

**DF-24-18010**

NO. \_\_\_\_\_

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

**RESERVATION OF RIGHTS**

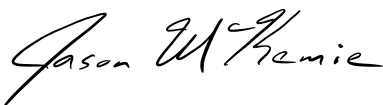
**Preservation of Evidence & Reservation of Rights**

Petitioner respectfully submits this packet and supporting materials for purposes of this emergency and procedural relief only. Petitioner affirms that all transcripts, summaries, and characterizations of audio, video, or law enforcement communications included herein are based on original recordings, messages, and documents lawfully obtained during the marriage or pursuant to standing access rights.

Petitioner reserves the right to introduce such original source materials—including full-length recordings, forensic evidence, and sworn statements—at trial or evidentiary hearing. Nothing in this submission shall be construed as a waiver of Petitioner’s right to authenticate or formally offer into evidence the original versions under Texas Rules of Evidence.

All rights reserved.

**Respectfully,**



**Jason McKemie**

*Petitioner Pro Se*

(214) 868-4901

jmckemie@mckemie.net

539 W Commerce St

Suite # 2010

Dallas, TX 75208

(214) 868-4901

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>254<sup>th</sup></u> JUDICIAL DISTRICT
&	§	
JASON MCKEMIE	§	DALLAS COUNTY, TEXAS

---

**EMERGENCY MOTION FOR FINANCIAL RELIEF, CONTINUANCE, ENFORCEMENT OF STANDING ORDERS, PROTECTION AGAINST PROCEDURAL ABUSE, AND HEARING ON SPOUSAL SUPPORT, LEGAL FEE'S, MARITAL DEBT & EARLY LOAN REPAYMENT DUE TO MEDICAL HARDSHIP**

---

**SUPPLEMENTAL:  
NOTICE OF EVICTION AND UPDATED MEDICAL HARDSHIP  
IN SUPPORT OF EMERGENCY MOTION FOR TEMPORARY RELIEF**

**TO THE HONORABLE JUDGE OF THE 254TH DISTRICT COURT:**

Petitioner, **Jason McKemie**, appearing **pro se**, respectfully submits this supplemental notice to inform the Court of a critical change in circumstances directly impacting the **Emergency Motion for Temporary Financial Relief filed on June 24<sup>th</sup>, 2025**.

On **June 26, 2025**, **Petitioner received a formal Notice to Vacate** for nonpayment of rent at the marital residence. Although Respondent, Gwen Ulijasz-McKemie, is the leaseholder and sole financial guarantor on the property, Petitioner has carried the full burden of housing costs since separation. Due to a recent hospitalization and worsening medical condition after being severed from all marital assets, Petitioner no longer has the financial capacity to maintain the residence. **[EXHIBIT A]**

Eviction proceedings are now active. Petitioner faces imminent loss of housing, posing an extreme risk of displacement, medical deterioration, and further destabilization—particularly while recovering from major spinal surgery and under physician-imposed restrictions.

In support of this supplement, Petitioner further notifies the Court of a serious and recurring case of cellulitis—a potentially dangerous bacterial infection requiring multiple emergency room visits and hospitalization at Texas Health Presbyterian Hospital in Dallas. At its worst, the infection progressed at nearly one inch per hour, requiring aggressive medical intervention. The condition was exacerbated by physical overexertion, lack of rest, and stress—circumstances made unavoidable due to Petitioner’s total lack of access to marital resources or prescribed rehabilitative equipment.

Despite initial treatment, the infection has repeatedly resurfaced. Medical providers have advised strict limitations on activity, stress, and physical strain. These recommendations have been nearly impossible to follow while facing eviction, financial distress, and the burden of pro se litigation.

Petitioner renews his request for:

- Immediate temporary financial relief in the amount of \$20,555;
- An order compelling Respondent to satisfy past-due rent or provide direct access to marital funds;
- Continuance of current proceedings to allow Petitioner time to recover and properly serve discovery with the guidance of counsel.
- Schedule a Hearing to revisit spousal support and legal fees, and reimbursement of marital debt placed upon Petitioner.
- Protection against the weaponization of civil and criminal proceedings against Respondent.

Petitioner also advises the Court that additional filings are forthcoming, including a motion for continuance, expanded financial relief, and a full evidentiary response to the allegations raised in Respondent's filings. Petitioner respectfully asks the Court's understanding as he prepares these filings while simultaneously attempting to preserve housing, protect his health, and respond without the benefit of legal counsel.

**Petitioner affirms, unequivocally, that he has never stalked, wiretapped, threatened, or harmed Respondent in any way.** These allegations will be addressed in full, with supporting evidence and witness testimony. Petitioner is not seeking sympathy—only the opportunity to present the truth.

Attached hereto as **Exhibit A** is a true and correct copy of the eviction notice dated June 26, 2025.

Petitioner is available for in-person or remote appearance and respectfully requests expedited review and relief. Without immediate intervention, Petitioner will lose access to housing, medical stability, and meaningful participation in this proceeding.

Respectfully submitted,

Jason McKemie  
Pro Se Petitioner  
5609 La Foy Blvd  
Dallas, TX 75209  
(214) 868-4901  
Jason@callvital.com

---

## 1. RESPONDENT'S STRATEGIC FINANCIAL DEPLETION AND ANTICIPATED RETALIATION

### **Petitioner's Supplemental Notice of Eviction and Updated Medical Hardship In Support of Emergency Motion for Temporary Relief**

TO THE HONORABLE JUDGE OF THE 254TH DISTRICT COURT:

Petitioner, Jason McKemie, appearing pro se, submits this supplemental notice in support of his **Emergency Motion for Temporary Relief [filed June 25, 2025]** to inform the Court of a material escalation in circumstances.

## 2. Statement of Clarification and Rebuttal to Mischaracterizations

### **To the Honorable Judge of the 254th District Court:**

The narrative before this Court is inaccurate—and dangerously so.

I am not a threat to anyone. I am not unstable. I am not abusive. What I am is a man who has always paid his bills, maintained good credit, worked hard, and met his obligations. I have never defaulted on a loan. I have never been 60 days late on a car payment. I have never been evicted or come close to bankruptcy—until now.

Today, I stand at the edge of financial collapse, not due to poor choices or misconduct, but because of Respondent's calculated actions. For months, she insisted we conserve cash and shift all expenses to credit. She directed me to apply for new cards, finance groceries, and assume full responsibility for shared and family expenses under the guise of a temporary "cash squeeze" during her employment transition. I followed her lead in good faith. I trusted that we were building a future together.

