

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
MEDICAL QUALITY ASSURANCE COMMISSION

ORIGINAL

In the Matter of the License )  
to Practice Medicine of ) No. 95-09-0077MD  
)  
JOHN M. ZIMBUREAN, M.D. ) STATEMENT OF ALLEGATIONS  
)  
Applicant. )  
\_\_\_\_\_)

The Administrator of the Washington State Medical Quality Assurance Commission, on designation by the Commission, states and alleges as follows: [NOTE: The patient(s) referred to in this Statement of Allegations is (are) identified on the attached Confidential Schedule.]

*if any* *WKS*  
Section I: ALLEGATIONS

1.1 Dr. John M Zimburean, M.D. has made application for a license to practice medicine in the State of Washington and that application is now pending.

Section 2: SUMMARY OF EVIDENCE

2.1 Applicant has advised the Commission that Applicant, individually and as a corporate partner, is the subject of multiple lawsuits. There are presently six open cases with hundreds of plaintiffs. Additional defendants are Brookhaven Psychiatric Pavilion, Dallas, Texas, and all or most of the professional and corporate individuals associated with Brookhaven. The complaints involve allegations of medical malpractice, conspiracy, fraud, negligence and false imprisonment concerning patients treated prior to 1992.

2.2 Applicant asserts that of the hundreds of patient plaintiffs, Applicant was directly responsible for the medical care of approximately five plaintiffs. Applicant describes his official relationship to Brookhaven as follows.

2.3 Applicant was first associated with Dallas Psychiatric Associates [Dallas Associates] as a senior resident in psychiatry in 1984. On off hours, Applicant was moonlighting and performing history and physicals on new admissions to Brookhaven. Dallas Associates was a group of psychiatrists providing attending physician services to Brookhaven.

2.4 Approximately a year later, Applicant was offered and accepted a position as associate psychiatrist with Dallas Associates. Applicant's position was a half-time salaried position

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John M. Zimburean, M.D. [Zimbure.soa 12/7/95]

*12/15/95*

