

NOTICE: THIS DOCUMENT CONTAINS  
SENSITIVE DATA

NO. **DF-24-18010**

IN THE MATTER OF  
THE MARRIAGE OF

GWENDOLYN ULIJASZ

JASON MCKEMIE

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IN THE DISTRICT COURT

302<sup>ND</sup> JUDICIAL DISTRICT &

DALLAS COUNTY, TEXAS

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EMERGENCY MOTION TO  
COMPEL FINANCIAL DISCOVERY

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COVER PAGE  
CONFIDENTIAL - FILED UNDER SEAL

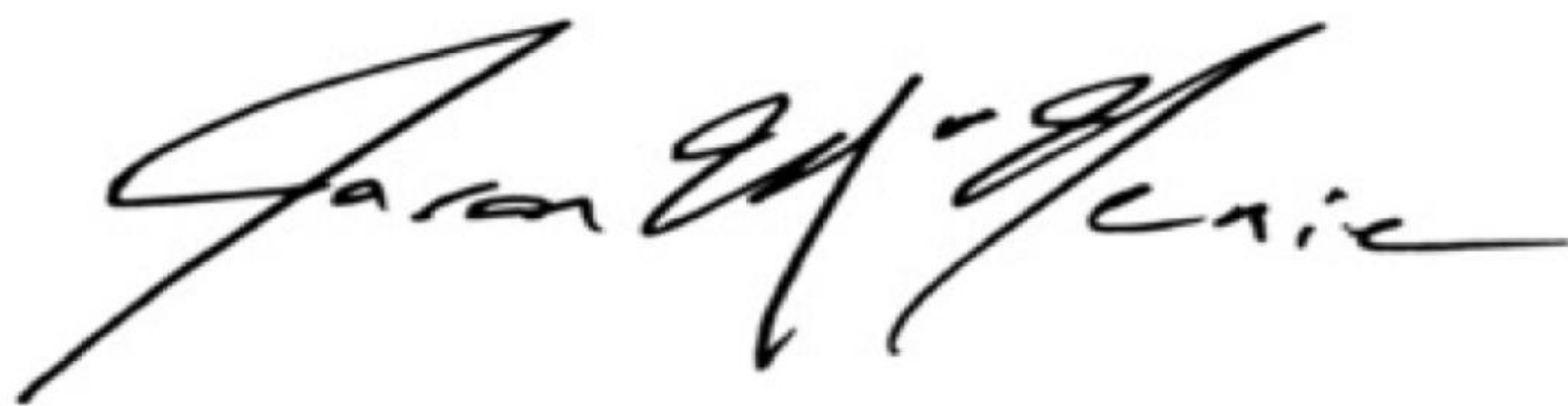
TO THE HONORABLE JUDGE OF THE 302<sup>ND</sup> DISTRICT COURT:

Pursuant to the Court's inherent authority over confidential family-law records, Respondent Jason McKemie respectfully submits the enclosed documents UNDER SEAL. These materials contain sensitive and confidential information involving protected health data, financial records, and sealed evidence that cannot be placed on the public docket.

Respondent requests that the Clerk of Court:

1. Accept the enclosed materials as a sealed submission;
2. Restrict access to judicial personnel only; and
3. Deliver the sealed packet directly to the Court for review.

Respectfully submitted,



**Jason McKemie**  
Pro Se Respondent  
539 W. Commerce St., Ste. 2010  
Dallas, Texas 75208  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)  
214-868-4901

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TO THE HONORABLE JUDGE OF THE 302<sup>ND</sup> DISTRICT COURT:

Respondent Jason McKemie respectfully files this Emergency Motion to Compel, and shows:

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**I. BACKGROUND**

Full financial discovery has never occurred in this case. In the prior court (254th District), opposing counsel withdrew on the eve of their discovery deadline while still drafting and filing objections behind the scenes, and Petitioner did not declare herself pro se during that period. This created a service gap that prevented any meaningful discovery before the case transferred to this Court following recusal. The same discovery-avoidance patterns used in the 254th District have now resurfaced here.

At the **September 9 pre-trial conference**, I informed Judge Sandra Jackson that discovery had been materially skipped in the prior court and that the same issues were reappearing here, including counsel withdrawal, shadow filings, and Petitioner refusing to declare herself pro se. Judge Jackson responded that those issues had not occurred in her courtroom and that she expected disclosure to proceed properly in the 302nd.

At that hearing, I requested:

1. subpoena authority,
2. a court-appointed forensic accountant for tracing, and
3. legal fees so I could secure representation after losing counsel during discovery.

Judge Jackson stated she could not grant those requests at that procedural stage. She then directed opposing counsel, **Ethan Scroggins**, to immediately release the missing financial statements. After hesitation, she repeated the directive and he agreed.

Judge Jackson further stated that although she could not grant the relief I requested that day, I **should have a minimum of 90 days with complete, certified financials before trial exhibits were due**. I told her that timeline would materially assist me.

That 90-day window never materialized.

**Following Judge Jackson's directive, I immediately provided opposing counsel with a detailed list of every missing page, missing month, missing account, and continuity failure, along with a full deficiency inventory and demonstratives.** In response, Ethan Scroggins stated he would provide a “substantive response” by October 7, 2025. When his response arrived, it consisted only of a list of Bates numbers from prior productions — simply restating the same GU000001–GU001668 materials I had already audited and identified as incomplete. No new statements, no missing pages, and no corrected financials were provided. The only documents produced after the Court's directive were **two pages**, not two statements, each containing identical transactions but labeled with different months, indicating that one or both were altered. No further documents have been produced. Following this, opposing counsel again withdrew, Petitioner again refused to declare herself, and I still do not have a **single complete account**.

Without institution-origin financial records, I cannot comply with the timeline the Court established for pre-trial preparation.

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## II. SUMMARY OF DEFICIENCIES

The deficiencies summarized here are **only examples**, not a complete list. Across every account and every production cycle, I have not received a single complete, consecutive, unaltered monthly statement.

Every account produced contains:

- missing months,
- missing pages,
- mixed-year page inserts,
- unexplained gaps,
- out-of-sequence statements, or
- substituted one-day “snapshot” balance pages.

Less than **20%** of required financial statements exist, and even those are structurally unusable. Petitioner remains responsible for providing complete financial discovery for **all accounts**, not just those listed here.

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### III. STRUCTURAL DEFECTS THAT MAKE SUPPLEMENTATION IMPOSSIBLE

- **The credit-card records are functionally unusable.**

Nine different card numbers route into a single undisclosed Chase source account, making continuity impossible. Entire months are missing, pages are fragmented, and early-cycle payments repeatedly wipe unsettled transactions. On Chase Sapphire x2372 alone, more than **\$70,000** in 2024 overpayments artificially inflated balances and masked transfers. As shown in the attached inventory, only the green-coded items are actual monthly statements; the red items are missing, incomplete, or snapshot pages that cannot be used for tracing. No accountant could reconstruct spending, reimbursements, or estate value from this. **Only native institution-origin records will resolve these gaps.**

- **These disclosures were structured, not sloppy.**

Pages from different years appear inside the same monthly statement. Consecutive pages are removed and replaced with unrelated months. Statements that should download sequentially appear as spliced, mixed-year PDFs. These patterns required planning, time, and coordination; they are not clerical mistakes but deliberate document fragmentation.

