

NO. **DF-24-18010**

IN THE MATTER OF	§	IN THE DISTRICT COURT
THE MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	301ST JUDICIAL DISTRICT
AND	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

EXHIBIT INDEX

Exhibit A – Rule 1006 Summary Chart of Production Gaps

This chart summarizes voluminous financial-production gaps across accounts and custodians. The chart is offered under Texas Rule of Evidence 1006 to show that no account has contiguous source-record coverage from August 2023 through present and that the estate cannot be reconstructed from Petitioner-controlled production. The underlying records, statements, productions, and available source materials are identified and will be made available for inspection as required.

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ORDER GRANTING LEAVE TO ISSUE THIRD-PARTY SUBPOENAS FOR FINANCIAL, LEASE, QLE, BENEFITS, AND ESTATE SOURCE RECORDS

On this day, the Court considered Jason McKemie's **Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas**.

After considering the motion, any response, the record, and argument, the Court **ORDERS**:

1. Leave to issue third-party subpoenas and nonparty discovery is **GRANTED**.
2. Jason McKemie may issue subpoenas and nonparty discovery for source records concerning financial accounts, credit cards, bank accounts, payment sources, overpayments, refunds, credits, transfers, loans, tax records, VEIP/equity, payroll, employer reimbursements, bonuses, compensation, San Antonio housing, lease payoff, rent ledgers, QLE/benefits, HSA/FSA functionality, healthcare reinstatement, and Accenture-related records.
3. The discovery period is modified for the limited purpose of third-party source-record discovery and related follow-up discovery.
4. The subpoenas may be directed to banks, credit-card issuers, payment processors, Accenture, benefits administrators, insurers, HSA/FSA administrators, payroll/equity custodians, tax preparers, landlord/property custodians, property managers, landlord-side payment custodians, landlord-side banks, and other neutral record holders reasonably necessary to obtain source records.
5. The June 11, 2026 trial setting is **CONTINUED**.
6. A status hearing is set for _____, 2026.
7. Sanctions, fee shifting, estate reconstitution, healthcare enforcement, adverse inferences, reimbursement, offsets, and related remedies are **RESERVED without prejudice**.

END OF ORDER.

SIGNED on MAY _____, 2026.

JUDGE PRESIDING

NO. DF-24-18010

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GWENDOLYN ULIJASZ-MCKEMIE	§	301ST JUDICIAL DISTRICT
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**ORDER RESERVING SANCTIONS, FEE SHIFTING,
ESTATE RECONSTITUTION, ADVERSE INFERENCES, AND
HEALTHCARE ENFORCEMENT FOR FURTHER HEARING**

On this day, the Court considered Jason McKemie’s **Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas**.

After considering the motion, any response, the record, and argument, the Court ORDERS:

1. The Court reserves without prejudice all issues concerning sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, stolen-property compensation, neutral forensic accounting, and related remedies.
2. Jason McKemie may reurge sanctions, fee shifting, adverse inferences, estate reconstitution, reimbursement, offsets, healthcare enforcement, neutral forensic accounting, and compensation after subpoena returns are received or upon further evidence.
3. The reserved issues include, but are not limited to:
 - a. Discovery noncompliance;
 - b. Failure to produce source-verifiable financial records;
 - c. VEIP/equity misclassification;
 - d. Tax-record defects;
 - e. Loan-record defects;
 - f. Lease/payoff/rent-ledger defects;
 - g. QLE/benefits and healthcare-order enforcement;
 - h. Legal-retainer and third-party contractor expenditures;
 - i. Dissipation, waste, and add-backs;

j. April 16 theft;

k. Stolen hard drives, devices, GPUs, network storage, music studio equipment, medication, financial records, litigation records, and trial-preparation materials; and

l. Any issue arising from third-party source-record production.

4. A hearing on reserved sanctions, fee shifting, healthcare enforcement, estate reconstitution, neutral forensic accounting, and related remedies is set for _____, 2026.
5. Nothing in this Order denies any requested sanctions, fee shifting, estate reconstitution, healthcare enforcement, compensation, adverse-inference, reimbursement, offset, or related relief.

END OF ORDER.

SIGNED on MAY _____, 2026.

JUDGE PRESIDING

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**ORDER GRANTING LEAVE TO ISSUE THIRD-PARTY
SUBPOENAS CONCERNING APRIL 16 THEFT, MOVERS,
SECURITY, CONTRACTORS, AND CHAIN OF CUSTODY**

On this day, the Court considered the **Motion for Enforcement, Sanctions, Continuance, and Leave to Issue Third-Party Subpoenas**.

