

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

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NO. **DF-24-18010**

IN THE MATTER OF
THE MARRIAGE OF

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IN THE DISTRICT COURT

GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

302nd JUDICIAL DISTRICT
DALLAS COUNTY, TEXAS

**MOTION FOR REINSTATEMENT OF WRONGFULLY REPORTED & WITHHELD
MARITAL FUNDS, AND DIRECTIVE FOR IMPENDING BONUS PAYMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Jason McKemie, Respondent, and files this **Motion for Reinstatement of Wrongfully Reported and Withheld Marital Funds, and Directive for Impending Bonus Payment**, and in support thereof respectfully shows the Court as follows:

I. CRITICAL BACKGROUND, MALICIOUS LITIGATION, AND RETALIATORY CONDUCT



1. **Medical Crisis.** On December 10, 2024, Respondent underwent invasive spinal surgery following a six-day hospitalization for a genetic spinal injury. He experienced temporary paralysis for seventy-two hours, required spinal epidurals every three days, and remained on heavy pain medication every four hours for more than two weeks.



2. **Discovery of Malicious Litigation Pattern.** On December 11, 2024, after months of escalating psychological and financial abuse by Petitioner, Respondent discovered documentation evidencing a longstanding pattern of malicious, settlement-driven litigation by Petitioner. Concerned she would again resort to false reports, Respondent contacted law enforcement to request notation of an imminent threat of fraudulent claims and to ensure any responding officers would know he was unarmed.



3. **Initial Retainer and Fraud Reports.** While Petitioner was in San Antonio, Respondent retained counsel by paying a \$5,750 retainer to Webb Family Law Firm. The next morning, December 12, Petitioner received a Chase fraud alert concerning a \$30,870.30 transfer representing survival funds for household expenses. She denied that transaction as “unauthorized,” then denied several other legitimate charges, including:

(a) the \$5,750 legal retainer;

(b) \$900 rehabilitation equipment;

(c) \$699 for an American Airlines plane ticket to Petitioner’s family Christmas; and

(d) an \$80 eBay gift for Petitioner's sister-in-law; and

(e) a \$30,000 wire transfer.



4. **Cutoff of Funds.** Petitioner reinstated only the eBay purchase—an item benefiting her directly—and left all other legitimate transactions reversed. The resulting card closure eliminated Respondent's access to marital funds, depriving him of counsel and medical necessities immediately after surgery.



5. **False Assurances and Secret Counsel.** From December 12–15, 2024, Petitioner repeatedly represented by text and recorded calls that she had no legal counsel and that it “would not be fair” for Respondent to have an attorney until she had chosen one herself. She refused to reinstate the \$5,750 retainer on that basis, insisting both parties should select attorneys “on the same day,” which she claimed would occur December 17–18. In truth, contemporaneous financial records and communications confirm that immediately after learning of the \$30,000 transfer, Petitioner retained counsel, paid them in full, and directed weekend preparation of pleadings.

6. **Filing for Advantage.** On December 16, Petitioner's attorneys filed a Petition for Annulment and an Application for Temporary Ex Parte Protective Order while Respondent remained without counsel, recovering from surgery, and financially incapacitated.



7. **Protective Order Service.** On December 18, 2024, Respondent was served with a Temporary Restraining Order arising from the Protective Order petition.




8. **Demonstrated Retaliation.** This four-day sequence—beginning with the fraudulent reports and ending with Petitioner's filing—constitutes deliberate interference with Respondent's right to counsel and retaliation for his attempt to obtain legal representation. The details are supported by the Sworn Affidavit of Jason Emory McKemie, incorporated by reference and attached as **Exhibit A**.

9. **Pattern of Weaponized Litigation.** Petitioner has a documented history of offensive litigation and threats of litigation touching numerous areas of her life, averaging over \$85,000 annually in offensive legal expenditures against former partners, employers, neighbors, landlords, and associates, often via misuse of protective-order mechanisms.




10. **Prior Witness-Tampering Example.** In a prior matter involving former spouse Christopher McNally, Petitioner obtained an extension of a protective order under irregular circumstances after Mr. McNally—scheduled to testify regarding Petitioner's misuse of protective orders—was arrested the day before the hearing and could not appear. The extension was granted by default with added restrictions, exemplifying Petitioner's pattern of weaponizing civil and criminal processes to suppress witnesses and control proceedings.

II. FINANCIAL MISCONDUCT AND FRAUD UPON THE COURT


 11. **Wrongful Fraud Reports.** Petitioner reported legitimate marital expenditures as “fraud,” freezing Respondent’s access to joint accounts. These included, among others:


- (a) the \$5,750 legal retainer;
- (b) \$900 rehabilitation equipment;
- (c) \$699 for an American Airlines plane ticket to Petitioner’s family Christmas; and
- (e) a \$30,000 wire transfer.

Petitioner later claimed that she was aware of the legitimacy of the charges, “but if there’s a 1% chance it might be fake you’ve got to cancel it.” Despite reassurances she would reinstate the cancelled charges, Petitioner never replaced funds, purchases, nor reinitiated the survival funds transfer; demonstrating deliberate misconduct.

 12. **Resulting Financial Damage.** When access was cut off, Respondent was recovering from spinal surgery. Petitioner’s actions left him with approximately \$25,000 per month in obligations and no marital resources, destroying his credit and preventing him from securing new housing or legal counsel.

