

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

FILED UNDER SEAL PURSUANT TO TEXAS
RULES OF CIVIL PROCEDURE AND
COURTS INHERENT AUTHORITY

DB-24-18010

NO. _____

IN THE MATTER OF	§	302nd JUDICIAL DISTRICT
	§	DALLAS COUNTY
GWENDOLYN ULIJASZ-MCKEMIE	§	
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

JUDICIAL BRIEF IN SUPPORT OF SEALED MOTION

TO THE JUDGE OF SAID COURT:

This sealed submission is not made lightly. The decision to seek psychological evaluation of Petitioner comes only after the total exhaustion of every conceivable avenue toward resolution. This motion is not retaliatory. It is not submitted out of anger, embarrassment, or desire for harm. It is made solely because the factual record, when reviewed in totality, leaves no other conclusion: such an evaluation is both necessary and urgent—not merely for the equitable division of the estate, but to halt ongoing fraud, obstruction, and procedural abuse that, if left unaddressed, will continue to harm all parties and obliterate the marital estate under the weight of litigation.

The conduct documented herein represents not a singular deviation, but a behavioral pattern repeated across prior relationships. Just as Petitioner’s ex-husband submitted a sworn 14-page letter warning of the predictable and devastating harm caused by her actions, I now stand before the Court as living proof of that same trajectory. This conduct will continue unless the Court intervenes.

During our relationship and marriage beginning in September 2023, I was only aware of two prescribed medications taken by Petitioner: Wellbutrin and Lexapro. I did not inquire further at the time. However, it is now evident from documentary and behavioral evidence that her psychiatric medication regimen was far more extensive. In December 2024, I discovered an Explanation of Benefits document showing that as of June 2024, Petitioner had been prescribed six psychiatric medications, including two antipsychotics. These medications were concealed from me throughout our relationship and marriage. It is my belief that Petitioner tapered off four of those medications in the weeks leading up to August 15, 2024, and that when she discontinued Lexapro and Wellbutrin on August 15, those were the final two of the six medications she ceased taking.

In August 2023, shortly after we began living together, I found a denial letter from The Hartford for group term life insurance through Petitioner’s employer, Cognizant Technology Solutions. The denial cited a DSM-5 psychiatric diagnosis. This document confirmed that a significant and undisclosed mental health condition existed and was known to Petitioner.

From August 2023 through the end of the year, Petitioner consistently sought a postnuptial agreement. I asked what terms she wanted protected, and she expressed concerns about separating business-related credit card liabilities and back taxes related to my prior filings. I agreed that these terms were fair and told her I would support such provisions. However, I made clear that I also required something in return: mutual psychological evaluations with full disclosure of diagnoses and results. She refused outright.

Despite numerous good-faith efforts, she would evade the topic entirely, later circling back to the agreement without ever acknowledging my request. When pressed, she became irate or dismissive. I explained that I had walked away from my career to support our shared household and start-up efforts, which were producing results but lacked retirement or long-term protection. If she was asking me to sign away any legal protections afforded to me under Texas law as a spouse, I needed to understand the nature of a condition so serious that it had resulted in a life insurance denial. That diagnosis and compliance with any required medications could not be separated from the agreement. I told her directly: if remaining on those medications was what kept her anchored in the personality I fell in love with, that compliance had to be a condition of any contract. She refused to engage.

This conversation recurred repeatedly, and each time she ignored my concerns. When Petitioner later changed employers and attempted to enroll again in life insurance through MetLife, she was again denied. I reiterated my request: no postnuptial agreement could be entered into without a full psychological evaluation and shared understanding of her diagnosis. On one occasion, I walked her through a typical day of mine, and I tried to get her to reverse the situation and view it from my perspective. I wanted her to put herself in a position of someone that it sacrificed immensely and done so without asking for any credit. She continued to ignore or deflect.