After considering the motion, any response, the record, and argument, the Court ORDERS:

1. Leave to issue third-party subpoenas and nonparty discovery concerning the April 16, 2026 theft and related events is **GRANTED**.
2. Jason McKemie may issue subpoenas and nonparty discovery to All My Sons, Merritt McClayton, moving-company booking entities, third-party payers, security contractors, bodyguards, storage providers, landlord/property custodians, property managers, landlord-side agents, locksmith/access vendors, constable-related custodians, bodycam/dashcam/open-records custodians, Jetty Partners, Decisive Resources, and any person or entity reasonably believed to have records concerning the April 16 theft.
3. The subpoenas may request records concerning planning, payment, booking, instructions, communications, dispatch, entry/access, transportation, storage, possession, custody, location, receipt, use, access, or handling of stolen hard drives, devices, GPUs, network storage, music studio equipment, medication, financial records, litigation records, safes, briefcases, and other stolen property.
4. Petitioner and all persons acting for or with Petitioner shall preserve all records, communications, invoices, receipts, payment records, photographs, videos, inventories,

location records, texts, emails, dispatch records, booking records, storage records, security records, and chain-of-custody records concerning the April 16 theft.

5. Petitioner shall not access, alter, delete, destroy, copy, image, use, disclose, transfer, conceal, or dispose of any stolen hard drives, devices, GPUs, network storage, litigation files, financial records, professional records, music studio materials, medication, or trial-preparation materials belonging to Jason McKemie.
6. Sanctions, fee shifting, adverse inferences, compensation, reimbursement, offsets, estate reconstitution, return of stolen property, neutral forensic sequestration, and related remedies are **RESERVED** without prejudice.

END OF ORDER.

SIGNED on MAY _____, 2026.

JUDGE PRESIDING

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BREAKDOWN OF ACCENTURE COMPENSATION AND JUSTIFICATION FOR SUBPOENA AUTHORITY

A. EXECUTIVE SUMMARY – CORE FINDINGS

1. **The contract controls the VEIP formula.** The Accenture agreement says VEIP permits up to **30% of eligible cash compensation** – base salary and bonus – toward monthly purchases of unrestricted Accenture shares, with a **50% matching RSU grant** if the shares are held through the matching grant date.
2. **Gwen’s own compensation notes prove she understood the plan.** Her notes identify the \$390,000 salary, \$150,000 first cash sign-on bonus, \$100,000 supplemental stock sign-on grant, \$175,000 five-year cliff RSU grant, annual cash bonus, leadership performance equity, VEIP payroll deductions, 50% match, and year-end match mechanics.
3. **Important correction that helps you:** Gwen’s notes say “1/3,” but the contract says **30%**. Use **30%** for court math because it is contract-backed. Use Gwen’s “1/3” language to prove she understood the economic substance and magnitude of the plan.
4. **Paystubs confirm real VEIP deductions, not theory.** The paystubs show “VEIP - US” deductions, including a final 2025 YTD amount of **\$48,750** and a January 2026 VEIP deduction of **\$3,250**.
5. **The 2025 VEIP number is suspiciously incomplete.** A full-year salary-only maximum under the contract would be **\$117,000** in participant contributions, plus a **\$58,500** match. The final payroll-visible VEIP amount of **\$48,750** leaves at least **\$68,250 in unverified salary-only contribution capacity** and **\$34,125 in related match value** unaccounted for.
6. **The actual 2025 bonus paid was not the spreadsheet-modeled \$120,900.** Paystubs show **Exec-Variable=Pay of \$45,242**, with a supplemental statement tying it to the period **10/16/2024 through 8/31/2025**. That is a major variance that requires the bonus worksheet and payroll register.

7. **The paystubs show taxable RSU activity.** 2025 paystubs show **RSU Fully Tax** of approximately **\$24,944.15** and **RSU NetShOffset** of **\$18,870.25**, meaning equity actually vested/released/taxed – it was not merely theoretical future compensation.
8. **“Extra tax withholding” is attackable.** The paystubs repeatedly show “Federal 2c/Extra Withholding: No/\$0.00,” while separately showing actual taxes, VEIP deductions, and RSU net-share offsets. If Gwen labeled equity investment or RSU share withholding as “extra tax withholding,” the payroll source records contradict that label.
9. **The VEIP screenshot appears to show an actual VEIP position, but not the full ledger.** The VEIP image shows purchased-share details and a visible value around **\$16,578.64**, but it is not a complete plan statement, election record, purchase ledger, employer-match record, or account history.
10. **The missing records are the case.** Without myHoldings, VEIP plan records, RSU grant/release records, payroll registers, and equity custodian statements, the Court cannot determine whether marital equity, employer match, deferred compensation, or taxable stock income was concealed, mislabeled, or moved.

