
CAUSE NO. DF-24-18010

IN THE MATTER OF
THE MARRIAGE OF

GWENDOLYN ULIJASZ-MCKEMIE
AND
JASON MCKEMIE

IN THE DISTRICT COURT

301ST JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

VERIFIED EMERGENCY SUPPLEMENT TO MOTION TO RECUSE FILED JUNE 11, 2026; REQUEST FOR MANDATORY WRITTEN RULING BEFORE RENDITION, SIGNATURE, ENTRY, OR ENFORCEMENT OF ANY FINAL DECREE; AND NOTICE OF ADDITIONAL SOURCE EVIDENCE

Notice for the Court: Because the Court is expected to determine whether to sign Petitioner's proposed decree today, Respondent is filing this Supplement immediately rather than delaying submission while exhibits are finalized. Additional supporting exhibits, affidavits, police records, timelines, and documentary evidence referenced herein will be submitted shortly in a separate supplemental exhibit filing.

TO THE HONORABLE COURT:

Jason McKemie, Respondent, files this **Verified Emergency Supplement to the Motion to Recuse filed June 11, 2026 ("Recusal No. 3")**. This supplement is not a new recusal motion. This is a supplement to the pending recusal, due-process, healthcare, discovery, stolen-evidence, protective-order, financial, witness-suppression, and trial-integrity issues already before the Court. Respondent is filing this Supplement before any ruling on the proposed decree because once a decree is signed, the practical ability to prevent further medical, financial, evidentiary, and procedural harm is materially reduced.

Because the Court is expected to determine whether to sign Petitioner's proposed decree today, Respondent is filing this Supplement immediately rather than delaying submission while exhibits are finalized. Additional supporting exhibits, affidavits, police records, timelines, and documentary evidence referenced herein will be submitted shortly in a separate supplemental exhibit filing.

The Court is expected to decide whether to render, sign, and enter Petitioner's proposed decree today. This Supplement is submitted under Texas Rule of Civil Procedure 18a as a procedural supplement to Recusal No. 3, which was filed before any evidence was offered, before any witness was called, before any exhibit was offered, and before any testimony was taken. No written ruling has been issued on Recusal No. 3.

This Supplement does not reurge the same grounds asserted in the prior recusals. Each recusal arose from a distinct escalation point in an increasingly severe pattern of procedural breakdown, discovery obstruction, financial concealment, healthcare interference, and trial-preparation sabotage:

- **Recusal No. 1** addressed the 254th District Court's failure to hear emergency relief, discovery obstruction, medical collapse, and the procedural trap created when counsel withdrew during discovery and reappeared at the discovery deadline to file blanket objections;
- **Recusal No. 2** addressed the subsequent structural collapse in the 302nd District, including broken financial-production assurances, continued concealment of source records, termination of dependent healthcare benefits through submission of a false divorce-based Qualifying Life Event (QLE), repeated healthcare noncompliance, continued discovery noncompliance, and the absence of any fair pathway to trial; and
- **Recusal No. 3** addresses entirely new and trial-dispositive developments, including a manufactured eviction, the use of non-service and procedural pressure to force Respondent into emergency courthouse appearances, the theft and destruction of litigation materials and survival property, including hard drives, evidence repositories, legal work product, medications, financial records, medical records, and trial materials, continued healthcare obstruction, continued source-record concealment, escalating false criminal allegations, and Respondent's present physical and procedural inability to meaningfully proceed due to deteriorating health and repeated hospitalizations.

The requested relief is narrow, emergency, and procedural. The Court should not render, sign, enter, transmit, enforce, or approve any final decree until Recusal No. 3 and this Supplement have been reviewed and ruled upon in writing.

This Supplement is submitted to prevent the Court from converting a record manufactured through healthcare obstruction, financial sabotage, false destitution claims, stolen evidence, property destruction, discovery obstruction, witness suppression, false criminal escalation, and a documented malicious-litigation pattern into a final judgment.

I. EMERGENCY RELIEF REQUESTED

1. Issue a written ruling on Recusal No. 3 and this Supplement before rendition, signature, entry, transmission, enforcement, fee awards, sanctions, or decree-related action.
2. Stay or abate decree action until the Court addresses the pending recusal, the unresolved medical-impossibility record, healthcare/HSA/FSA/QLE/COBRA compliance, financial-source-record defects, stolen evidence, witness suppression, and the newly surfaced SAPD/writ/property evidence.
3. Deny in full any request by Petitioner, her counsel, experts, vendors, investigators, or agents for attorney fees, costs, sanctions, protective expenses, expert/vendor expenses, or any cost shifting against Jason.