13. **Unpaid Bonuses and Misrepresented Settlement.** At mediation, Petitioner represented that a separate settlement she received was paid as a tort award, not as compensation, and thus not community property. Subsequent review shows that representation was false: the \$156,048 settlement was paid as **compensation**, rendering it community property. Respondent is entitled to 50% (\$78,023). Petitioner’s concealment deprived him of his share and constitutes financial misconduct.

 14. **Impending Bonus.** Petitioner is scheduled to receive a \$150,000 bonus on or about November 15, 2025. At mediation, the parties acknowledged \$75,000 remained owed to Respondent and that \$50,000 of a subsequent bonus would be applied toward that obligation; Respondent received neither. The impending bonus should be awarded to Respondent to satisfy obligations incurred in his name due to Petitioner’s conduct or, alternatively, secured in escrow under Court supervision.

 15. **Fraud upon the Court.** Petitioner’s conduct—including misrepresenting income, concealing bonuses, dissipating settlement proceeds, and claiming destitution while earning roughly \$1.5 million annually—constitutes fraud upon the community and upon this Court. Petitioner has weaponized financial control to deprive Respondent of counsel and procedural parity, contrary to the purpose of temporary orders.

III. NOTICE OF ADDITIONAL RELIEF TO BE ADDRESSED SEPARATELY

16. Respondent places the Court on notice that a separate motion will address damages arising from Petitioner's false declaration of destitution at the January 7, 2025 hearing. As a direct result, while recovering from spinal surgery, Respondent assumed approximately \$25,000 per month in marital-residence expenses. To meet those obligations, Respondent's father loaned him \$50,000, diverting funds intended for his entry into a memory-care facility. Respondent will seek reimbursement of that sum and related sanctions by separate motion.
17. According to Petitioner's disclosures, she had expended approximately \$480,000 in legal fees by July 23, 2024. Although the parties agreed to bear their own legal costs, Petitioner's engagement of six attorneys at extraordinary rates constitutes waste of marital resources. Respondent reserves the right to seek a legal-fee equalizer and sanctions for bad-faith litigation to recover disparities between fees drawn from the marital estate and the reasonable cost of Respondent's representation.

IV. RESERVATION OF RIGHTS

18. Respondent expressly reserves all rights, claims, and remedies available under law and equity, including but not limited to reimbursement, waste, breach of fiduciary duty, fraud on the community, and sanctions for discovery abuse or bad-faith litigation. Nothing herein waives any pending or future claims, motions, or requests for relief, nor accepts any accounting, valuation, or characterization of assets asserted by Petitioner. Respondent reserves the right to supplement, amend, or expand this Motion as additional facts or financial records become available.

V. PRAYER FOR RELIEF

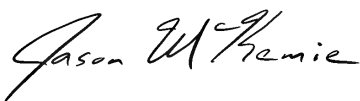
WHEREFORE, PREMISES CONSIDERED, Respondent respectfully requests that the Court:

- a. Order reinstatement or reimbursement of all legitimate transactions wrongly reported as fraud;
- b. Order Petitioner to produce a **complete accounting and full funds tracing** for the **\$156,048 settlement within ten (10) days**, including: (i) proof of all deposits, transfers, and withdrawals; (ii) monthly statements for every **originating, intermediate, and destination** account through which any portion moved; (iii) documentation showing the **current location and balance** of remaining proceeds; and (iv) a **continuing obligation to supplement** if additional accounts or transfers are later identified;
- c. Order Petitioner to **reimburse Respondent \$78,023**, representing his one-half community share of the **\$156,048** settlement, together with **pre- and post-judgment interest as**

allowed by law, and require that payment be made **within five (5) business days** after compliance with subparagraph (b); if the original proceeds have been moved or dissipated, require satisfaction **from Petitioner's current assets, bonuses (including the November 2025 bonus), or other funds under her control.**

- d. Direct that the forthcoming **\$150,000 bonus due on or about November 15, 2025** be **immediately awarded and disbursed to Respondent** to satisfy marital debts and obligations incurred in his name as a result of Petitioner's conduct; **alternatively**, if immediate disbursement is not feasible, order that the entire amount be **deposited within two (2) business days of receipt into the registry of the Court or a mutually-agreed neutral escrow** (failing agreement within three (3) business days, then the **registry of the Court**), to be held **without withdrawal absent further order.**
- e. Reinstate Respondent's **Chase Sapphire Visa Card** for necessary living expenses and **interim attorney's fees; alternatively**, order payment of Respondent's reasonable and necessary **interim attorney's fees** directly from the marital estate to ensure parity of representation;
- f. Reinstate the following legitimate purchases and transfers: **\$750 legal retainer; \$900 rehabilitation equipment; \$699 American Airlines ticket; and the \$30,000 wire transfer;**
- g. **Declare** that all amounts awarded or disbursed under this Motion constitute **interim restitution for financial injury** and **shall not be treated as a distributive award or offset** in any future division of the marital estate;
- h. Set this matter for **show-cause** on shortened notice and award **fees and sanctions** to Respondent for any noncompliance with deadlines in subparagraphs (b)–(d); and
- i. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,



Jason McKemie

Pro Se, Respondent

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***A supplemental filing
will be submitted on
Wednesday, Oct 23rd,
2025, which will
include all Exhibits.***

Date: October 22, 2025

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