B. COMPENSATION MECHANICS CHART

COMPONENT	SOURCE BASIS	WHAT IT IS	TIMING	PROOF STATUS	LITIGATION USE
Base salary	\$390,000	Fixed cash salary	Semi-monthly pay rate of \$16,250	Confirmed by notes and paystubs	Establishes income floor and VEIP eligibility
Cash signing bonus	\$300,000 total	Two \$150,000 installments	Nov. 2024 and Nov. 2025	Confirmed by contract and paystubs	Direct cash income; refutes poverty narrative
Global Annual Bonus / Exec-Variable-Pay	Contract + paystub	Cash bonus based on company and individual performance	End of calendar year after fiscal-year performance	Actual 2025 paid: \$45,242	Requires bonus worksheet; major variance from expected/model
Leadership New Hire Equity	\$175,000 model/notes	RSUs, five-year cliff vest	Issued after start date; full vest at fifth anniversary	Grant docs missing	Asset exists even if unvested; must be disclosed
Supplemental New Hire Equity	\$100,000 notes/model	RSUs vesting 1/3 per year over 3 years	Anniversary vesting	Grant docs missing; taxable RSU activity appears	Supports vested marital equity claim
Leadership Performance Equity	Notes/model: 34% expected	Annual RSU award based on prior fiscal year	January award; 1/3 per year	Grant docs missing	Concealed future/vested equity issue
VEIP participant contribution	Contract: up to 30% of base salary + bonus	Payroll-funded unrestricted Accenture shares	Monthly purchases	Paystubs show \$48,750 YTD 2025	Major missing asset / source-record issue
VEIP company match	Contract: 50% matching RSU grant	Employer match based on shares purchased/heid	After program year / Jan. 5 active employee condition	Source records missing	Central hidden compensation issue
RSU taxable release	Paystubs	Taxable vested/released equity	2025 tax event	RSU Fully Tax + RSU NetShOffset shown	Proves actual equity event occurred
HSA/FSA/benefits	Benefits summary + paystubs	Benefits/savings deductions	Semi-monthly	Confirmed in benefit summary/paystubs	Helps separate real benefits from fake “tax withholding” labels

The contract also says equity details are available through **myHoldings**, and that grant agreements and plan documents govern equity grants. That makes myHoldings records mandatory source records, not optional backup documents.

C. PAY-STEP TIMELINE

DATE / PERIOD	EVENT	SOURCE SIGNIFICANCE
Aug. 22, 2024	Gwen signed Accenture documents	Confirms acceptance and knowledge of compensation terms.
Oct. 16, 2024	Accenture start date / effective employment period	Used in spreadsheet and bonus proration model.
Nov. 2024	First \$150,000 sign-on bonus paid	Confirmed in Gwen's notes and paystub records.
Nov.–Dec. 2024	VEIP enrollment window	Contract says annual enrollment generally runs Nov. 15–Dec. 15.
Jan.–June 2025	VEIP deductions begin / appear	Payroll-visible VEIP deductions build to at least \$48,750, with an apparent higher mid-year figure requiring reconciliation.
Aug. 31, 2025	Accenture fiscal year end	GAB eligibility and first-year proration hinge on this date.
Oct.–Nov. 2025	RSU taxable activity appears	Paystubs show RSU Fully Tax and RSU NetShOffset.
Nov. 14, 2025	ExecVariablePay paid	\$45,242 paid for 10/16/2024–8/31/2025.
Nov. 21, 2025	Second \$150,000 sign-on bonus paid	Paystub confirms \$150,000 signing bonus and \$113,475 net deposit.
Dec. 2025	Final 2025 paystub totals	Shows 2025 YTD earnings, taxes, VEIP, RSU NetShOffset, and net pay totals.
Jan. 21, 2026	New 2026 VEIP deduction appears	Shows \$3,250 VEIP - US deduction, proving continuing VEIP activity into 2026.

D. VEIP / BEIP RECONSTRUCTION

The documents use **VEIP**. If another source uses **BEIP**, treat it as a second label only after the plan document confirms that term. Based on the uploaded contract, the controlling plan is VEIP.

CONTRACT MECHANICS

The contract says Gwen may designate up to **30% of eligible cash compensation**, defined as **base salary and bonus**, toward monthly purchases of unrestricted Accenture Class A shares. The deducted amounts are taken from net payroll and used to buy shares the following month. If she participates without withdrawing and remains active at the program-year date, she receives a **matching RSU grant based on 50% of the number of shares purchased and held through the matching grant date**.

