

This article examines how the Supreme Court has applied the government speech doctrine to limit First Amendment rights of individual speakers in two related areas: public schools and public workplaces. It focuses particularly on how the Court in *Hazelwood School District v. Kuhlmeier* (with respect to the student press) and *Garcetti v. Ceballos* (with regard to public employees) used the government speech concept to reduce or eliminate First Amendment protections belonging to student journalists and public employees. Part II of the article shows how lower courts have interpreted those holdings to allow government administrators in schools, colleges, and public workplaces to stifle unflattering expression and retaliate against those who report malfeasance. Part III of the article explores the concept of hybrid speech, and Part IV concludes that a hybrid speech analysis would better serve the First Amendment values presented in the student press/public workplace contexts.