In parallel, Petitioner pushed for a lease on a \$5,000/month residence in Dallas. I explicitly told her that I could not be a financially obligated signatory due to my role in our start-up and lack of income. I agreed to reside there with her, but refused to obligate myself financially to a lease while working an unpaid position she encouraged me to take. All of my financial decisions were made in reliance on her support, and with the understanding that we were building a future together.

After the relationship deteriorated, Petitioner later asserted that our relationship was merely a six-month fling and assigned 100% of the financial responsibility for the residence to me—despite the fact that I had no legal obligation under the lease. This maneuver was not accidental. It was part of a broader campaign to isolate, bankrupt, and defame me.

Petitioner views herself as a perpetual victim. And in that worldview, a victim requires a villain. That villain must be destroyed in order for the narrative to survive. In her own written Step Four from recovery, she writes: “He could die in a car wreck tomorrow and I would be fine—but he better not move on, meet someone, and be happy.” This illustrates her motives without interpretation.

She has filed 19 police reports with escalating false allegations—each designed to make me appear dangerous, mentally unstable, or criminally liable. Her objective is clear: to fabricate a criminal record or felony that will damage my reputation, inhibit my ability to work, rent housing, or engage in future relationships. Her allegations mimic those made against previous partners, including unfounded sexual misconduct claims and protective orders that serve to socially and professionally isolate.

Petitioner encourages her partners to pursue entrepreneurial work because it fosters financial dependence. Then she cuts off access to all financial assets and support. I was offered a salaried \$250,000 job in November 2024. She forbade me from accepting it. By that time, she had already been secretly siphoning marital assets into concealed accounts. She knew she was leaving. The reason she discouraged the job was clear: the deeper the financial collapse, the greater the power differential, and the more difficult it would be for me to secure legal representation.

She has worked methodically to destroy the attributes that make me lovable or professionally viable. Her goal is not to end the relationship—it is to eliminate any path to recovery or support. The volume and nature of the police reports, the procedural abuse, the financial sabotage, and the deliberate healthcare obstruction all support this. This is not merely damaging—it is pathological.

Respectfully, this Court is not equipped to diagnose or manage the condition driving these actions. What is required now is clinical clarity. There is no legal mechanism capable of restoring fairness in this case without psychiatric intervention. I submit to the Court that the only viable path forward begins with a full psychological evaluation.

Should this motion be granted, I will immediately file a narrowly tailored request for emergency relief. Supporting documentation—including bank records, sworn declarations, medical photographs, and email evidence—is available under seal for in camera review.

I respectfully request that the Court review this motion as a matter of necessity, not preference.

Respectfully submitted,

Jason McKemie

August 6, 2025
DATE

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JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

JUDICIAL BRIEF IN SUPPORT OF SEALED MOTION

TO THE HONORABLE OF SAID COURT:

SUMMARY OF FACTS SUPPORTING EVALUATION

Known Psychiatric History and Denials:

- August 2023: Life insurance denial from **The Hartford** citing **DSM-5 psychiatric diagnosis**.
- December 2024: Explanation of Benefits shows **six psychiatric prescriptions**, including **two antipsychotics**, prescribed as of June 2024.
- Only **two medications**—Wellbutrin and Lexapro—were disclosed to me during our relationship.

Refusal to Undergo Evaluation:

- Petitioner sought a **postnuptial agreement**.
- I agreed to her terms but requested mutual **psychological evaluations**.
- She refused, evaded, or became hostile every time the issue was raised.

Financial Entrapment and Concealment:

- I gave up a \$250K salaried job at her request.
- I did not co-sign lease due to lack of income—she later assigned me **100% responsibility** for the residence.
- Petitioner concealed **over \$500,000** in marital assets.
- She paid herself first, then reversed a \$30,000 survival transfer I initiated

Legal and Procedural Abuse:

- Filed **19 false police reports**, including:
 - Allegations of stalking, hacking, surveillance, breaking and entering.
 - Many involved **Apple AirTags registered to her own account**.
- SAPD has referred her to its **Mental Health Division**.
- Her ex-partner alleges near-identical abuse:
 - Dozens of DCFS complaints in Cook County, Illinois.
 - **Children temporarily removed** based on false allegations.
 - DCFS later labeled Petitioner a **serial harasser**.