Instead, I was systematically drained. I now carry over \$25,000 per month in obligations—while recovering from spinal surgery, battling a serious medical infection, and having been completely cut off from marital accounts. Respondent, meanwhile, has retained a six-attorney legal team employing corporate litigation tactics against a hospitalized pro se party who has been deliberately severed from financial resources. I am not self-represented by choice—I was forced into this position because Respondent's obstruction made legal representation financially impossible.

I was left with less than \$300 in my checking account the day after spinal surgery. I had to physically pull myself out of bed and go to a bank branch just to withdraw enough cash for food. Meanwhile, Respondent has siphoned over \$400,000 away into a concealed account and is paying off \$80,000 in personal credit card debt in one day and rushing her attorneys to serve Petitioner with false protective order to sever access and gain strategic advantage.

After witnessing weeks of escalating misrepresentations and financial cutoffs, I contacted 911 to report my concerns. I informed law enforcement that I had located extensive legal documents in Respondent's filing cabinet, that I had retained legal counsel, and that I feared imminent retaliation

through false police reports and fabricated protective order claims. That call was made to protect myself and to create a contemporaneous record. It is documented and submitted as [Exhibit B].

This crisis didn't happen on its own. It was manufactured—deliberately and surgically—to leave me isolated, undefended, and financially disabled before I had a chance to respond.

I ask this Court to look past the manufactured chaos and evaluate the evidence. The story currently being told does not align with the facts. And the facts are coming.

### **Exhibit C - 911 Incident Report**

The screenshot shows a document titled "Reports - Incident Report". It contains a table with the following columns: Date, Time, User, Type, Conf., and Comments. There are three rows of "Response" entries. Below the table, there are sections for "Address Changes", "Priority Changes", and "Alarm Level Changes", all of which indicate "No" changes.

Comments Date	Time	User	Type	Conf.	Comments
12/11/2024	15:35:38	[REDACTED]	Response		[1] caller thinks is being set up by wife , findind info on lawsuits in wifes document , (gwendolyn uljasz mckemie ) she is nal ,is on busn trip traveling ,,
12/11/2024	17:10:20	[REDACTED]	Response		[2] REV BY SPVR LEE...
12/11/2024	17:14:52	[REDACTED]	Response		[3] RTC: when calling comp adv not police matter comp said was talking to an attorney already 214 868 4901

Address Changes  
No Address Changes

Priority Changes  
No Priority Changes

Alarm Level Changes  
No Alarm Level Changes

### **3. Eviction Notice Received – June 26, 2025**

Petitioner was served with a formal Notice to Vacate the marital residence due to nonpayment of rent. Although Respondent, Gwen Ulijasz-McKemie, is the **sole financial guarantor** on the lease, Petitioner has carried 100% of the housing costs since separation. With no access to marital accounts or shared HSA funds, and after exhausting his personal resources while recovering from invasive spinal surgery, Petitioner now faces **imminent eviction and loss of housing**. [EXHIBIT A]

### **4. Medical Crisis – Recurring Aggressive Cellulitis**

While still recovering from spinal surgery, Petitioner developed a serious and recurring staph infection (cellulitis), which rapidly spread and required multiple emergency room visits and hospitalization at Texas Health Presbyterian Hospital. At one point, the infection was documented as climbing nearly **one inch per hour**, and doctors warned of the risk of systemic infection if left untreated.

The infection has been exacerbated by:

- Inability to rest due to financial and legal obligations
- Stress caused by lack of access to healthcare funds (HSA card disabled by Respondent)
- Loss of prescribed rehabilitation equipment after Respondent falsely reported the purchase as fraud

Medical providers have advised strict rest and reduction of physical stress, yet Petitioner has been unable to comply due to the burden of carrying all marital housing, legal, and medical expenses without support.

## 5. Renewed Request for Immediate Relief

Petitioner respectfully renews and supplements his request for:

**Petitioner respectfully requests the following relief:**

- Immediate temporary financial support in the amount previously requested
- An order compelling Respondent to satisfy past-due rent or transfer equivalent funds via the joint account
- Emergency protection against further obstruction, particularly regarding healthcare access and shared financial resources
- A continuance to allow Petitioner to stabilize housing, address ongoing medical issues, and retain counsel for proper response and discovery
- Enforcement of all applicable Standing Orders
- Judicial safeguards against further procedural manipulation or coordinated interference with Petitioner's participation
- A scheduled hearing on spousal support, legal fees, and resolution of marital debt
- Sanctions as appropriate based on Respondent's conduct

---

## 6. Pending Filings and Evidentiary Response

Petitioner is actively preparing:

- **A response to Respondent's June 23rd filings**
- **A comprehensive evidentiary motion** proving further financial concealment, and repeated discovery obstruction

He asks for the Court's consideration and understanding as he finalizes these submissions under extraordinary medical and financial distress.

## 7. Statement Regarding False Allegations of AirTag Surveillance

Respondent has **accused Petitioner of placing Apple AirTags** on her person and property to track her movements. These accusations are **categorically false**.

Respondent voluntarily turned over the AirTags in question to the San Antonio Police Department in early 2024. Upon review, SAPD subpoenaed Apple for registration data related to the devices. The response from Apple confirmed precisely what Petitioner had testified to under oath during the January 7 hearing:

- The AirTags were installed between December 2023 and February 2024
- All AirTags were **registered to Respondent's own Apple ID and associated devices**
- **None** of the devices were ever **registered to Petitioner**, nor were they ever paired to any device under his control
- These AirTags have **only been trackable from Respondent's devices**, and remain that way through today

The tracking devices that Respondent repeatedly cited in police complaints and courtroom accusations were, in fact, **registered to her**—not to Petitioner, and not traceable by anyone else. At no point has Petitioner had access to track Respondent using these devices. Respondent asked Petitioner to help install her own AirTags between December 2023 and February 2024 for her personal use and travel protection.

Despite receiving clear results from Apple's subpoena confirming that the AirTags were never linked to Petitioner, **Respondent continued to turn in additional devices to law enforcement**, each time insisting she was being stalked. The only logical explanation is that she simply **could not comprehend the possibility that Petitioner had installed her devices without also granting himself the ability to monitor her. But that assumption was false. Petitioner never accessed those AirTags, nor did he ever intend to.** That was not the nature of the relationship he wanted.