- **The GLU Distribution LLC account was withheld for eight months.**

Petitioner produced nothing but a screenshot of a login-error page while claiming she could not obtain statements. No monthly statements, no historical activity, and no CSV data were produced. Only after multiple deficiency notices did Petitioner supply a single “current balance” page with no historical information. This account cannot be traced without institution-origin statements.

- **Petitioner’s projected legal-fee disclosures appear intentionally structured.**

Her financial-planning documents include a **\$260,000–\$480,000** projected legal-fee range with no corresponding invoices or billing records. A \$220,000 variation cannot be reconciled with counsel’s prior claim of two-week billing. These figures appear strategically embedded for fee-shifting or estate-allocation positioning, not reflective of actual expenses.

- **The burden imposed on me shows why supplementation is futile.**

I have spent days without sleep trying to identify missing pages, missing months, and continuity gaps across more than ten accounts. The issue is not missing documents — **the issue is deliberate structural manipulation.** These records cannot be reconstructed by any pro se litigant, attorney, or forensic accountant without native institution-issued statements.

- **These disclosures were built to prevent tracing and cannot be repaired.**

The effort required to break apart statements, reorder pages, mix years, and substitute one-day snapshots demonstrates intentional, methodical obstruction. No amount of supplementation can cure disclosures engineered to obscure continuity. **Only institution-origin records will allow accurate evaluation of the marital estate.**

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#### IV. REQUEST FOR RELIEF

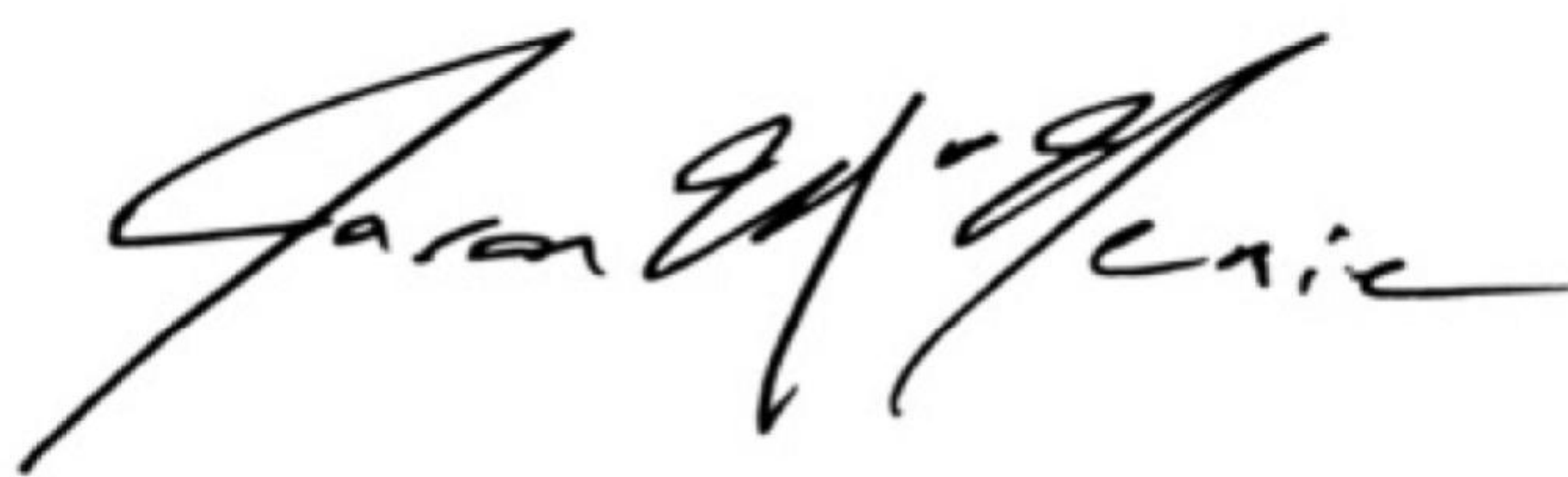
I respectfully request that the Court:

1. **Grant this Motion** and recognize that the financial disclosures produced to date are materially incomplete and unusable;
2. **Acknowledge that further supplementation cannot cure the structural defects** documented in this Motion;
3. **Preserve my right to immediately seek third-party subpoenas** for native, institution-issued financial statements and transaction histories;
4. **Set a short deadline** for any remaining documents Petitioner can realistically produce, with the understanding that such production cannot replace institution-origin records; and
5. **Reserve the Court's authority to impose sanctions or other appropriate relief** if Petitioner continues to obstruct discovery or withhold required financial information.

I request any additional relief the Court deems appropriate.

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Respectfully submitted,



**Jason McKemie**

539 W. Commerce St., Suite 2010

Dallas, TX 75208

[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

214-868-4901

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JASON MCKEMIE

302<sup>nd</sup> JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

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**LETTER TO THE COURT**

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**To:** **The Honorable Judge Sandra Jackson**

302nd District Court  
Dallas County, Texas

**From:** **Jason McKemie**

539 W. Commerce St., #2010  
Dallas, TX 75208  
jmckemie@mckemie.net

**Date:** October 9<sup>th</sup>, 2025

**Subject:** Expression of Appreciation Regarding the September 9, 2025, Pre-Trial Conference

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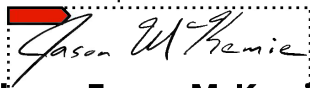
**Dear Judge Jackson:**

I wanted to thank you for the way you conducted the pre-trial conference on September 9, 2024. At that time, I was frightened and overwhelmed. After months of filings and hearings, I felt as if I had spent nine months writing motions that no one would ever read, much less rule on. When I spoke too quickly, trying to explain too much, you stayed calm. When I mentioned how many motions I had filed, you said, "That was not in my courtroom." When comments were made over what I was trying to share, you stayed present with me, let me finish, and then said that in your courtroom it is your intention that everyone—especially on their first day—feels heard.

In that instant, I understood what it truly meant to stand before a judge. It was the first time in this process that I felt heard and understood, and I left the courtroom that day with a calm I hadn't felt in months. And on that day, I needed that. Thank you.

It takes effort to stay present and attuned in a courtroom that moves as fast as yours does. That calm focus mattered to me. You have my respect, and I hope others follow your example. If that becomes part of your legacy, it's a meaningful one – its steadiness will certainly stay with those of us who have witnessed it.

With Respect & Gratitude,



**Jason Emory McKemie**

Respondent, Pro Se' (\*nbc)

(\*nbc) = *\*Not* by Choice

GRATITUDE LETTER \* JUDGE SANDRA JACKSON

1 of 1

PLEASE PROVIDE FULL ACCOUNT TRACING FOR ALL CREDIT CARD OVERPAYMENTS  
 THIS IS ONLY A PARTIAL LIST OF SUCH OVERPAYMENTS FOR CHASE SAPPHIRE X2372.  
 PLEASE PROVIDE FOR ALL CARDS.

