

**Note:** The following checklist is excerpted with permission from Craig A. Christensen, “Closing Argument,” chapter 9 of Eric L. Andrews et al., [Wisconsin Trial Practice](#) (3d ed. 2013-14). For a thorough analysis of each step, including applicable cross-references, please see the discussions in that chapter.

***Checklist: Selected Grounds for Objections During Closing Argument***

- ☐ Refers to facts not in evidence or from counsel’s own knowledge
- ☐ Calls for speculation on unsupported inferences
- ☐ Refers to other verdicts
- ☐ Refers to counsel’s opinion of a witness’s credibility
- ☐ Refers to a party’s wealth or poverty
- ☐ Appeals to the jury’s prejudices based on race, religion, or nationality
- ☐ Appeals to the jury’s self-interest to enlarge or reduce the verdict
- ☐ Refers excessively to the defendant’s insurance
- ☐ Refers to a prior settlement
- ☐ Addresses jurors by name