GWEN'S OWN UNDERSTANDING

Gwen's own notes say she understood:

- salary was **\$390,000**;
- the stock-match program used payroll deductions;
- Accenture grants the match at year-end;
- her own VEIP investment was fully vested and withdrawable;
- the company match cliff-vested after two years;
- continued participation mattered.

That is powerful. It proves this was not confusing to her.

VEIP MATH – COURT-READY SCENARIOS

Use these as alternative valuation models depending on what the Court accepts as eligible cash compensation.

VEIP Scenario	Eligible Cash Compensation	Max Participant Contribution	50% Match	Total VEIP Value Before Market Movement	Payroll-Visible 2025 VEIP	Unverified Contribution Shortfall	Unverified Match Gap	Total Unverified VEIP Gap
Contract salary-only floor	\$390,000	\$117,000	\$58,500	\$175,500	\$48,750	\$68,250	\$34,125	\$102,375
Salary + actual 2025 Exec-Variable-Pay	\$435,242	\$130,573	\$65,286	\$195,859	\$48,750	\$81,823	\$40,911	\$122,734
Salary + modeled expected GAB	\$510,900	\$153,270	\$76,635	\$229,905	\$48,750	\$104,520	\$52,260	\$156,780
Gwen-note 1/3 salary-only model	\$390,000	\$130,000	\$65,000	\$195,000	\$48,750	\$81,250	\$40,625	\$121,875

Best courtroom model: lead with the **contract salary-only floor** because it is the cleanest and hardest to dispute. Then show the higher models only if the Court considers actual or expected bonus as eligible compensation.

What the VEIP Problem Actually Is:

This is not a “complicated compensation” problem. It is a **source-record concealment problem**. The paystubs show payroll-visible VEIP activity, but the paystubs do **not** show:

- election percentage;
- monthly share purchases;
- purchase price;
- shares purchased;
- whether shares were sold, transferred, or withdrawn;
- whether she suspended participation;
- whether an employer match was granted;
- whether the match was forfeited, delayed, or hidden;
- current VEIP account balance;
- complete myHoldings account history.

Without those records, the Court cannot determine whether the marital estate includes:

- unrestricted VEIP shares;
- matching RSUs;
- vested/released stock;
- unvested but divisible RSUs;
- proceeds from stock sales;
- replacement liquidity from loans or family transfers.

E. RSU / EQUITY RECONSTRUCTION

1. EQUITY GRANTS IDENTIFIED

EQUITY COMPONENT	AMOUNT / FORMULA	VESTING	SOURCE STATUS
Leadership New Hire Equity	\$175,000 per notes/model	Five-year cliff vest	Grant agreement missing
Supplemental New Hire Equity	\$100,000 per notes/model	1/3 each year over 3 years	Grant agreement missing
Leadership Performance Equity	Expected 34% of base in Gwen’s notes/model	1/3 each year over 3 years	Award/grant source records missing
VEIP purchased shares	Up to 30% eligible cash comp	Participant shares unrestricted	Transaction ledger missing
VEIP matching RSUs	50% match based on purchased/held shares	Full vest/release after 2 years	Match grant records missing

The contract confirms the RSU structure and that equity details are governed by grant agreements and myHoldings source records.

2. PAYSTUBS PROVE ACTUAL TAXABLE RSU ACTIVITY

The 2025 paystubs show:

- **RSU Fully Tax:** approximately **\$24,944.15**
- **RSU NetShOffset:** approximately **\$18,870.25**

That matters because RSUs can create taxable income without a normal cash deposit. A party can receive stock, have shares withheld for taxes, and show little or no ordinary bank deposit while still receiving marital compensation value.

This is why net-pay-only analysis is a trap.

3. MISSING RSU RECORDS

You need the following source records:

- grant agreements;
- grant notices;
- acceptance records;
- vesting schedules;
- release statements;
- share withholding records;
- sale confirmations;
- myHoldings account history;
- brokerage/custodian statements;
- tax forms showing stock compensation.

