

Until the Seventh Circuit decided *Hosty v. Carter*, no court had upheld *Hazelwood*'s application to independent student speech at a public university. However, in *Hosty*, the Seventh Circuit broke from precedent by granting qualified immunity to a university dean who called the printers to stop publication of a student newspaper. This note will examine the *Hosty* decision and Seventh Circuit's unfortunate interpretation of *Hazelwood* to find that the university administrator's actions did not violate "clearly established" law. It will provide a critical legal analysis of the Seventh Circuit's majority decision by illustrating how the court confuses government funding for an open forum with government funding for its own speech. It will argue that the court relied on its own disingenuous forum analysis—accomplished by isolated examinations of funding, age, and educational status—to demonstrate that the students' claims were based on unsettled law.