or the rules of the school."[333] School searches must also be reasonably related in scope to the circumstances justifying the interference, and "not excessively intrusive in light of the age and sex of the student and the nature of the infraction."[334] In applying these rules, the Court upheld as reasonable the search of a student's purse to determine whether the student, accused of violating a school rule by smoking in the lavatory, possessed cigarettes. The search for cigarettes uncovered evidence of drug activity held admissible in a prosecution under the juvenile laws.

In *Safford Unified School District #1 v. Redding*,[335] a student found in possession of prescription ibuprofen pills at school stated that the pills had come from another student, 13-year-old Savana Redding. The Court found that the first student's statement was sufficiently plausible to warrant suspicion that Savana was involved in pill distribution, and that this suspicion was enough to justify a search of Savana's backpack and outer clothing.[336] School officials, however, had also "directed Savana to remove her clothes down to her underwear, and then 'pull out' her bra and the elastic band on her underpants"[337]—an action that the Court thought could fairly be labeled a strip search. Taking into account that "adolescent vulnerability intensifies the patent intrusiveness of the exposure" and that, according to a study, a strip search can "result in serious emotional damage," the Court found that the search violated the Fourth Amendment.[338] "Because there were no reasons to suspect the drugs presented a danger or were concealed in her underwear," the Court wrote, "the content of the suspicion failed to match the degree of intrusion."[339] But, even though the Court found that the search had violated the Fourth Amendment, it found that the school officials who conducted the search were protected from liability through qualified immunity, because the law prior to *Redding* was not clearly established.[340]

Government Workplace.—Similar principles apply to a public employer's work-related search of its employees' offices, desks, or

---

[333] 469 U.S. at 342. The Court has further elaborated that this "reasonable suspicion" standard is met if there is a "moderate chance" of finding evidence of wrongdoing. Safford Unified School District #1 v. Redding, 557 U.S. ___, No. 08–479, slip op. at 5 (2009).

[334] 469 U.S. at 342.

[335] 557 U.S. ___, No. 08–479 (2009).

[336] 557 U.S. ___, No. 08–479, slip op. at 7.

[337] 557 U.S. ___, No. 08–479, slip op. at 8.

[338] 557 U.S. ___, No. 08–479, slip op. at 8.

[339] 557 U.S. ___, No. 08–479, slip op. at 1, 9. Justice Thomas dissented from the finding of a Fourth Amendment violation.

[340] *See* "Alternatives to the Exclusionary Rule," *infra*. Justices Stevens and Ginsburg dissented from the grant of qualified immunity.