Missing Statements		AMOUNT PAID IN CREDIT CARD OVERPAYMENTS													
MISSING STATEMENTS	STATEMENT DUE DATE	DATE RANGE INCLUDED	REMARKS	OVERPAYMENTS			OVERPAYMENTS			TOTAL OVERPAYMENTS					
June 2023 - Jan 2024	---	3/16/23 - 12/16/2023	Not Received	Feb-24	Jan-25	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	
Nov-24	11/12/24	9/16/24 - 10/15/24	Pages 3, 5-7 Missing	Mar-24	Feb-25	\$12,551	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	
Dec-24	12/12/24	10/16/24 - 11/15/24	Page 3 Missing	Apr-24	Feb-25	\$3,754	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25		
Jan-25	01/12/25	11/16/24 - 12/15/24	Page 3 Missing	May-24	Feb-25	\$11,231	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25		
Feb 2025 - Sept 2025	---	12/16/24 - PRESENT	Not Received	Nov-24	Feb-25	\$6,028	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25		
<b>CHASE SAPPHIRE X2372</b>				<b>x2372 Total \$66,356</b>			<b>\$66,356</b>								
<b>19 STATEMENTS REMAIN MISSING</b>															

Petitioner has produced thousands of pages of documents, where even a single account is broken up between dozens of files, which have with multiple accounts in that file, much of which are missing crucial pages, with gaps throughout the dates requested (June 2023 – PRESENT / OCT 2025). Despite being consistent reminders, the majority of the documents are unusable as they do not show inflows/outflows into the accounts. Examples: Annual Summaries, running a Report and with only a 1 duration (10/1/25 – 10/2/25) and pretending it's a statement, etc. These only provide snapshot balances, and provide no understanding of what has flowed into and out of the account making growth calculation and asset tracing impossible.

**OFFICIAL MONTHLY STATEMENTS MARKED IN GREEN. RED – AWAITING STATEMENTS.**

	A	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE
1																											
2	PP PAYMENT SERVICE PROVIDERS																										
3	CHASE																										
4	CHASE																										
5	CHASE																										
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52	CHASE																										

**P2P PAYMENT SERVICE PROVIDERS**

**VENMO**

PAYPAL
APPLEPAY
CASHAPP
GOOGLEPAY

**CHECKING ACCOUNTS**

Chase Checking xx3898 (~9259)
Chase Checking xx9259 (~3898)
Chase Checking xxREDACTED
Chase GLU Checking xx8627
Chase Checking xx9941
Chase Checking xx6893
Chase Checking xx2110

**CREDIT CARDS**

Chase Sapphire xx2372
Chase Sapphire xx4005 (~7555, ~3444)
Chase Sapphire xx7555 (~4005, ~3444)
Chase Sapphire xx3444 (~4005, ~7555)
Chase Sapphire xx4400
Chase Sapphire xx8801
Chase Sapphire xx7496 (~7396)
Chase Sapphire x7396 (~7496)
AMEX PLATINUM xx5000 (~6008, ~7006)
AMEX PLATINUM xx6008 (~5000, ~7006)
AMEX PLATINUM xx7006 (~5000, ~6008)
CITI Advantage xx2295

9 CARD NUMBERS FOR 1 ACCOUNT

**INVESTMENT AND RETIREMENT ACCOUNTS**

AIG 401k
E*TRADE STOCK / Morgan Stanley at Work / Grant number: A44637 / AUG 16TH, 2024
Empower Cognizant Technology Solutions 401k Savings Plan
Vanbguard Value Index Fund / Vanguard Growth Index
Accenture 401k
Voya - Cognizant 401(k) Retirement Savings Plan
E-Trade x8274
E-Trade x5029
E-Trade x6977
E-Trade x6587
E-Trade x201
Cognizant Tecnology 401(k) Savings Plan
E-Trade Roth IRA
Traditional IRA Account #7
Vanguard IRA
Advantigen Biosciences, LLC shares

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**Subject:** Discovery  
**Date:** Friday, October 10, 2025 at 1:33:20 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>, Jason McKemie <mckemie76@gmail.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>  
**Attachments:** 2025-10-09 Exhibit A - Discovery Log.xlsx, Dec 2024 Page 3.pdf, Nov 2024 Page 3.pdf

Mr. McKemie,

Your “exhibits” to your requests for information appear to be based only on the 2024-02-24 production and the issues are addressed in the subsequent production from 2025-06-23. We do not have to explain every item or statement to you. We have produced what you requested. That said, still see the below regarding some of the discovery:

- Statements for Chase x7369 – See GU001599, GU001639 for the first pages of previous statements (different account number transfer) that show the previous account balance transferring over
- Chase x2372 – See GU001648 for Jan 2025 3<sup>rd</sup> page
- VEIP statements – See GU000615-648 and GU000492-521.
- AIG 401(k) - See GU000595-614. These statements show all transactions and complete information regarding deposits, withdrawals, etc. Also show loan repayments.
- Chase x3898 – See “Statements” GU001598-1650
- Chase x2372 – See “Statements” GU001598-1650
  - Nov 2024 page 3 attached
  - Dec 2024 page 3 attached

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

The following four pages includes everything produced by opposing counsel since receiving Judge Sandra Jackson’s directive to release the missing financials. Please note that the first two pages are the same document, simply titled Nov for one and Dec for the other. And the third document is simply a list of all the documents submitted in prior discovery releases, which I spent a significant amount of time itemizing all of the deficiencies only to wait 2 months to receive the list again with no response for all the deficiencies.

ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
10/25	WWW.WAGGINWATER.COM WWW.WAGGINWAT IL	69.00
10/25	EATZI'S - OAK LAWN DALLAS TX	166.19
10/26	NOHEMY TEAROOM DALLAS TX	16.78
10/25	TM *LANE 800-653-8000 CA	105.70
10/26	7-ELEVEN 32924 DALLAS TX	11.78
10/26	7-ELEVEN 32924 DALLAS TX	39.95
10/25	& SLING.COM 888-363-1777 CO	79.01
10/26	FORESTWOOD ANTIQUE MALL DALLAS TX	150.47
10/27	& KASA YOGA DALLAS 972-7465991 TX	280.00
10/28	VZWLSS*APOCC VISN 800-922-0204 FL	321.60
10/28	7-ELEVEN 50711 HTTPSWWW.7ELE TX	40.00
10/29	CELEBRATION RESTAURANT D DALLAS TX	65.21
10/30	SQ *BEYOND THE DOOR AND M gosq.com TX	571.07
10/29	CVS/PHARMACY #07742 800-746-7287 TX	101.25
10/30	Prime Video Channels amzn.com/bill WA	14.06
10/28	TOM THUMB #2990 DALLAS TX	109.82
10/29	KROGER #0528 DALLAS TX	36.27
10/29	CVS/PHARMACY #07742 DALLAS TX	6.81
10/29	BRK PARKING DALLAS TX	5.00
10/29	APPLE.COM/BILL 866-712-7753 CA	64.94
10/29	& KASA YOGA DALLAS 972-7465991 TX	220.00
10/31	APPLE.COM/BILL 866-712-7753 CA	1.07
10/30	TARGET.COM WWW.TARGET.CO MN	14.06
10/30	APPLE.COM/BILL 800-275-2273 CA	3.24
10/29	TOM THUMB #2990 DALLAS TX	4.99
10/30	APPLE.COM/BILL 866-712-7753 CA	21.65
10/29	CVSEExtraCare 8007467287RI 800-746-7287 RI	5.00
10/30	TARGET 00008755 DALLAS TX	13.78
10/30	NORDSTROM DIRECT #0808 800-285-5800 IA	16.18
10/31	APPLE.COM/BILL 866-712-7753 CA	3.24
10/31	APPLE.COM/BILL 866-712-7753 CA	7.57
10/30	RACETRAC569 00005694 DALLAS TX	49.63
10/31	APPLE.COM/BILL 866-712-7753 CA	6.48
10/30	RACETRAC569 00005694 DALLAS TX	54.11
10/31	ALTO PHARMACY HTTPSALTO.COM CA	107.78
10/30	PARKPLACE DAL 17 HHND DALLAS TX	10.00
11/01	Idolize Brows and Bea Dallas TX	47.50
11/01	APPLE.COM/BILL 800-275-2273 CA	19.47
11/01	7-ELEVEN 37329 DALLAS TX	18.71
11/02	KROGER #0528 DALLAS TX	27.09
11/01	SERVICE FEE 888-658-5465 TN	148.14
11/02	APPLE.COM/BILL 866-712-7753 CA	42.20
11/01	US TREAS TAX PYMT 888-658-5465 TN	7,922.00
11/02	UPS*1Z588YT70391781825 800-811-1648 GA	13.09
11/02	UBER *ONE HELP.UBER.COM CA	9.99
11/02	NORDSTROM #0738 DALLAS TX	204.01
11/02	USPS KIOSK 4822229553 DALLAS TX	21.05
11/02	NFG*EZEKIEL TAYLOR SCH 888-284-7978 DC	257.50
11/01	HOLLYWOOD STAR NAILS & S UNIVERSITY PA TX	63.25
11/01	EATZI'S - LOVERS DALLAS TX	127.81
11/02	RAISING CANES 0295 DALLAS TX	21.20
11/02	KASA YOGA DALLAS DALLAS TX	75.00
11/03	APPLE.COM/BILL 866-712-7753 CA	40.00
11/03	NORDSTROM DIRECT #0808 800-285-5800 IA	138.56
11/02	TLF*SURROUNDINGS EVENTS A 608-8457888 WI	229.99
11/03	WHATABURGER 176 Q26 DALLAS TX	19.23
11/05	CHILDREN INTERNATIONAL HTTPSWWW.CHIL MO	87.00
11/05	APPLE.COM/BILL 866-712-7753 CA	27.03
11/05	APPLE.COM/BILL 866-712-7753 CA	2.99
11/06	SP EMPORIUM PIES HTTPSWWW.EMPO TX	110.00
11/07	APPLE.COM/BILL 866-712-7753 CA	31.36
11/06	APPLE.COM/BILL 866-712-7753 CA	8.65
11/07	STUBHUB, INC. 866-788-2482 CA	215.00
11/06	PARKWHIZ, INC. 888-472-7594 IL	40.60
11/06	TEXAS BB CONCESSIONS ARLINGTON TX	15.55
11/08	APPLE.COM/BILL 866-712-7753 CA	29.99
11/09	APPLE.COM/BILL 866-712-7753 CA	6.44



