

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

IN THE MATTER OF
MARRIAGE OF

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GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

IN THE DISTRICT COURT THE

302th JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

FILED UNDER SEAL

SUBMITTED FOR IN CAMERA REVIEW ONLY

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Submitted to:

The Honorable Judge David Whelan
302nd District Court, Dallas County

Filed by:

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Notice to Opposing Counsel:

This submission is filed under seal and is not being served with full content currently. Counsel for Petitioner is notified of the existence of a sealed in-camera submission. Copies of this filing may be requested by judicial order or upon further motion.

TO THE HONORABLE JUDGE OF THE 254th DISTRICT COURT:

Respondent, **Jason McKemie**, appearing pro se, respectfully files this submission under seal for in camera review. This motion is brought pursuant to Rule 204 of the Texas Rules of Civil Procedure and the Court's equitable authority under Texas Family Code §§ 6.502 and 6.503. The contents of this motion involve matters of psychiatric history, procedural misconduct, and evidentiary risk that materially affect the integrity of these proceedings and the safety of Respondent.

This filing is submitted in good faith and under seal for protection of all parties, and to ensure that the Court may evaluate the record in a secure and truthful manner.

STATEMENT OF CIRCUMSTANCES

I. MENTAL CONDITION IN CONTROVERSY

In 2023, The Hartford denied Petitioner employer provided Group Term Life Insurance at Cognizant Technology Solutions due to an undisclosed DSM-5 psychiatric diagnosis. Coverage was contingent on a formal psychological evaluation, which Petitioner refused to complete through an independent physician. Instead, Petitioner contacted a friend in Chicago, who was not her treating psychiatrist, to complete the necessary forms – apparently to avoid third-party psychiatric review. Upon appeal, I am aware that her risk profile did cause another denial, however it is my understanding that her second appeal was approved although at a diminished level of coverage and she also had to come out of pocket on an amount above what was employer provided to be approved.

EXHIBIT A - HARTFORD

In 2024, Petitioner was required to undergo a psychiatric evaluation by MetLife for them to approve group term life insurance provided by her employer. This was triggered by a DSM5 diagnosis within her health records. I do recall there being a mention of involuntary psychiatric hospitalizations in the past, however I lack that documentation.

Petitioner discontinued her psychiatric medication in August 2024. Immediately following that cessation, Respondent documented a sharp behavioral shift including emotional destabilization, aggressive litigation escalation, and psychological cruelty. These behaviors were not isolated; they became consistent and patterned, involving sadistic medical abandonment and financial sabotage during Respondent's post-surgical recovery.

EXHIBIT B – METLIFE

Petitioner has also initiated a series of protective orders against multiple former partners in multiple jurisdictions, each following a similar pattern of medication cessation, career elevation, and retaliatory legal escalation. These patterns, when combined with demonstrably false testimony, suggest serious psychological dysfunction that materially affects Petitioner's ability to participate fairly in these proceedings.

EXHIBIT C - CHRISTOPHER MCNALLY
EXHIBIT D - JASON MCKEMIE
EXHIBIT E - JASON PRAU

Petitioner has a history of weaponizing both civil and criminal justice systems for both personal gain, as well as to attack and silence her opposition. Gwen has a documented track record of securing confidential, cash settlements from employers upon exit. She has received a confidential settlement from each of her last three employers which are included as evidence.

EXHIBIT F – AIG
EXHIBIT G – AB
EXHIBIT H – COGNIZANT

II. GOOD CAUSE FOR EVALUATION

Respondent has produced evidence that Petitioner has:

- Submitted falsified and materially misleading financial disclosures (e.g. misrepresenting VEIP contributions as tax withholdings).
- Numerous weaponized protective orders have been taken out in the past against others Christopher McNally, Jason Paru, Aimee McNally, Jason McKemie & others.
- Petitioner has been the recipient of protective order filings from Christopher McNally.
- Reports are included from the San Antonio Police Department of various false reports made by Petitioner. Upon leaving the marital residence, there were over 12 false police reports against Respondent despite not being to San Antonio in over 6 years.
- On December 14, 2024 petitioner called Dallas emergency services and reported that respondent had attempted suicide on the Thursday prior and was demanding a wellness check. Responded and petitioner were together on that Thursday night and no such incident had occurred, which can be confirmed by text messages and home security cameras.
- Engaged in documented patterns of litigation abuse aligned with known psychological disorder criteria.