4. Prohibit Petitioner, her counsel, experts, vendors, investigators, agents, contractors, or anyone acting with or for her from accessing, inspecting, imaging, copying, using, relying on, benefiting from, or receiving any derivative benefit from Jason's stolen hard drives, evidence repositories, trial binders, Apple devices, computers, records, tools, briefcase, passport, medications, or seized litigation materials.
5. Require third-party source verification before any decree is signed or enforced, including healthcare/HSA/FSA/QLE/COBRA records, Accenture benefit/payroll records, SAPD/Dallas police records, writ/constable/bodycam/dashcam records, lease buyout records, financial institution records, contractor/vendor billing, and stolen-property chain-of-custody evidence.

II. THIS CASE BEGAN WITH A WARNING, NOT A DIVORCE DISPUTE

On December 10, 2024, Jason underwent invasive spinal surgery. On December 11, 2024, while recovering from surgery, Jason discovered substantial documentation showing a long documented pattern of malicious litigation, protective-order use, false allegations, settlement concealment, retaliation, and silencing tactics involving Petitioner's former romantic partners, spouses, spouses of former spouses, neighbors, a landlord, and at least three prior employers.

Jason contacted law enforcement on December 11, 2024. He warned that Petitioner would come after him through the same pattern: false police reports, protective-order positioning, financial isolation, healthcare interference, and procedural capture. He specifically told the operator that if anyone was dispatched to his house, officers should know he would be unarmed.

Jason then met with counsel. Counsel reviewed the documentation and agreed that Jason faced a high-risk situation. Counsel advised him to preserve enough money to maintain the marital residence for approximately three months and to obtain medically necessary rehabilitation equipment. Counsel told Jason not to drain funds for legal fees and not to take more than needed to preserve the estate.

On December 12, 2024, Jason transferred approximately \$30,000 to preserve the marital residence and purchased rehabilitation equipment and a Christmas gift Petitioner had requested for her sister. Petitioner texted Jason asking whether the transactions were legitimate. Jason confirmed that they were. That same evening, Petitioner promised amicability, promised Jason would remain in the marital residence while she used corporate housing in San Antonio, and promised she would never leave him with nothing to live on.

Petitioner then reported those legitimate survival, medical, and legal transactions as fraud. She paid approximately \$14,000 to Donna Tomlinson/Hargrave Family Law, filed a protective order and petition for annulment, and began the precise pattern Jason warned law enforcement would occur. Emergency police calls claiming Jason attempted suicide occurred days after Jason warned the police. The protective order followed approximately one week after the warning. The record is not hindsight. The record is the warning becoming reality.

III. THE FIRST RECORDED EVENT IN THIS CASE MATTERS

On January 7, 2025, at the protective-order hearing, Donna Tomlinson of Hargrave Family Law appeared and moved to withdraw from representing Petitioner. Judge Sandra Jackson expressed concern because serious allegations had been made, the matter involved a protective order, and a continuance had already been granted.

Donna Tomlinson then stated on the record that proceeding forward with her representation of Gwendolyn Ulijasz-McKemie would violate her ethical oath as an officer of the court.

That was not a side comment. It was the opening event of this litigation record. A protective-order case built on severe allegations began with Petitioner's own counsel telling the Court that continued representation would violate counsel's ethical oath. That fact belongs at the center of the Court's review before any decree is signed.

IV. THE RECORD IS AN INVERSION OF REALITY

The proposed decree is not merely unfavorable. It is the inverse of reality. Petitioner's marital timeline is false. Her financial disclosures are false or structurally unusable. Her destitution narrative is false. Her healthcare compliance is false. Her property narrative is false. Her police-report narrative is false. Her proposed decree would reward the very misconduct that manufactured Jason's collapse.

This was not a situation of someone with a history of not paying bills. Respondent had a 790 credit score, had never been evicted, maintained excellent credit and had never filed bankruptcy. The eviction/writ machine was manufactured. Petitioner was the sole financial guarantor on the Dallas lease. She denied responsibility, then she and counsel admitted a payoff/release arrangement with the landlord. Jason was then pursued through eviction machinery over rent and housing obligations distorted by that secret buyout and release which was concealed for over 6 months before testimony forced it into the open

The Court should not sign a decree that treats manufactured collapse as ordinary nonpayment, trial waiver, or bad luck.

V. THE MARRIAGE TIMELINE PRESENTED BY PETITIONER IS FRAUDULENT

Petitioner's proposed marital timeline is not a harmless date dispute. It alters property characterization, reimbursement, fiduciary duties, healthcare/benefit rights, income tracing, and community-estate value. It is the foundation of the proposed property wipeout.

Jason has a Declaration and Registration of Informal Marriage signed by both parties on September 22, 2023. The declaration states that the parties agreed to be married, lived together as a married couple in Texas, and represented to others that they were married. Jason also has a signed Declaration of

Domestic Partnership, joint accounts, joint financial conduct, reciprocal powers of attorney, Ameriprise beneficiary documentation identifying the parties as spouses, and multiple witnesses, including the wedding officiant, confirming the relationship timeline.