**Detective Vidal**, who reviewed the matter, confirmed that at least four detectives had been assigned to various complaints filed by Respondent against Petitioner. In one case, body camera footage reviewed by the department reportedly showed evidence of contrived distress. Detective Vidal inquired whether Respondent had a history of psychiatric medication, and Petitioner confirmed she had recently discontinued six prescribed medications. He responded that her behaviors were concerning and that she would likely be **referred to the department's mental health unit** for further evaluation.

Moreover, SAPD Detective Vidal, whose recorded statement is available via secure link or **[Exhibit]** stated clearly that **"nothing points to (Jason)"** in their investigation. Multiple officers expressed concern about the emotional presentation and conflicting claims made by Respondent. One officer reportedly brought his body camera to an in-person meeting out of concern regarding the authenticity of the situation, which another detective shared with me appeared to be "contrived distress".

These findings are consistent with Petitioner's repeated statements under oath, and further confirm that Respondent's surveillance allegations are entirely unsupported by the technical data, police reports, or third-party evidence.



*Detective Vidal San Antonio Police Department “Fusion” Department – “Nothing points to you, all arrow point to her.” [EXHIBIT V]* – Detective Vidal confirmed that records received from Apple support Petitioner’s testimony: the AirTags found on Respondent’s vehicle were registered to **Respondent’s Apple ID and iPhone**, and were **only trackable by Respondent—not by Petitioner or any third party.**]

**8. Evidence of Respondent’s Misuse of AirTags and False Accusations**

Contrary to Respondent’s repeated claims that Petitioner used Apple AirTags to track or surveil her, the evidence shows it was **Respondent herself who planted AirTags on Petitioner without his knowledge or consent.**

Following Respondent’s visit to the marital residence to retrieve her belongings, Petitioner discovered **three separate AirTags** concealed within his personal property, including:

- **Inside his vehicle**
- **Inside his backpack**
- **In a small travel case of his**

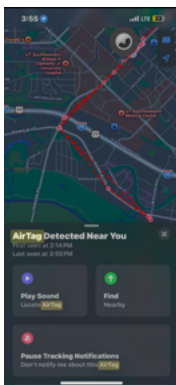
Petitioner was immediately notified by his iPhone of the presence of unknown AirTags traveling with him. Screenshots taken at the time confirm that these AirTags were **registered to Respondent’s Apple ID and phone number**, not Petitioner’s. These screenshots, which will be submitted as **Exhibits B, B2, B3, B4** conclusively show that:

- Petitioner was being tracked using AirTags registered to Respondent
- The AirTags were planted without Petitioner’s knowledge or consent
- These AirTags triggered automatic Apple safety alerts on Petitioner’s device
- Petitioner immediately disabled the devices and retained them as evidence

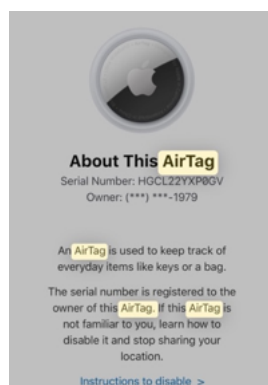
Petitioner has preserved the physical AirTags, all associated metadata, and screenshots of the alerts showing Respondent’s registered contact information. These materials will be made available for forensic examination or further subpoena as required by the Court.

Respondent’s attempt to falsely accuse Petitioner of surveillance—while simultaneously engaging in the very behavior she alleged—is part of a documented pattern of projection and narrative manipulation. These findings not only destroy the credibility of Respondent’s claims, but they also demonstrate a willful abuse of the legal system and an intentional effort to provoke false criminal suspicion against Petitioner.

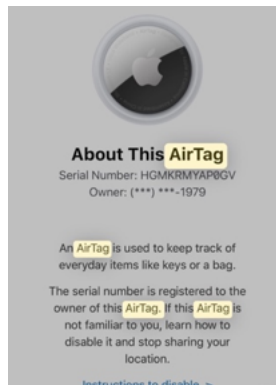
**Exhibit B**



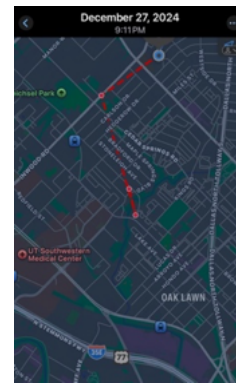
**B2**



**B3**



**B4**



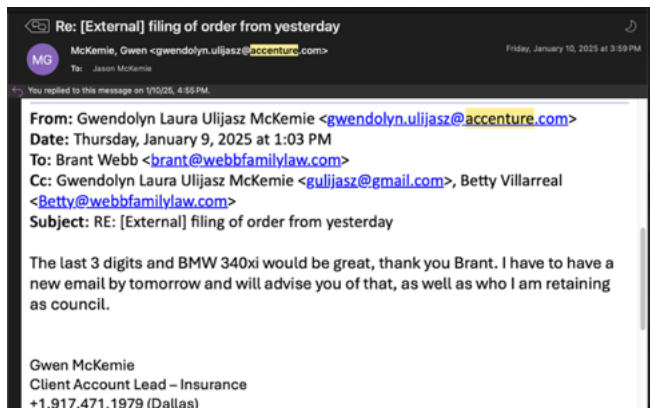
## 12. False Claims of Financial Destitution and Manipulated Deposits

### January 7<sup>th</sup> Hearing

Respondent Testified that:

- That her employer (Accenture) had taken her laptop and placed her on leave at this time pending an investigation and that she was “functionally not working.”
- Her \$94k BMW Sports Car with < 10k miles on it was in disrepair. (“**not functional**”)
- Due to not having a functional vehicle, that she and her sister had to take “**A Greyhound Bus**” to get to the Jan 7<sup>th</sup> Hearing
- That she couldn’t possibly afford any more than her expenses for the San Antonio residence she leased just days prior.
- That recently gave Petitioner **\$8,400**
- They she had to borrow \$7,000 from her sister to cover basic living expenses (Rent) and to replace her Electronics prior to the Jan 7<sup>th</sup> hearing, yet the loan documentation shows that the first loan was granted on Jan 11<sup>th</sup>. We are **unable to verify these loans via funds transfers** as we still have not been provided the associated bank statements.
  - Nov Dec 17, 2024 - \$42,076
  - Dec 17, 2024 - \$49,891

13.



