

11/12/2024

By: C. Leurgans Deputy

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MARIE ALVARADO-GIL
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SACRAMENTO
10

11 CHAD CONDIT, and individual,
12 Plaintiff

13 v.

14 MARIE ALVARADO-GIL, an individual;
CALIFORNIA STATE SENATE, a California
15 public entity; and DOES 1 through 50,
inclusive,
16

Defendants.
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19 MARIE ALVARADO-GIL, an individual; and
COMMITTEE ALVARADO GIL FOR
20 SENATE, a political organization,

21 Cross-Complainants

22 v.

23 CHAD CONDIT, and individual; and DOES 1
through 10, inclusive,
24

Cross-Defendant
25
26
27
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CASE NO.: 24CV017664
[Unlimited Jurisdiction]

**DEFENDANT MARIE ALVARADO-GIL'S
CROSS-COMPLAINT FOR DAMAGES**

1. ASSAULT
2. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS
3. CONVERSION

DEMAND FOR JURY TRIAL

[Exempt from Fees-Gov. Code § 6103]

1 DEFENDANT/CROSS-COMPLAINANT MARIE ALVARADO-GIL (“Cross-Complainant”)
2 and COMMITTEE ALVARADO GIL FOR SENATE hereby make the following allegations against
3 PLAINTIFF/CROSS-DEFENDANT CHAD CONDIT (“Cross-Defendant”), and DOES 1 through 10,
4 inclusive, and allege and complain as follows:

5 **INTRODUCTION**

6 1. Cross-Complainant MARIE ALVARADO-GIL has served as the California State
7 Senator for the 4th Senate District since being elected Senator in November of 2022.

8 2. Cross-Defendant CHAD CONDIT served as Cross-Complainant’s Chief of Staff shortly
9 following her election in December of 2022 until approximately December of 2023, when the California
10 State Senate terminated his employment.

11 3. Cross-Defendant was terminated by the California State Senate because of misconduct.
12 Following his termination by the California State Senate, Cross-Defendant sought revenge against Cross-
13 Complainant, who he blamed for his own personal failures.

14 4. During Cross-Defendant’s time serving as Cross-Complainant’s Chief of Staff, Cross-
15 Defendant threatened Cross-Complainant by warning her that he knew “how to make people disappear”,
16 and indicating to Cross-Complainant that he was personally involved in the unsolved disappearance and
17 murder of Chandra Levy, the former mistress of Cross-Defendant’s father, former Congressman Gary
18 Condit. In addition to the warnings that he could make her disappear, Cross-Defendant told Cross-
19 Complainant more than once that if she were a man, Cross-Defendant would “kick [her] ass.” Cross-
20 Defendant also carried deadly weapons, including firearms, while working as Cross-Complainant’s
21 Chief of Staff.

22 5. Following those threats, Cross-Complainant, for the first time, looked into the unsolved
23 disappearance and murder of Chandra Levy.

24 6. Subsequently, Cross-Complainant began to live in constant fear of Cross-Defendant and
25 his extended family because she understood them to potentially be involved with the unsolved
26 disappearance and murder of Chandra Levy. For example, Cross-Defendant frequently discussed his
27 uncle Hop Condit, brother of former Congressman Gary Condit, who Cross-Defendant claimed had
28 multiple felony convictions and had been in and out of prison and/or jail since he was a teenager. Cross-

1 Defendant told Cross-Complainant that he and Hop Condit had “a history of supporting one another,”
2 further indicating to Cross-Complainant that her life was, and is, in serious danger.

3 7. Furthermore, Cross-Defendant’s alcohol abuse, drug abuse, and threats of physical
4 violence became more pronounced over time, causing Cross-Complainant to reasonably fear for her
5 personal safety as Cross-Defendant’s behavior became increasingly unstable and unpredictable, and
6 because Cross-Complainant knew Cross-Defendant to carry deadly weapons on a frequent basis.

