

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. DF-24-18010

IN THE MATTER OF
MARRIAGE OF

GWENDOLYN ULIJASZ-MCKEMIE
&
JASON MCKEMIE

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IN THE DISTRICT COURT THE

302nd JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

**MOTION FOR LEAVE TO SERVE
SUBPOENA OUTSIDE DISCOVERY PERIOD TO COMPEL
PRODUCTION OF CONCEALED FINANCIAL ACCOUNTS**

TO THE HONORABLE JUDGE RAY WHELESS:

***Appearing Pro Se Not by Choice**, Respondent, Jason McKemie files this **Motion for Leave pursuant to Texas Rule of Civil Procedure 205.3**, respectfully requesting the Court’s permission to serve a narrowly tailored subpoena outside the closed discovery window to obtain concealed financial records critical to the equitable resolution of this case.

**See Attached “Procedural Identity Theft Disclaimer.”*

I. JUDICIAL ORIENTATION” → “I. PROCEDURAL BACKGROUND & GROUNDS FOR SUBPOENA

During the original discovery window, **Respondent requested full financial disclosures**, including all bank and credit card statements held by Petitioner, Gwen Uljasz-McKemie. Many gaps remain. In several instances, Petitioner produced only annual summaries rather than monthly statements—a tactic that fails to show account activity, obscures cash flow, and makes it impossible to reconcile transaction volume.

Whether this failure stems from an inability to understand the difference between a static year-end balance and actual account movement—or from a willful effort to conceal financial misconduct—the result is the same: key financial data remains hidden, and the discovery record is materially compromised.

II. RELIEF REQUESTED” → “II. SUBPOENA SCOPE AND REQUESTED MATERIALS”

- **Discovery Obstruction as Pattern, Not Oversight:**

Petitioner has repeatedly withheld, redacted, delayed, or scrambled financial disclosures—including bank records, credit card accounts, reimbursement documentation, and investment statements—despite direct and repeated discovery requests.

- **Credit Account Proliferation Designed to Conceal:**

Petitioner has produced at least eight (8) different Chase Sapphire credit card numbers. Several display identical balances and transaction patterns, while others were withheld entirely or provided only in part. This creates a false impression of account diversity while obscuring actual financial activity.

- **Chronological Tampering of Statements:**

Statements are presented out of sequence—bouncing between 2023 and 2025, across multiple card numbers, months, and even document types—making it impossible to reconstruct timelines, trace transfers, or audit rental reimbursement flows.

- **Suspected Rental Reimbursement Diversion:**

Petitioner informed Respondent that her rent is reimbursed by her employer, yet we have not been able to identify but a few ACH credit which would apply. Proper identification and income labeled as crucial in evaluating estate value and moving towards trial with fundamentally flawed accounting would not be prudent. Beyond any rental credits, we can't even find a single rental payment made by Petitioner, making this exercise even more violating both financial transparency expectations and discovery obligations.

- **Intentional Record Mixing to Obstruct Review:**

Credit card statements are commingled with unrelated leases, loan documents, and miscellaneous correspondence in a single PDF, creating artificial confusion and obstructing basic financial analysis. This is neither accidental nor consistent with good-faith disclosure.

- **Ongoing Harm from Systematic Obstruction:**

Petitioner's concealment tactics have directly impaired Respondent's ability to assess community assets, contest false claims, and obtain equitable relief. The cumulative effect is a distorted financial record and delayed accountability.

- **Partial and Withheld Credit Card Statements:**

Petitioner produced only partial statements for accounts ending in 9941, 3898, and 6893. These records do not extend through the present, despite multiple requests. She has entirely failed to produce any statements for accounts ending in 7496, 8627, 9259, and at least one account with redacted identifiers—rendering verification impossible without subpoena intervention.

- **Two Key Accounts Missing Entirely from Production:**

Petitioner has not denied the existence of these accounts; in fact, she has affirmatively acknowledged them, and their legitimacy has never been in dispute. In one instance, she provided only a screenshot of a login page, claiming the account remains “locked due to fraud”—a status that has allegedly persisted unchanged for over eight months.

