

SUPREME COURT OF THE UNITED STATES

United States v. Bramblett

348 U.S. 503 (1955) · No. No. 159 · Decided April 4, 1955

SUMMARY

The Supreme Court considered whether 18 U.S.C. § 1001 applied to false representations made to the Disbursing Office of the House of Representatives. The Court held that the statute's reference to a matter within the jurisdiction of a department or agency of the United States encompassed the legislative and judicial branches, reversed the judgment of the District Court, and reinstated the prosecution.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice Reed
JURISDICTION	Federal
DECIDED	April 4, 1955
DOCKET	No. 159
DISPOSITION	reversed
PROCEDURAL POSTURE	The United States appealed directly from the District Court's judgment arresting judgment after a jury convicted appellee on seven counts under 18 U.S.C. § 1001.
STANDARD OF REVIEW	De novo review of the District Court's interpretation of 18 U.S.C. § 1001 and its arrest of judgment.
PRECEDENTIAL VALUE	Published opinion of the Supreme Court of the United States; binding precedent at the time of decision.
PARTIES	United States v. Bramblett

TOPICS

- statutory interpretation
- legislative history
- criminal procedure
- federalism

PRACTICE AREAS

- criminal law
- federal criminal procedure
- statutory interpretation
- legislative history

QUESTIONS PRESENTED

1. Whether 18 U.S.C. § 1001 applies to false statements made in a matter within the jurisdiction of the legislative branch of the Federal Government.
2. Whether the House of Representatives Disbursing Office falls within the phrase 'any department or agency of the United States' as used in § 1001.
3. Whether strict construction of a criminal statute requires § 1001 to be limited to falsifications made to executive departments or agencies.

HOLDINGS

1. The phrase 'any department or agency of the United States' in § 1001 encompasses the executive, legislative, and judicial branches of the Federal Government.
2. Strict construction of a criminal statute does not require giving the statute its narrowest possible meaning in disregard of legislative purpose.

KEY QUOTATIONS

“The context in which this language is used calls for an unrestricted interpretation. This is enforced by its legislative history. It would do violence to the purpose of Congress to limit the section to falsifications made to the executive departments.” (509-510)

“That criminal statutes are to be construed strictly is a proposition which calls for the citation of no authority. But this does not mean that every criminal statute must be given the narrowest possible meaning in complete disregard of the purpose of the legislature.” (510)

FACTUAL BACKGROUND

Appellee, a former member of Congress, was charged with falsely and fraudulently representing to the Disbursing Office of the House of Representatives that a named woman was entitled to compensation as his official clerk. The jury convicted him on seven counts under 18 U.S.C. § 1001 after acquittals were ordered on the other counts. The District Court arrested judgment because it concluded that the House Disbursing Office was outside the statute's reference to a department or agency of the United States.

PROCEDURAL HISTORY

An 18-count indictment was returned in the United States District Court for the District of Columbia. The court directed a judgment of acquittal on counts 8 through 18, and the jury found appellee guilty on the remaining seven counts. The District Court then granted appellee's motion in arrest of judgment, concluding that the House Disbursing Office was not a department or agency of the United States within § 1001 and that the statute did not protect the legislative or judicial branches. The Government brought a direct appeal under 18 U.S.C. § 3731.

DISPOSITION

reversed

CASES CITED

- United States v. Gilliland, 312 U.S. 86, 93-95
- United States v. Cohn, 270 U.S. 339
- Romney v. United States, 83 U.S. App. D.C. 150, 167 F.2d 521
- United States ex rel. Marcus v. Hess, 317 U.S. 537
- Spivey v. United States, 109 F.2d 181

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