F. EXPECTED-VS-ACTUAL COMPENSATION TABLE

COMPONENT	EXPECTED / CONTRACT BASIS	ACTUAL PRODUCED EVIDENCE	VARIANCE / ISSUE	MISSING SOURCE RECORD	LITIGATION SIGNIFICANCE
Base salary	\$390,000	Pay rate \$16,250 semi-monthly	Confirmed	Payroll register	Establishes income floor
2024 sign-on bonus	\$150,000	Confirmed in notes/paystubs	Confirmed	2024 W-2 / payroll register	Refutes poverty claims
2025 sign-on bonus	\$150,000	Paystub confirms \$150,000; net \$113,475	Confirmed	Payroll register / W-2	Large cash inflow
GAB / Exec-Variable-Pay	Notes expected about 30%; spreadsheet modeled	Actual paystub shows \$45,242	\$75,658 below model	Bonus worksheet	Cannot accept self-serving bonus explanation
Leadership New Hire Equity	\$175,000	No complete grant source record produced in this set	Missing	Grant agreement / myHoldings	Marital asset disclosure issue
Supplemental New Hire Equity	\$100,000	RSU taxable activity appears	Partial proof only	Grant agreement / vesting release	Vested equity likely exists
Leadership Performance Equity	Expected 34% / \$132,600 model	No award source record shown	Missing	Jan award record / myHoldings	Hidden future equity issue
VEIP participant contribution	Salary-only max \$117,000; higher if bonus included	Final visible 2025 VEIP \$48,750	At least \$68,250 contribution gap	VEIP election + ledger	Central concealment issue
VEIP match	Salary-only match \$58,500	Match record missing	At least \$34,125 match gap if payroll-visible only	Match RSU grant	Hidden employer-paid asset
RSU taxable release	Should appear on paystub / W-2 / equity record	RSU Fully Tax ~\$24,944.15	Equity event confirmed but not explained	Release statement	Proves stock compensation occurred
RSU NetShOffset	Share/tax offset	~\$18,870.25	Must be traced	Share withholding record	Prevents "no cash deposit" deception
HAS / FSA / Benefits	Benefit elections / deductions	HAS / FSA shown in benefits and paystubs	Must separate from tax/equity	HSA/FSA custodial records	Blocks mislabeling

G. MISSING SOURCE RECORDS AND WHY THEY MATTER

MISSING RECORD	WHO HAS IT	WHAT IT PROVES	INFERENCE IF WITHHELD
VEIP annual election forms	Accenture / VEIP admin / myHoldings	Election percentage and timing	Withholding conceals whether she elected full/max participation
VEIP transaction ledger	VEIP admin / equity custodian	Shares purchased, dates, prices, balances	Paystubs cannot verify the asset
VEIP employer match records	Accenture / equity admin	Matching RSUs earned or forfeited	Conceals employer-paid compensation
VEIP withdrawal/suspension records	VEIP admin	Whether she stopped, withdrew, transferred, or sold	Explains the \$48,750 issue
myHoldings full account export	Accenture / equity platform	Complete equity picture	Central source-record concealment if absent
RSU grant agreements	Accenture / myHoldings	Amount, grant date, vesting, restrictions	Prevents valuation and characterization
RSU release statements	Equity custodian	Vested shares and taxable income	Hides actual income/equity event
RSU share-withholding records	Equity custodian / payroll	Shares withheld for taxes	Explains RSU NetShOffset
Bonus calculation worksheet	Accenture HR/payroll	Why actual bonus was \$45,242	Prevents testing bonus variance
Payroll register	Accenture payroll	Complete gross-to-net history and corrections	Paystubs alone may be curated
W-2 support records	Accenture payroll	Taxable wages, stock comp, withholding	Verifies income beyond bank deposits
Brokerage statements	Equity custodian	Shares held/sold/transferred	Confirms marital asset/proceeds
Bank records for account ending 9259	Bank	Deposits and liquidity movement	Shows where compensation actually went
Sister/family loan records	Gwen / bank / third party	Liquidity replacement or concealment path	Tests whether loans replaced equity deductions

H. CONCEALMENT / FRAUD INDICATORS

1. SOURCE-RECORD SUBSTITUTION

Producing paystubs without myHoldings, VEIP, grant, vesting, and custodian records is not full disclosure. Paystubs show deductions and taxable events; they do not show the equity account balance, matching grant, share purchases, sales, or withdrawals.

2. VEIP CONTRIBUTION PATTERN

The final 2025 paystub-visible VEIP amount is **\$48,750**, which equals **10 pay periods × \$4,875**. Since \$4,875 is exactly **30% of \$16,250**, this shows maximum-rate VEIP participation for a limited period, then a stop, freeze, reversal, or missing explanation.

That is not ambiguity. That is a traceable payroll event requiring source records.

3. "EXTRA TAX WITHHOLDING" MISLABELING

The paystubs show "Federal 2c/Extra Withholding: No/\$0.00," while separately listing taxes, VEIP deductions, and RSU NetShOffset. If Gwen disclosed large sums as "extra tax withholding," she needs to identify actual tax versus VEIP, RSU withholding, share withholding, deferred compensation, or elective equity investment.

4. RSU INCOME WITHOUT BANK DEPOSIT

RSUs can appear as taxable income and be offset through net share withholding, leaving little or no ordinary cash deposit. The paystubs show **RSU Fully Tax** and **RSU NetShOffset**, which means the Court cannot rely on bank deposits alone.