This evidence destroys the "short marriage" fiction. The decree should not be signed on a marital timeline contradicted by signed declarations, domestic-partnership documents, powers of attorney, joint investment activity, joint accounts, beneficiary records, and witness testimony.

VI. FINANCIAL ISOLATION WAS MANUFACTURED BEFORE PETITIONER LEFT

Before separation, Petitioner convinced Jason not to accept an AT&T position paying approximately \$250,000 per year by representing that he would contribute more to the family by continuing to support her career, household structure, and income platform. She then left after financially isolating him.

Petitioner concealed the first half of a \$300,000 Accenture sign-on bonus structure while telling Jason the parties were experiencing a "short-term cash crunch" because she had "front loaded" expenses for her new role. She instructed Jason to place more and more community expenses on his personal credit cards, promising those balances would be paid off when the first half of the sign-on bonus arrived in November 2024. She assured him they would immediately resume paying all cards in full each month, as they had done before.

Instead, Petitioner left Jason days after spinal surgery, partially immobilized, with no income, maxed personal credit, and no realistic ability to retain counsel. She had instructed him to buy personalized Christmas gifts for her family and to carry household and community expenses on his personal credit while money was flowing through her accounts into undisclosed or untraced source accounts.

This was not ordinary financial disagreement. It was financial strangulation, debt shifting, and counsel-prevention by design. Petitioner controlled the income, benefits, bank access, healthcare access, and litigation posture, then used the collapse she manufactured as leverage.

The consequences were not limited to Jason. His parents loaned him approximately \$50,000 to keep him alive and preserve the marital estate. Soon after, Jason's father finally obtained access to a memory-care placement, but the family lacked the funds necessary to secure it because those funds had already been diverted into the emergency caused by Petitioner's financial sabotage. Jason's parents are now in bankruptcy and are being forced to sell their home and move into apartments to survive the collapse Petitioner engineered.

Petitioner has also continued sending mail and litigation-related materials to Jason's parents despite repeated requests to stop, further distressing a family already dealing with dementia, bankruptcy, forced displacement, and the financial destruction caused by this case.

VII. FALSE DESTITUTION, THIRD-PARTY CONTRACTORS, AND SOURCE-RECORD COLLAPSE

Petitioner declared destitution while earning extraordinary income. Her February 7, 2026 Amended Inventory and Appraisal lists Accenture equity, a \$150,000 signing bonus, a \$34,225.57 cash bonus, Accenture 401(k) value, Ameriprise IRA/Roth IRA balances, alleged loans, a BMW M340xi with a claimed \$55,902 balance, and a Glock firearm. The same inventory advances a July 26, 2024 marriage date contradicted by the signed informal-marriage declaration and other relationship evidence.

Petitioner claimed she was living in her car, using public transportation, and unable to afford rent without loans while earning approximately \$125,000 per month, while her employer reimbursed housing, while she stayed in a luxury hotel, and while she deployed extraordinary third-party resources.

Exhibit N2 shows a Jetty Partners invoice dated January 9, 2025 for \$24,227.94, including professional services, residence services, vehicle services, due-diligence investigation, close-protection escort, and forensic device analysis. Exhibit N2 also includes a Decisive Resources proposal signed January 16, 2025 for physical security (\$10,000), investigations (\$10,000), and privacy management (\$2,000 per month), including OSINT investigations, documenting evidence, investigative reports, law-enforcement/attorney liaison, data-removal work, credit monitoring/freezes, and privacy management.

Petitioner cannot declare destitution while deploying lawyers, investigators, contractors, privacy/security consultants, reputation/due-diligence resources, and paid personnel to control the narrative, invade Jason's privacy, monitor his property, attack his credibility, and then ask the Court to shift fees or wipe out Jason's estate interest.

The financial productions remain structurally unusable. Prior filings document missing months, missing pages, mixed-year page inserts, one-day snapshots masquerading as statements, reissued card numbers, missing account continuity, missing source records, and discovery responses that recited Bates ranges without curing the defects. No decree can be safely signed on this financial record.

VIII. NEW BMW / INVENTORY CONTRADICTION REQUIRES SOURCE VERIFICATION

New SAPD dashcam evidence appears to show Petitioner with a BMW X3 on May 29, 2026. Petitioner's February 7, 2026 inventory identifies only a 2023 BMW M340xi with a claimed \$55,902 loan balance and negative equity. If Petitioner acquired a new BMW while representing the M340xi as encumbered and while omitting the new vehicle from inventory, that is not a side issue. It is new source evidence that the inventory and loan/debt structure require verification before any decree action.

Jason does not ask the Court to speculate about title, lease, payoff, or ownership. Jason asks the Court to require source verification before signing a decree based on an inventory now contradicted by

police-video evidence.