EXHIBIT I – SAPD REPORTS
EXHIBIT J – DALLAS POLICE REPORTS

Petitioner’s conduct appears clinically consistent with traits of Cluster B personality disorders, including identity destabilization, compulsive victimhood projection, and retaliatory escalation. Respondent is not a medical professional and does not offer a diagnosis but respectfully asserts that these behavioral patterns place Petitioner’s psychological condition directly in controversy and require formal evaluation.

III. TIMELINE / MILESTONES

- **May 8, 2023:** Petitioner & Respondent meet at Oishii for dinner in Dallas. Gwen states she fled to Dallas from Chicago to hide from ex-common law husband Christopher McNally as he is a threat to her life. Jason's shares about overcoming C-PTSD from his past relationship with Jennifer New. Immediately inseparable.
- **June 2023:** Layoff at Jason's work Connexall, Jason affected. Offered position in North Carolina, or startup opportunity in Dallas w/ no salary.
- **July 2023:** Decide to move in together.
- **Aug 2023:** Set up joint Bank account at Chase Bank. Sign POA's. Move in together. Gwen begins referring to them as partners. Jason having difficult time accepting financial help from Gwen. Travel India & Nepal.
- **Sept 2023:** Gwen's asks Jason to research Advantigen. Gwen sits Jason down on couch, encourages him to trust her. We're a team. My money is your money. Jason's job isn't any less valuable. Gwen suggests 1st joint investment to symbolize their marriage/partnership and recommends Advantigen – Jason agrees. Both very happy. (Legally Married)
- **June 2024:** Petitioner actively prescribed six psychiatric medications, including antidepressants and mood stabilizers. (Ceremonial Wedding)
- **Late July 2024:** Four prescriptions ceased.
- **Mid-August 2024:** Final two medications discontinued.
- **Within days:** Petitioner's behavior became erratic, volatile, mood swings from needy to fits of rage.
- **Late August 2024:** Gwen tells Jason that they are going to go through a brief "cash crunch" and to "leverage credit as much as possible."
- **September 2024:** Morning Terrors, Fits of Rage, Manipulative Behaviors & Dishonesty, Lies, Tears up Wedding License.
- **October 2024:** Escalating Cruelty, Horrible Gaslighting, Attacking Respondent, Insulting, Money & Image Obsessed.
- **November 2024:** Starts off very abusive and escalates, then from mid-Nov through Thanksgiving very close, Improving.
- **November 29th:** Back Injury – Hospitalized.
- **December 3rd:** Jason learns Gwen is having an affair. Simultaneously, Gwen's behavior dramatically swings from love to indifference and cruelty.
- **December 6th:** Jason comes back to Dallas.
- **December 11th:** Jason Paid Legal Retainer, Called 911
- **December 12th:** Gwen abandons Respondent prior to spinal surgery and begins full procedural and financial severance.

Pharmaceutical records (Exhibit K) show that as of June 2024, Petitioner was prescribed six psychiatric medications associated with the treatment of mood disorders, personality dysregulation, and affective instability. In late July, four of these medications were discontinued. By mid-August, all psychiatric prescriptions ceased. Within days of this withdrawal, Petitioner’s behavior deteriorated rapidly and dangerously. Respondent observed severe emotional volatility, manipulative conduct, and eventual physical and financial abandonment. These events directly coincide with the prescription timeline and support the necessity of psychological evaluation.

