

NO-NOs

- Attorney's personal belief.
- Vouching for a client or witness.
- Calling witness or opposing party a liar.
- Sending a message.
- Attacking or enhancing the credibility of a witness.
- Appeal to the conscience of the community.
- Arguing facts outside the record.
- Comments on evidence ruled inadmissible.
- Comments on prior jury awards or settlement with "empty chair."
- Comments on crowded dockets.
- Appeals to sympathy, prejudice or jurors' self-interest.
- Comments on insurance coverage.
- Golden Rule
- Fawning to jurors.
- Overemotionalism.
- Shifting responsibility for verdict from jury.
- Incorrect statement of the law.
- Arguing issues outside the scope of the case.
- Comments on wealth of parties.