

**EXHIBIT 10**  
**(File Under Seal)**

***GIUFFRE***

***VS.***

***MAXWELL***

**Deposition**

***STEVEN W OLSON***

*05/26/2016*

---

***Agren Blando Court Reporting & Video, Inc.***

*216 16th Street, Suite 600*

*Denver Colorado, 80202*

*303-296-0017*

**Agren Blando Court Reporting & Video, Inc.**

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

---

CONFIDENTIAL DEPOSITION OF DR. STEVEN W. OLSON  
May 26, 2016

---

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

---

APPEARANCES:

S.J. QUINNEY COLLEGE OF LAW, UNIVERSITY OF UTAH

By Paul G. Cassell, Esq.

383 S. University Street

Salt Lake City, UT 84112

Phone: 801.585.5202

Cassellp@law.utah.edu

Appearing on behalf of the

Plaintiff

HADDON, MORGAN AND FORMAN, P.C.

By Laura A. Menninger, Esq.

150 East 10th Avenue

Denver, CO 80203

Phone: 303.831.7364

lmenninger@hmflaw.com

Appearing on behalf of the

Defendant

1 Pursuant to Subpoena, Notice and the  
2 Federal Rules of Civil Procedure, the DEPOSITION OF  
3 DR. STEVEN W. OLSON, called by Defendant, was taken  
4 on Thursday, May 26, 2016, commencing at 8:54 a.m.,  
5 at 150 East 10th Avenue, Denver, Colorado, before  
6 Kelly A. Mackereth, Certified Shorthand Reporter,  
7 Registered Professional Reporter, Certified Realtime  
8 Reporter and Notary Public within Colorado.

9 \* \* \* \* \*

10 I N D E X

11 EXAMINATION	PAGE
12 MS. MENNINGER	4
13 MR. CASSELL	109
14 MS. MENNINGER	127
MR. CASSELL	136

15 PRODUCTION REQUEST(S) :	
16	
17	44

**Agren Blando Court Reporting & Video, Inc.**1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## INDEX OF EXHIBITS

DESCRIPTION	INITIAL REFERENCE
Exhibit 1 Authorization for the Release and Disclosure of Protected Health Information and Medical Records	7
Exhibit 2 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action	7
Exhibit 3 Subpoena to Testify at a Deposition in a Civil Action	8
Exhibit 4 Document titled Centura Health Physician Group Patient Information	40
Exhibit 5 Visit note for Dr. Olson	43
Exhibit 6 Document titled Patient Health Summary, The Entrance Medical Centre	100
Exhibit 7 Document titled Patient Health Summary from Central Coast Family Medicine	105

**Agren Blando Court Reporting & Video, Inc.**

1 Q All right. Do you know how you came to be  
2 the doctor for Virginia Giuffre?

3 A No. I -- she would have filled out a new  
4 patient packet and showed up for a new patient  
5 appointment for a particular reason. I reviewed it.

6

7

8 Q Do you know where that new patient packet  
9 is now?

10 A It's going to be scanned in the computer.  
11 If you don't have it, I brought my computer. I can  
12 probably scan it and print it out or just print it  
13 out.

14 Q Is that among the documents that you have  
15 next to you?

16 A The new patient packet isn't here, but I  
17 have it -- I should have it on my computer. I could  
18 probably log in and print it, to be honest. It  
19 wouldn't be that hard. I assumed that the hospital  
20 is taking care of all the documentation that was  
21 requested. So I didn't actually bring it.

22 Q I understand.

23 A I actually have it, happen to have it with  
24 me.

25 Q All right. Why don't we -- we can

**Agren Blando Court Reporting & Video, Inc.**

1 probably do that when we take a break in just a few  
2 minutes, and I can tell you how to get on the  
3 Internet and we'll see if that works.

4 A Um-hum.

5 Q Do you know how many times that you saw  
6 Virginia Giuffre?

7 A Once.

8 Q Do you know whether she was referred to  
9 you by another doctor?

10 A No.

11 Q Do you mean no, you don't know or --

12 A I have no idea. I have no idea. I don't  
13 know why she would have been referred. Most the time  
14 people are referring out.