Respondent claimed she was placed on leave and had her laptop confiscated pending an investigation. Laptop confiscation is to protect the company by removing the employee’s ability to communicate on behalf of the company while being vetted. So how is she able to utilize her work email at that this time. What is the point of confiscating a laptop if the employee retains email capabilities elsewhere?

[Exhibit G]

14. In the January 7<sup>th</sup> 2025 hearing, Respondent stated that she had just given Petitioner \$8,400. [Exhibit F]

CHASE		October 23, 2024 through November 22, 2024 Account Number: 000000527876893	
<b>TRANSACTION DETAIL</b> (continued)			
DATE	DESCRIPTION	AMOUNT	BALANCE
11/12	ATM Cash Deposit 11/12 2475 W Mockingbird Lan Dallas TX Card 4112	100.00	5,508.13
11/12	11/12 Online Transfer To Chk ...3898 Transaction#: 22695263377	-3,400.00	2,108.13
11/15	Intouch Credit U Ck-With PPD ID: 311079474	-561.44	1,546.69
11/18	Mohela Mohela Dbt PPD ID: M431261525	-183.10	1,363.59
11/18	Usaa P&C Autopay PPD ID: Usaa-Pobp	-377.66	985.93
11/19	Almos Energy Rcr UTIL Pymt 003065544255 Web ID: 9000000091	-63.05	922.88
11/19	Amz_Storecrd_Pmt Payment 604578108065362 Web ID: 9130142001	-23.79	899.09
11/22	Online Transfer From Chk ...3898 Transaction#: 22796750628	1,500.00	2,399.09
<b>Ending Balance</b>			<b>\$2,399.09</b>
Interest Paid Year-to-Date			
The monthly service fee for this account was waived as an added feature of a linked Chase Sapphire Checking account.			
<b>TRANSACTION DETAIL</b>			
DATE	DESCRIPTION	AMOUNT	BALANCE
<b>Beginning Balance</b>			
10/23	Octopus Energy Octopus En St-K3M8Q8J0Z8Q0 Web ID: 4270465600	-256.78	2,147.07
10/24	Verizon Wireless Payments PPD ID: 1223344794	-185.94	1,961.13
10/24	Zelle Payment To Juanis (Maria Camacho Claudio) Jpm99Apxxid	-240.00	1,721.13
10/25	Zelle Payment To Emilio 22500012965	-80.00	1,641.13
10/28	Online Transfer From Chk ...3898 Transaction#: 22516949333	500.00	2,141.13
11/05	Public Storage I Rental PPD ID: 4953551121	-133.00	2,008.13
11/12	ATM Cash Deposit 11/12 2475 W Mockingbird Lan Dallas TX Card 4112	3,400.00	5,408.13

[Exhibit F]

Bank records demonstrate that on or about the time in question, Respondent made a cash deposit of \$3,400 into a joint account (xx6893). That money was then immediately transferred from the joint account into Respondent’s private checking account ending in XX3898. This transaction sequence had no practical effect other than to falsely inflate deposits and additions section of the bank statement. This technique was used to provide an appearance of supporting Petitioner, when no funds ever touch his account at any point in this process.

Respondent was paying off significant personal debt with community assets at this time, while simultaneously funding a hidden account while sending screenshots of an artificially low balance in her former checking account to Petitioner, to emotionally and financially manipulate him for control.

Furthermore, Petitioner will present evidence that Respondent established a concealed bank account in or around September 2024, through which she began funneling substantial marital funds. This account was never disclosed to Petitioner, and Respondent went to considerable lengths to disassociate this account from all of her other Chase accounts so that it could remain concealed.

These actions were part of a calculated strategy to withhold access to marital assets while constructing a false narrative of generosity and financial limitation. The evidence will show that Petitioner was systematically starved of resources, left with less than \$300 in total accessible funds, and misled not only in personal communications, but also under oath before this Court.

[Exhibit K]

---

## 15. False Claims of Financial Destitution and Manipulated Deposits

### January 7<sup>th</sup> Hearing

Respondent Testified that:

- That her employer (Accenture) had taken her laptop and placed her on leave at this time pending an investigation and that she was “functionally not working.”
- Her \$94k BMW Sports Car with < 10k miles on it was in disrepair. (“not functional”)
- Due to not having a functional vehicle, that she and her sister had to take “A Greyhound Bus” to get to the Jan 7<sup>th</sup> Hearing
- That she couldn’t possibly afford any more than her expenses for the San Antonio residence she leased just days prior.
- That recently gave Petitioner \$8,400
- They she had to borrow \$7,000 from her sister to cover basic living expenses (Rent) and to replace her Electronics
  - Nov Dec 17, 2024 - \$42,076
  - Dec 17, 2024 - \$49,891

---

## 16. Transactions of Respondents in the Months immediately prior to the Jan. 7<sup>th</sup> Hearing:

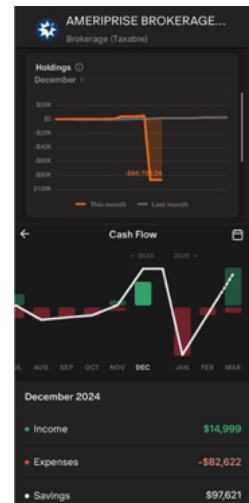
- \$1,400,000 Annual Compensation Plan [Exhibit 173](#)
- \$198,000 Check for Nov 15-30 2024 Pay Period [Exhibit K](#)
- \$32,500 Monthly Salary Compensation [Exhibit 173](#)
- \$92,000 in vested stock options exercised in Nov/Dec (CTSH) [Exhibit 0 \(pg 11\)](#)
- \$49,000 contribution to a Traditional IRA (Ameriprise) [Exhibit Q](#)
- \$42,000 contribution to a Roth IRA (Ameriprise) [Exhibit Q](#)
- \$89,000 unexplained transaction at Ameriprise [Exhibit Q](#)
- \$59,000 in Expense Reimbursements
- \$147,000 Settlement from **Cognizant** (Abuse Allegation) [Exhibit Z](#)
- \*\$7,980 per pay period post-tax Roth 401(k) contributions (2024)
- \*\$4,800 per pay period post-tax contribution to VEIP Equity Stock Program
- \*Penalty Bearing Acts (Standing and Temp Order Violations)

