

**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