

The background of the cover is a solid light yellow color. It is decorated with several stylized, light green leaf motifs. These motifs are arranged in a diagonal pattern, with some at the top left, some in the middle, and some at the bottom left. Each motif consists of a small stem with two leaves.

CHECKING EXECUTIVE POWER

**Presidential Impeachment in
Comparative Perspective**

Jody C. Baumgartner, Naoko Kada

 *Greenwood*
PUBLISHING GROUP

CHECKING EXECUTIVE POWER

This page intentionally left blank

CHECKING EXECUTIVE POWER

PRESIDENTIAL IMPEACHMENT IN COMPARATIVE PERSPECTIVE

Edited by Jody C. Baumgartner and Naoko Kada

PRAEGER

Westport, Connecticut
London

Library of Congress Cataloging-in-Publication Data

Checking executive power : presidential impeachment in comparative perspective / edited by Jody C. Baumgartner and Naoko Kada.

p. cm.

Includes bibliographical references and index.

ISBN 0-275-97926-1 (alk. paper) — ISBN 0-275-97927-X (pbk. : alk. paper)

1. Presidents. 2. Impeachments. 3. Comparative government. I. Baumgartner, Jody C., 1958- II. Kada, Naoko.

JF255.C46 2003

342'.062—dc21

2003051771

British Library Cataloguing in Publication Data is available.

Copyright © 2003 by Jody C. Baumgartner and Naoka Kada

All rights reserved. No portion of this book may be reproduced, by any process or technique, without the express written consent of the publisher.

Library of Congress Catalog Card Number: 2003051771

ISBN: 0-275-97926-1

0-275-97927-X (pbk.)

First published in 2003

Praeger Publishers, 88 Post Road West, Westport, CT 06881

An imprint of Greenwood Publishing Group, Inc.

www.praeger.com

Printed in the United States of America



The paper used in this book complies with the Permanent Paper Standard issued by the National Information Standards Organization (Z39.48-1984).

10 9 8 7 6 5 4 3 2 1

Contents

Tables and Figures	vii
Acknowledgments	ix
Chapter 1	Introduction: Comparative Presidential Impeachment 1
	<i>Jody C. Baumgartner</i>
Chapter 2	The Political Nature of Presidential Impeachment in the United States 21
	<i>William B. Perkins</i>
Chapter 3	Weak Institutions and Strong Movements: The Case of President Estrada's Impeachment and Removal in the Philippines 45
	<i>Yuko Kasuya</i>
Chapter 4	Presidential Impeachment and the Politics of Survival: The Case of Colombia 65
	<i>Victor J. Hinojosa and Aníbal Pérez-Liñán</i>
Chapter 5	Madagascar: Impeachment as Parliamentary Coup d'Etat 81
	<i>Philip M. Allen</i>
Chapter 6	Impeachment, Russian Style (1998–99) 95
	<i>Jody C. Baumgartner</i>
Chapter 7	Impeachment as a Punishment for Corruption? The Cases of Brazil and Venezuela 113
	<i>Naoko Kada</i>
Chapter 8	Comparative Presidential Impeachment: Conclusions 137
	<i>Naoko Kada</i>
Endnotes	157

Recommended Readings	185
Index	189
About the Contributors	195

Tables and Figures

Table 1-1. Regime Structures	9
Table 1-2. Constitutional and Statutory Provisions for Impeachment	11
Table 1-3. Phases and Outcomes of Presidential Impeachment	17
Table 2-1. Presidents, Unified/Divided Government, and Trends in Impeachment	23
Table 2-2. Impeachment Votes and Major Partisan Shifts Resulting in Divided Government	33
Table 2-3a. Party Breakdowns in Impeachment Voting (Jackson through Nixon)	34
Table 2-3b. Party Breakdowns in Impeachment Voting (Clinton)	35
Table 2-4. Partisanship in Twenty-eight Impeachment Votes	37
Table 2-5. Preference Scores and Defectors, Non-defectors in the Johnson, Nixon, and Clinton Impeachments	39
Table 2-6. Defection, Reelection, and the 1996 Election: First Senate Clinton Vote	41
Table 3-1. Change in the Number of Impeachment Endorsers by Party	50
Table 3-2. Legislators' Impeachment Endorsement Ratio by Party	53
Table 3-3. Ratio of Impeachment Endorsers by Term Limit Classification	54
Table 3-4. Partisan Composition of the Filipino Senate	55

