

# POLLACK & BALL, L.L.C.

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November 6, 2023

Deputy J. Schwarz  
Lancaster County Sheriff's Office  
575 South 10<sup>th</sup> Street  
Lincoln, NE 68508

Via email to [jschwarz@lancaster.ne.gov](mailto:jschwarz@lancaster.ne.gov)

Re: Marshall Vogel

Dear Deputy Schwarz:

Please be advised that I have been retained by Marshall Vogel.

From this point forward, please make no further efforts to interview my client, as I have instructed him to give no more statements to law enforcement. I further request that you not interview either of his children without my consent.

I request that you preserve all potential evidence in this matter, including what you would constitute potentially exculpatory evidence pursuant to Brady v. Maryland.

I further request that you proactively obtain and preserve evidence that may be relevant or exculpatory insofar as the accuser's allegations and credibility are concerned, including but not limited to any text messages, call logs, social media, photographs, recordings or other evidence on her devices or any witness devices. I request that you obtain and preserve all communications between the alleged victim and any other witness who has been interviewed and given statements or anyone that you interview going forward.

I further request that you please contact me to discuss this further.

Thank you.

Very truly yours,

  
Sandy Pollack

cc: Chris Turner, Chief Deputy Lancaster County Atty (via email)