IX. HEALTHCARE OBSTRUCTION IS LIFE-SAFETY, NOT ARGUMENT

Healthcare is central to this Supplement because a decree signed on the proposed record would leave Jason - a man with congestive heart failure - homeless, bankrupt, without transportation, without the ability to afford COBRA, without functional HSA/FSA access, without surgeries, without reliable medication access, and without the practical ability to rebuild employment.

Jason needs spinal surgery and surgery for a torn rotator cuff, ruptured bicep, and torn tendons. He has been repeatedly hospitalized with congestive heart failure. He gained approximately fifty-two pounds from fluid retention after being forced off GLP-1 medication without warning when healthcare access was obstructed. He was hospitalized immediately before writ events and released himself Against Medical Advice to try to preserve property, medication, records, and evidence.

Petitioner repeatedly tied Jason's survival to healthcare access. On the December 12 call, she promised she would never leave him with nothing to live on and discussed healthcare in terms tied to whether Jason would die without it. She later obstructed healthcare, HSA/FSA access, medication access, surgery access, and benefit functionality while representing compliance.

If the Court signs the proposed decree and cuts off the only practical path to COBRA, medication, deductibles, surgery, and medical stability, the result is not a later-correctable property error. It is life-safety danger.

X. FIREARM, DEATH STATEMENTS, AND POST-DECREE DANGER

The Court should not assume that signing a decree ends this. Jason has repeatedly warned that Petitioner will not stop until she has a protective order, criminal leverage, or a felony-level narrative capable of silencing him.

Petitioner's own inventory lists a Glock semi-automatic gun acquired in October 2025. Jason has identified a police report where Petitioner stated she needed a gun due to a property dispute. Jason has also identified writings in the sealed submission for in-camera review concerning murder fantasies involving a former husband. Those facts must be reviewed in the context of healthcare/death statements, false criminal escalation, and stolen-property-based allegations.

This is not dramatic wording. The Court is being asked to sign a decree that could leave Jason without healthcare, surgery, medication, COBRA affordability, transportation, evidence, housing, and financial ability to survive while Petitioner continues escalating police narratives. That is not finality. That is a launchpad for the next strike.

XI. SAPD RECORDS SHOW FALSE-REPORTING ESCALATION AND STOLEN-PROPERTY NARRATIVE

SAPD Report No. SAPD26106749 records Petitioner attempting to frame Jason's HSA/benefit-access efforts as fraud. The officer told her it did not appear Jason was attempting to impersonate her, that Jason was authorized on the account, and that no criminal conduct appeared from the benefits-access conduct. The same report records that Petitioner then escalated into a statement that Jason drugged and raped her in 2024 while declining to make a sexual-assault report.

SAPD Report No. SAPD26108224 records additional escalation involving alleged abandoned property, drug paraphernalia, marijuana, a broken Tile tracker, an AirTag, and references to multiple prior reports. Jason can supplement the dashcam/bodycam recordings this week, including Detective Vidal's statement that nothing points to Jason and everything points to Petitioner.

New location evidence shows Jason's carbon-fiber briefcase at 12802 Kings Forest Street, San Antonio, Texas, Petitioner's residence, before it was later discarded. Jason's Apple TV is now reportedly in an SAPD evidence locker after Petitioner used stolen or removed property to generate allegations. The chain is direct: Petitioner removes Jason's property, transports or receives it, creates a criminal narrative around it, reports it, and then tries to use the police report as litigation leverage.

That pattern is not protection-seeking. It is weaponized law enforcement built from stolen property.

XII. THE WRITS WERE BAIT, NOT NORMAL EVICTIONS

Jason would never voluntarily leave the residence during execution of an eviction/writ if doing so meant abandoning evidence, medication, clothing, passport, trial binders, hard drives, tools, records, computers, and survival property. The only reason Jason left was the improper-service bait that required him to go to the courthouse to seek emergency relief.

Jason repeatedly said Petitioner could retrieve her property through a third party. He repeatedly objected to Petitioner's personal access because he warned she would steal evidence, destroy property, plant or manipulate items, and manufacture allegations. The exact conduct he warned about then occurred.

During the second writ aftermath, while Jason's remaining property was outside and Jason had to leave for the courthouse to seek emergency protective and restraining relief, Petitioner's attorney appeared and interfered with Jason's attempt to preserve toolboxes and survival property. Jason told the attorney that mutual injunctions restricted Petitioner's access and removal of property. The attorney asked whether Jason had a copy of the injunction. Jason explained that Petitioner had stolen his printer and that he was in the middle of an eviction. The attorney then acted as though the injunction did not exist and a moving truck was pulled up.