V. June – Dec 2024 (Relief Amount / Paid in Sanctions)

Checking Account Disparity

GWEN DEPOSITS xx3898	\$422,629
JASON DEPOSITS xx9072	\$41,228
DIFFERENCE	\$211,315
HALF	\$170,087

VII. DIE: MORNING TERROR

Petitioner started engaging in actions aimed at depriving Jason of sleep throughout the months of September – December of 2024. She would wait until the just after he had fallen asleep at night and then awake him with a jolting yell. Typically berating him over a manufactured event that day. Additionally, Petitioner would come place her face an inch of two in front on Jason’s in the morning and would then wake him up in absolute terror when she would scream “DIE” in his face to wake him up. Jason pleaded with her to top. This continued so long it was so disturbing to respond and that he began writing letters at night and leaving them in the bathroom and on her nightstand, begging her not to do it in the morning. These letters were written with so much desperation that he would plead to her to give him 20 min in the morning. That he would allow her to abuse him as much as she wanted, if she could grant him 20 minutes in the morning to wake up.

VIII. “Exhibit - June 2024 Gwen Prescriptions.pdf”

This appears to be a legitimate **Explanation of Benefits (EOB)** or prescription coverage report that lists **multiple psychiatric medications** prescribed to Gwen as of mid-2024.

EXHIBIT K – MEDICATIONS

VIII. THE SILENCED VICTIM SPEAKS LOUDEST

Petitioner had spoken to petitioners ex, law husband, Christopher McNally at one point and I was going to try to get him to testify in these court proceedings. I was calling Christopher McNally to speak specifically on the weaponization of protective orders and specifically how they can be used to isolate in silence past victims. I felt strongly that his testimony would be relevant and meaningful. I could not help but notice that in Petitioners discovered documents were released that there was a communication to petitioner that indicated that I had spoken to him.

EXHIBIT N – NO CONTACT THROUGH 3RD PARTIES

IV.. RESPONDENT’S POSITION ON MUTUAL EVALUATION AND COST ALLOCATION

Respondent cannot afford the cost of a psychological evaluation and requests that any such expense be paid from the marital estate. Petitioner, who has controlled the estate and spent significant sums on litigation, is capable of funding the evaluation subject to equitable adjustment.

If the Court hesitates to order an evaluation solely for Petitioner, Respondent is willing to submit to the same examination under the same conditions, provided it is conducted by an independent, court-appointed provider and paid from the estate.

V. REQUEST FOR ANTI-CLAWBACK PROTECTION

Respondent is not requesting a ruling on division of the marital estate currently. However, considering the documented psychological and behavioral patterns described herein, Respondent respectfully requests that the Court include in its order a provision explicitly prohibiting Petitioner from seeking post-division clawback, seizure, or offset of any portion of Respondent’s awarded share of the estate.

Respondent has stepped away from income-generating work at Petitioner’s encouragement, contributed unpaid labor to Petitioner’s career growth, and endured financial, medical, and legal collapse as a direct result of the destabilization described in this motion. If this Court ultimately awards Respondent any portion of the estate, it must remain his to rebuild from – not subject to renewed litigation or retaliatory financial action by a party whose psychological instability may be confirmed through formal evaluation.

Prior to petitioner moving in with respondent, respondent was consistently earning between \$350,000 and \$400,000 a year. After Respondent and Petitioners moved in together, Respondent's compensation increased over 450% in the first year. That was not achieved unilaterally. These gains were the combination of significant effort, time, strategy, and partnership in addition to countless hours of uncompensated work by Respondent. We both sacrifice significantly to make such huge leaps hey man, what's up good I've been working like crazy and I'm almost don

V. RESPONDENT'S GOOD FAITH AND THE PSYCHOLOGICAL CONSEQUENCES OF PETITIONER'S RETALIATION

Respondent states under penalty of perjury that he made five separate documented attempts to de-escalate these proceedings and resolve them amicably. In each instance, Petitioner responded not with compromise or conversation, but with legal escalation and retaliatory enforcement mechanisms.

As a result of Petitioner's responses, Respondent has now endured:

- Nineteen police reports filed against him,
- Six separate law enforcement investigations,
- A fraudulent protective order,
- Medical collapse, including untreated infection,
- Near-total financial isolation,
- And imminent housing loss.