Figure 4-1. Popularity Rates for Ernesto Samper, August 1994–July, 1998	71
Table 4-1. Models of Presidential Popularity (OLS)	74
Table 4-2. Vote Acquitting Samper in the Colombian House (June 12, 1996)	75
Table 4-3. Model Predicting the Vote in the Colombian House of Representatives (June 12, 1996)	77
Table 4-4. Predicted Probability of Supporting the President, by Party (Based on Table 4.2)	78
Table 6-1. Major Russian Political Parties, Their Orientation, and Associated Duma Factions (1999)	98
Table 6-2. Impeachment Attempts in Russia, 1992–1997	100
Table 6-3. Summary of Voting on Impeachment Charges Against President Yeltsin, May 15, 1999	104
Table 6-4. Russian Duma Voting on Presidential Impeachment, 1999, by Charge and Faction	108
Figure 7-1: Impeachment and Removal Process in Brazil and Venezuela	115
Table 7-1. Impeachment Vote, Brazilian House of Deputies, 1992	124
Table 7-2 Indictment Vote, Brazilian Senate, 1992	125
Table 8-1. Constitutional Impeachment and Removal Provisions by Country: Legislative (Bicameral and Unicameral) Impeachment	139
Table 8-2. Constitutional Impeachment and Removal Provisions by Country: Mixed (Legislative and Judicial) Impeachment	141
Table 8-3. Constitutional Impeachment and Removal Provisions by Country: Other	143
Table 8-4. Constitutional Impeachment and Removal Provisions: Institutions by Majorities Required	144
Figure 8-1. Presidential Impeachment as a Multi-stage Game	153

Acknowledgments

This book is the result of a collaboration that began over the Internet. In the course of electronic correspondence between the two editors regarding recent work each had done on impeachment in their respective countries of focus, the idea for producing this volume was born. The editors then contacted other contributors who they knew had worked on, or might have an interest in working on, impeachment, again via the Internet, and this book grew from there—without this medium of communication, it might not have materialized.

Most of the papers that comprise this volume were originally presented at a panel at the Midwest Political Association Annual Meeting in spring 2002. It was at that time that most of us gathered to meet and discuss the project. The generous and insightful comments by the panel chair, Dr. Michael Mezey (De Paul University), and discussant, Dr. Ryan Barilleaux (Miami University), were extremely helpful as well as very encouraging. Thanks are also due to James Sabin of Greenwood Publishing, who, through two different projects with Jody, has offered a great deal of professional assistance and encouragement.

It has been a great pleasure for Jody to work with the contributors to this volume, all of whom have brought valuable knowledge and understanding to the project, and without whom it would not have been possible. All have been a pleasure to work with, and he is grateful for the opportunity to expand his circle of friends. He would like to thank them for their patience, cooperation, and trust, and of course for their excellent contributions. Similarly, the close collaboration with Naoko has been insightful, fruitful, and a pleasure. It was her intellectual checks that kept the project on track. On a personal note, he would like to thank his wife Lei for the enormous amount of patience she displayed during the year or so we were working on this project.

Naoko would like to thank Jody for his patience and grace during the production of this book. She would also like to thank the contributors for their superb work under a very tight schedule, many of whom were old friends before, and new friends made in the process. She is ever grateful to her husband, Anthony, for his understanding and support during the sometimes quite stressful collaboration of this project.

Introduction: Comparative Presidential Impeachment

Jody C. Baumgartner

INTRODUCTION

Presidential impeachment is the equivalent of a political earthquake. It convulses, disrupts, and in many cases, polarizes the body politic as few political events can. The rancorous debate among scholars, public intellectuals, and political commentators during the Clinton impeachment illustrates this perfectly.¹ Impeachment proceedings have the power to disrupt and destroy political careers, and that destruction is often not limited to the president. The fall of U.S. House of Representative Speakers Newt Gingrich and Bob Livingston in late 1998 during the impeachment proceedings of U.S. President William Clinton are evidence of this fact. Presidential impeachment is, in short, an extraordinary political event.

Presidential impeachment proceedings are historically rare, but the 1990s saw a wave of them that began with the impeachment and subsequent removal of Brazilian President Collor in 1992, and continued throughout the decade. In all, a total of seven presidents, from every corner of the globe, faced a serious impeachment challenge during this period. This book examines and compares these impeachment efforts.

Should we view the recent wave (if it can be called such) of impeachments with alarm? Does it indicate democratic instability, as some might think? Or, as others maintain, is it a positive sign, since as the result of impeachment proceedings (successful or otherwise), future presidents will better understand that they can and will be held accountable? Is impeachment, as still others suggest, a healthier alternative than removal of a president by military coup or assassination?

Presidential impeachment is a subject that remains shrouded in misunderstanding. What exactly does impeachment mean? For example, before Clinton's impeachment in 1998, many U.S. citizens understood

“impeachment” to mean removal from office. But there are other questions about the process as well. Why do presidential systems have provisions for impeachment at all? Is impeachment, as some claim, strictly a legal proceeding, or is it something more? What explains the emergence of an impeachment attempt? When are they most likely to succeed?

The contributors to this volume have shed some light on these questions, illuminating the extraordinary process of presidential impeachment. The book casts a wide net, examining presidential impeachment in several countries in several regions of the world, with chapters devoted to impeachment attempts in the United States, Colombia, Brazil, Venezuela, Russia, the Philippines, and Madagascar. In each of these countries there has been a serious attempt to impeach a sitting president within the past decade or so.

