

I WAS SUBJECTED TO OVER ONE HUNDRED STRIP SEARCHES IN LESS THAN 25 DAYS. THE STRIP SEARCHES WERE NOT APPLIED TO MAINTAIN "IN A GOOD FAITH EFFORT TO MAINTAIN OR RESTORE DISCIPLINE" BUT INSTEAD IS USED TO "MALICIOUSLY AND SADISTICALLY" DEGRADE HARASS CAUSE MENTAL ANGUISH, ANGER AND DISTRESS. THEY WERE UNNECESSARY AND WANTON MOTIVATED STRIP SEARCHES. "STRIP SEARCHES ARE UNCONSTITUTIONAL UNLESS THE GUARD OR OFFICER HAS A REASONABLE SUSPICION THAT THE DETAINEE HAS A CONCEALED WEAPON OR CONTRABAND OF SOME SORT." SHAIN V. ELLIOW, 273 F.3d 56, 66 (2d CIR. 2001) STRIP SEARCHES THAT VIOLATE THE EIGHTH AMENDMENT ALSO VIOLATE RIGHTS UNDER THE FOURTH AMENDMENT AND THE FOURTEENTH AMENDMENT. THERE WAS NO NEED TO STRIP SEARCH 100 TIMES IN 25 DAYS. ~~THERE WAS NO NEED TO STRIP SEARCH 100 TIMES.~~ THE WARDEN MADE NO EFFORT TO USE AS LITTLE FORCE AS NECESSARY.

THE WARDEN IS IN VIOLATION OF U.S. CONST. AMENDS. 4TH, 8TH AND 14TH STRIP SEARCHING IN GROUPS VIOLATED THE FOURTH AMENDMENT BECAUSE DEFENDANT HAD NOT PROVIDED EVIDENCE SUGGESTING THAT GROUP STRIP SEARCHES (VERSUS INDIVIDUALIZED SEARCHES) INCREASED THE LIKELIHOOD OF STRIP SEARCHES. STRIP SEARCHING IN GROUPS VIOLATED THE FOURTH AMENDMENT. THE FOURTH AMENDMENT PROTECTS PRISONERS FROM UNREASONABLE SEARCHES AND SEIZURES. "STRIP SEARCHES THAT ARE EXCESSIVE, VINDICTIVE, HARASSING OR UNRELATED TO ANY LEGITIMATE PENOLOGICAL INTEREST ARE NOT REASONABLE. IT IS ALSO CLEAR THAT PRISONERS RETAIN A LIMITED RIGHT TO BODILY PRIVACY."

THE PRISONER ELIMINATION ACT (PREA) RECOGNIZES THAT SEXUAL HARASSMENT CAN CONSTITUTE A VIOLATION OF THE EIGHTH AMENDMENT. 42 U.S.C. § 15601. PREA REQUIRES THAT FACILITIES ADOPT A ZERO-TOLERANCE APPROACH TO THIS FORM OF ABUSE. PREA ALSO REQUIRES VISUAL BARRIERS DURING STRIP SEARCHES. LOPEZ V. YOUNG BLOOD, 609 F. SUPP. 2d 1125 (E.D. CAL. 2009) STATE IT WAS UNCONSTITUTIONAL TO STRIP SEARCH DETAINEES IN A GROUP. IN HAYES V. MARRIOTT 70 F.3d 1144, 1147-48 (10TH CIR. 1995). HELD THAT A BODY CAVITY SEARCH IN FRONT OF FEMALE GUARDS STATED A CLAIM FOR A FOURTH AMENDMENT VIOLATION BECAUSE THERE WAS NO SECURITY NEED.

THE STRIP/VISUAL BODY CAVITY SEARCHES WERE GROUP SEARCHES CONDUCTED IN VIEW OF OTHER INMATES, OFFICERS AND FEMALE OFFICERS. EACH PRISONER COULD OBSERVE THE SEARCHES OF OTHER PRISONERS IN THE GROUP. THERE WERE NO PARTITIONS OR OTHER BARRIERS TO PREVENT SUCH OBSERVATION. TDCJ MUST EMPLOY PRIVACY PARTITIONS OR BOOTHS WHEN CONDUCTING STRIP SEARCHES. THE SUPREME COURT SET FORTH A FOURTH AMEND. BAKING TEST FOR VIOLATIONS IN BELL, 441 US. AT 559. THE OFFERS VISUALLY INSPECTED GENITALS AND RECTAL AREAS AS PART OF THE STRIP SEARCHES OUTSIDE THE CELLS IN PLAIN VIEW WITHOUT PRIVACY PARTITIONS.

STRIP SEARCHES USED AS A MEANS OF PUNISHMENT VIOLATE THE DUE PROCESS CLAUSE OF THE FOURTEENTH AMENDMENT. ALL THE OTHER INMATES WERE INNOCENT AND SHOULD NOT HAVE BEEN STRIP SEARCHED