According to Petitioner's own financial disclosures, she has spent upwards of \$480,000 in legal and litigation-related expenses pursuing this campaign – a staggering use of community assets to destroy, rather than resolve.

Respondent has never engaged in abuse, violence, stalking, or financial fraud. He has never retaliated, threatened, or acted in anger. He has loved and supported Petitioner through medical, legal, and professional hardship. His only mistake was believing that it was possible to end this relationship peacefully – to show Petitioner that separation did not have to mean destruction.

But what Respondent has now come to understand is this: for Petitioner – particularly while off her psychiatric medication – victimhood is not optional; it is essential. In her psychological worldview, there can be no separation without a villain, and once cast in that role, the villain must be destroyed.

Respondent respectfully asks the Court to consider this pattern not as narrative speculation, but as a consistent clinical indicator – one that supports the urgent need for a formal, independent psychological evaluation of Petitioner to prevent further harm and ensure fair process going forward.

VII. REQUEST FOR PROTECTION AGAINST RETALIATORY FILINGS

Respondent respectfully requests that the Court formally note that this Motion is submitted under seal, in good faith, supported by documentary evidence and sworn declarations, and directly relates to Respondent's right to a fair and just adjudication of the matters before the Court.

Given the documented history of retaliatory escalation by Petitioner following prior filings, and her pattern of initiating protective orders in response to adverse litigation developments, Respondent asks that this Court monitor for any subsequent filings intended to silence, intimidate, or restrict Respondent's lawful participation in these proceedings.

Respondent further requests that should any new protective order be filed within sixty (90) days of this Motion, the Court require in-camera review and confirmation of factual merit prior to issuance of any ex parte temporary relief, and that the filing of this Motion not be construed as harassment, threat, or abuse.

VI. PRAYER FOR RELIEF

Respondent respectfully requests that this Court:

1. Grant this Motion and order a psychological evaluation of Petitioner by a neutral court-appointed expert.
2. Authorize use of community funds for the cost of the evaluation.
3. If necessary, require both parties to submit to evaluation under identical conditions.
4. Permit the results to be filed under seal and made available only to the Court and parties.
5. Enter a pretrial finding that any allegations or claims shall not be used to reduce, offset, or claw back Respondent's share of the community estate, such as:
 - Petitioner's fabricated police report
 - Misconduct or Misrepresentations Petitioner might have made to her employer
 - Any code of conduct violations or Ethics violations by Petitioner
 - The perjured testimony of Pamela Woodman
 - Petitioner's weaponization of protective orders
 - Or conduct provoked, manipulated, or manufactured by Petitioner.
6. Preserve Respondent's right to seek reimbursement of one-half of all legal fees paid by Petitioner from the marital estate, where such fees were incurred in pursuit of unnecessary, retaliatory, or fraudulent litigation.

7. Preserve Respondent's right to seek a full accounting and equitable share of all concealed or mischaracterized assets, including hidden accounts, misrepresented investments, and fabricated liabilities.
8. Preserve Respondent's right to pursue civil remedies, including intentional infliction of emotional distress, if the conduct described herein is substantiated through evaluation or trial.
9. Grant all other relief, at law or in equity, to which Respondent may be justly entitled.

VII. RESERVATION OF RIGHTS

Respondent expressly reserves the right to:

- File this motion or its contents in any related civil, criminal, administrative, or federal proceeding, including but not limited to bar complaints, tort claims, or protective order defenses.
- Seek unsealing or partial disclosure if opposing counsel or Petitioner misrepresents facts raised herein, engages in retaliation, or uses protective orders to obstruct justice.
- Reference, quote, summarize, or republish the contents of this sealed filing if procedural manipulation, witness suppression, or perjury continues.
- Use these materials as part of a future motion for sanctions, financial relief, court supervision, or public protection.
- Request judicial reconsideration or writ review if the issues raised herein are not addressed within a reasonable time.

This reservation is made in good faith to preserve Respondent's due process rights, safety, legal recourse, and ability to prevent future harm to himself or others.

Respectfully submitted,

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