Respondent has repeatedly informed Petitioner that any Chase branch can print current statements on demand, including for locked accounts. Her continued refusal to produce this information—despite repeated guidance on how to obtain it—demonstrates that further voluntary cooperation is

unlikely. At this point, a subpoena is the only viable path to secure this documentation and ensure financial transparency.

At least two Chase accounts listed in Respondent's original discovery request were omitted altogether. This is a direct violation of both the request and the Court's discovery expectations. These omissions have materially obstructed Respondent's ability to trace suspected concealed transactions, including reimbursements and cash withdrawals.

- **Respondent Was Severed from Counsel Mid-Discovery:**

Discovery was served in good faith. However, Petitioner's counsel filed a Motion to Withdraw citing non-payment, then disappeared during the court-approved discovery window—leaving Respondent unrepresented during a critical period.

- **Evidence of Shadow Representation During Withdrawal:**

While formally withdrawn, Petitioner's counsel continued operating behind the scenes. Petitioner looped Respondent into communications with attorney Will Cook, demonstrating that counsel remained active during the discovery window despite having formally exited the case. This reveals strategic manipulation of court timelines and coordinated concealment.

- **Coordinated Last-Minute Filing to Close Discovery:**

On the final night of discovery—at approximately 11:45 p.m.—Petitioner's counsel simultaneously filed a Notice of Appearance, blanket objections, and partial financial disclosures. These materials had clearly been prepared in advance while counsel was operating unofficially. By 12:00 a.m., counsel declared discovery closed and refused to participate further. No meaningful responses were ever submitted.

- **Coordinated Obstruction Undermined the Entire Process:**

Respondent asserts that the above actions were not coincidental or procedural missteps, but a calculated strategy to avoid the discovery process entirely through delay, concealment, and exploitation of procedural gaps.

- **Any outgoing or incoming deposits and rent-related payments.**

During the original discovery window, Respondent requested full financial disclosures, including all bank and credit card statements held by Petitioner, Gwen Ulijasz-McKemie. Many gaps remain. In several instances, Petitioner produced only annual summaries rather than monthly statements—a tactic that fails to show account activity, obscures cash flow, and makes it impossible to reconcile transaction volume.

- **Subpoena Relief Justified by Ongoing Obstruction**

Whether this failure stems from an inability to understand the difference between a static year-end balance and actual account movement—or from a willful effort to conceal financial misconduct—the result is the same: key financial data remains hidden, and the discovery record is materially

compromised.

- **Scope of This Motion Is Narrow—But Discovery Remains Unresolved:**

Respondent is seeking limited account information here because it relates directly to a live claim of procedural fraud involving rental payments and potential concealment of assets. However, this narrow motion does not constitute an acknowledgment that proper discovery ever occurred. Respondent reserves the right to file a broader motion to reopen discovery under judicial supervision and full subpoena authority.

II. RELIEF REQUESTED

Respondent respectfully requests leave of Court under Texas Rule of Civil Procedure 205.3 to serve third-party subpoenas on JPMorgan Chase Bank, N.A. and Venmo, Inc., for the production of concealed financial records critical to equitable distribution of the marital estate. These records are narrowly tailored, time-bound, and designed to resolve key gaps in financial transparency resulting from Petitioner's discovery misconduct.

A. Scope of Subpoena – Required Data

The subpoenas should compel the following:

1. All Checking, Savings, Money Market, Credit, Investment, or Business Accounts

- Identify and produce all accounts held solely or jointly by Petitioner from **September 1, 2023, to Present**, including:
 - Open and closed accounts
 - Accounts renamed, reassigned, reissued, or rolled over
 - Any account using Petitioner's
 - SSN: **361-72-2457**
 - DOB: **May 27, 1978 (Regardless of Associated Name)**
 - Identify any Produce any Accounts utilizing any combination of the First, Middle, and Last Names below identified which might not have been caught by the search utilizing just the SSN & DOB.
 - **First Name Variants:** (Blank), G, Gwen, Gwendol, Gwendolyn
 - **Middle Name Variants:** (Blank), L, L., Laura
 - **Last Name Variants:** U, Uljasz, Stat, Stathoulopoulos, McNally, McKemie