7 8. After Cross-Defendant’s termination by the California State Senate, Cross-Complainant
8 took a closer look at the work Cross-Defendant had completed while volunteering for Cross-
9 Complainant’s campaign and serving as her Chief of Staff. Cross-Complainant discovered that Cross-
10 Defendant had stolen approximately \$50,000.00 from her campaign.

11 **JURISDICTION AND VENUE**

12 9. The Superior Court of the State of California has jurisdiction in this matter because Cross-
13 Complainant and Cross-Defendant are residents of the State of California. No federal question is at issue
14 because Cross-Complainant’s claims are based solely on California law.

15 10. Venue is proper in this judicial district and the County of Sacramento because, pursuant
16 to California Code of Civil Procedure section 394(b), the County of Sacramento is where the injury
17 occurred. Venue is further proper in the County of Sacramento because Cross-Defendant’s Complaint
18 against Cross-Complainant has venue in Sacramento County.

19 **PARTIES**

20 11. Defendant/Cross-Complainant MARIE ALVARADO-GIL is, and at all relevant times
21 mentioned herein was, a resident of the State of California.

22 12. Cross-Complainant COMMITTEE ALVARADO GIL FOR SENATE is a campaign
23 committee organized under the laws of the State of California and certified by the California Fair
24 Political Practices Commission, I.D. No. 1457661.

25 13. Plaintiff/Cross-Defendant CHAD CONDIT, upon information and belief, is, and at all
26 relevant times mentioned herein was, a resident of the State of California.

27 14. The true names and capacities of DOES 1 through 10, inclusive, are unknown to Plaintiff
28 at this time, and Cross-Complainant therefore sues such Defendants under fictitious names. Cross-

1 Complainant is informed, and believes, and thereon alleges, that each Defendant designated as a DOE is
2 in some manner highly responsible for the occurrences alleged herein, and that Cross-Complainant's
3 injuries and damages, as alleged herein, were proximately caused by the conduct of such DOE
4 Defendants. Cross-Complainant will seek leave of the Court to amend this Complaint to allege the true
5 names and capacities of such DOE Defendants when ascertained.

6 **FACTUAL ALLEGATIONS**

7 15. In 2022, Cross-Complainant MARIE ALVARADO-GIL ran to become California State
8 Senator for the 4th Senate District. Despite Cross-Complainant running for the first time in 2022 and
9 running as a Democrat in a Republican-leaning district, Cross-Complainant won her race and was elected
10 California State Senator for the 4th Senate District.

11 16. Upon information and belief, Cross-Defendant CHAD CONDIT ran for the California
12 State Assembly in 2022 but was defeated in the primary election. Subsequently, Cross-Defendant
13 approached Cross-Complainant about participating in her campaign as a volunteer. Cross-Defendant
14 worked as volunteer for Cross-Complainant from approximately July of 2022 through November of
15 2022, when Cross-Complainant won her election.

16 17. Following her election as California State Senator for the 4th Senate District, the
17 California State Senate hired Cross-Defendant as Cross-Complainant's Chief of Staff. Cross-Defendant
18 served in his capacity as Chief of Staff for Cross-Complainant from approximately December of 2022
19 through December of 2023, when the California State Senate terminated Cross-Defendant for cause.

20 18. Following his hiring in December of 2022, Cross-Defendant immediately began abusing
21 his authority as Chief of Staff by hiring unqualified friends and family members to Cross-Complainant's
22 staff and by approving salaries that exceeded the appropriate range for those qualifications. Furthermore,
23 on information and belief, Cross-Defendant conspired with his son, Stanislaus County Supervisor
24 Chance Condit to secure a budget allocation of five million dollars (\$5,000,000.00) without the
25 knowledge or consent of Cross-Complainant. The unauthorized allocation was reported to the Attorney
26 General's Office for further investigation. Cross-Defendant also used Cross-Complainant's electronic
27 signature without Cross-Complainant's knowledge or consent, including to embezzle funds from Cross-
28 Complainant's campaign, COMMITTEE ALVARADO GIL FOR SENATE.

