	Somewhat	No
0	1	2

Please add all the points you awarded and provide a TOTAL: _____
(Max possible: 28)

III. List of Attendees

Attendance List – Training of Trainers – Judgement Writing Course May 4 - 5, 2010

N°	NAMES	INSTITUTION	POSITION	GENDER F	GENDER M	TEL N°	E-MAIL
1	MUGENZI Louis Marie	Supreme Court	Judge		✓	078 8301027	mmugelo@yahoo.fr
2	MUTASHYA Jean Baptiste	Supreme Court	Judge		✓	078 8307924	jbmutashya@yahoo.fr
3	KALIWABO Charles	Inspector of Court	Inspector		✓	078 8308059	ckaliwabo@yahoo.fr
4	KAYITESI RUSERA Emily	Supreme Court	Judge	✓		078 8300467	ruskayi@yahoo.fr
5	KABALIRA Stanislas	Inspector of Court	Inspector		✓	078 8307912	kabastani@yahoo.fr
6	RUTAZANA Angeline	HC Kigali	Judge	✓		078 8304496	angrut@yahoo.fr
7	GAKWAYA Justin	HC Rwamagana	Judge		✓	078 8307911	gakwaho@yahoo.fr
8	HITIMANA J.M.V.	HC Musanze	Judge		✓	078 8307917	rusjamari@yahoo.fr
9	MUHIMA Antoine	HC Nyanza	Judge		✓	078 8307922	mushonda1@yahoo.fr
10	KIBUKA Jean Luc	HCC	Judge		✓	078 8307918	jkibuka@yahoo.fr

IV. Summary Analysis of Pre-Training Evaluations

Note: Participants were asked only to respond to the first question of the Pre-Training Evaluation as this was the focus of the first day of training.

1. Read the first page.

How well does your beginning provide your readers with the factual overview they need in order to understand the issues?

- Not at all (0)
- Somewhat (1)
- Very well (7)

Does the beginning clearly list the issues in the order in which they will be decided?

- Not at all (0)
- Somewhat (3)
- Very well (5)

Does the beginning of your judgment include information that has no relevance to the issues at hand?

- Yes, a lot (0)
- None at all (6)
- A few (1)

V. Summary Analysis of Post-Training Evaluations

1. Read the first page.

How well does your beginning provide your readers with the factual overview they need in order to understand the issues?

- Not at all (0)
- Somewhat (7)
- Very well (1)

Does the beginning clearly list the issues in the order in which they will be decided?

- Not at all (3)
- Somewhat (4)
- Very well (1)

Does the beginning of your judgment include information that has no relevance to the issues at hand?

- Yes, a lot (1)
- A few (1)
- None at all (6)

2. Now check the headings.

Do your headings echo the issues/questions listed in the introduction?

- Not at all (3)
- Somewhat (3)
- Very well (2)

Does the typography clearly signal the difference between headings and subheadings?

- Not at all (1)
- Somewhat (5)
- Very well (2)

Are the headings listed in a logical sequence (e.g., threshold issues, like jurisdiction first, contingent issues like damages, last)?

- Not at all (2)
- Somewhat (2)
- Very well (4)

3. Now read the section immediately following the introduction.

In your judgment, if the section immediately following the introduction addresses the first issue, please add two points to the score and skip to question 4 below.

- (0)

If the section immediately following the issue deals with procedural history or other information, is it justified? I.e., does it include facts or law common to more than one issue, or unresolved questions of procedure, or laws relevant to all the issues?

- Not at all (3)
- Somewhat (2)
- Very well (3)

4. Now read the analysis of the issues.

For each issue in your judgment, indicate whether the analysis is clear and succinct.

- Not at all (0)
- Somewhat (3)
- Very well (5)

Is the analysis persuasive?

- Not at all (0)
- Somewhat (2)
- Very well (6)

Is the losing party's position stated clearly and impartially?

- Not at all (0)
- Somewhat (2)
- Very well (6)

Could reader unfamiliar with the case tell why the losing party lost?

- Not at all (0)
- Somewhat (2)
- Very well (6)

5. Now check the ending.

Are the findings and rulings clearly indicated?

- No (0)
- Somewhat (3)
- Very well (5)

Would the ending be improved by a recapitulation of the reasons?

- Yes (1)
- Somewhat (1)
- No (6)

Would the ending be improved by adding arguments from consequence?

- Yes (0)
- Somewhat (6)
- No (2)