## EXHIBIT O

### 17. See Bank Statement ending in XX3898 – Exhibit D.

This record reflects Respondent actively paying off significant personal debt during the same time she claimed financial destitution under oath. The account activity contradicts her sworn declarations and demonstrates access to substantial funds inconsistent with her representations to the Court. [Exhibit K2 & K4]

Graph illustrates a \$86,736 withdrawal made from their Ameriprise Accounts at the same time two 401k roll overs taking place for roughly the same amount. This allowed roughly \$90k to be siphoned out of the account and if you were not looking for it, the account would appear unchanged. [Exhibit O]



### 18. Judicial Deception: Coordinated False Testimony to Manufacture a Stalking Narrative

At the January 7, 2025, hearing, Respondent and her sister, **Pamela Woodman**, presented coordinated testimony designed to **manufacture a narrative of surveillance, intimidation, and stalking by Petitioner.**

Under oath, **Mrs. Woodman** testified that an off-duty police officer discovered a hidden listening **device hidden in a plant** at the marital residence. Her testimony was dramatic and calculated to mislead:

**Pam Woodman:** “There were some visible cameras in every room of the house. Some were hidden, some were in plants. There were listening devices throughout the house. I would estimate that there were dozens. Completely intimidating.”

**Gwen Uljasz-McKemie (GLU):** “How did you know, Pam, that there were listening devices, not being an audio expert, and how do you know about what that was in the plant, not being a plant expert, if I may.”

**Pam Woodman:** “The former police officer found that one.”

**Brant Webb (Attorney):** “Objection hearsay about anything this third party says, your honor.”

**Gwen Uljasz-McKemie:** “Did you overhear that?”

**Judge Brown:** “No, Stop. I have to make a ruling. So sustained as to anything the police officer said, but she can testify to the actions of the police officer. So she testified that the police officer found the device, so that, that's admissible. So, you can't tell us what the officer said because he's not here to testify.”

This testimony was **demonstrably false.**

**Constituting Aggravated Perjury – A false statement, under oath, during an official legal proceeding that is also material to the proceeding.**

**Gwen Uljasz-McKemie (GLU):** “How did you know, Pam, that there were listening devices, not being an audio expert, and how do you know about what that was in the plant, not being a plant expert, if I may.”

**Pam Woodman:** “There were some visible cameras in every room of the house. Some were hidden, some were in plants. There were listening devices throughout the house. I would estimate that there were dozens. Completely intimidating.”



In the attached video footage **[Exhibits H]** & **[Exhibit I]**, the so-called “device” in question is clearly shown it is a **smart hydrometer**—a commercial soil moisture sensor that notifies plant owners when watering is needed. Respondent herself identifies the item on camera, laughs about it, and even mocks Petitioner’s inability to keep the plant alive *despite* having the device. There is no attempt to conceal its function.

Pam Woodman is **present in the room** during this exchange. Her voice is captured on the recording, instructing Respondent to stop talking to Petitioner through the security—behavior that occurred throughout the day. Despite firsthand knowledge of what the device actually was, she testified to a fabricated discovery by a third party officer, invoking hearsay to lend false authority to a claim of criminal surveillance.

This testimony was not just inaccurate—it was knowingly false. Both women were fully aware of the device’s true purpose. The question was scripted. The exchange was rehearsed. The perjury was **deliberate**.

The purpose of this coordinated fabrication was threefold:

- **To support the issuance of a retaliatory protective order;**
- **To frame Petitioner as dangerous and unstable;**
- **And to influence the Court’s perception in financial rulings through a false narrative of fear.**

---

The protective order that followed was **not the result of evidence**—it was the product of **judicial fraud**. This was not a misstatement or exaggeration. It was **aggravated perjury**, constructed to weaponize this Court against Petitioner and deny him fair adjudication.

Petitioner asserts this was an orchestrated abuse of the judicial process by two parties acting in concert, and that sanctions and referral for criminal perjury are appropriate and forthcoming.

In the interim, Petitioner respectfully requests that the Court:

- Take judicial notice of the contradiction between sworn testimony and video evidence;
- Review Exhibits H;
- And give this incident proper weight in evaluating Respondent’s credibility and compliance going forward.

---

## 19. STRATEGIC INTENT AND COLLAPSE BY DESIGN

**The audacity of Respondent’s deception was no accident.** It was rooted in the belief that Petitioner would never survive long enough—legally, physically, or financially—to expose the truth.

Respondent buried Petitioner in household debt, quietly shifted hundreds of thousands of dollars in assets out of view before the end of 2024, and used the illusion of marital teamwork to manipulate him into facilitating his own financial ruin.

Her plan was clear and executed with precision: **emotionally manipulate Petitioner into taking on marital debt; embed false abuse allegations into an annulment petition; secure a protective order under fabricated pretenses; initiate felony charges to brand him unstable and dangerous; cancel his access to medical equipment after spinal surgery; withhold his legal retainer; sever his ability to hire counsel; and ultimately drive him into desperation—isolated, in pain, and resource-starved—to force a one-sided resolution that left her financially protected while Petitioner was left broken.**

She struck just **two days after his spinal nerve ablation surgery**. While he was immobilized and medicated, Respondent and her sister **mocked his condition**—calling it “just a shot” and sneering, “Who rallies this many people for back pain?” They then canceled his prescribed rehabilitation equipment, withdrew his access to marital funds, and maliciously withheld his legal retainer—**cancelled just two days prior, cutting him off from representation at a critical moment in the proceedings.**

Respondent, a seasoned litigant who has spent over \$80,000 annually on legal matters for three consecutive years, **knew exactly what she was doing.**

At the very moment she claimed financial destitution in court to avoid paying spousal support or legal fees, Petitioner had less than \$300 in his account and was recovering from surgery. Despite Respondent being the sole guarantor on the lease, the full burden of the household was dumped onto Petitioner, who was ordered to meet monthly obligations exceeding \$25,000—without access to shared accounts or representation.

To comply with those orders, Petitioner would have had to more than double his previous income—securing a \$468,000/year role, completing interviews, onboarding, working 2–3 weeks, and receiving his first paycheck—all within ten days.

**And somehow, he did it.**

He met every financial obligation for five consecutive months—**not with access to capital**, but by selling the things he loved, working through the night, and pushing his body past the point of collapse. He often went without sleep for days at a time. He endured hospitalizations, three emergency room visits, and all the while Respondent continued to **cancel his access to the marital HSA card**, preventing him from filling prescriptions for an aggressively recurring potentially life-threatening staph infection.

