## Strip Searches and Silos

Adopting a Holistic Approach to Charter Remedies

## Safford Unified School Dist. v. Redding, 129 S. Ct. 2633 (2009)





## Potential Bearers of the Risk of Loss

- ☐ Individual public official who violated the Constitution/Charter
- □ Governmental Entity
- □ The citizen whose rights were violated

## The Silo Effect in American Constitutional Remedies Jurisprudence