GU001670

ACCOUNT ACTIVITY (CONTINUED)

Date of Transaction	Merchant Name or Transaction Description	\$ Amount
10/25	WWW.WAGGINWATER.COM WWW.WAGGINWAT IL	69.00
10/25	EATZI'S - OAK LAWN DALLAS TX	166.19
10/26	NOHEMY TEAROOM DALLAS TX	16.78
10/25	TM *LANE 800-653-8000 CA	105.70
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11/01	US TREAS TAX PYMT 888-658-5465 TN	7,922.00
11/02	UPS*1Z588YT70391781825 800-811-1648 GA	13.09
11/02	UBER *ONE HELP.UBER.COM CA	9.99
11/02	NORDSTROM #0738 DALLAS TX	204.01
11/02	USPS KIOSK 4822229553 DALLAS TX	21.05
11/02	NFG*EZEKIEL TAYLOR SCH 888-284-7978 DC	257.50
11/01	HOLLYWOOD STAR NAILS & S UNIVERSITY PA TX	63.25
11/01	EATZI'S - LOVERS DALLAS TX	127.81
11/02	RAISING CANES 0295 DALLAS TX	21.20
11/02	KASA YOGA DALLAS DALLAS TX	75.00
11/03	APPLE.COM/BILL 866-712-7753 CA	40.00
11/03	NORDSTROM DIRECT #0808 800-285-5800 IA	138.56
11/02	TLF*SURROUNDINGS EVENTS A 608-8457888 WI	229.99
11/03	WHATABURGER 176 Q26 DALLAS TX	19.23
11/05	CHILDREN INTERNATIONAL HTTPSWWW.CHIL MO	87.00
11/05	APPLE.COM/BILL 866-712-7753 CA	27.03
11/05	APPLE.COM/BILL 866-712-7753 CA	2.99
11/06	SP EMPORIUM PIES HTTPSWWW.EMPO TX	110.00
11/07	APPLE.COM/BILL 866-712-7753 CA	31.36
11/06	APPLE.COM/BILL 866-712-7753 CA	8.65
11/07	STUBHUB, INC. 866-788-2482 CA	215.00
11/06	PARKWHIZ, INC. 888-472-7594 IL	40.60
11/06	TEXAS BB CONCESSIONS ARLINGTON TX	15.55
11/08	APPLE.COM/BILL 866-712-7753 CA	29.99
11/09	APPLE.COM/BILL 866-712-7753 CA	6.44