And the damage didn't stop with him. As false police reports escalated, so did the fear within his family. Petitioner's family have been desperately waiting for an opening at a memory care facility aligned with his father's current needs. Petitioner's father did not hesitate to help his son when Respondent abandoned him after his spinal surgery. Shortly after loaning this money, a unit in the memory care wing came available. A room they have waited a year for. Yet, the funds were not available for the deposit required within the 3 day window prior to the unit being offered to the next in line. Mr. McKemie lost his opportunity to move into this memory care community. Something that he was really looking forward to. Mr. McKemie is confused every day when the divorce will be over. And Petitioner is going to get him into that home come hell or high water.

Respondent will see that there are victims to her crimes, and for the very first time; she's going to care what happens to them. Because, Petitioner will do everything in his power to assure that **what happens to her, is proportionate to what she has done to others.**

---

**These were not victimless acts.** They were calculated.

All the while, Respondent continued to redirect funds into long-term equity holdings, investing heavily in her **VEIP program** while claiming to be destitute—shielding her wealth behind accounts with early withdrawal penalties, while funding her lifestyle with low-interest family loans and elective cosmetic procedures at a luxury clinic.

Meanwhile, Petitioner was denied every form of financial relief, blocked from legal access, and forced to operate **pro se against a six-attorney litigation team**—because Respondent had **embedded fabricated allegations into her pleadings.**

---

**Any attempt to challenge the spousal support ruling would reopen those claims, triggering renewed criminal exposure.**

---

These are the reasons they were so bold. Not only did they think he could never ever make it this far, even more **they did not think he would survive it. Even planned for it. And they did not care.**

They believed Petitioner would collapse before he could ever respond. **That he would be gone—evicted, hospitalized, & destroyed**—before the Court could see what had really happened.

This wasn't an overstep. It was **cruelty by design.** A premeditated assault on due process, truth, and Petitioner's ability to stand.

---

Petitioner respectfully requests that the Court:

- **Take judicial notice of the coordinated false testimony presented in Exhibits H and I;**
- **Review the attached video evidence in context with the testimony given;**
- **And weigh this conduct heavily in all future determinations of Respondent's credibility, intent, and compliance.**

**Petitioner has been harmed. His family is still hurting. And it never had to be this way.**

He offered Respondent every opportunity to pursue a quiet, uncontested separation. He didn't even intend to file for divorce in the first place.

But with Respondent, there is no version of events in which she isn't the victim. And in Respondent's world, when there is a victim, there must be a villain.

**And villains must be destroyed.**

---

## 20. RESERVATION OF RIGHTS

Petitioner expressly reserves the right to pursue all civil remedies available under Texas law against **Pamela Woodman and Respondent Gwen Ulijasz-McKemie** for their coordinated, knowingly false testimony presented under oath at the January 7, 2025, hearing. The perjured claims involving a fictitious surveillance device were not only material to these proceedings—they directly resulted in the issuance of a fraudulent protective order that cut Petitioner off from financial relief, medical access, and legal counsel.

Petitioner asserts that **this single calculated act of perjury has been the primary driver of the catastrophic chain of events that followed** that have left him hospitalized multiple times, financially paralyzed, and without representation. This was not a misunderstanding. It was a malicious and premeditated cruel abuse of the judicial system with the full intention of causing harm.

Accordingly, Petitioner reserves the right to:

- **Pursue civil damages for defamation, abuse of process, intentional infliction of emotional distress, and related claims;**
- **Seek monetary sanctions under Texas law for aggravated perjury and judicial fraud;**
- **And refer this matter to law enforcement, including the Dallas County District Attorney, for potential criminal prosecution under Tex. Penal Code § 37.03 (Aggravated Perjury) and related offenses.**

This reservation **shall not be construed as limiting future filings**, nor as a waiver of any additional remedies available. Petitioner explicitly puts the Court and all parties on notice that further legal

action may be initiated if this misconduct is not meaningfully addressed.

---

## REQUEST FOR JUDICIAL NOTICE

Petitioner respectfully requests that the Court:

- Take judicial notice of the contradiction between sworn testimony and video evidence;
  - Review **Exhibits H and I**;
  - Give this incident appropriate weight in evaluating Respondent's credibility, intent, and future compliance.
- 

### 21. Claimed \$7,000 Loan for Rent and Electronics Replacement

Respondent testified at the January 7, 2025 hearing that she had to borrow \$7,000 from her sister to cover basic living expenses, **including rent and a replacement laptop**. However, Petitioner was later provided with loan documentation which stated these loans were not initiated **until after** the January 7 hearing—**directly contradicting** her sworn testimony. These loans also were not in the amount of \$7,000 but were in the amount of \$30,000 and \$29,000. According to Respondent's timeline, the funds had already been spent by the time of the hearing, yet the loan agreements show otherwise.

Petitioner requested supporting documentation—including bank statements or confirmation of funds transferred—but Respondent has refused to produce any such proof. Despite this lack of substantiation, Petitioner, acting in good faith, agreed to acknowledge the loans' existence and voluntarily declared half. However, he received no benefit from these alleged funds.

To burden the marital estate with a loan from which one party received zero benefit constitutes **undue enrichment**. Accordingly, these loans should be **classified as separate debt, traceable only to Respondent**, and excluded from any community liability calculation.

---

### 22. Respondent's VEIP Contributions vs. Claims of Financial Destitution

Simultaneously, Respondent is actively investing approximately **\$10,000 per month [EXHIBIT V]** into Accenture's VEIP (Voluntary Equity Investment Program). These deductions began in January 2025—after Respondent filed for annulment on December 16, 2024—and represent **long-term equity contributions with penalties for early withdrawal**, in direct violation of both the **Standing Orders** and **Temporary Orders** prohibiting the movement or concealment of community assets.

This strategy appears designed to shield assets from division while maintaining the outward appearance of financial hardship. Respondent is diverting the maximum allowable into a **protected equity fund** that yields a **guaranteed 50% return**, with a **\$65,000 employer match** vesting immediately at year-end.

Meanwhile, she continues to portray herself as financially destitute—relying on “sweetheart loans” with 2% interest and 30-year terms to fund her lifestyle, while undergoing elective cosmetic surgery at one of the most prestigious boutique clinics in Texas.

At the same time Petitioner is unable to qualify for a single loan due to the marital debt he assumed—debt incurred prior to being falsely accused, cut off from funds, and isolated by a protective order obtained through perjury.