5. BONUS VARIANCE

Gwen's notes expected cash annual bonus around 30% of base compensation, and your model used 31% / \$120,900. Actual paystubs show **\$45,242**. That variance may be proration or performance-based, but the missing bonus worksheet is what proves it. Without it, the Court cannot accept a self-serving explanation.

6. EQUITY OWNERSHIP REQUIREMENT

The contract states Accenture leaders must hold equity, and that vested and unvested RSUs plus VEIP shares count toward that requirement. That makes it even less credible to treat the equity trail as incidental. Accenture itself requires equity ownership; the marital estate needs the equity source records.

I. SUBPOENA TARGETS AND DRAFT REQUESTS

1. ACCENTURE HR / PAYROLL

Request:

Produce all payroll registers, gross-to-net reports, pay statements, supplemental earning statements, W-2 support records, bonus calculation worksheets, compensation summaries, payroll deduction records, tax withholding records, payroll correction records, and year-end compensation records for Gwendolyn Ulijasz, Gwendolyn Ulijasz-McKemie, and/or Gwen McKemie from October 16, 2024 through present, including all records reflecting or explaining Regular Pay, PTO, Holiday, Regular Retro, Exc frm Of Ret, Signing Bonus, ExecVariablePay, RSU Fully Tax, VEIP - US, RSU NetShOffset, ExpenseReversal, HSA, FSA, Roth 401(k), After Tax Contr, Fed W/H, FICA EE, Fed MWT EE, direct deposits, checks, reversals, reimbursements, and corrections.

2. ACCENTURE EQUITY COMPENSATION / MYHOLDINGS

Request:

Produce the complete myHoldings account history and all records reflecting Accenture equity granted, purchased, vested, released, withheld, sold, transferred, canceled, forfeited, or held for Gwendolyn Ulijasz from October 16, 2024 through present, including Leadership New Hire Equity, Leadership Supplemental New Hire Equity, Leadership Performance Equity, VEIP purchased shares, VEIP matching RSUs, grant agreements, acceptance records, grant notices, vesting schedules, release statements, tax-withholding/share-withholding records, sale confirmations, fractional-share records, account statements, and year-end tax summaries.

3. VEIP PLAN ADMINISTRATOR

Request:

Produce all VEIP records for Gwendolyn Ulijasz from October 16, 2024 through present, including enrollment records, election forms, election percentages, eligible-compensation calculations, plan-year contribution limits, payroll deduction records, purchase confirmations, share-purchase dates, purchase prices, shares purchased, shares held, shares sold, shares transferred, withdrawals, suspensions, cancellations, fractional-share payments, employer-match calculations, matching RSU grant records, matching vesting schedules, forfeiture records, and account balances.

4. EQUITY CUSTODIAN / BROKERAGE PLATFORM

Request:

Produce all account statements, transaction histories, confirmations, trade confirmations, vesting confirmations, release confirmations, tax forms, 1099s, W-2 support records, cost-basis records, withholding records, and account-balance records for all Accenture equity accounts, brokerage accounts, stock-plan accounts, VEIP accounts, and RSU accounts held for or controlled by Gwendolyn Ulijasz from October 16, 2024 through present.

5. BANK RECORDS / LIQUIDITY REPLACEMENT

Request:

Produce all bank records, wire records, ACH records, deposit records, transfer records, loan proceeds, loan repayment records, and account statements reflecting funds received from Accenture, equity sales, VEIP withdrawals, RSU proceeds, family loans, sister loans, third-party advances, or funds used to replace liquidity after VEIP deductions or equity-related payroll withholding from October 16, 2024 through present.

J. JUDGE-READABLE ONE-PAGE EXPLANATION

Why Gwen Ulijasz-McKemie's Accenture Compensation Is Not Ambiguous

Gwen Ulijasz-McKemie's Accenture compensation is not ambiguous. It is a structured executive compensation plan with defined components, defined formulas, defined payroll deductions, defined equity grants, and defined source records.

The compensation structure includes salary, cash sign-on bonus, annual cash bonus, restricted stock units, leadership equity, supplemental new-hire equity, VEIP share purchases, and VEIP matching RSUs. These are not interchangeable categories. Salary is cash. Bonus is cash. VEIP is an elective stock-purchase program. RSUs are equity compensation. RSU tax withholding is not the same thing as ordinary cash income. A net bank deposit does not show the full compensation picture.

The contract states that VEIP permits up to 30% of eligible cash compensation – base salary and bonus – to be deducted from net payroll and used to purchase Accenture shares. It also provides for a 50% matching RSU grant if the participant satisfies the plan conditions. On a \$390,000 salary alone, that creates a \$117,000 annual participant contribution capacity and a \$58,500 employer-match issue before even counting bonus compensation.

