Case 1:15-cv-07433-LAP
EXHIBIT 10
(Eila IIndan Caal)
(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

## Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 3 of 15 \*\*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

# Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 4 of 15 \*\*Agren Blando Court Reporting & Video, Inc.\*\*

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	
LO	* * * * * * * I N D E X
11	DIGE.
12	EXAMINATION PAGE
13	MS. MENNINGER 4 MR. CASSELL 109
14	MS. MENNINGER 127
	MR. CASSELL 136
15	PRODUCTION REQUEST(S):
16	44
17	
18	
19	
20	
21	
22	
23	
24	
25	

# Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 5 of 15 \*\*Agren Blando Court Reporting & Video, Inc.\*\*

1		INDEX OF EXHIBITS	
2			INITIAL
3	DESCRIPTION		REFERENCE
4	Exhibit 1	Authorization for the Release	7
5		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	7 in
9		a Civil Action	
10	Exhibit 3	Subpoena to Testify at a Deposition in a Civil Action	8
11 12	Exhibit 4	Document titled Centura Health Physician Group Patient Information	40
13			4.2
	Exhibit 5	Visit note for Dr. Olson	43
14 15	Exhibit 6	Document titled Patient Health Summary, The Entrance Medical Centre	100
16	Exhibit 7	Document titled Patient Health Summary from Central Coast	105
17		Family Medicine	
18			
19			
20			
21			
22			
23			
24			
25			

# Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 6 of 15 \*\*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	O All right. Why don't we we can

# Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 7 of 15 \*\*Agren Blando Court Reporting & Video, Inc.\*\*

probably do that when we take a break in just a few 1 minutes, and I can tell you how to get on the 2 Internet and we'll see if that works. 3 Um-hum. 4 Do you know how many times that you saw 5 Q Virginia Giuffre? 6 7 Α Once. Do you know whether she was referred to 8 0 9 you by another doctor? 10 Α No. Do you mean no, you don't know or --11 Q I have no idea. I have no idea. I don't 12 Α know why she would have been referred. Most the time 13 14 people are referring out. 15 Right. 0 They don't refer back to a general 16 17 practitioner. No one ever refers anyone to you? 18 0 It generally goes the other direction. 19 Α Well, other patients might refer people to me, and 20 that happens, but --21 Okay. Do you know if you treat 22 O Ms. Giuffre's children in your practice? 23 Not that I'm aware of. 24 Α

25

0

Do you know a woman by the name of

# Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 8 of 15 \*\*Agren Blando Court Reporting & Video, Inc.\*\*

1	
2	A I know several
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
11	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.

# Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 9 of 15 \*\*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, b	at
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 y	ou
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 we	nt
23	back and read the note, I went, Oh, yeah, I remembe	r
24	someone mentioning about being in a sexual abuse	
25	trial or something, some kind of sexual abuse thing	

### Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 10 of 15 \*\*Agren Blando Court Reporting & Video, Inc.\*\*

1 That's the only unusual part that stuck 0 2 out? 3 A Yeah, and I don't really remember anything 4 about her at all, actually, I don't. 5 Do you know what she looks like? 6 No, I don't remember. It was one time a A 7 year ago. I don't remember. 8 I understand. Okay. If it's okay with 0 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 Is that all right? 0 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 (BY MS. MENNINGER) So we're back on the 0 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

## Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 11 of 15 \*\*Agren Blando Court Reporting & Video, Inc.\*\*

that you, as I understand it, and tell me if I'm 1 wrong, have access to medical records from your 2 3 office on your laptop, correct? 4 A Yes. Okay. And you were able to get on your 5 0 laptop and print out records related to Ms. Giuffre 6 7 that you had on that laptop, correct? 8 A Yes. And we printed that out and made copies 9 for everyone here, and that's what you see in front 10 11 of you as Exhibit 4, correct? 12 A Yes. We made those printouts on a portable 13 0 So they're not the best quality, correct? 14 printer. 15 A Correct. And some portions are not printing out as 16 0 17 well? 18 A Yes. And you, I think, would be okay with 19 0 sending us a more complete set later? 20 21 A Yes. All right. I'm going to take just a 22 O 23 minute to review it. Can you tell us what the records that you 24 25 just printed out in Exhibit 4 represent?

### Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 12 of 15 \*\*Agren Blando Court Reporting & Video, Inc.\*\*

Generally it's demographics information 1 Α and then a list of medications, a list of surgeries, 2 a list of family medical history, and then a list of 3 physical complaints that there's some -- it's called 4 review of systems, things someone has been feeling 5 6 and self-reported in the last two weeks. So is this typically -- is this 7 Okav. patient information document typically in the 8 patient's handwriting? 9 10 Α Yes. And I presume you don't know Ms. Giuffre's 11 O 12 handwriting? 13 Α No. But it's a practice to ask the patient to 14 Q fill these forms out? 15 Yes, and then have it there before their 16 Α 17 appointment. All right. So if I see the date reflected 18 0 19 on the top of the first page as May 21st, 2015 --20 Um-hum. Α -- do you believe that to be the date that 21 Q you actually saw Ms. Giuffre? 22 Probably, yes. 23 Α 24 Q Okay. 25 Sometimes people will bring it in early, Α

#### Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 13 of 15 Agren Blando Court Reporting & Video, Inc.

1 but yeah. 2 Why don't we go ahead and mark 0 Okay. 3 Exhibit 5, which will be helpful as we're going 4 through this. 5 (Exhibit 5 marked.) (BY MS. MENNINGER) And I'm going to ask 6 Q 7 you to keep 4 and 5 kind of close by, and we'll talk about them. 8 9 Do you recognize Exhibit 5? 10 Α That's the visit note. 11 And the visit note of Ms. Giuffre's visit 0 12 with you? 13 Α Yes. 14 0 In your office? 15 Α Yes. 16 And after looking at Exhibit 5, can you 0 17 tell what date it is that you actually saw 18 Ms. Giuffre? 19 5/21/2015. Α 20 Okay. Is that also the same date as the Q 21 patient intake form --22 Α Yes. 23 -- in Exhibit 4? Q 24 Α Yes. 25 All right. Do you recall whether you Q

### Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 14 of 15 *Agren Blando Court Reporting & Video, Inc.*

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

# Case 1:15-cv-07433-LAP Document 1198-11 Filed 01/27/21 Page 15 of 15 \*\*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
7	May 26, 2016 Giuffre v. Maxwell
8	Case No. 15-cv-07433-RWS
9	
10	The original deposition was filed with
11	Laura Menninger, Esq., on approximately the
12	31st day of May, 2016.
13	_XXX_ Signature waived.
14	Unsigned; signed signature page and amendment sheets, if any, to be filed at trial.
15 16	Reading and signing not requested pursuant to C.R.C.P. Rule 30(e).
17	Unsigned; amendment sheets and/or signature
18	pages should be forwarded to Agren Blando to be filed in the envelope attached to the
19	sealed original.
20	
21	Thank you.
22	AGREN BLANDO COURT REPORTING & VIDEO, INC.
23	cc: All Counsel
24	
25	