1 19. Beginning in approximately January of 2023, Cross-Complainant began to notice that
2 Cross-Defendant exhibited signs of alcohol abuse and possible drug abuse. Cross-Complainant noticed
3 empty cans of alcohol in the vehicles that Cross-Defendant used to drive her to and from work events.
4 Cross-Complainant also noted that Cross-Defendant lacked the skills and knowledge to adequately serve
5 as her Chief of Staff.

6 20. In February of 2023, barely three months into Cross-Defendant's tenure as Chief of Staff,
7 Cross-Complainant began a coaching and training program with Cross-Defendant because of his lack of
8 judgment and experience. Cross-Complainant provided verbal direction, written instructions, and other
9 coaching and encouragement regularly, in hopes that Cross-Defendant would improve his performance.
10 Cross-Defendant's performance did not improve.

11 21. Upon information and belief, Cross-Defendant sustained an acute back injury in March
12 of 2023 while vacationing at Disneyland. Cross-Defendant returned to work with noticeable physical
13 limitations, including deficits to his posture and his ability to sit, stand, and walk. Cross-Complainant
14 urged Cross-Defendant to seek medical treatment and workplace accommodations.

15 22. Following his back injury, Cross-Complainant and other staff members began to suspect
16 that Cross-Defendant was abusing prescription medications in addition to his alcohol abuse, and that the
17 abuse of alcohol and drugs were manifesting as cognitive deficits. Although Cross-Defendant tried to
18 conceal his impairments, his ineffectiveness as Chief of Staff began to destroy office morale, as other
19 staffers were required to handle Cross-Defendant's job duties.

20 23. Cross-Defendant engaged in a pattern of being inexplicably absent from the office,
21 including from pre-scheduled meetings and legislative briefings, coming to work inebriated from
22 alcohol, painkillers, or both, slurring his speech, exhibiting a stumbling gait, and driving unsafely.

23 24. Cross-Defendant was required to drive Cross-Complainant to and from events of
24 legislative purpose as part of his responsibilities as Chief of Staff. The vehicles Cross-Defendant drove
25 sometimes contained empty bottles of alcohol and/or prescription drugs. Cross-Defendant also
26 frequently carried firearms in those vehicles. Cross-Complainant asked Cross-Defendant if he had a
27 concealed carry permit, and Cross-Defendant told her he did not have a permit. On one occasion, while
28 Cross-Complainant was about to take a tour of Bishop Airport, Cross-Defendant realized that he would

1 have to proceed through TSA screening to walk the tarmac. Cross-Defendant dismissed himself from
2 the screening, and when he returned, he told Cross-Complainant that he had to leave something in the
3 car. Cross-Defendant admitted to Cross-Complainant that the item he put in the car was a firearm. After
4 several instances of finding empty alcohol and/or drug containers in the vehicles Cross-Defendant drove,
5 and several instances of his erratic driving and illegally carrying deadly weapons in vehicles, Cross-
6 Complainant refused to ride in a vehicle with Cross-Defendant. Because of Cross-Defendant's threats
7 and unstable and dangerous behavior, Cross-Complainant communicated to her staff that she was not
8 comfortable being alone with Cross-Defendant under any circumstances. That created an additional
9 burden on other staffers, who had to handle Cross-Defendant's driving responsibilities.

10 25. In approximately June of 2023, Cross-Complainant was left with no choice but to bring
11 her concerns about Cross-Defendant's behaviors and performance to the attention of the California State
12 Senate's Human Resources department.

13 26. Despite Cross-Defendant's abhorrent conduct, Cross-Complainant felt sorry for Cross-
14 Defendant and his wife, who Cross-Complainant had befriended over time. Cross-Complainant was
15 patient with Cross-Defendant and gave him multiple opportunities to improve his behavior and
16 performance, and to improve his deteriorating health.

17 27. In December of 2023, Cross-Complainant held a district office ribbon-cutting event and
18 holiday party in Modesto. Cross-Defendant, who was supposed to be on medical leave, attended the
19 holiday party. Prior to the arrival of the other staff, Cross-Defendant had already become drunk. He was
20 eventually located in a bathroom with his pants around his ankles, yelling for help. In the following days,
21 Cross-Complainant asked Cross-Defendant for his resignation so that he could avoid the embarrassment
22 of being terminated.

