

[Case Caption]

PROFFER UNDER FED. R. EVID. 801(d)(2) AND OBJECTIONS

SECTION 1: Government’s Initial Proffer as to Conspiracy

[The Government’s proffer of facts showing that (1) a conspiracy or conspiracies existed, (2) the declarant of each statement and the defendant(s) were members of the conspiracy or conspiracies, and (3) the statements were made in the course of, and in furtherance of, the conspiracy or conspiracies.]

SECTION 2: Government’s Proffer as to Specific Statements

Statement #1	Declarant	Date	Source	Basis for Admission
[either verbatim or best paraphrase possible]	[name of declarant]	[of statement]	[name or identification of source]	[explanation why the statement is admissible under Rule 801(d)(2)]

Defendant	Objections to Statement #1
[name]	
[name]	

Statement #2	Declarant	Date	Source	Basis for Admission

Defendant	Objections to Statement #2