it by its parent body. The enabling resolution that gives it life also contains the grant and limitations of the committee's power.[228] In *Watkins v. United States*,[229] Chief Justice Warren cautioned that "[b]roadly drafted and loosely worded . . . resolutions can leave tremendous latitude to the discretion of the investigators. The more vague the committee's charter is, the greater becomes the possibility that the committee's specific actions are not in conformity with the will of the parent house of Congress." Speaking directly of the authorizing resolution that created the House Un-American Activities Committee,[230] the Chief Justice thought it "difficult to imagine a less explicit authorizing resolution." [231]

But the far-reaching implications of these remarks were circumscribed by *Barenblatt v. United States*,[232] in which the Court, "[g]ranting the vagueness of the Rule," noted that Congress had long since put upon it a persuasive gloss of legislative history through practice and interpretation, which, read with the enabling resolution, showed that "the House has clothed the Un-American Activities Committee with pervasive authority to investigate Communist activities in this country." [233] "[W]e must conclude that [the Committee's] authority to conduct the inquiry presently under consideration is unassailable, and that . . . the Rule cannot be said to be constitutionally infirm on the score of vagueness." [234]

Because of the usual precision with which authorizing resolutions have generally been drafted, few controversies have arisen about whether a committee has projected its inquiry into an area not sanctioned by the parent body.[235] But in *United States v. Rumely*,[236] the Court held that the House of Representatives, in authorizing a select committee to investigate lobbying activities devoted to the promotion or defeat of legislation, did not thereby intend to empower the committee to probe activities of a lobbyist that were unconnected with his representations directly to Congress but rather designed to influence public opinion by distribution of literature. Consequently the committee was without authority to compel the

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[228] United States v. Rumely, 345 U.S. 41, 44 (1953).

[229] 354 U.S. 178, 201 (1957).

[230] The Committee has since been abolished.

[231] Watkins v. United States, 354 U.S. 178, 202 (1957).

[232] 360 U.S. 109 (1959).

[233] 360 U.S. at 117–18.

[234] 360 U.S. at 122–23. But note that in Stamler v. Willis, 415 F.2d 1365 (7th Cir. 1969), *cert. denied*, 399 U.S. 929 (1970), the court ordered to trial a civil suit contesting the constitutionality of the rule establishing the committee on allegations of overbreadth and overbroad application, holding that *Barenblatt* did not foreclose the contention.

[235] *But see* Tobin v. United States, 306 F.2d 270 (D.C. Cir. 1962), *cert. denied*, 371 U.S. 902 (1962).

[236] 345 U.S. 41 (1953).