Two men also appeared and bragged about being paid approximately \$500 per hour each - approximately \$1,000 per hour combined - to monitor or participate in the property event. Jason has their business card. Five hundred dollars would have preserved storage, bodycam, transcripts, or survival property. Petitioner claimed destitution while deploying paid resources at rates Jason could not access to save his own property.

This was not ordinary moving. It was a hostile takeover of the residence under the cover of a manufactured writ.

XIII. STOLEN PROPERTY, COMPUTER HARDWARE, AND ASSET DESTRUCTION

There is no meaningful division of assets in the proposed decree if Petitioner can first steal, destroy, remove, or control Jason's property and then claim that everything in the house was hers or subject to her narrative. Jason's monitors, televisions, computers, hardware, home-studio equipment, tools, hard drives, trial binders, personal papers, passport, medication-related items, Apple devices, and evidence repositories were taken, destroyed, separated, discarded, or made inaccessible.

Jason's property losses are not \$60,000. They are easily in the range of \$100,000 or more before accounting for lost evidence, lost work product, lost client obligations, and lost ability to earn. Jason built a computer for a client for approximately \$4,500; the client had already paid approximately \$2,500; that computer was stolen, creating an immediate repayment/replacement problem and additional reputational harm.

Jason also faces imminent loss of a remaining storage unit containing approximately \$25,000 in property unless estate funds are released. He needs approximately \$444 for bodycam footage from the writ and expects the combined writ bodycam/dashcam records to cost approximately \$1,000. He has repeatedly requested transcripts and records needed to prove what occurred. Without funds, the record itself is being starved.

This is why the stolen-property issue is procedural, not merely economic. Petitioner's theft and destruction of property stripped Jason of evidence, tools, hardware, clothing, computers, records, and the means to defend himself and rebuild.

XIV. STOLEN HARD DRIVES AND EVIDENCE REPOSITORIES

Petitioner stole Jason's hard drives, evidence repositories, trial binders, personal papers, electronics, records, and survival property. She destroyed or separated equipment, power cables, data cables, monitors, computers, and hardware in a manner inconsistent with ordinary moving and consistent with targeted litigation/evidence sabotage.

Those stolen hard drives and evidence repositories are Jason's separate property and stolen evidence. Petitioner, her counsel, experts, vendors, investigators, agents, contractors, and anyone acting with or for her must not be permitted to access, inspect, image, copy, use, rely upon, authenticate, test, review, receive, or benefit from those materials in any way. The only permissible relief is preservation of Jason's rights, categorical non-access, categorical non-use, sequestration away from Petitioner and her agents, and return to Jason.

XV. ADDRESS CONFIDENTIALITY PROGRAM AND THE PRIOR-PARTNER NARRATIVE

Jason invested immense effort in Petitioner's claimed safety during the marriage. He personally assisted Petitioner with the Texas Address Confidentiality Program, including late-night work removing or reducing public data-broker exposure because Petitioner represented that a former husband was dangerous and might try to find or kill her. Jason was also placed into the protection framework based on Petitioner's representations, despite the former husband never contacting or threatening Jason.

This matters because Jason did not ignore Petitioner's claimed safety concerns. He protected her. He believed her. He acted on her representations. The later discovery that the same former husband is willing to testify and disputes the allegations against him is directly relevant to pattern, credibility, protective-order misuse, and why Jason's warnings about malicious litigation were credible from the beginning.

XVI. REPRESENTATION ASYMMETRY AND OUT-OF-STATE COUNSEL ARE PART OF THE DUE-PROCESS COLLAPSE

Petitioner claimed poverty while employing multiple law firms, out-of-state counsel, employment-defense resources, investigators, due-diligence or reputation-destruction resources, security/paid personnel, privacy consultants, and contractors. Jason repeatedly objected to pro hac vice admission and additional out-of-state counsel because the estate was already funding extraordinary litigation expenditures while Petitioner represented herself as financially distressed or destitute.

Jason's request was simple: Petitioner may hire whomever she wants, but if she brings in additional out-of-state counsel and extraordinary resources, those costs must not be shifted to Jason or the estate, and local counsel sponsoring out-of-state counsel should share responsibility for misconduct, sanctions, improper service, witness suppression, or abuse of process. The Court should not let representation asymmetry become the mechanism that finalizes a distorted record.

XVII. FORMER-HUSBAND WITNESS AND ACTIVE WITNESS SUPPRESSION

Recent filings from Christopher McNally, Petitioner's former husband and a material witness in this case, show protective-order-extension and fee/body-attachment challenges in Cook County, Illinois. Those filings identify overlapping counsel involvement and the use of protective-order restrictions and coercive relief in a manner that impaired or chilled McNally's ability to communicate or testify.

Additional filings state that fees and body-attachment pressure risked impairing his ability to testify in this case and that he was expected to testify in the Dallas divorce proceeding. That is directly relevant to Recusal No. 3, trial fairness, witness access, protective-order misuse, and whether this Court should sign a decree before Jason can present sworn evidence from McNally.