This contradiction reveals a clear strategy:

- Shift all household debt onto Petitioner
- Channel income into protected equity instruments
- Fund a high-end lifestyle through backdoor loans
- Maintain the appearance of financial strain to avoid spousal obligations

In reality, Respondent is not only **financially solvent**, she is using this Court’s leniency to grow her wealth while positioning Petitioner as insolvent and unstable.

---

## 23. PRAYER FOR RELIEF

**WHEREFORE, PREMISES CONSIDERED**, Petitioner respectfully requests that the Court grant this Emergency Motion in its entirety and issue an Order providing the following relief:

1. Immediate temporary financial support in the amount previously requested;
2. An order compelling Respondent to satisfy all past-due rent or transfer equivalent funds to Petitioner via the joint checking account;
3. Emergency protection prohibiting further obstruction of Petitioner’s access to healthcare, prescriptions, or shared marital resources;
4. A continuance of the current proceedings to allow Petitioner time to stabilize his housing and health, retain counsel, and meaningfully respond to pending filings and discovery requests;
5. Enforcement of all applicable Standing and Temporary Orders currently in place;
6. Judicial safeguards to prevent further procedural interference or coordinated efforts to deprive Petitioner of full participation in this litigation;
7. A hearing to be scheduled on spousal support, legal fees, and resolution of marital debt obligations; and Early Loan Repayment for my Fathers Memory Care.
8. Emergency Motion to Stay Execution of Writ of Possession Due to Pending Relief and Medical Hardship
9. Any further relief, whether at law or in equity, to which Petitioner may be justly entitled.

**Respectfully submitted,**

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

## **JUDGE PRESIDING**

254th Judicial District Court  
Dallas County, Texas

---

<b>Section</b>	<b>Correct Numbering</b>
RESPONDENT'S STRATEGIC FINANCIAL DEPLETION...	<b>1</b>
Petitioner's Supplemental Notice...	<b>2</b>
Eviction Notice...	<b>2.1</b>
Medical Crisis – Cellulitis	<b>2.2</b>
Renewed Request for Immediate Relief	<b>2.3</b>
Petitioner Respectfully Requests...	<b>3</b>
Pending Filings and Evidentiary Response	<b>4</b>
Final Remarks	<b>5</b>
Statement of Clarification...	<b>6</b>
Statement Regarding AirTags	<b>7</b>
Evidence of Respondent's Misuse of AirTags	<b>8</b>
False Claims of Financial Destitution...	<b>9</b>
Manipulated Deposits / Exhibit F	<b>10</b>
Transactions Before Jan 7th	<b>11</b>
Judicial Deception (Pam/Gwen)	<b>12</b>
STRATEGIC INTENT AND COLLAPSE BY DESIGN	<b>13</b>
Reservation of Rights	<b>14</b>
Request for Judicial Notice	<b>15</b>
Claimed \$7,000 Loan	<b>16</b>
VEIP Contributions	<b>17</b>
PRAYER FOR RELIEF	<b>18</b>

# TEXAS EVICTION NOTICE (NOTICE TO QUIT)

Date: June 26, 2025

This notice is sent to Jason McKemie ("Tenant") and further directed to all residents, occupants, subtenants, and any others in possession of the Premises.

Property Address: 5609 La Foy Blvd, Dallas TX 75209 ("Premises")

Lease Start Date: April 12, 2024 ("Lease")

In accordance with your Lease and the laws of Texas, after service on you of this notice, you are hereby given the following instructions:

*(Check the Appropriate Box)*

- **NONPAYMENT.** Within 3 days, the Landlord demands the total amount due:

- Past Rent: \$ 4,999.00 For the period of: June 1, 2025
- Late Fees: \$ 499.90 Details: June 20,2025
- Other Fees: \$ 300.00 Details: June 21,22,23,24,25,26

Total Amount Due: \$ 5798,90

Payment Instructions: #5024342213 Wells Fargo ACC or Zelle  
office@skweresproperties.com

If the above payment is not made within the required timeframe, the Tenant will be required to quit and deliver possession of the Premises.

- **NONCOMPLIANCE.** Within 3 days, you are hereby required to remedy the following violation of your Lease: June 29,2025.

This is out of compliance with your Lease. You are hereby obligated to notify the Landlord by the end of the notice period that the violation has been cured or quit and deliver possession of the Premises.

- **MONTH-TO-MONTH TENANCY.** Within 30 days of the next payment date, you are hereby required to quit and deliver possession of the Premises in accordance with your Lease.

**YOU ARE FURTHER NOTIFIED** that the Landlord hereby elects to declare that forfeiture of your Lease under which you hold possession of the Premises if you fail to perform or otherwise comply. Such noncompliance will institute legal proceedings to recover rent and possession of said Premises which shall result in a judgment against you including costs



and necessary disbursements together with possible statutory damages as allowed by law for such unlawful detention.

**Landlord Signature:** *Skweres Properties LLC* **Date:** 06.26.2025  
Print Name: SKWERES PROPERTIES LLC  
Address: \_\_\_\_\_  
Telephone: (281 ) 651 - 8615  
E-Mail: Jacquelineskweres@gmail.com      Tskweres@gmail.com

CAUSE NO. JPC-25-06838-51  
EVICTION - RESIDENTIAL

SKWERES PROPERTIES LLC

Plaintiff(s)

v.

JASON MCKEMIE

Defendant(s)

§  
§  
§  
§  
§  
§  
§

IN THE JUSTICE COURT

PRECINCT 5, PLACE 1

DALLAS COUNTY, TEXAS

**NOTICE OF HEARING**

SKWERES PROPERTIES LLC  
4659 SPRUCE ST  
BELLAIRE TX 77401

The above case has been set for a EVICTION BENCH TRIAL on **July 25, 2025 at 10:00 am** at Justice of the Peace, Precinct 5, Place 1, located at 3443 St. Francis Avenue Dallas Texas 75228.

Evidence may be submitted on cases prior to the hearing in the ways listed below.

- In person or commercial delivery
- By mail
- Electronically: [www.efiletexas.gov](http://www.efiletexas.gov)

**ISSUED** on June 30, 2025

*Hector Deleon*

**Clerk of the Court**  
Justice Court  
Precinct 5, Place 1  
3443 St. Francis Avenue  
Dallas Texas 75228  
Court Phone: 214-943-6980  
[JP51Court@dallascounty.org](mailto:JP51Court@dallascounty.org)

**Notice:**

To request to reset the above hearing date, a written Motion for Continuance stating the reason (*good cause*) for the continuance must be filed with this Court prior to the date and time above. Failure to comply with this notice requirement may result in the denial of your Motion for Continuance.