GU001670

**EXHIBIT A  
GWEN'S PRODUCTION**

Description	Start	End	Date Produced	Responsive To RFP
2022-06-22 AdvantiGen Subscription Agreement.pdf	GU000001	GU000002	2/24/25	IA
2023-03-19 AdvantiGen Subscription Agreement.pdf	GU000003	GU000004	2/24/25	IA
2024 AIG 401(k).pdf	GU000005	GU000010	2/24/25	IA
2024 AMEX Platinum x6008 Statements.pdf	GU000011	GU000031	2/24/25	IA
2024 Chase Acct x3898 Statements.pdf	GU000032	GU000075	2/24/25	IA
2024 Chase Acct x6893 Statements.pdf	GU000076	GU000105	2/24/25	IA
2024-07 through 2025-01 Chase Sapphire x2372.pdf	GU000106	GU000126	2/24/25	IA
2024-12-31 MetLife HSA Summary.pdf	GU000127	GU000127	2/24/25	IA
2025 Accenture HSA Election Details.pdf	GU000128	GU000128	2/24/25	IA
2025 Accenture Life Insurance Summary.pdf	GU000129	GU000133	2/24/25	IA
2025-01-11 Email re Retainer loan terms.pdf	GU000134	GU000135	2/24/25	IA
2025-01-31 Accenture 401(k) Summary.pdf	GU000136	GU000137	2/24/25	IA
2025-02-01 Accenture Investment Summary.pdf	GU000138	GU000154	2/24/25	IA
2025-02-01 Ameriprise IRA & Roth IRA Acct. Summary.pdf	GU000155	GU000161	2/24/25	IA
2025-02-14 Email re Beerman Law Fees Judgment McNally.pdf	GU000162	GU000162	2/24/25	IA
2025-02-16 Accenture Employment Agreement (showing clawback of bonus).pdf	GU000163	GU000168	2/24/25	IA
2025-02-16 Overview of Offer from Accenture.pdf	GU000169	GU000171	2/24/25	IA
Amex Acct. x1009 Loan Disclosure.pdf	GU000172	GU000173	2/24/25	IA
Chase GLU Acct. Cannot Access.pdf	GU000174	GU000174	2/24/25	IA
Chase Visa x4005 Dec 2024.pdf	GU000175	GU000180	2/24/25	IA
Chase Visa x7396 Dec-Jan 2024.pdf	GU000181	GU000186	2/24/25	IA
Chase Visa 2024 Spending Report PDF.pdf	GU000187	GU000218	2/24/25	IA
Hartford ADD policy 25k from Cognizant.pdf	GU000219	GU000220	2/24/25	IA
Hartford Life Insurance Info. (Jason).pdf	GU000221	GU000223	2/24/25	IA
HSPRD History Bill - Ulijasz.pdf	GU000224	GU000227	2/24/25	IA
Jan 2025 USAA 20250104 bank checking statement 9941.pdf	GU000228	GU000229	2/24/25	IA
Sofi Loan.pdf	GU000230	GU000230	2/24/25	IA
April 2024 Chase Visa x2372.pdf	GU000231	GU000236	3/11/25	IA
August 2024 Chase Visa x2372.pdf	GU000237	GU000242	3/11/25	IA
February 2024 Chase Visa x2372.pdf	GU000243	GU000246	3/11/25	IA
January 2024 Chase Visa x2372.pdf	GU000247	GU000250	3/11/25	IA
July 2024 Chase Visa x2372.pdf	GU000251	GU000256	3/11/25	IA
June 2024 Chase Visa x2372.pdf	GU000257	GU000262	3/11/25	IA
March 2024 Chase Visa x2372.pdf	GU000263	GU000266	3/11/25	IA
May 2024 Chase Visa x2372.pdf	GU000267	GU000272	3/11/25	IA
all chase accounts except GLU distr - no money market or savings account.pdf	GU000273	GU000273	3/11/25	IA
citibank- no charges Redacted.pdf	GU000274	GU000274	3/11/25	IA
Citicard no charges membership fee only.pdf	GU000275	GU000275	3/11/25	IA
wellsfargo auto loan closed 2023.pdf	GU000276	GU000276	3/11/25	IA
SAPPHIRE CHECKING (...3898) - balance transferred to new checking bc of fraud	GU000277	GU000279	3/11/25	IA
Chase Sapphire x3898 Account Restricted	GU000280	GU000280	3/11/25	IA
2024-01-26 AMEX.pdf	GU000281	GU000287	3/13/25	IA
2024-02-23 AMEX.pdf	GU000288	GU000298	3/13/25	IA
2024-03-26 AMEX.pdf	GU000299	GU000305	3/13/25	IA
2024-04-25 AMEX.pdf	GU000306	GU000316	3/13/25	IA
2024-05-26 AMEX.pdf	GU000317	GU000326	3/13/25	IA
2024-06-25 AMEX.pdf	GU000327	GU000336	3/13/25	IA
2024-07-26 AMEX.pdf	GU000337	GU000346	3/13/25	IA
2024-08-26 AMEX.pdf	GU000347	GU000354	3/13/25	IA
2024-09-25 AMEX.pdf	GU000355	GU000362	3/13/25	IA
2024-10-25 AMEX.pdf	GU000363	GU000368	3/13/25	IA
2024-11-25 AMEX.pdf	GU000369	GU000376	3/13/25	IA
2024-12-26 AMEX.pdf	GU000377	GU000384	3/13/25	IA
2025-01-26 AMEX.pdf	GU000385	GU000394	3/13/25	IA
2025-02-23 AMEX.pdf	GU000395	GU000402	3/13/25	IA
2023 Cognizant Incentive Award Plan Final.pdf	GU000403	GU000436	6/23/25	3, 12
2024 Jason Ameriprise.pdf	GU000437	GU000446	6/23/25	1, 12
2024 W2.pdf	GU000447	GU000447	6/23/25	2, 12
2024 Cognizant Technology Solutions 2024 W-2.pdf	GU000448	GU000450	6/23/25	2, 12
Accenture 401(k).pdf	GU000451	GU000474	6/23/25	1, 12
Accenture Investment Summary.pdf	GU000475	GU000491	6/23/25	1,3,9, 12
Accenture Paystubs Final.pdf	GU000492	GU000521	6/23/25	2, 12
Advantigen Confirmation.pdf	GU000522	GU000522	6/23/25	1, 9, 21
Advantigen Shares Final.pdf	GU000523	GU000555	6/23/25	3, 12
Advantigen Subscription Final.pdf	GU000556	GU000594	6/23/25	3, 12
AIG 401(k).pdf	GU000595	GU000614	6/23/25	1, 12
All 4 VEIP 2025 statements - inception Jan 2025 Final.pdf	GU000615	GU000648	6/23/25	1, 3, 12
Ameriprise Statements.pdf	GU000649	GU000746	6/23/25	1, 12
Amex.pdf	GU000747	GU000921	6/23/25	12, 15
Chase x3898 Final.pdf	GU000922	GU000985	6/23/25	1, 10, 12
Chase x6893 Final.pdf	GU000986	GU001029	6/23/25	1, 10, 12
Cognizant 401(k) Empower Statements.pdf	GU001030	GU001065	6/23/25	1, 12
Cognizant 401(k) Empower to Voya.pdf	GU001066	GU001069	6/23/25	1, 12
Cognizant 401(k) Voya Tax Final.pdf	GU001070	GU001073	6/23/25	1, 12
Cognizant 401(k) Voya to Ameriprise.pdf	GU001074	GU001076	6/23/25	1, 12
Cognizant 401(k) Voya.pdf	GU001077	GU001115	6/23/25	1, 12
Cognizant Paystubs.pdf	GU001116	GU001150	6/23/25	2, 12
Cognizant Separation Agreement Final.pdf	GU001151	GU001158	6/23/25	9, 12
Etrade Final.pdf	GU001159	GU001281	6/23/25	1, 12
E-Trade Final.pdf	GU001282	GU001303	6/23/25	1, 10, 12
HSA Final.pdf	GU001304	GU001318	6/23/25	1, 10, 12
Jetty Invoice Final.pdf	GU001319	GU001319	6/23/25	12
Lease Final.pdf	GU001320	GU001337	6/23/25	6, 12

**They emailed this list of defective discovery docs I spent 24 hours detailing all the deficiencies within.**

My Holdings All RSUs and Stock w. vesting schedules Final.pdf	GU001338	GU001352	6/23/25	1, 3, 12
New CC Account Paid Off Final.pdf	GU001353	GU001356	6/23/25	12
Payment to IRS for 2024 Taxes.pdf	GU001357	GU001357	6/23/25	12
Pictures of Software and Jason.pdf	GU001358	GU001595	6/23/25	12, 13
Promisorry Note.pdf	GU001596	GU001597	6/23/25	4, 12
Statements.pdf	GU001598	GU001650	6/23/25	1, 10, 12, 15
Texts with Sister.pdf	GU001651	GU001656	6/23/25	5, 11, 12
Tracking Devices Final.pdf	GU001657	GU001662	6/23/25	12
ULJASZ LETTER - Procedure.pdf	GU001663	GU001663	6/23/25	7, 12
Woodman.pdf	GU001664	GU001664	6/23/25	4, 12
Audio Jason			6/23/25	12, 13, 14
Advantigen Subs Final.pdf	GU001665	GU001668	6/23/25	3, 12
Dec 2024 page 3.pdf	GU001669	GU001669	10/9/25	1, 10, 12, 15
Nov 2024 page 3.pdf	GU001670	GU001670	10/9/25	1, 10, 12, 15

**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Thursday, September 25, 2025 at 2:20:51 PM Central Daylight Time  
**From:** Jason McKemie <jmckemie@mckemie.net>  
**To:** Ethan Scroggins <escroggins@sullivancook.com>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>  
**Priority:** High  
**Attachments:** Disc Demand\_Gwen - Disc List (Master).pdf

Ethan,

I know there's a lot to pull together but can you prioritize these for quick turn around? Would be much appreciated. Thanks.