Medical Obstruction and Malicious Harm:

- December 2024 to present: Denied access to HSA funds despite 26 written requests.
- May 2025: Hospitalized with infection; denied necessary antibiotics.
- One prescription filled before she **deactivated** the card.
- HSA balance remains with almost the full available balance (**\$6,000**), only a \$41 charge to it thus far despite having well over \$30,000 in medical expenses thus far due to continued hospitalizations because of not having access to the HSA card.

Sworn under the penalty of perjury.

Jason McKemie

August 6, 2025

Date

PRO SE **NOT BY CHOICE** (PROCEDURAL IDENTITY THEFT DISCLAIMER)

Petitioner did not merely file first — she intercepted Respondent’s filing by fraudulently reversing his attorney retainer the day after his spinal surgery, she severed his access to counsel and funds. She withheld the retainer reinstatement until Friday to block re-engagement, then had attorneys work through the weekend to file first with a fabricated protective order — a calculated seizure of Petitioner status to construct a false narrative of abuse and victimhood, consistent with her documented legal history of doing so across multiple institutions.

Respondent was left destitute, forced to sell plasma for medication. Over the prior 4 months, Petitioner had funneled hundreds of thousands into hidden accounts and buried him in marital debt through emotional manipulation under the pretense of a “short term cash crunch”. In reality, large volumes of cash were flowing in yet she informed Respondent they were at risk of bouncing utility payments, encouraging him to get another credit card or to put groceries on 6mo payment plans. SAPD referred her to the Mental Health Division after the fourth AirTag she turned in — just as the prior 3 — was registered solely to her iCloud, effectively killing the “stalking” narrative. Despite 25 Motions, 5 Emergency Motions, 22 Ex Parte Judicial Requests for Relief, a Judge Recusal, over nine months... no court has ruled on the perjury, aggravated perjury, fraud, asset concealment, witness tampering,—or corrected the false “six-month marriage” narrative that was weaponized to deny Respondent spousal support, legal fees, and due process.

Truth is an absolute defense to defamation.

—NOTICE TO THE COURT AND RECORD—

This document is submitted with a standing constitutional and procedural reservation of rights. Respondent has previously notified this Court in writing of un rebutted allegations of discovery abuse, evidentiary suppression, financial coercion, and litigation misconduct—all of which remain unrul ed upon at the time of this filing.

Any entry of decree, final ruling, or trial-based judgment prior to formal rulings on these motions constitutes a willful denial of due process under both the Texas Constitution and the 14th Amendment to the U.S. Constitution.

This reservation is hereby entered into the permanent record and incorporated by reference into all prior and future filings, without waiver.

“THE RIGHT TO DUE PROCESS WITHOUT ACCESS OR ENFORCEMENT IS AN ILLUSION OF JUSTICE—NOT JUSTICE ITSELF.

This notice also preserves Respondent’s right to seek redress under 42 U.S.C. §1983 or there applicable remedies if fundamental rights violations are not corrected.



Trial May Not Proceed Until Outstanding Motions Are Ruled On

Trial **WOULD CONSTITUTE A PROCEDURAL FAILURE IF COMMENCED PRIOR TO THE Court’s ruling on all pending motions, including those relating to discovery violations, financial concealment, and procedural fraud. Proceeding without resolving these matters would not only violate due process but would also allow the foundation of trial to rest on un rebutted falsehoods and unresolved evidentiary conflicts.**

Respondent respectfully requests that the Court confirm, on the record, that no trial setting or final ruling will occur until all outstanding motions have been fully adjudicated.

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