CASE NO. JPC 25-06838 -51 **PETITION: EVICTION CASE**

I hereby acknowledge the court date and understand if the Plaintiff fails to appear, the case may be Disposed for Want of Prosecution  
X of Claudia Patricia  
(Please initial and sign)

PLAINTIFF Skwers Properties LLC  
(Landlord/Property Name)

VS. DEFENDANT(S): Jason McKemik  
Gwendolyn Ukijas

Rental Subsidy (if any) \$ \_\_\_\_\_  
Tenant's Portion \$ \_\_\_\_\_  
TOTAL MONTHLY RENT \$ 4,999.00

COMPLAINT: Plaintiff (Landlord) hereby complains of the defendant(s) named above for eviction of plaintiff's premises (including storerooms and parking areas) located in the above precinct. Address of the property is:

5609 La Foy Blvd Dallas TX 75209  
Street Address Unit No. (If any) City State Zip

1. SERVICE OF CITATION: Service is requested on defendants by personal service at home or work or by alternative service as allowed by the Texas Justice Court Rules of Court. Other addresses where the defendant(s) may be served are:

5609 La Foy Blvd Dallas TX 75209  
2904 S

2.  UNPAID RENT AS GROUNDS FOR EVICTION: Defendant(s) failed to pay rent for the following time period(s): 29 days  
TOTAL DELINQUENT RENT AS OF DATE OF FILING IS: \$ 5948.90  
Plaintiff reserves the right to orally amend the amount at trial to include rent due from the date of filing through the date of trial.

3.  OTHER GROUNDS FOR EVICTION/LEASE VIOLATIONS: Lease Violations (if other than non-paid rent - list lease violations)

4.  HOLDOVER AS GROUNDS FOR EVICTION: Defendant(s) are unlawfully holding over since they failed to vacate at the end of the rental term or renewal of extension period, which was the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

5. NOTICE TO VACATE: Plaintiff has given defendant(s) a written notice to vacate (according to Chapter 24.005 of the Texas Property Code) and demand for possession. Such notice was delivered on the JUNE day of 26, 2025 and delivered by this method: letter and email

6. I have reviewed the information about the Texas Eviction Diversion Program available at [www.txcourts.gov/eviction-diversion/](http://www.txcourts.gov/eviction-diversion/):  
 YES  NO

7. ATTORNEY'S FEES: Plaintiff  will be or  will NOT be seeking applicable attorney's fees. Attorney's name, address, and phone & fax numbers are: \_\_\_\_\_

8.  BOND FOR POSSESSION: If Plaintiff has filed a bond for possession, plaintiff requests (1) that the amount of plaintiff's bond and defendant's counter bond be set, (2) that plaintiff's bond be approved by the Court, and (3) that proper notices as required by the Texas Justice Court Rules are given to Defendant(s).

REQUEST FOR JUDGMENT: Plaintiff prays that defendant(s) be served with citation and that plaintiff have judgment against defendant(s) for: possession of premises, including removal of defendants and defendants' possessions from the premises, unpaid rent if set forth above, attorney's fees, court costs, and interest on the above sums at the rate stated in the rental contract, or if not so stated, at the statutory rate for judgments under Civil Statutes Article 5069-1.05.

I consent for the answer and any other motions or pleadings to be sent to my email address: \_\_\_\_\_

Skwers Properties LLC  
Petitioner's Printed Name

Claudia Patricia  
Signature of Plaintiff (Landlord/Property Owner) or Agent  
4659 Spruce St  
Address of Plaintiff (Landlord/Property Owner) or Agent  
Bellaire TX 77401  
City State Zip  
281-651-8615  
Phone & Fax No. of Plaintiff (Landlord/Property Owner) or Agent  
214-705-4059

DEFENDANT(S) INFORMATION (if known):  
DATE OF BIRTH: 4.8.1974  
\*LAST 4 NUMBERS OF DRIVER LICENSE: 12807724  
\*LAST 4 NUMBERS OF SOCIAL SECURITY: 449-67-7823  
DEFENDANT'S PHONE NUMBER: 214-868-4901

Gwendolyn Laura Ukijas  
DOB 05-21-1978  
Sworn to and subscribed before me this 24 day of JUN 30 2025, 20\_\_\_\_.  
Phone # 917-471-1979  
gulijas2@gmail.com

MEDICAL

Facility	Date	Balance Due
Advance Emergency Center	3/13/25	\$1,808.24
Texas Medicine Resources, LLP	3/15/25	\$379.21
Obiageli Nebe	3/22/25	\$99.31
Evan Dittmar	3/20/25	\$128.34
Michael Kutsen	3/15/25	\$242.51
Dallas EP PLLC	3/13/25	\$242.51
Texas Health Presbyterian Hospital Dallas	3/15/25	\$436.89
Sound Physicians of Texas III	3/15/25	\$30.67
James Pak	3/15/25	\$8.39
Pamela Jensen	3/15/25	\$8.40
St Joseph	3/15/25	\$2,000.00
David Aron	3/15/01	\$440.00
		<b>\$5,824.47</b>

Financial Relief Request

	Amount	Fee's	TOTALS
Rent June	\$5,798	\$400	\$6,198
Rent July	\$5,000	\$500	\$5,500
Cash Relief	\$5,000		\$5,000
Car June	\$561	\$25	\$586
Car July	\$561		\$561
Medical	\$5,824		\$5,824

12:54 96

Used Vehicle

# \$18,959.15

CURRENT BALANCE

Pay

Calculate Payoff

**Activity**

- Late Charge Assessment **\$25.57**  
Jun 30, 2025  
Uncategorized

---

- INTOUCH CREDIT U NION - PAYMENT **-\$561.44**  
May 15, 2025  
Loans

---

- INTOUCH CREDIT U NION - PAYMENT **-\$561.44**  
Apr 15, 2025  
Loans

---

- INTOUCH CREDIT U NION - PAYMENT **-\$561.44**  
Jan 15, 2025  
Loans

---

- INTOUCH CREDIT U NION - PAYMENT **-\$561.44**  
Dec 16, 2024  
Loans

---

- INTOUCH CREDIT U NION - PAYMENT **-\$561.44**