1. Chase Sapphire Visa x2372
  - Nov 2024 - Missing Pages 3, 5-7
  - Dec 2024 - Missing Page 3
  - Jan 2025 - Missing Page 3

Loan Amount following statements for separate property calculation:

- Sept 2023
- June 2024

Also, please expedite the statements for Chase Sapphire x7396. The only statement provided was Jan of 2025. The card had a balance of roughly \$35k in Dec, so this was not a new card and had been used heavily. Need Statements for June 2023 - Present.

Attached are the line items you requested.

Jason McKemie  
214.868.4901

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**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>  
**Date:** Wednesday, September 24, 2025 at 8:13 AM  
**To:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

TYPE	COMPANY / INSTITUTION	IDENTIFIER	Description	Start	COMMENTS
			Tracing for All Cash/E Withdrawals >\$499		Chase x3898 Jan 2025 \$13k, 10/24 \$500, 11/24 \$600, 9/24 \$1,600, etc. All accounts please.
			All transfers		All accounts, w/ account #'s, names
			GLU DISTRIBUTION X8627 Statements		I have received no statements.
			Tracing for All Overpayments towards Credit Cards		Chase Sapphire x3444 – Aug 2025 \$13,210, Chase Sapphire x2372 Feb 2024 \$5,796, Etc. (Lots). Need full tracing
			FULL Statements Released for VENMO (JUNE 2023 – PRESENT)		need all
			Tracing for Daily Account Balances		all accounts
			Create Contiguous Summary for all Checking Accounts		contiguous with legend showing mapping to credit card swapping
			COGNIZANT SETTLEMENT		Tort Claim was False. Community Asset. \$ requires full tracing. Used Community Property to Fund Litigation
			Divorce Legal Costs		All legal is separate per the Agmt between Will Cook and Brant Webb via email; full accounting of SC billing required to ensure charges are applied solely to Petitioner; as SC moved Gwen to two-week billing during discovery, her maximum exposure cannot exceed two weeks of charges, and I bear none.
			Other Legal Expenses Paid		
			COGNIZANT SETTLEMENT		All Billing needed from all law offices
			Legal Costs for Protective Order, Contempt, Extension of Protective Order		Billing Statements Needed.
			MISSING VEIP SUMMARY		Monthly Statements Required
RETIREMENT	AIG	AIG	2024 AIG 401(k).pdf	GU000005	Daily Snapshots, 6mo Summary are Not Acceptable, Lacks Monthly Statements
RETIREMENT	AMERIPRISE	AMERIP	2025-02-01 Ameriprise IRA & Roth IRA Acct. Summary.pdf	GU000155	Annual Reports are not Acceptable
CREDIT	AMERICAN EXPRESS	AMEX LOAN	Amex Acct. x1009 Loan Disclosure.pdf	GU000172	Require Monthoy Statement: Loan Disclosure from Aug 2024 tells me nothing about what payments have been made, and what is outstanding
BANK	CHASE	CHASE	2024 Chase Acct x3898 Statements.pdf	GU000032	Missing: June 2023 – Dec 2023, June 2025 – Sept 2025
CREDIT	CHASE	CHASE 2372	August 2024 Chase Visa x2372.pdf	GU000237	Missing: June 2023 – March 2024, Aug 2024 – Sept 2025
BANK	CHASE	CHASE 3898	Chase Sapphire x3898 Account Restricted	GU000280	June 2023 – Dec 2023, June 2025 – Sept 2025
BANK	CHASE	CHASE 3898	SAPPHIRE CHECKING (...3898) – balance transfered to new checking bc of fraud	GU000277	Balance Transferred shows \$13,000 Missing. Need full tracing.
CREDIT	CHASE	CHASE 4005	Chase Visa x4005 Dec 2024.pdf	GU000175	Missing: June 2023 – Nov 2024, ergggfgFeb – Sept 2025
CREDIT	CHASE	CHASE 7396	Chase Visa x7396 Dec-Jan 2024.pdf	GU000181	Only Jan 2025 Statement Provided. Dec had \$34,857 balance – was not a new card. \$13K Overpayment Dec 2024 Need June 2023 – Present
BANK	CHASE	REDACTED	Personal Checking		REDACTIONS ARE NOT PERMITTED
CREDIT	CHASE	CHASE SPD RPT	ChaseVisa2024_Spending Report PDF.pdf	GU000187	Spending Reports are Not Acceptable
BANK	CHASE	CHS ACTS	all chase accounts except GLU distr – no money market or savings account.pdf	GU000273	Spending Reports are Not Acceptable
CREDIT	CHASE	CHS SAP	2024-07 through 2025-01 Chase Saphire x2372.pdf	GU000106	Nov 2024 – Missing Page 3, 5-7, Dec 2024 – Missing Page 3, January 2025 Missing Page 3
CREDIT	CITIBANK	CITI	citibank- no charges_Redacted.pdf	GU000274	Need MonthlyStatements
COMP	COGNIZANT	COG PAY	2024-09-13 Cognizant Paystub.pdf	GU000279	Missing June. – Nov 2023,
COMP	GLU DISTRIBUTION	GLU D	Chase GLU Acct. Cannot Access.pdf	GU000174	Monthly Statements Required
LEGAL	LEGAL	HSPRD	HSPRD History Bill – Ulijasz.pdf	GU000224	Need Full Accounting for All Legal Billing, Marital and Not. Her legal bills are separate from mine, however value needs to be established for wasted assets
LEGAL	LEGAL	LEGAL	2025-02-14 Email re Beerman Law Fees Judgment McNally.pdf	GU000162	Need all legal billing accounted for.
HSA	HSA	METLIFE	2024-12-31 MetLife HSA Summary.pdf	GU000127	Release HSA Card Immediately
LOANS	LOANS	RETAINER LOANS	2025-01-11 Email re Retainer loan terms.pdf	GU000134	proof of funds + notarized agmnt prior to standing / temp orders or remove it
LOANS	LOANS	SOFI	Sofi Loan.pdf	GU000230	Need Current Months Statement
LOANS	AUTO LOAN	WR AUTO	wellsfargo auto loan closed 2023.pdf	GU000276	Why do you have your previous car loan versus your current?

**Cc:** "[wcook@sullivancook.com](mailto:wcook@sullivancook.com)" <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>, Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required

Ethan,

This should get you started. Thx.

Please reply with full and complete documentation by Tuesday, Sept 30, 2025.

Jason McKemie

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**From:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

**Date:** Tuesday, September 23, 2025 at 3:12 PM

**To:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Cc:** "[wcook@sullivancook.com](mailto:wcook@sullivancook.com)" <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>, Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason Mckemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

Mr. McKemie,

The Court directed and made sure that production would be made in response to legitimate and reasonable requests for production made under proper procedure. You already asked for these documents, and we have already produced documents bates labeled GU000001 – GU001668 in response. The manner at which we have produced documents follows the rules.

If you have identified specific instances of missing pages in statements, provide those specific instances. You cannot just state that the entire production is incomplete while ignoring what we have produced.

I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*

*600 East Las Colinas Blvd, Suite 1300*

*Irving, TX 75039*

*(214) 520-7494*

[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

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**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Sent:** Sunday, September 21, 2025 9:32 PM

Jason McKemie

Wednesday, December 3, 2025 at 1:50:47 AM Central Standard Time

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**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required  
**Date:** Tuesday, September 30, 2025 at 5:47:54 PM Central Daylight Time  
**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**CC:** Will Cook <wcook@sullivancook.com>, Chandler Alt <calt@sullivancook.com>, Kim Jones <kjones@sullivancook.com>, Jason McKemie <mckemie76@gmail.com>

Mr. McKemie,

I had an emergency TRO come up today that took up most of my day and an all day mediation yesterday.

