sonableness "under prevailing professional norms" that takes into account "all the circumstances" and evaluates conduct "from counsel's perspective at the time."[324] Providing effective assistance is not limited to a single path, and the defendant bears the burden to prove insufficiency[325]. No detailed rules or guidelines for adequate representation are appropriate: "Any such set of rules would interfere with the constitutionally protected independence of counsel and restrict the wide latitude counsel must have in making tactical decisions."[326]

Because even the most highly competent attorneys might choose to defend a client differently, "[j]udicial scrutiny of counsel's performance must be highly deferential."[327] Counsel's obligation is a general one: to act within the wide range of legitimate, lawful, and reasonable conduct.[328] "[S]trategic choices made after thorough investigation of relevant law and facts . . . are virtually unchallengeable,"[329] as is "a reasonable decision that makes particular investigations unnecessary,"[330] or a reasonable decision selecting which is-

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[324] 466 U.S. at 688, 689.

[325] 466 U.S. at 690.

[326] 466 U.S. at 689. *Strickland* observed that "American Bar Association standards and the like" may reflect prevailing norms of practice, "but they are only guides." Id. at 688. Subsequent cases also cite ABA standards as touchstones of prevailing norms of practice. *E.g.*, Wiggins v. Smith, 539 U.S. 510, 524 (2003), and Rompilla v. Beard, 545 U.S. 374, 387 (2005). But in Bobby v. Van Hook, the Court held that the Sixth Circuit had erred in assessing an attorney's conduct in the 1980s under 2003 ABA guidelines, and also noted that its holding "should not be regarded as accepting the legitimacy of a less categorical use of the [2003] Guidelines to evaluate post-2003 representation." 558 U.S. ___, No. 09–144, slip op. at 5 n.1 (2009) (per curiam).

[327] *Strickland*, 466 U.S. at 689. The purpose is "not to improve the quality of legal representation, . . . [but] simply to ensure that criminal defendants receive a fair trial." Id.

[328] There is no obligation to assist the defendant in presenting perjured testimony, Nix v. Whiteside, 475 U.S. 157 (1986), and a defendant has no right to require his counsel to use peremptory challenges to exclude jurors on the basis of race. Georgia v. McCollum, 505 U.S. 42 (1992). Also, "effective" assistance of counsel does not guarantee the accused a "meaningful relationship" of "rapport" with his attorney such that he is entitled to a continuance in order to change attorneys during a trial. Morris v. Slappy, 461 U.S. 1 (1983).

[329] *Strickland*, 466 U.S. at 690 ("[C]ounsel is strongly presumed to have rendered adequate assistance and made all significant decisions in the exercise of reasonable professional judgment."). *Accord* Burt v. Titlow, 571 U.S. ___, No. 12–414, slip op. (2013). *See also* Yarborough v. Gentry, 540 U.S. 1 (2003) (deference to attorney's choice of tactics for closing argument).

[330] *Strickland*, 466 U.S. at 691. *See also* Woodford v. Visciotti, 537 U.S. 19 (2002) (state courts could reasonably have concluded that failure to present mitigating evidence was outweighed by "severe" aggravating factors); Schriro v. Landrigan, 550 U.S. 465 (2007) (federal district court was within its discretion to conclude that attorney's failure to present mitigating evidence made no difference in sentencing).