

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

\_\_\_\_\_  
KENNETH GOLDMAN, )  
 )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
TWENTY-FIRST CENTURY DEMOCRATS, *et al.*) Civil Action No. 1:07-cv-02103-PLF  
 )  
Defendants. )  
\_\_\_\_\_)

**ERRATA**

Plaintiff Kenneth Goldman, by and through his attorney, submits this Errata to correct Defendant Kelly Young's address in his Complaint for Declaratory Injunctive and Monetary Relief and Jury Demand, filed with this Court on November 23, 2007. Attached please find the first page of the complaint with the corrected address.

Respectfully submitted,

/s/ David Wachtel

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(202) 745-1942

Attorney for Kenneth Goldman

DATED: November 27, 2007

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA**

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KENNETH GOLDMAN, )  
46681 Ashmere Square )  
Sterling, VA 20165, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
TWENTY-FIRST CENTURY DEMOCRATS, ) Civil Action No. \_\_\_\_\_  
Serve: Bill Combs ) Jury Demand  
1311 L St. N.W., Suite 300 )  
Washington, D.C. 20005 )  
 )  
KELLY YOUNG, )  
1744 Kilbourne Pl NW )  
Washington, DC 20010, )  
 )  
Defendants. )  
 )  

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**COMPLAINT FOR DECLARATORY, INJUNCTIVE,  
AND MONETARY RELIEF AND JURY DEMAND**

**PRELIMINARY STATEMENT**

1. Plaintiff, Kenneth Goldman, brings this action under the District of Columbia Human Rights Act, D.C. Code Ann. § 2-1401 *et seq.*, against his former employer, Twenty-First Century Democrats (“Defendant TFCD”), for declaratory and injunctive relief and monetary damages for injuries he has sustained as a result of discrimination on the basis of religion and retaliation for his opposition to religious discrimination. Plaintiff also files this action against Kelly Young (“Defendant Young”), Defendant TFCD’s former Executive Director, who was instrumental in Defendant TFCD’s discriminatory and retaliatory treatment of Mr. Goldman. Defendant Young created a work environment dominated by her belief in the practices of Landmark Education