This is witness suppression. The Court should not sign a final decree before allowing Jason to present McNally's sworn testimony or unsworn declaration regarding Petitioner's protective-order pattern, false allegations, silencing mechanisms, overlapping counsel involvement, personal/professional/psychological/financial destruction, and retaliation risk.

McNally was subpoenaed; subpoena prohibited contact with Gwen; PO language now chills his testimony.

XVIII. FALSE REPORTING AND PROTECTIVE-ORDER MISUSE MUST BE ADDRESSED BEFORE DECREE

A few months ago, Jason applied for a protective order. The judge did not review his evidence. The difficulty in this case is that what Petitioner does is more insidious than the typical domestic-violence fact pattern. It is not as obvious as a punch in the face or an assault with a baseball bat. It is less dramatic, but no less dangerous.

Petitioner purchased a firearm and made threats. Jason has recordings in which Petitioner discusses his death and directly links it to healthcare access. She offered only limited care while acknowledging healthcare as a survival issue. She then systematically obstructed that healthcare.

Petitioner disabled HSA access while Jason was hospitalized with a serious infection. She interfered with surgery. She represented benefits had been restored, but the benefits were either not restored or remained functionally inaccessible. Even when coverage technically existed, she obstructed access to funds required for copays, deductibles, medications, and treatment costs.

After entering Jason's residence and taking his property, Petitioner transported or received property in San Antonio and attempted to use it as the basis for criminal allegations. The pattern is unmistakable: she takes property, creates a narrative around it, presents the allegation to law enforcement, and attempts to transform her own conduct into criminal allegations against Jason.

Jason cannot leave this litigation without enforceable protection against knowingly false criminal allegations, stolen-property-based accusations, healthcare interference, and witness suppression. Without intervention, this does not end.

XIX. THE RECORD HAS BEEN SCREAMING FOR EIGHTEEN MONTHS

The issue before the Court is no longer whether the parties disagree. The issue is whether this record can honestly be described as ordinary.

This record contains more than 120 pleadings, more than 1,400 pages of filings, repeated requests for a court reporter, repeated requests for transcripts, repeated requests for source records, repeated requests for third-party verification, more than seventy emergency filings, repeated healthcare motions, repeated enforcement motions, repeated discovery motions, repeated notices of noncompliance, repeated requests for emergency relief, repeated warnings regarding financial collapse, repeated warnings regarding healthcare obstruction, repeated warnings regarding evidence theft, repeated warnings regarding false reporting, repeated warnings regarding due-process concerns, and repeated warnings that Jason was facing imminent personal, financial, medical, and procedural destruction.

The Court is not looking at a silent record. The Court is looking at a record that has been screaming for eighteen months.

Jason warned that healthcare was being obstructed. It was. Jason warned that a false divorce-based healthcare termination had occurred. Accenture later admitted the QLE was implemented in error. Jason warned that financial disclosures were false. Subsequent records contradicted representations of destitution. Jason warned that evidence would be targeted. Hard drives, evidence repositories, trial binders, Apple devices, computers, and litigation materials disappeared. Jason warned that criminal allegations would escalate. Fraud allegations became stalking allegations. Stalking allegations became drugging allegations. Drugging allegations became sexual-assault allegations.

The question is no longer whether the warnings existed. The question is what the Court must do before signing a final decree after the warnings proved true. The answer cannot be to sign first and ask questions later.

XX. SIGNING NOW WOULD FINISH THE MANUFACTURED COLLAPSE

If the Court signs the proposed decree on this record, it will not merely divide property. It will complete the exact malicious-litigation campaign Jason warned law enforcement about on December 11, 2024.

It will leave Jason homeless, bankrupt, without affordable COBRA, without stable healthcare, without needed surgeries, without reliable medication access, without transportation, without the stolen

evidence needed to defend himself, without computers or tools needed to rebuild income, without access to bodycam/dashcam/transcript proof he cannot afford, with parents pulled into bankruptcy, with a father suffering dementia and deprived of memory-care stability, facing false criminal allegations, and at immediate risk of death from untreated or destabilized congestive heart failure and delayed surgical care.

That is not a side issue. That is the emergency.

