

**NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA
DF-24-18010**

NO. _____

IN THE MATTER OF	§	IN THE DISTRICT COURT THE
MARRIAGE OF	§	
	§	
GWENDOLYN ULIJASZ-MCKEMIE	§	<u>254th</u> JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

**MOTION FOR SANCTIONS FOR AGGRAVATED
PERJURY AND FRAUD UPON THE COURT AGAINST
PAMELA WOODMAN**

PROPOSED ORDER GRANTING MOTION FOR SANCTIONS AND REFERRAL

1. On this day, the Court considered Petitioner Jason McKemie’s Motion for Sanctions and Referral for **Aggravated Perjury and Fraud Upon the Court Against Pamela Woodman**.
2. After reviewing the Motion, evidence submitted, and applicable law, the Court hereby finds as follows:

That Respondent’s (Gwendolyn Ulijasz-McKemie’s) witness **Pamela Woodman** knowingly presented **materially false testimony** under oath at the January 7, 2025, hearing.

3. That such testimony was directly contradicted by video evidence already admitted into the record as Exhibit A;
4. That such false testimony contributed to the issuance of a restraining order and materially affected the course of these proceedings.

Accordingly, it is ORDERED that:

- A. Monetary sanctions in the amount of \$25,000 + \$ _____ are hereby imposed upon witness Pamela Woodman, payable directly to Petitioner Jason McKemie, as a remedy for fraud upon the court, abuse of process, and material perjury under oath.
- B. Said sanctions are not fines or criminal penalties, but civil monetary sanctions imposed pursuant to Tex. R. Civ. P. 215, and are designed to compensate Petitioner for documented legal and financial harm resulting from the false testimony.
- C. The matter is referred to the Dallas County District Attorney's Office and the Texas Attorney General's Office for review and investigation of aggravated perjury and fraud upon the court;
- D. Gwendolyn Ulijasz-McKemie and Pamela Woodman are deemed unreliable witnesses for purposes of any future proceedings in this matter;
- E. The record of this ruling shall be preserved and available for appellate and oversight review.
- F. Petitioner further requests that sanctions be set at an amount sufficient to deter future abuse and proportionate to the financial circumstances of the parties.
- G. Pamela Woodman is a high-net-worth individual possessing extraordinary wealth and influence. A \$25,000 sanction doesn't represent hardship—it barely registers as a rounding error on errand day. I ask this Court to consider how consequence should be measured when a person's financial power knows no real limit.

And with wealth and influence comes responsibility.
Pamela Woodman used hers to help bend this courtroom into submission.

She used it to sever a man from due process.

To eliminate his spousal support while he was recovering from invasive spinal surgery.

To help strip him of legal representation, food access, and healthcare—at his most vulnerable.

She knew him.

She stood at his wedding. She helped plan it at her lake house.

Jason thought she was coming to be a voice of reason—to help Gwen back onto her psychiatric medication.

He was relieved she was coming.

But when Pamela became aware that Gwen’s accusations of drug use and relapse were false—when she knew about her sister’s psychiatric history, her false allegations against other men, and her history of fraudulent protective order filings—she didn’t stop the lie.

She joined it.

Willingly. Aggressively.

She didn’t turn a blind eye.

She enabled evil.

None of the cascading harm that followed—Jason’s eviction risk, legal helplessness, food instability—could have unfolded without Pamela Woodman’s blessing. She empowered it.

And to top it off, she funded the very legal army that executed it—under the guise of “loans,” later used to distort the estate value and diminish Petitioner’s share, while simultaneously funneling Gwen’s income into high-yield equity funds that benefit them both.

Her capacity for harm appears directly proportional to her cash reserves.

That is why this sanction cannot be symbolic. It must reflect both the enormity of her resources and the gravity of her betrayal.

- H. Lesser sanctions would not deter future misconduct, nor reflect the extraordinary harm caused—including the loss of counsel, medical hardship, and denial of procedural rights that flowed directly from the false testimony already

documented and submitted as Exhibit A.

- I. A \$25,000 sanction is merely symbolic to parties of this financial stature. Anything less would be insufficient to deter future misconduct or to acknowledge the severity of the coordinated fraud upon the Court.

SIGNED this _____ day of July 2025.

JUDGE PRESIDING

Respectfully Submitted,

Jason McKemie
Petitioner, Pro Se
539 W Commerce St #2010
Dallas, TX 75208
(214) 868-4901
jmckemie@mckemie.net

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kim Jones		kjones@sullivancook.com	7/16/2025 6:05:04 AM	SENT
Jeffrey ECook		jcook@sullivancook.com	7/16/2025 6:05:04 AM	SENT
Tiffany Castenada		tcastenada@sullivancook.com	7/16/2025 6:05:04 AM	SENT
William CCook		wcook@sullivancook.com	7/16/2025 6:05:04 AM	SENT
Ethan Scroggins		escroggins@sullivancook.com	7/16/2025 6:05:04 AM	SENT
Chandler Alt		calt@sullivancook.com	7/16/2025 6:05:04 AM	SENT
Jason McKemie		jmckemie@mckemie.net	7/16/2025 6:05:04 AM	SENT
Gwendolyn Ulijasz McKemie		GUlijasz@gmail.com	7/16/2025 6:05:04 AM	SENT
JASON EMORYMCKEMIE		jason@callvital.com	7/16/2025 6:05:04 AM	SENT
PAMELA WOODMAN		pam_woodman@icloud.com	7/16/2025 6:05:04 AM	SENT