

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA**

NO. DF-24-18010

**NOTICE: DOCUMENT CONTAINS  
SENSITIVE INFORMATION.**

**IN THE MATTER OF  
MARRIAGE OF**

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§

**GWENDOLYN ULIJASZ-MCKEMIE  
&  
JASON MCKEMIE**

**IN THE DISTRICT COURT THE**

**302<sup>nd</sup> JUDICIAL DISTRICT**

**DALLAS COUNTY, TEXAS**

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## **NOTICE OF FILING OF SWORN AFFIDAVIT**

**REGARDING FALSE RECORDING ALLEGATIONS AND RECURRENT PREJUDICE**

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I, **Jason McKemie**, respectfully file this Notice to bring to the Court's attention my **Sworn Affidavit Regarding False Recording Allegations and Ex Parte Prejudice** (Attached – 3 Pages), filed on November 25, 2025.

This affidavit contains **material factual corrections** concerning a recurring false narrative about my alleged history of improper recording of court proceedings — a narrative that has influenced multiple hearings and resulted in significant prejudice, including searches, confiscation of my electronics, denial of access to digital exhibits, and removal from the courthouse following ex parte communications.

The statements in the affidavit address:

- that I have **never been reprimanded, sanctioned, warned, punished, or disciplined** by any court for recording proceedings at any time in my life;
- that the **only** recording I ever made was during the first hearing of my life, openly and in plain view;
- that the recording captured **three hours of coordinated false testimony** that has since been disproven by Petitioner's own discovery and financial records; and
- that the false "recording threat" narrative now circulating ex parte has resulted in **repeated and ongoing prejudice** across multiple judicial interactions.

Because these issues directly affect the fairness and integrity of all proceedings in this case, I respectfully request that the Court **review the affidavit prior to the scheduled hearing** so

that rulings may be based on accurate, verified information rather than misinformation conveyed outside my presence.

My sworn affidavit is attached hereto as **Exhibit A**.

Respectfully submitted,

A handwritten signature in black ink, reading "Jason McKemie", is enclosed within a dashed rectangular box. A red arrow points to the top-left corner of the box. A horizontal line is drawn across the signature.

**Date:** November 25, 2025

**Jason McKemie**

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Dallas, Texas 75208

jmckemie@mckemie.net | (214) 868-4901

**Respondent, Pro Se**

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IN THE MATTER OF	§	IN THE DISTRICT COURT THE
MARRIAGE OF	§	
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GWENDOLYN ULIJASZ-MCKEMIE	§	<u>302<sup>nd</sup></u> JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

AFFIDAVIT OF JASON MCKEMIE REGARDING  
**FALSE RECORDING ALLEGATIONS AND EX PARTE PREJUDICE**

**SUMMARY:**

This affidavit is submitted to correct the record regarding a false narrative that I have a history of improperly recording court proceedings. This allegation—originating outside the courtroom—has been repeatedly communicated to multiple judicial officers without my knowledge or presence. As a result, I have experienced a recurring pattern of prejudice across numerous hearings, including physical searches, confiscation of my electronics, denial of access to exhibits, heightened scrutiny, and in one instance, removal from the courthouse. I have never been reprimanded, sanctioned, or disciplined by any court for recording proceedings, and all such insinuations are false. This statement is submitted to ensure that all future rulings are based on accurate information rather than misinformation conveyed through ex parte channels.

I, **Jason McKemie**, declare under penalty of perjury as follows:

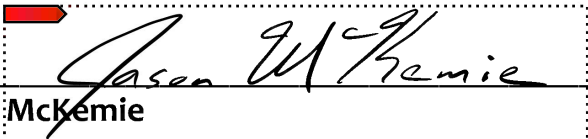
1. **I have never been reprimanded, sanctioned, warned, punished, or disciplined by any court for recording proceedings at any time in my life.**
2. The only recording I have ever made in any legal setting occurred during the first hearing of my life, in early 2025. The device was in **plain view**, sitting openly on the desk in front of me. I did not conceal it, and no one in the courtroom objected to its presence at the time.
3. The device was not a “spy device,” as has repeatedly been implied. It is the same make and model (Plaud.ai) **used by Petitioner herself**. We each purchased one of these nearly two years prior together, and Petitioner has also utilized this device extensively.

It is designed to record meetings to capture notes and action items—**not** clandestine surveillance.