XXI. PROPOSED WRITTEN FINDINGS REQUESTED BEFORE ANY DECREE ACTION

6. Recusal No. 3 was filed on June 11, 2026 before evidence was offered, witnesses were called, testimony was taken, or trial evidence was received.
7. The Court has been notified that Jason's trial readiness was materially impaired by stolen hard drives, stolen evidence repositories, stolen trial materials, stolen Apple devices, stolen paper records, stolen work product, stolen or destroyed computers, stolen tools, stolen client hardware, stolen passport/medication-related items, and destruction of property.
8. The Court has been notified that Petitioner's proposed marital timeline is contradicted by sealed in-camera exhibits, joint accounts, joint investments, domestic-partnership documents, reciprocal powers of attorney, beneficiary records, character/relationship witnesses, and a signed Declaration and Registration of Informal Marriage dated September 22, 2023.
9. The Court has been notified that healthcare/HSA/FSA/QLE/COBRA compliance remains disputed and requires third-party source verification before any decree affecting healthcare access is signed or enforced.
10. The Court has been notified that SAPD records bear on false reporting, device/tracking allegations, healthcare-benefit allegations, protective-order misuse, credibility, trial readiness, and chain of custody for stolen property.
11. The Court has been notified that financial source records remain incomplete, structurally defective, and inadequate for final property division absent institution-origin verification.
12. The Court has been notified that recent McNally filings bear on witness suppression, protective-order misuse, body-attachment pressure, overlapping counsel involvement, and interference with a material witness.
13. The Court has been notified that Petitioner deployed Jetty Partners, Decisive Resources, privacy/security/investigation contractors, lawyers, paid personnel, and out-of-state counsel while claiming destitution and seeking to shift costs or erase Jason's estate interest.

14. The Court has been notified that Jason objects to any final decree, fee award, sanctions award, enforcement step, or trial ruling entered before written resolution of Recusal No. 3 and this Supplement.

XXII. REQUEST FOR ORDER

15. grant recusal or refer Recusal No. 3 and this Supplement for decision before any decree action;
16. stay rendition, signature, entry, transmission, enforcement, fee awards, sanctions, and decree action pending written recusal resolution;
17. order immediate third-party source verification of healthcare, HSA/FSA, QLE, COBRA, plan elections, and functional benefits access;
18. order source-record financial verification before final property division;
19. order preservation, sequestration away from Petitioner and her agents, categorical non-use, categorical non-access, and categorical non-benefit as to all stolen evidence, stolen hard drives, stolen records, stolen Apple devices, stolen computers, stolen trial binders, and stolen property;
20. deny in full Petitioner's request for fees, expenses, sanctions, costs, protective expenses, expert/vendor expenses, or fee shifting against Jason;
21. allow Jason to submit McNally's sworn testimony or unsworn declaration and supplemental exhibit pinpoints before decree signature;
22. order release or advancement of sufficient estate funds for Jason to obtain bodycam/dashcam footage, transcripts, medical continuity, COBRA, storage preservation, transportation preservation, and emergency property protection before decree action;
23. preserve Jason's objections for mandamus, appeal, due process, recusal, stolen-evidence, healthcare, discovery, source-record, sanctions, contempt, financial-relief, false-reporting, witness-suppression, and trial-readiness review.

XXIII. SOURCE MAP / EXHIBITS FOR IMMEDIATE REVIEW

Issue	Primary source/exhibit	Why it matters before decree
Recusal No. 3	Verified Motion to Recuse filed June 11, 2026	Procedural bar/mandatory written ruling before decree action.

Marriage timeline	Sealed in-camera submission; Declaration of Informal Marriage; domestic partnership; Ameriprise/POA/witness materials	Shows proposed marital timeline is false and property division premise is inverted.
Healthcare life-safety	Healthcare PO materials; ERISA/EBSA notices; Accenture/QLE/COBRA records; medical letters	Shows decree could cut off medication, COBRA, surgery, HSA/FSA access, and CHF stability.
Financial collapse	Amended Inventory; discovery deficiency filings; Accenture compensation; financial matrices	Shows false destitution, missing source records, alleged loans, and concealed/omitted assets.
Third-party contractors	Exhibit N2 - Jetty Partners invoice; Decisive Resources proposal/signature certificate	Shows claimed poverty while deploying paid investigators/security/privacy/reputation resources.
SAPD escalation	SAPD26106749; SAPD26108224; dashcam/bodycam pending	Shows benefits-fraud allegation rejected by officer and escalation into drugging/sexual-assault/tracking narratives.
Stolen property/evidence	Writ Aftermath Exhibit V index; property photos; AirTag/Find My screenshots; SAPD property evidence	Shows evidence theft, Apple device chain of custody, briefcase at Petitioner's residence, and property destruction.
Witness suppression	McNally filings; proposed unsworn declaration	Shows material witness access impaired through protective-order/body-attachment pressure.
Writ bait/manufactured eviction	Lease/guarantor records; buyout/release materials; writ/bodycam requests	Shows Petitioner used lease/writ machinery to force Jason out and enable theft/destruction.

XXIV. VERIFICATION

My name is Jason McKemie. I am over 18 years of age, competent to make this declaration, and the facts stated in this Supplement are true and correct based on my personal knowledge, my review of records, filings, police reports, recordings, transcripts, court orders, medical records, benefit records, photographs, location records, financial records, witness communications, and attached evidence.