23 28. In response, Cross-Defendant became furious and loudly berated and threatened Cross-
24 Complainant. Cross-Defendant told Cross-Complainant that he knew "how to make people disappear"
25 and indicated that he was personally responsible for the unsolved disappearance and murder of Chandra
26 Levy. In that moment, Cross-Complainant recalled that Cross-Defendant had previously threatened, on
27 more than one occasion, that if she were a man, Cross-Defendant would "kick [her] ass." Cross-
28 Defendant was close enough to Cross-Complainant and angry enough that Cross-Complainant believed

1 and reasonably feared that Cross-Defendant was going to strike her in a fit of rage.

2 29. Following the interaction, Cross-Complainant, for the first time, began researching the
3 unsolved disappearance and murder of Chandra Levy. Cross-Complainant discovered that Chandra Levy
4 was the former mistress of Cross-Defendant's father, former Congressman Gary Condit. She realized
5 that, at the time of the murder and disappearance of Chandra Levy, Cross-Defendant would have been
6 approximately 35 years old. Cross-Complainant also recalled the stories Cross-Defendant told her about
7 Cross-Defendant and Hop Condit having "a history of supporting one another."

8 30. Upon realizing that Cross-Defendant's claim that he was involved in the unsolved
9 disappearance and murder of Chandra Levy could be true, Cross-Complainant began to fear for her life
10 and for her family's safety. Subsequently, Cross-Complainant lived in constant fear of Cross-Defendant
11 and his extended family because she understood them to potentially be involved with the unsolved
12 disappearance and murder of Chandra Levy.

13 31. Based on conversations between Cross-Complainant and Cross-Defendant during Cross-
14 Complainant's electoral campaign and Cross-Defendant's tenure as Chief of Staff, Cross-Defendant
15 knew that Cross-Complainant has been in therapy because of previous marital problems and battles with
16 cancer.

17 32. As a direct and proximate result of Cross-Defendant's threats to make Cross-Complainant
18 "disappear", Cross-Complainant was forced to seek additional therapy for emotional distress due to
19 Cross-Defendant's abusive conduct and death threats.

20 33. Following Cross-Defendant's separation of employment from the California State Senate
21 and learning of Cross-Defendant's potential involvement in the unsolved disappearance and murder of
22 Chandra Levy, Cross-Complainant began scrutinizing Cross-Defendant's work on Cross-Complainant's
23 electoral campaign and Cross-Defendant's tenure as Chief of Staff. Cross-Complainant discovered that
24 Cross-Defendant had embezzled approximately \$50,000.00 from Cross-Complainant's campaign,
25 COMMITTEE ALVARADO GIL FOR SENATE.

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1 **FIRST CAUSE OF ACTION**

2 **ASSAULT**

3 **(Against Cross-Defendant CHAD CONDIT)**

4 34. Cross-Complainant realleges and incorporates by reference each and every paragraph
5 above as though fully set forth herein.

6 35. Cross-Complainant alleges, as more specifically stated in the Factual Allegations
7 incorporated herein, that Cross-Defendant CHAD CONDIT intentionally caused reasonable
8 apprehension of imminent harm against Cross-Complainant, which caused harm to Cross-Complainant,
9 resulting in assault. Cross-Complainant further alleges that, in addition to actual harm caused to Cross-
10 Complainant by the acts of Cross-Defendant CHAD CONDIT, as alleged herein, such acts caused Cross-
11 Complainant dignitary harm. Cross-Complainant further alleges that the actual harm and dignitary harm
12 caused by the acts of Cross-Defendant CHAD CONDIT, as alleged herein, would cause actual harm and
13 dignitary harm to a reasonable person of ordinary constitution.

14 36. As an actual and proximate result of Cross-Defendant CHAD CONDIT's conduct, as
15 alleged herein, Cross-Complainant has suffered, and continues to suffer, severe and extreme emotional
16 distress.