4. When I later learned that court permission is required to record proceedings, I **never recorded another hearing again**. I have never attempted to weaponize that recording or use it for any unlawful purpose, nor did I ever have any intention of doing so.
5. My reason for recording that first hearing was simple: it was the first legal proceeding I had ever attended; I was unfamiliar with court procedure; I was facing allegations of stalking and abuse that I strongly disputed; and I wanted to ensure I correctly understood what was said and what I needed to address afterward.
6. That recording captured three hours of testimony from Petitioner and her sister that has since been proven false, including claims of dozens of “listening devices,” alleged “surveillance devices” hidden in household plants, and a supposed “tracking device” conveniently found by an off-duty police officer on Petitioner’s vehicle. It also captured sworn assertions of “destitution” that defy comprehension when compared to Petitioner’s actual compensation. Petitioner holds a compensation package valued at approximately \$1.5 million per year — **an average of roughly \$125,000 per month**. Her claims that she was financially destitute, did not have a functional automobile, relied on public transportation and Greyhound buses, and required loans to pay rent (which is fully reimbursed by her employer) were not misunderstandings or mistakes. **These statements were the inverse of reality, presented solely to obtain favorable rulings under false pretenses.** The evidence subsequently produced — including Petitioner’s own “Find My” screenshots released during discovery showing her BMW registered to her Apple ID with her own AirTag attached — directly contradicts the testimony she and her sister provided under oath.
7. I repeatedly approached Petitioner’s counsel in good faith after that hearing, asking them to correct the false testimony so future rulings were not based on factual inaccuracies. They told me there had been *no court reporter* that day, that it was “my word against hers,” and **“good luck with that.”** They dismissed my concerns, and at one point referred to me as a “deadbeat.”
8. Only after I stated that I possessed a recording of the hearing did counsel **abruptly declare three of their own attorneys as “expert testifying witnesses” within one hour**, effectively removing them from cross-examination about their conduct and their client’s testimony. Immediately thereafter, the narrative that I “record judges,” “weaponize recordings,” or “present a threat” began appearing at every judicial interaction.

9. Since that time, I have been subjected to repeated and highly unusual prejudicial treatment across multiple hearings, including being frisked, ordered to surrender my phone, prohibited from accessing digital exhibits, and instructed to open my coat and pull up my sleeves. On one occasion, **I was removed from the courthouse entirely after an ex parte communication between the judge and opposing counsel—at the very moment I was seeking emergency assistance to avoid imminent homelessness during an eviction proceeding.** This pattern of treatment did not originate from anything I said or did in the courtroom; it arose directly from false information conveyed outside my presence and has repeatedly deprived me of a fair opportunity to be heard.
10. At the September 9 pretrial conference, opposing counsel (Ethan Scroggins) interrupted me and stated, **“He’s been removed from chambers before.”** The only people who had knowledge of that incident were myself, Judge Bedard, and the bailiffs present that day. No one else was aware of what occurred. For Mr. Scroggins to reference that event at all demonstrates that he possessed detailed knowledge of the consequences that flowed directly from false statements made outside my presence. He also knew those statements were untrue, yet they resulted in my removal from the courthouse during an emergency request for assistance to avoid homelessness in an eviction proceeding brought on the basis of false testimony and a lease for which Petitioner—not I—was the sole financial guarantor.
11. **I was not removed from court due to any conduct of my own.** Immediately before Judge Bedard retreated into chambers to call opposing counsel, our interaction had been respectful, calm, and at times even lighthearted. The removal occurred *only after* that private call.
12. The repeated invocation of this false “recording threat” narrative has resulted in ongoing prejudice, denial of due process, the suppression of evidence, and severe consequences—including loss of access to healthcare and medication—based entirely on an allegation that is **categorically untrue.**

I declare under penalty of perjury that the above is true and correct.

  
\_\_\_\_\_  
Jason McKemie

Date: November 25, 2025

AFFIDAVIT OF JASON MCKEMIE  
REGARDING FALSE RECORDING NARATIVE AND EX PARTE PREJUDICE

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Filing Description: NOTICE OF FILING OF SWORN AFFIDAVIT -  
CORRECTING FALSE RECORDING ALLEGATIONS AND EX PARTE  
PREJUDICE

Status as of 12/1/2025 9:58 AM CST

#### Case Contacts

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