Six days is too short a turnaround for the amount of items you identified. We will have a substantive response to you regarding the identified items by end of day October 7, 2025 (one week from now).

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

---

**From:** Jason McKemie <jmckemie@mckemie.net>  
**Sent:** Wednesday, September 24, 2025 8:13 AM  
**To:** Ethan Scroggins <escroggins@sullivancook.com>  
**Cc:** Will Cook <wcook@sullivancook.com>; Chandler Alt <calt@sullivancook.com>; Kim Jones <kjones@sullivancook.com>; Jason McKemie <mckemie76@gmail.com>  
**Subject:** Re: Subject: Court-Ordered Financials — Immediate Production Required  
**Importance:** High

Ethan,

This should get you started. Thx.

Please reply with full and complete documentation by Tuesday, Sept 30, 2025.

Jason McKemie

---

**From:** Ethan Scroggins <escroggins@sullivancook.com>  
**Date:** Tuesday, September 23, 2025 at 3:12 PM  
**To:** Jason McKemie <jmckemie@mckemie.net>  
**Cc:** "wcook@sullivancook.com" <wcook@sullivancook.com>, Chandler Alt

<[calt@sullivancook.com](mailto:calt@sullivancook.com)>, Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>, Jason McKemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** RE: Subject: Court-Ordered Financials — Immediate Production Required

Mr. McKemie,

The Court directed and made sure that production would be made in response to legitimate and reasonable requests for production made under proper procedure. You already asked for these documents, and we have already produced documents bates labeled GU000001 – GU001668 in response. The manner at which we have produced documents follows the rules.

If you have identified specific instances of missing pages in statements, provide those specific instances. You cannot just state that the entire production is incomplete while ignoring what we have produced.

I will not address the arguments you are making about community property and separate property in this email. That is a matter for the Court and an issue for final trial.

Sincerely,

**ETHAN SCROGGINS**  
**Sullivan & Cook LLC**

*Attorney*  
600 East Las Colinas Blvd, Suite 1300  
Irving, TX 75039  
(214) 520-7494  
[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)

---

**From:** Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>

**Sent:** Sunday, September 21, 2025 9:32 PM

**To:** Ethan Scroggins <[escroggins@sullivancook.com](mailto:escroggins@sullivancook.com)>

**Cc:** Will Cook <[wcook@sullivancook.com](mailto:wcook@sullivancook.com)>; Chandler Alt <[calt@sullivancook.com](mailto:calt@sullivancook.com)>; Kim Jones <[kjones@sullivancook.com](mailto:kjones@sullivancook.com)>; Jeff Cook <[jcook@sullivancook.com](mailto:jcook@sullivancook.com)>; Jason McKemie <[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)>; Jason McKemie <[mckemie76@gmail.com](mailto:mckemie76@gmail.com)>

**Subject:** Subject: Court-Ordered Financials — Immediate Production Required

**Importance:** High

Ethan,

On **September 8**, the Court directed your client to provide **full and complete financials**, and you confirmed on the record that production would be made. Two weeks later, no additional statements have been received. Ten months have now passed without compliance, which has prevented resolution and caused considerable harm; I want to move forward, but cannot until your client complies.

**A. Scope of Required Production (June 2023 – June 2025)**

1. **All accounts.** Bank, credit card, investment, retirement, and brokerage

accounts. No account may be excluded on the ground it is “separate property.” If an account is asserted to be separate, your client bears the burden to establish separate character through **complete statements and tracing**.

2. **Monthly statements only.** Produce official, institution-issued **monthly** statements. **No quarterlies, annual summaries, or daily “snapshots”** (e.g., AIG one-day reports). These do not satisfy the Court’s directive.
3. **Sequential, gap-free coverage.** Statements must be consecutive and **cover every day** in the period. The closing balance of one statement must equal the opening balance of the next. If an account or card number changed, production must show **continuous coverage from the prior number’s last day through the successor’s first day**.
4. **Complete documents. All pages** for each statement set. No missing pages.
5. **Format and organization.** Pages must be right-side-up, legible, and searchable (OCR). Each account must be produced as **one consolidated PDF** (labeled by institution, last-4, and month sequence).
6. **Account tracing (renumbered/reissued cards).** Provide a **cross-reference spreadsheet** linking prior and successor numbers and the effective date(s) of change(s).
7. **Supporting pay records.** Produce **complete pay stubs** and **full accountings** for the period.

## **B. Third-Party Services and Security Personnel**

1. **Vendors (e.g., Jetty Partners; any security/investigative/contractor services).** Produce **full invoices, proof of funds transfers or canceled checks,** and **service documentation** describing dates, locations, personnel, scope, and findings.
2. **Interrogatory disclosure (witness identification).** Identify by **full legal name, current residential and business addresses, telephone numbers, email addresses, and employer:**
  - a. The **three security personnel** who accompanied Respondent at the marital residence on **January 2, 2024;**
  - b. **All** individuals who searched Respondent’s **new residence;** and
  - c. The individual(s) who inspected Respondent’s **vehicle** and allegedly discovered a device.

This information is required so that subpoenas may be issued timely for trial.

## **C. Loans, Contributions, and Non-community Items**

1. **Loans.** Any loan your client intends to list must be supported by:
  - a. **Executed, notarized loan agreement** dated **prior** to issuance; and
  - b. **Proof of funds transfer** into your client’s account (wire/ACH/canceled check).
1. **Loans incurred after December 16, 2024** are excluded from this production as taken against standing/temporary orders and will not be treated as community obligations.
2. **Concurrent equity contributions.** Ongoing contributions (approximately

**\$10,000/month, ~\$130,000/year)** to equity funds initiated **after** entry of the orders are inconsistent with any asserted loan-based “need” and must be fully disclosed in the statements and accountings.

3. **Elective cosmetic procedures.** Elective cosmetic surgery is **not** a community obligation and must be **excluded** from community expense accounting.
4. **GLU Distribution (...8627).** Produce **monthly statements** in the same consolidated, sequential, complete manner as all other accounts.
5. **Reimbursements and allowances.** Provide a **full accounting of all reimbursements/allowances** (including housing/rent reimbursements) and all **business-related expenses** during the period; statements must reflect receipt of reimbursements where claimed.

#### **D. Production Mechanics (to avoid disputes)**

- **Native data for validation.** In addition to PDFs, produce **native transaction exports** (CSV/Excel) for each account with at least: transaction date, posting date, description/merchant, debit/credit, running balance, instrument/ID, and transfer source/destination.
- **No redactions** other than PII masking to last-4 where legally required.
- **Bates numbering** and clear file naming (Institution\_Last4\_YYYYMM-YYYYMM.pdf).
- **Privilege log** required for any withheld material, with sufficient detail for evaluation.
- **Custodian certification.** Provide a signed statement (by Respondent and/or the records custodian, as applicable) that production is **complete, consecutive, and gap-free** for the stated period and that the **card/account renumbering mapping is accurate.**

#### **E. Immediate and Final Deadlines**

- **Immediate:** The **December 2024** statement for the card ending **2372** is incomplete (**page 3 missing**). Provide the complete **four-page** statement within **24 hours**.
- **Final:** All remaining responsive financial records **in the format above** must be produced **no later than Monday, September 29, 2025**. By that date, three weeks will have elapsed since the Court’s directive—**a sufficient and reasonable period**.