17 37. As an actual and proximate result of Cross-Defendant CHAD CONDIT's conduct, as
18 alleged herein, Cross-Complainant has suffered, and continues to suffer, pain, suffering, embarrassment,
19 humiliation, shame, emotional distress, and mental anguish in an amount according to proof.

20 38. In doing the wrongful and intentional acts and/or omissions as herein alleged, Cross-
21 Defendant CHAD CONDIT acted with oppression, fraud, and malice and with conscious and willful
22 disregard for the health, safety, and rights of Cross-Complainant and with an intent to vex, injure, and/or
23 annoy Cross-Complainant. Such acts and/or omissions were done with malice, oppression, and/or fraud
24 and was and is despicable, shocking, and offensive to the sensibilities of a reasonable person and entitles
25 Cross-Complainant to an award of punitive damages against Cross-Defendant CHAD CONDIT in an
26 amount sufficient to punish Cross-Defendant and to make an example of Cross-Defendant.

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1 **SECOND CAUSE OF ACTION**

2 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

3 **(Against Cross-Defendant CHAD CONDIT)**

4 39. Cross-Complainant realleges and incorporates by reference each and every paragraph
5 above as though fully set forth herein.

6 40. As set forth above, the actions of Cross-Defendant CHAD CONDIT were outrageous and
7 demonstrated Cross-Defendant's complete disregard for Cross-Complainant.

8 41. Cross-Defendant CHAD CONDIT assaulted Cross-Complainant and threatened the life
9 of Cross-Complainant, including, but not limited to, by causing Cross-Complainant to believe that Cross-
10 Defendant was criminally culpable in the unsolved disappearance and murder of Chandra Levy and that
11 Cross-Complainant would suffer the same fate as Ms. Levy, demonstrating that Cross-Defendant acted
12 with intent to cause Cross-Complainant severe emotional distress and/or acted with conscious disregard
13 of the reasonable probability that Cross-Complainant would suffer severe emotional distress. Cross-
14 Defendant CHAD CONDIT's conduct was so extreme as to go beyond the bounds of decency and be
15 regarded as intolerable in a civilized society.

16 42. As an actual and proximate result of Cross-Defendant CHAD CONDIT's conduct, as
17 alleged herein, Cross-Complainant has suffered, and continues to suffer, severe and extreme emotional
18 distress.

19 43. As an actual and proximate result of Cross-Defendant CHAD CONDIT's conduct, as
20 alleged herein, Cross-Complainant has suffered, and continues to suffer, pain, suffering, embarrassment,
21 humiliation, shame, emotional distress, and mental anguish in an amount according to proof.

22 44. As a direct and proximate result of the wrongful acts and/or omissions of Cross-
23 Defendant CHAD CONDIT, as described herein, Cross-Complainant suffered, and continues to suffer,
24 the injuries and damages set forth herein.

25 45. In doing the wrongful and intentional acts and/or omissions as herein alleged, Cross-
26 Defendant CHAD CONDIT acted with oppression, fraud, and malice and with conscious and willful
27 disregard for the health, safety, and rights of Cross-Complainant and with an intent to vex, injure, and/or
28 annoy Cross-Complainant. Such acts and/or omissions were done with malice, oppression, and/or fraud

1 and was and is despicable, shocking, and offensive to the sensibilities of a reasonable person and entitles
2 Cross-Complainant to an award of punitive damages against Cross-Defendant CHAD CONDIT in an
3 amount sufficient to punish Cross-Defendant and to make an example of Cross-Defendant.

4 **THIRD CAUSE OF ACTION**

5 **CONVERSION**

6 **(Against All Cross-Defendants)**

7 46. Cross-Complainant realleges and incorporates by reference each and every paragraph
8 above as though fully set forth herein.

9 47. Cross-Defendants, and each of them, substantially interfered with Cross-Complainant
10 MARIE ALVARADO-GIL and COMMITTEE ALVARADO GIL FOR SENATE's property by
11 knowingly or intentionally taking possession of campaign funds without the knowledge or consent of
12 Cross-Complainant MARIE ALVARADO-GIL and COMMITTEE ALVARADO GIL FOR SENATE.