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

Executed in Texas on June 15, 2026.



Jason McKemie

539 W. Commerce St., Ste. 2010

Dallas, TX 75208

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this filing was served on all counsel and parties of record through the electronic filing/service system and/or by email on June 15, 2026.



Jason McKemie

APPENDIX A

UNSWORN DECLARATION OF CHRISTOPHER McNALLY

My name is **Christopher McNally**. I am over eighteen years of age. My address is **228 Millbridge Rd., Riverside, Illinois 60546** and my birthday is **August 24,1976**. I am of **sound mind**, competent to make this declaration, and the facts stated below are within my personal knowledge and are true and correct.

This declaration is provided only in response to subpoena/court testimony request and is not contact with Gwendolyn Ulijasz.

I submit this declaration in response to a subpoena/request for sworn testimony in Dallas County case DF-24-18010. I am not contacting Gwendolyn Ulijasz, attempting to communicate with her, or attempting to communicate with her through Jason McKemie or any third party. I understand that prior protective-order language restricts contact or communication through third parties. This declaration is provided solely for court use, subpoena compliance, testimony preservation, and lawful evidentiary purposes in pending litigation.

Nothing in this declaration is intended as a message to Gwendolyn Ulijasz, a request that any person contact her, or an attempt to harass, intimidate, embarrass, or communicate with her. I provide this statement only because I have been identified as a material witness with firsthand knowledge relevant to litigation-pattern evidence, protective-order use, witness restrictions, credibility, and potential witness suppression.

1. I was previously in a long-term relationship with Gwendolyn Laura Ulijasz. Our relationship ended in or around December 2022.
2. I am aware that Jason McKemie is currently involved in divorce litigation with Gwendolyn Laura Ulijasz in Dallas County, Texas, Cause No. DF-24-18010.
3. I was subpoenaed by Jason McKemie to appear and testify remotely in that case. My understanding is that the subpoena was for remote court testimony only and did not authorize or request any direct or indirect contact with Gwendolyn Ulijasz outside sworn testimony in court.
4. I am willing to testify under oath regarding my personal experiences with Gwendolyn Laura Ulijasz, including her use of litigation, protective-order proceedings, police reports, threats, confidentiality restrictions, third-party communication restrictions, and other legal pressure.

5. Based on my personal experience, Gwendolyn Laura Ulijasz used legal proceedings and protective-order restrictions in a manner that impaired my ability to speak freely about her conduct, defend myself, communicate with relevant witnesses, or warn others.
6. I am aware that protective-order language or related restrictions have been used or asserted in a way that discourages or prevents me from communicating information about Gwendolyn Laura Ulijasz to third parties.
7. I am willing to testify despite concern that doing so may expose me to retaliation, accusations, or attempted enforcement of restrictions against me.
8. I have reviewed or been informed of certain allegations and conduct occurring in Jason McKemie's case. Based on my personal experience, the conduct described to me appears consistent with patterns I experienced or observed involving Gwendolyn Laura Ulijasz.
9. I have personal knowledge regarding protective-order litigation involving Gwendolyn Laura Ulijasz and myself, including disputes over allegations, restrictions on communication, attempts to characterize speech or evidence-sharing as prohibited conduct, and efforts to restrict my ability to present or publish evidence concerning my own experience.
10. I contest the merits and accuracy of allegations made against me by Gwendolyn Laura Ulijasz in protective-order proceedings and related enforcement proceedings.
- 11. I deny that I committed the acts or misconduct alleged against me in those proceedings.**
12. I have experienced serious personal, professional, psychological, and financial harm following my relationship and litigation history with Gwendolyn Laura Ulijasz.
13. I am aware of other individuals who, based on information available to me, have experienced similar patterns involving Gwendolyn Laura Ulijasz, including allegations, litigation pressure, protective-order mechanisms, reputational harm, financial harm, and restrictions on speech or testimony.
14. I understand that Gwendolyn Laura Ulijasz's counsel in proceedings involving me has included Jonathan Steele / Beermann LLP. I further understand that counsel associated with those proceedings has also appeared or sought to participate in Jason McKemie's Texas divorce case.
15. At or near the time I became relevant as a potential witness in Jason McKemie's case, proceedings involving me included coercive enforcement efforts, including contempt-

related proceedings and/or body-attachment-type relief. **The timing and nature of the proceedings during the July bench trial, and the recent June requests for body-attachment relief, appear calculated to disrupt my ability to comply with the subpoena and provide testimony as a material witness.**

16. I have documents, records, messages, court papers, police reports, or other materials that may corroborate my testimony.
17. I am willing to appear for testimony, provide documents, and answer questions under oath, subject to appropriate court process and protection from any allegation that my participation is prohibited contact.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on **June 15, 2026.**


Christopher McNally

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Status as of 6/15/2026 10:43 AM CST

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