The paystubs prove VEIP activity occurred. They show "VEIP - US" deductions. They also show RSU taxable activity and RSU net-share offset activity. That means the issue is not theoretical. Accenture equity compensation was moving through payroll and equity systems.

But the produced paystubs are not enough. Paystubs do not show the VEIP election, purchased shares, purchase prices, match calculation, matching RSU grant, withdrawals, sales, transfers, account balance, vesting schedule, or current holdings. Those facts are controlled by Accenture's myHoldings/equity records, VEIP plan records, payroll registers, and equity custodian records.

The Court should not accept self-selected paystubs or litigation summaries as substitutes for source records. The missing records are the records that prove whether marital equity, employer match, restricted stock, taxable equity income, and deferred compensation were concealed, mislabeled, or moved.

The issue is not complexity. The issue is source-record concealment.

K. HEARING QUESTIONS

QUESTIONS FOR GWEN:

1. You accepted the Accenture Managing Director compensation package, correct?
2. You signed Accenture's compensation and equity terms on or about August 22, 2024, correct?
3. Your base salary was \$390,000, correct?
4. Your semi-monthly pay rate was \$16,250, correct?
5. These compensation notes identifying your salary, sign-on bonus, stock grants, annual bonus, leadership performance equity, and VEIP plan were your own notes, correct?
6. You understood the cash sign-on bonus was \$300,000 total, paid in two \$150,000 installments, correct?
7. You received the first \$150,000 sign-on bonus in 2024, correct?
8. You received the second \$150,000 sign-on bonus in November 2025, correct?
9. You understood VEIP allowed you to invest a percentage of salary and bonus into Accenture shares, correct?
10. The contract states the VEIP limit is up to 30% of eligible cash compensation, correct?
11. You understood Accenture would provide a 50% matching RSU grant if the plan conditions were satisfied, correct?
12. You understood your own VEIP-purchased shares were unrestricted shares, correct?
13. You understood the company match was separate from your own purchased shares, correct?
14. You did not produce the complete VEIP election records, correct?
15. You did not produce the complete VEIP transaction ledger, correct?
16. You did not produce the complete myHoldings account history, correct?
17. You did not produce the VEIP employer-match calculation or matching RSU grant records, correct?
18. Your paystubs show "VEIP - US" deductions, correct?
19. Your paystubs show a 2025 YTD VEIP amount of \$48,750, correct?
20. Explain why that amount is far below 30% of your \$390,000 salary.
21. Explain whether you stopped, suspended, withdrew, changed, or reversed your VEIP election in 2025.
22. Identify every VEIP share purchased in 2025.

23. Identify every VEIP share sold, transferred, withdrawn, or retained in 2025 and 2026.
 24. Identify every matching RSU granted or expected from your 2025 VEIP participation.
 25. Your paystubs show RSU Fully Tax and RSU NetShOffset, correct?
 26. Identify the RSU grant that vested or released and caused the RSU taxable event.
 27. Identify every share withheld for taxes.
 28. Identify every share deposited into your equity account.
 29. Identify every Accenture share sold or transferred.
 30. Your paystubs show "Federal 2c/Extra Withholding: No/\$0.00," correct?
 31. Identify every dollar you disclosed as "extra tax withholding."
 32. For each such dollar, identify whether it was actual tax, VEIP, RSU NetShOffset, share withholding, deferred compensation, benefit deduction, or equity investment.
 33. You received \$45,242 in ExecVariablePay in 2025, correct?
 34. Produce the bonus worksheet showing how that amount was calculated.
 35. Identify every loan, family transfer, or sister loan used to replace liquidity while you were investing in Accenture equity.
 36. Questions for Accenture / Plan Administrator
 37. What was Gwen Ulijasz's eligible VEIP compensation for 2025?
 38. What VEIP election percentage did she choose?
 39. When did the election begin?
 40. Did she modify, suspend, withdraw, or cancel the election?
 41. What were the total 2025 participant contributions?
 42. What shares were purchased with those contributions?
 43. What were the purchase dates and purchase prices?
 44. What shares were held through the matching grant date?
 45. What matching RSU grant was issued or calculated?
 46. Were any matching RSUs forfeited, delayed, canceled, or withheld?
 47. What RSUs vested or released in 2025?
-

48. What shares were withheld for taxes?
49. What shares were sold or transferred?
50. What account currently holds the shares?
51. What source records prove each answer?