2. Account Statements

- Monthly statements from September 1, 2023 through present
- All account activity from the closing date of most recent statement through production

- Explicit continuity mapping of any accounts that evolved via number reassignment, balance rollover, or relabeling

3. **Transaction-Level Data**

For all accounts identified:

- CSV or Excel format preferred
- Dates, descriptions, balances, memos
- Source/destination data for ACH, Zelle, wire transfers, check deposits

4. **Peer-to-Peer Payments & Digital Wallets**

- All transactions through Venmo, Zelle, Apple Pay, PayPal, Cash App, or other P2P platforms linked to accounts above

5. **Credit Card Specifics**

- All credit card accounts (Chase or otherwise) issued or reissued to Petitioner since Sept 1, 2023
- Last four digits of each card
- Full transaction logs for all cards tied to Petitioner's SSN, regardless of account title

6. **Account Continuity Lineage**

- Identify any sequential accounts used to rotate, rename, or obscure activity
- Detail origin/destination of carryover balances and cash infusions across accounts

7. **Significant Transfers and Advances**

- Identify all credit card cash advances or balance transfers exceeding \$5,000
- Identify payee/recipient and associated metadata (e.g., ATM withdrawal locations)

B. To properly trace concealed transactions and determine the continuity of these accounts, Respondent requests that Chase be compelled to:

1. **Identify all checking, savings, money market, credit card, and investment accounts** held in Petitioner's name (or jointly with Respondent) from **September 1, 2023, through the present**—including all **closed, renamed, reassigned, or transferred accounts**.
2. **Provide transaction-level data** (machine-readable format preferred, such as Excel or CSV) for each account, including:
 - Transaction dates, descriptions, amounts, balances
 - Source/destination metadata for all ACH, Zelle, wire transfers
 - Any memo fields or classification codes available
3. **Reconstruct account lineage**, where applicable, by identifying:
 - Whether newer account numbers are continuations or replacements of older accounts
 - Dates of account openings, closures, or transfers
 - Any internal records showing movement of balances between accounts under different identifiers

4. **Produce records related to any cash advances, credit card balance transfers, or significant deposits**, including:
- Explanation of any advances exceeding \$2,000
 - Payee or recipient if advances were transferred to third parties
 - Transaction metadata, including ATM withdrawal locations if applicable

III. WHY THIS IS NECESSARY?

Petitioner has repeatedly withheld or scrambled financial data to disrupt accountability. Without a complete account lineage and access to transaction-level records, Respondent cannot:

- Trace reimbursements
- Validate rent payments
- Confirm cash movement during the period of alleged concealment
- Protect his due process rights in this divorce action

This request is narrowly tailored, time-bound, and directly relevant to **live allegations of financial misconduct**, including the suspected misuse of Chase accounts to facilitate undisclosed rent payments, dual-payment schemes, and post-separation asset dissipation.

III. LEGAL BASIS

Under Texas Rule of Civil Procedure 205.3, discovery may be served on a nonparty after the discovery period ends, provided the Court grants leave. Where there is evidence of financial concealment or discovery obstruction, courts routinely grant such relief to ensure transparency and fairness in marital estate division.

Respondent asserts that this request is not intended to reopen discovery in full, but to allow targeted inspection of omitted financial evidence that has direct bearing on current property disputes, potential fraud, and pending eviction coordination.

This subpoena is narrowly tailored to obtain concealed accounts and financial continuity data necessary for equitable distribution and to prevent irreversible harm from asset dissipation.

See Tex. R. Civ. P. 205.3(b); see also *In re Weekley Homes, L.P.*, 295 S.W.3d 309 (Tex. 2009) (discovery rights include access to relevant financial information, even where objections or procedural limitations exist).

VI. JUSTIFICATION: RENTAL FRAUD, EVICTION MANIPULATION, AND IMPACT ON PROPERTY RIGHTS

Respondent is currently facing imminent eviction from the marital residence — despite not being a financially obligated party on the lease. The residence was leased solely in Petitioner’s name in February

2024. Respondent explicitly refused to co-sign or obligate himself financially, as he was working full-time on a non-salaried startup venture encouraged by Petitioner. He had no fixed income and made clear at the time that he could not assume legal responsibility for a \$5,000/month lease.