#### **F. HSA Access**

Additionally, I demand immediate release of the **HSA card credentials**, which are protected by the standing and temporary orders and which I have requested at least **28 times**. Attached are prior requests and medical documentation reflecting the progression of harm since **May 2025**, including **three emergency-room visits** and a **six-day hospitalization**.

Attached is a letter another letter, this one documenting my diagnosis of Congestive Heart Failure, and reiterating the criticality of access to this card.

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Timely production is also critical for trial preparation. Trial exhibits must be exchanged 30 days before trial. If full and complete financials are not produced at least 90 days before trial, I

cannot reasonably prepare exhibits or submit materials to a forensic accountant. Any attempt to delay production until exhibits are due will require me to seek a continuance of the trial date.

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**Non-compliance:** If production is not made **in this format** and **by these deadlines**, I will file notice with the Court and seek appropriate relief, including an order compelling proper production or authorizing subpoenas to custodians of records **at your client's expense**, as well as any other relief the Court deems just.

Please confirm receipt, provide the complete **December 2024 Chase x2372 statement within 24 hours**, and confirm the **September 29 production timing**.

Sincerely,

Jason McKemie  
(214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

Ethan,

Thank you for confirming production **GU000001-GU001668**. I'm not "ignoring" what was produced; I'm identifying the **specific defects** that prevent the Court-ordered "full and complete" financials. Please cure the items below or point me to the exact **Bates range** that already satisfies each request. Attached are **Demonstrative Exs. A-1 and A-2** marking missing months/pages; they are **illustrative only** and not a substitute for production.

This should get you started. I will advise if I find any additional documentation missing.

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**A. Global completeness (all accounts).** Based on my review of **GU000001-GU001668**, **no account** includes a full set of **consecutive monthly statements** for the Court-ordered period. The specific items listed below are **illustrative**, not exhaustive. To close the loop for **every account produced to date**:

1. **Consecutive monthlies.** Produce **official monthly statements (all pages)** for **each account** from **June 1, 2023 to present**, so that the **closing balance of one month equals the next month's opening balance**, with **no gaps**.
2. **Native detail.** For each account, also produce the **CSV/Excel transaction export** (transaction date, posting date, description/merchant, debit/credit, running balance, transfer source/destination).
3. **Production map.** Provide a **production map** listing **account** → **months produced (Bates)** → **missing months**, for all personal, joint, business, credit, and plan accounts.
4. **If unavailable.** If you contend any monthly statement **cannot be obtained**, identify the **specific month** and provide (a) the institution's written confirmation or portal notice showing unavailability, and (b) the **steps and dates** you took to request it (e.g., branch request number or ticket).
5. **Page completeness.** Where a month has been produced **without all pages**, re-produce the **complete set**. If a provider omits "Page x of y" footers, state the **total page count** for that month so completeness can be verified.

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**B. Missing or incomplete statements (monthly required)**

1. **Chase Sapphire Visa x2372**
  - **Nov 2024 - Missing Pages 3, 5-7**
  - **Dec 2024 - Missing Page 3**
  - **Jan 2025 - Missing Page 3**

Please ensure produced **statements do not have omitted pages of transaction history.**

2. **AIG 401(k)** – Only a **06/22/2024 one-day snapshot** and a **01/01/2025-06/01/2025 roll-up** were produced. These are not monthly statements. Please produce **consecutive monthly statements (all pages)** from **Sept 2023-present** and the **CSV/Excel** export with **date, posting date, description, source code, amount, and running balance.**
  3. **GLU Distribution LLC (Chase)** – **Monthly statements June 2023-present** have not been produced. The fee-only report is not a monthly statement. Chase confirms monthly statements are available at any branch with authorization. Please produce **full monthly statements (all pages)** plus **check images, wires/ACH/Zelle**, and a **CSV/Excel** ledger.
- 

#### **C. Retirement/equity deferrals (VEIP/ESPP) & employer match (Oct 2024-present)**

4. **Payroll elections/changes** – Produce **VEIP/ESPP election/change confirmations** (Nov/Dec 2024) and any HR/benefits emails memorializing effective dates/amounts.
  5. **Payroll registers/pay stubs** – Produce the **per-pay registers** showing **VEIP** line items and **tax** withholdings to reconcile any entries labeled “extra tax withholding.”
  6. **Plan/provider postings** – Provide **plan statements** reflecting each payroll deferral and the associated **employer match/true-up and vesting**, and the **remittance files** (employer→plan) showing **source codes** and dates.
- 

#### **D. AIG 401(k) loan history (separate vs community; reimbursement)**

7. The plan shows an active loan (orig. **10/11/2019**). Please produce:
    - **Loan principal balance as of Sept 1, 2023,**
    - **Amortization schedule;** and
    - **Each loan payment** posted **Sept 2023-present** (principal/interest).
    - If available, provide the administrator’s **“balance as of Sept 1, 2023”** letter.
- 

#### **E. Production map (to avoid more back-and-forth)**

8. Provide a simple **production map** linking each account to **Bates ranges & months covered**, and identifying missing months.

For example:

Account	Last-4	Institution	Months Produced (Bates)	Missing Months	CSV?
Chase Visa	x2372	Chase	2024-11 (GU ___-); 2024-12 (GU ___-)	2024-12 p.3 missing	No
AIG 401(k)	—	AIG	2025 H1 roll-up (GU ___-); 2024-06-22 snapshot (GU)	2023-09..present <b>monthlies</b>	No
GLU LLC DDA	x8627	Chase	—	2023-06..present	No
Payroll (VEIP)	—	Employer	—	Oct 2024..present registers	—

If you contend any item above is already produced, please identify the **Bates range** and **month**.

### Format & timing

- **Format:** Statements as **OCR PDFs**; payroll/registers & remittances as **CSV/Excel** (or legible PDF if CSV not kept).
- **Cure date:** Please produce the missing pages/monthlies and provide the production map by **close of business (5:00 p.m. CT) Tuesday, Sept 30, 2025**. If you need **one business day**, say so now.
- **If not cured:** I will file a short **motion to compel** seeking (i) a production map, (ii) replacement of snapshots/roll-ups with **true monthlies + CSV**, and (iii) **fees**.

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To keep lanes clean: **HSA access** will be addressed by **separate emergency motion and proposed order** (same-day digital provisioning).

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**F. Discovery.** As a courtesy for the time required to compile the deficiency inventory, I am extending the response deadline by one business day. **Please provide a full and complete response—either producing the missing materials or citing exact Bates ranges—no later than close of business (5:00 p.m. CT) on Tuesday, September 30, 2025.**

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Best,

Jason McKemie  
(214) 868-4901  
[jmckemie@mckemie.net](mailto:jmckemie@mckemie.net)

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**Attachments:**

- **Demonstrative Ex. A-1** – Missing Monthly Statements by Account/Month (compiled from GU000001-GU001668).
- **Demonstrative Ex. A-2** – Chase Sapphire x2372 – Missing Statements/Pages (compiled from GU000001-GU001668).

*(Demonstratives only; no work-product waiver / no admissions.)*

### Automated Certificate of eService

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Status as of 12/19/2025 10:45 AM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jason McKemie		jmckemie@mckemie.net	12/19/2025 10:03:55 AM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	12/19/2025 10:03:55 AM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	12/19/2025 10:03:55 AM	SENT