15 Q Right.

16 A They don't refer back to a general  
17 practitioner.

18 Q No one ever refers anyone to you?

19 A It generally goes the other direction.  
20 Well, other patients might refer people to me, and  
21 that happens, but --

22 Q Okay. Do you know if you treat  
23 Ms. Giuffre's children in your practice?

24 A Not that I'm aware of.

25 Q Do you know a woman by the name of Lynn

**Agren Blando Court Reporting & Video, Inc.**

1 Miller?

2 A I know several Millers.

3 Q Who works at Saint Thomas More Hospital?

4 A I think so, yeah. That sounds familiar,  
5 yeah.

6 Q Do you know her professionally?

7 A Not really.

8 Q Okay.

9 A I mean, her name sounds familiar.

10 Q Do you know of any connection between Lynn  
11 Miller and Virginia Giuffre?

12 A None. I have met Virginia once. I only  
13 saw her once, a year ago. That's the extent of my --

14 Q Have you ever read any media reports about  
15 Ms. Giuffre?

16 A No. No, I haven't. I don't know anything  
17 about it.

18 Q Okay. Do you know how long --

19 A She -- I believe she mentioned that it was  
20 some kind of -- mentioned something about being a  
21 famous sexual abuse something.

22 Q You haven't read any of the reports?

23 A I have no idea.

24 Q Okay. I'm just trying to establish your  
25 sources information.



**Agren Blando Court Reporting & Video, Inc.**

1 A Yeah.

2 Q So if you had information about  
3 Ms. Giuffre, other than your visit --

4 A Yeah.

5 Q -- do you know another source?

6 A No.

7 Q From family members?

8 A No.

9 Q From community members, anything?

10 A Nothing.

11 Q Do you know how long your visit with her  
12 lasted?

13 A It -- sometimes I document time spent, but  
14 not always. I mean, it's not important. They're  
15 half-hour visits typically. It would have been a  
16 half hour or less, I would expect.

17 Q All right. Before looking at your  
18 records, is there anything about Ms. Giuffre that you  
19 recall just from the top of your head?

20 I understand you see many, many patients  
21 and this was a year ago. So you tell me.

22 A Nothing. I saw her once. And when I went  
23 back and read the note, I went, Oh, yeah, I remember  
24 someone mentioning about being in a sexual abuse  
25 trial or something, some kind of sexual abuse thing.

1 Q That's the only unusual part that stuck  
2 out?

3 A Yeah, and I don't really remember anything  
4 about her at all, actually, I don't.

5 Q Do you know what she looks like?

6 A No, I don't remember. It was one time a  
7 year ago. I don't remember.

8 Q I understand. Okay. If it's okay with  
9 you, I would like to take a break and see if we can  
10 pull up the other records because I don't want to go  
11 through my questions and then go back and look at  
12 those records. I'd rather do it one time.

13 A Okay.

14 Q Is that all right?

15 A Yeah, I'm fine with that.

16 MS. MENNINGER: All right. Let's go off  
17 the record.

18 (Recess taken from 9:41 a.m. to  
19 10:07 a.m.)

20 (Exhibit 4 marked.)

21 Q (BY MS. MENNINGER) So we're back on the  
22 record. All right.

23 I'm going to give you a document marked as  
24 Exhibit 4. And I'm going to make a small record  
25 about what just took place off the record, which is

**Agren Blando Court Reporting & Video, Inc.**

1 that you, as I understand it, and tell me if I'm  
2 wrong, have access to medical records from your  
3 office on your laptop, correct?

4 A Yes.

5 Q Okay. And you were able to get on your  
6 laptop and print out records related to Ms. Giuffre  
7 that you had on that laptop, correct?

8 A Yes.

9 Q And we printed that out and made copies  
10 for everyone here, and that's what you see in front  
11 of you as Exhibit 4, correct?