Despite this, the January 7 ruling improperly assigned 100% financial responsibility for the residence to Respondent. This ruling is not contractually enforceable, and it was obtained through perjury and falsified evidence. Petitioner submitted misleading financial disclosures, including false declarations of destitution and redacted bank statements — omitting over \$420,000 in marital income earned in the months preceding the hearing.

Respondent paid \$5,000/month in rent from January through May 2025. However, due to recurring hospitalization from a staph infection and physical collapse, he was unable to pay June, July, or August. An initial eviction attempt failed due to improper service. Respondent now faces a second eviction — and this time, Petitioner’s name has been removed from the notice, despite being the only financial guarantor on the lease.

Respondent believes this was intentional. Based on Petitioner’s prior concealment of accounts and manipulation of financial records, it is suspected that she covertly paid the arrears to the landlord while instructing him to proceed with eviction filings under Respondent’s name alone. This would effectively:

- Remove Respondent from the property without court oversight,
- Render him homeless during active litigation,
- And allow Petitioner to reclaim the residence while evading the consequences of her prior perjury.

Respondent respectfully asserts that Petitioner’s ongoing concealment of account activity, underreporting of income, and misrepresentation of liabilities form a clear pattern of financial misconduct that materially prejudices the division of the marital estate and obstructs Respondent’s right to due process.

This pattern is substantiated by the following:

- Petitioner’s name has been removed from active eviction proceedings despite being the sole financial guarantor on the lease for the Dallas marital residence
- Petitioner’s sworn testimony on January 7, 2025, that she could not afford more than \$3,800/month in rent at her San Antonio residence, despite a verified compensation package exceeding \$1.46 million annually
- Her concealed \$10,000/month contributions to the Accenture Voluntary Equity Investment Program (VEIP), which began after the standing and temporary orders were in effect
- Her failure to disclose that her San Antonio housing costs were reimbursed by her employer
- The complete absence of San Antonio rent payments or Sullivan & Cook legal payments from the Chase accounts she produced—despite discovery responses claiming legal expenditures of up to \$480,000
- Confirmed documentation showing Petitioner maintains multiple undisclosed Chase accounts, including accounts with overlapping identifiers and activity consistent with deliberate account rotation to evade traceability

Respondent further notes that Petitioner failed to disclose any account showing monthly rent payments or legal fee disbursements, despite confirmation from Sullivan & Cook that they operate on a biweekly

billing cycle. These omissions are not anomalies; they are consistent with a broader strategy of concealment.

This conduct has escalated to a measurable harm: Respondent is currently facing imminent eviction from a residence for which he is not contractually obligated—a lease executed solely by Petitioner. Respondent has strong reason to believe Petitioner is making off-record payments to the landlord while enabling a legally fictitious eviction campaign to strip him of housing, disrupt his access to the courts, and skew final property division in her favor.

These tactics are part of a larger sequence of events that began on December 11, 2024, when Respondent retained legal counsel. Petitioner, upon being notified of the charge, falsely reported it as fraudulent and delayed its reinstatement until her attorneys had filed a protective order based on fabricated allegations. This maneuver deprived Respondent of counsel at a critical procedural juncture.

At the time, Petitioner had already diverted \$422,000 to concealed accounts and withdrew approximately \$90,000 from a joint Ameriprise account. Simultaneously, she encouraged Respondent to incur personal credit debt for household expenses while misrepresenting her liquidity. Petitioner created a narrative of a temporary “cash crunch” and submitted falsified bank screenshots to justify the financial disparity.

On December 13, 2024—two days after Respondent underwent spinal surgery—Petitioner abruptly departed the residence. He was left partially immobilized, financially isolated, and burdened with all household obligations, including the \$25,000/month cost of the marital estate. The rulings issued on January 7 subsequently cemented this imbalance, based on what Respondent alleges were fraudulent declarations and perjured testimony by both Petitioner and her sister.

This pattern is not unique to this case. Petitioner’s three prior marriages each resulted in severe financial and psychological harm to her partners. Her most recent prior relationship, with a common-law spouse, similarly involved stalking claims, a protective order, and a forced eviction.