13 48. Cross-Complainant MARIE ALVARADO-GIL and COMMITTEE ALVARADO GIL
14 FOR SENATE were deprived of property of which it otherwise would be in possession absent the
15 conduct of Cross-Defendants, and each of them, which was a substantial factor in causing Cross-
16 Complainant MARIE ALVARADO-GIL and COMMITTEE ALVARADO GIL FOR SENATE harm,
17 in an amount according to proof.

18 49. As a direct and proximate result of the wrongful conduct of Cross-Defendants, and each
19 of them, Cross-Complainant MARIE ALVARADO-GIL and COMMITTEE ALVARADO GIL FOR
20 SENATE have been harmed and are entitled to recover the monetary benefit that Cross-Defendants, and
21 each of them, gained through their wrongful conduct.

22 50. At all times mentioned herein, Cross-Defendants, and each of them, inclusive of DOES
23 1 through 10, were authorized and empowered by each other to act, and did so act, as agents of each
24 other, or ratified each other's conduct, and all of the things herein alleged to have been done by them
25 were done in the capacity of such agency or ratification. Upon information and belief, all Cross-
26 Defendants are responsible in some manner for the events, acts, and/or omissions described herein and
27 are liable to Cross-Complainant for the damages and/or harm caused by such events, acts, and/or
28 omissions.

51. In doing the wrongful and intentional acts and/or omissions as herein alleged, Cross-Defendants, and each of them, acted with oppression, fraud, and malice and with conscious and willful disregard for the health, safety, and rights of Cross-Complainant and with an intent to vex, injure, and/or annoy Cross-Complainant. Such acts and/or omissions were done with malice, oppression, and/or fraud and was and is despicable, shocking, and offensive to the sensibilities of a reasonable person and entitles Cross-Complainant to an award of punitive damages against Cross-Defendants, and each of them, in an amount sufficient to punish Cross-Defendants, and each of them, and to make an example of Cross-Defendants, and each of them.

PRAYER FOR RELIEF

1. For compensatory damages in an amount according to proof;
2. For general damages;
3. For special damages;
4. For punitive damages;
5. For treble damages;
6. For interest on any applicable amounts;
7. For reasonable attorney's fees and costs pursuant to California Penal Code section 496(c) or any other basis; and
8. For any other relief the Court deems just and proper.

DATE: November 12, 2024

FISHER & PHILLIPS LLP

By: 

Alden J. Parker
David B. Witkin

Attorneys for Defendant
MARIE ALVARADO-GIL

**PROOF OF SERVICE
(CCP § 1013(a) and 2015.5)**

I, the undersigned, am at least 18 years old and not a party to this action. I am employed in the County of Sacramento with the law offices of Fisher & Phillips LLP and its business address is 621 Capitol Mall, Suite 2400, Sacramento, California 95814.

On **November 12, 2024**, I served the foregoing document(s) **DEFENDANT MARIE ALVARADO-GIL'S CROSS-COMPLAINT FOR DAMAGES** on the person(s) listed below as follows:

Alan I. Schimmel, Esq.
Michael W. Parks, Esq.
Arya Rhodes, Esq.
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CHAD CONDIT

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- ☒ **[by MAIL]** - I enclosed the document(s) in a sealed envelope or package addressed to the person(s) whose address(es) are listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in Sacramento, California, in a sealed envelope with postage fully prepaid.
- ☐ **[by OVERNIGHT DELIVERY]** - I enclosed the document(s) in an envelope or package provided by an overnight delivery carrier and addressed to the person(s) at the address(es) listed above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight carrier.
- ☐ **[by ELECTRONIC SERVICE]** - Based on a court order or an agreement of the parties to accept service by electronic transmission, I electronically served the document(s) to the person(s) at the electronic service address(es) listed above.

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

Executed **November 12, 2024**, at Sacramento, California.

Shelby Kerner

Print Name

By: _____

Signature