12 A Yes.

13 Q We made those printouts on a portable  
14 printer. So they're not the best quality, correct?

15 A Correct.

16 Q And some portions are not printing out as  
17 well?

18 A Yes.

19 Q And you, I think, would be okay with  
20 sending us a more complete set later?

21 A Yes.

22 Q All right. I'm going to take just a  
23 minute to review it.

24 Can you tell us what the records that you  
25 just printed out in Exhibit 4 represent?

**Agren Blando Court Reporting & Video, Inc.**

1           A       Generally it's demographics information  
2           and then a list of medications, a list of surgeries,  
3           a list of family medical history, and then a list of  
4           physical complaints that there's some -- it's called  
5           review of systems, things someone has been feeling  
6           and self-reported in the last two weeks.

7           Q       Okay. So is this typically -- is this  
8           patient information document typically in the  
9           patient's handwriting?

10          A       Yes.

11          Q       And I presume you don't know Ms. Giuffre's  
12          handwriting?

13          A       No.

14          Q       But it's a practice to ask the patient to  
15          fill these forms out?

16          A       Yes, and then have it there before their  
17          appointment.

18          Q       All right. So if I see the date reflected  
19          on the top of the first page as May 21st, 2015 --

20          A       Um-hum.

21          Q       -- do you believe that to be the date that  
22          you actually saw Ms. Giuffre?

23          A       Probably, yes.

24          Q       Okay.

25          A       Sometimes people will bring it in early,

1 but yeah.

2 Q Okay. Why don't we go ahead and mark  
3 Exhibit 5, which will be helpful as we're going  
4 through this.

5 (Exhibit 5 marked.)

6 Q (BY MS. MENNINGER) And I'm going to ask  
7 you to keep 4 and 5 kind of close by, and we'll talk  
8 about them.

9 Do you recognize Exhibit 5?

10 A Yes. That's the visit note.

11 Q And the visit note of Ms. Giuffre's visit  
12 with you?

13 A Yes.

14 Q In your office?

15 A Yes.

16 Q And after looking at Exhibit 5, can you  
17 tell what date it is that you actually saw  
18 Ms. Giuffre?

19 A 5/21/2015.

20 Q Okay. Is that also the same date as the  
21 patient intake form --

22 A Yes.

23 Q -- in Exhibit 4?

24 A Yes.

25 Q All right. Do you recall whether you



1 STATE OF COLORADO)

2 ) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER )

4 I, Kelly A. Mackereth, do hereby certify  
5 that I am a Registered Professional Reporter and  
6 Notary Public within the State of Colorado; that  
7 previous to the commencement of the examination, the  
8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was  
10 taken in shorthand by me at the time and place herein  
11 set forth, that it was thereafter reduced to  
12 typewritten form, and that the foregoing constitutes  
13 a true and correct transcript.

14 I further certify that I am not related to,  
15 employed by, nor of counsel for any of the parties or  
16 attorneys herein, nor otherwise interested in the  
17 result of the within action.

18 In witness whereof, I have affixed my  
19 signature this 31st day of May, 2016.

20 My commission expires April 21, 2019.

21  
22  
23 Kelly A. Mackereth, CRR, RPR, CSR  
24 216 - 16th Street, Suite 600  
25 Denver, Colorado 80202

**Agren Blando Court Reporting & Video, Inc.**

1 AGREN BLANDO COURT REPORTING & VIDEO, INC.  
216 - 16th Street, Suite 600  
2 Denver, Colorado 80202  
4450 Arapahoe Avenue, Suite 100  
3 Boulder, Colorado 80303

4  
5  
6 DR. STEVEN W. OLSON  
May 26, 2016  
7 Giuffre v. Maxwell  
Case No. 15-cv-07433-RWS  
8

9  
10 The original deposition was filed with  
11 Laura Menninger, Esq., on approximately the  
12 31st day of May, 2016.

13             Signature waived.

14     Unsigned; signed signature page and  
15 amendment sheets, if any, to be filed at  
16 trial.

17     Reading and signing not requested pursuant  
18 to C.R.C.P. Rule 30(e).

19     Unsigned; amendment sheets and/or signature  
20 pages should be forwarded to Agren Blando to  
21 be filed in the envelope attached to the  
22 sealed original.

23 Thank you.

24 AGREN BLANDO COURT REPORTING & VIDEO, INC.

25 cc: All Counsel