Due to criminal allegations made in the originally filed Petition for Annulment by Petitioner; and any attempt to contest the rulings on January 7th on Spousal Support and Legal fees would expose Respondent to further criminal legal risk as they could be utilized to reintroduce new evidence of those alleged crimes. His former attorney stated that contesting the spousal support rulings would be “legal suicide.” Petitioner, whom is no stranger to courtrooms (spending over \$100k/yr on litigation over the past 2 years. This shifting of marital debt, they of all community assets, relentless financial strangulation, obstruction of medical access and due process at Respondent’s most vulnerable moment; coupled with the fraudulent and manipulated bank statements while making declarations of destitution and economic hardship together formed a procedural trap door preventing any potential option for correction. After over 20 motions, five emergency motions, countless engagements with opposing counsel, and 22 attempted visits for economic hardship to the district and associate judges – petitionere out there that will read this and do so sometime soon.

For these reasons, Respondent respectfully requests that this Court approve the pending subpoena directed to JPMorgan Chase Bank. The subpoena has been narrowly crafted to secure concealed account records, reconstruct financial lineage, and verify or rebut the suspected misuse of account structure to facilitate ongoing financial abuse and evidentiary obstruction. Without this relief, Respondent is unable to ensure fair property division or defend against continuing concealment.

IV. RESERVATION OF RIGHTS

Respondent further reserves all rights to **seek full and fair remedy** through all available procedural, evidentiary, and equitable means, including the right to reopen discovery, pursue sanctions, or initiate separate legal action based on any misconduct uncovered through this subpoena or previously concealed by Petitioner.

V. PRAYER

Respondent respectfully prays that the Court grant this Motion for Leave and permit the issuance of third-party subpoenas to **JPMorgan Chase Bank, N.A. and Venmo, Inc.** for the above-described financial account records. Respondent further reserves the right to seek full reopening of discovery based on documented obstruction, shadow legal coordination, and systemic concealment of evidence. To properly trace concealed transactions and determine the continuity of these accounts,

This subpoena is narrowly tailored to obtain concealed accounts and financial continuity data necessary for equitable distribution and to prevent irreversible harm from asset dissipation.

Respondent requests that Chase be compelled to:

1. **Identify all checking, savings, money market, credit card, and investment accounts** held in Petitioner's name (or jointly with Respondent) from **September 1, 2023, through the present—**including all **closed, renamed, reassigned, or transferred accounts.**
2. **Provide transaction-level data** (machine-readable format preferred, such as Excel or CSV) for each account, including:
 - Transaction dates, descriptions, amounts, balances
 - Source/destination metadata for all ACH, Zelle, wire transfers
 - Any memo fields or classification codes available
3. **Reconstruct account lineage**, where applicable, by identifying:
 - Whether newer account numbers are continuations or replacements of older accounts
 - Dates of account openings, closures, or transfers
 - Any internal records showing movement of balances between accounts under different identifiers
4. **Identify and Produce records related to any cash advances, credit card balance transfers, or significant deposits**, including:
 - Explanation of any advances exceeding \$5,000
 - Payee or recipient if advances were transferred to third parties
 - Transaction metadata, including ATM withdrawal locations if applicable

5. Identify and produce and all accounts associated with **Security Number 361-72-2457** and **Date of Birth May 27, 1978, regardless of the name utilized.**

6. Please include all accounts utilizing various combinations of the following First, Middle, and Last Names:
 - FIRST NAME:
 1. (Blank)
 2. G
 3. GWEN
 4. GWENDOL
 5. GWENDOLYN

 - MIDDLE NAME:
 1. (Blank)
 2. L
 3. LAURA

 - LAST NAME:
 1. U
 2. ULIJASZ
 3. STAT
 4. STATHOULOPOULOS
 5. MCNALLY
 6. MCKEMIE

Respectfully submitted,



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RESPONDENT’S DISCLAIMER:

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 unrebutted allegations of discovery abuse, evidentiary suppression, financial coercion, and litigation misconduct—all of which remain unruled 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 unrebutted 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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