L. PROOF GAPS / NEXT DOCUMENTS NEEDED

IMMEDIATE MUST-HAVE FINANCIAL RECORDS:

1. Complete myHoldings export
2. VEIP election records
3. VEIP transaction ledger
4. VEIP matching RSU records
5. VEIP withdrawal/suspension/cancellation records
6. RSU grant agreements
7. RSU vesting/release statements
8. RSU share withholding records
9. 2025 bonus worksheet
10. Complete payroll register
11. 2024 and 2025 W-2 support records
12. Equity custodian / brokerage statements
13. Bank records for compensation deposits
14. Records for sister/family loan inflows
15. HSA/FSA/benefit custodian records

IMMEDIATE MUST-HAVE THIRD PARTY RECORDS:

1. leave to subpoena Accenture HR/payroll;
2. leave to subpoena Accenture myHoldings/equity administrator;
3. leave to subpoena the VEIP plan administrator;
4. leave to subpoena the stock-plan custodian/brokerage;
5. an order compelling Gwen to produce all source records, not summaries;

6. no trial or property division until the source records are produced and reconciled;
7. adverse inference / sanctions reservation if she refuses or continues substituting summaries for source records.

IN CLOSING:

This is not an ambiguous compensation issue. It is a formula-based executive compensation plan with missing source records. The paystubs prove VEIP and RSU activity occurred, but only Accenture's payroll, myHoldings, VEIP, and equity custodian records can show the asset, match, vesting, withholding, sales, transfers, and current balance. Without those records, the Court cannot determine whether marital equity compensation was concealed, mislabeled, or moved.

DF-24-18010

NO. _____

**IN THE MATTER OF
THE MARRIAGE OF**

§

IN THE DISTRICT COURT

§

§

GWENDOLYN ULIJASZ-MCKEMIE

§

301st JUDICIAL DISTRICT

&

§

JASON MCKEMIE

§

DALLAS COUNTY, TEXAS

SUBPOENA TARGETS

EXHIBIT P - PROPOSED THIRD-PARTY FINANCIAL RECORD CUSTODIANS

Jason McKemie seeks leave to subpoena source records from the following custodians and any successor, predecessor, affiliate, custodian, administrator, payment processor, brokerage, equity platform, financial institution, lender, landlord, vendor, contractor, or record holder reasonably believed to possess records necessary to reconstruct the marital estate:

1. JPMorgan Chase Bank
 - Checking accounts
 - Savings accounts
 - Credit card accounts
 - Replacement card records
 - Account continuity records
 - Closed account records
 - Payment source records

2. American Express
 - Credit card statements
 - Account continuity records
 - Replacement card records
 - Overpayment records
 - Refund and credit records

3. Citibank
 - Credit card accounts
 - Banking records
 - Account continuity records

- Replacement card records
 - Payment source records
4. Accenture Payroll
 - Payroll registers
 - Compensation records
 - Bonus records
 - Expense reimbursements
 - QLE records
 - Benefits records
 5. Accenture Equity / myHoldings
 - VEIP records
 - RSU records
 - Grant records
 - Vesting records
 - Equity account history
 6. VEIP Plan Administrator
 - Elections
 - Contributions
 - Match calculations
 - Transaction ledgers
 7. Equity Custodian / Brokerage Platforms
 - Account statements
 - Transaction histories
 - Share transfers
 - Equity holdings
 - Sale records
 8. Internal Revenue Service and Tax Record Custodians
 - Tax transcripts
 - Wage and income transcripts
 - Tax payment records
-

9. GLU Distribution LLC
 - Banking records
 - Financial statements
 - Accounting records
 - Tax records
 - Source records

10. Landlords, Property Managers, Property Custodians, and Related Payment Custodians
 - Rent ledgers
 - Lease records
 - Buyout records
 - Payoff records
 - Payment histories

11. All Individuals, Family Members, Friends, Business Associates, Entities, or Financial Institutions Alleged to Have Made Loans, Advances, Gifts, Transfers, or Financial Contributions to Petitioner

12. All Persons or Entities Involved in the April 16, 2026 Writ, Property Removal, Eviction Activities, Property Retrieval Activities, Moving Activities, Storage Activities, Security Activities, Bodyguard Activities, Access Activities, or Related Payment Activities

13. Any Additional Financial Institution, Credit Card Issuer, Brokerage, Equity Platform, Payroll Processor, Tax Custodian, Payment Processor, Loan Source, Lender, Transfer Source, Transfer Destination, Reimbursement Source, Contractor, Vendor, or Record Holder identified through source-record tracing or subpoena responses.

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 115562633

Filing Code Description: EXHIBITS LIST

Filing Description: Proposed Orders and Subpoena Targets - Motion to Enforce, Sanctions, Leave

Status as of 6/2/2026 8:54 AM CST

Case Contacts

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