The basic assumption of this book, and one that is addressed throughout, is that impeachment is a political, rather than a legal proceeding. In other words, this book is about the *politics* of presidential impeachment. Each case study includes a discussion of the historical and constitutional bases of the presidency, the structural balance of governmental power, constitutional and statutory provisions for impeachment, the structure of party politics in each country, and presidential popularity prior to the impeachment attempt. After discussing these contextual factors, all of which are related to the emergence of an impeachment attempt, the authors move to an examination of wrongdoing (alleged or otherwise) by the president or those associated with the president and the associated scandal, the reaction by the legislature, and how the impeachment process played out in the institutions of government. While the framework is broad, it is focused enough to allow for comparison between the cases and some general conclusions about all phases of the impeachment process and executive accountability to be drawn.

The remainder of this chapter discusses why it is important to understand presidential impeachment, and then reviews the extant literature on the subject. A general discussion of the theoretical and historical bases of impeachment and a discussion of the framework which guides our study follows. Finally, the cases are briefly introduced.

WHY STUDY PRESIDENTIAL IMPEACHMENT?

Understanding impeachment is important for several reasons. As previously noted, between 1990 and 2001 there were several presidential impeachment attempts in various countries throughout the world. While outcomes in each case varied, such frequency suggests that presidential impeachment may not be all that uncommon, particularly in newer democracies.

Presidential impeachment, as it has been adopted over the years in various countries, is similar to, but more extreme than, a vote of no-confidence

in parliamentary systems. Presidential systems, with their strict separation of functions, are designed to (among other things) maximize executive stability at the expense of checking the executive. Besides impeachment, these systems have no regularized “means of removing an unpopular—and possibly feckless—chief executive.”² Thus, although unwieldy, impeachment is the ultimate check on the power of a chief executive in a presidential system, and therefore a fundamental democratic element of these systems. By itself, this makes it worthy of study and important to understand.

Interestingly, the subject of presidential impeachment has been largely ignored by political scientists. For many years this was justified, since few stable democracies were, in any meaningful sense, “presidential.” However, an increasing number of new democracies are opting for some form of presidentialism, whether in its strictly separated form (as in the U.S.) or in hybrid form (sharing executive power with a prime minister, as in France) form.³ Therefore, it has become increasingly important to understand presidential systems and presidential power, and by extension, how presidential impeachment works. This is especially the case in newer and more fragile democracies, where executive-legislative conflict can contribute to a breakdown of the regime;⁴ in these cases, impeachment constitutes a legal-constitutional alternative to less preferred or more familiar alternatives such as system breakdown, military coup, *autogolpe*, etc.⁵

THE LITERATURE

Political scientists have been strangely silent on the subject of presidential impeachment. A summary of the literature on this subject leads to three main conclusions. First, most of the existing work is descriptive, and, either explicitly or implicitly, normative (e.g., did the crime justify the punishment?). Second, most of it is the product of historians, journalists, insiders, or legal scholars. Finally, existing impeachment literature is by and large limited to studies of individual impeachment cases in the United States.

There is little book-length scholarship about presidential impeachment that can properly be considered political science. Exceptions to this include an edited volume from 1975 examining Watergate and its effects on American politics.⁶ The Clinton impeachment occasioned two book-length works, one of them an edited volume that examines all aspects of the affair, and another that looks at legislative behavior through the lens of local constituencies and money.⁷ There are several published papers that address various aspects of the Clinton impeachment in the U.S., including, for example, some that examine Congressional voting behavior,⁸ others that examine public opinion,⁹ another that deals with the use of senatorial rhetoric in the Clinton and Johnson trials,¹⁰ and a study

which suggests that impeachments are more likely in this modern era of intense partisan conflict.¹¹

Historians have contributed several very good accounts of the trial and impeachment of Andrew Johnson, which, although focusing on the role of Reconstruction politics and the relationship between Johnson and Congress, are by and large descriptive.¹² Journalistic and insider narratives about the impeachment efforts directed against both Presidents Nixon and Clinton abound, and although many are compelling, and illuminate certain aspects of the politics of impeachment, they are generally descriptive, fairly narrowly focused (on a particular case), and often have a particular normative bent.¹³

There are also a number of legal texts on the subject, but as might be imagined, these take a legalistic approach to impeachment, focusing mainly on what constitutes impeachable offenses and the procedures involved in impeachment.¹⁴ At this point it might be useful to discuss what we believe to be the deficiencies of the legal approach to understanding the politics of presidential impeachment.¹⁵

The legal approach first assumes, erroneously, that what constitutes an impeachable offense can be determined with some exactitude. Under this assumption, the only U.S. presidents (for example) who ever broke the law were Andrew Johnson, Richard Nixon, and Bill Clinton. There are, however, differences of opinion over whether or not any of these three men ever committed high crimes or misdemeanors. Furthermore, the legal approach tends to ignore presidents who may have broken the law but were never held accountable (for more on this, see Chapter 2). In other words, there are many presidents who may have acted outside the confines of the law but who never faced an impeachment threat.

The legal approach to the study of impeachment also assumes that partisan differences should not play a role in whether or not a president is to be impeached; this of course is a normative argument. The idea is well encapsulated in the following passage from one of the standard texts on impeachment:

The major *problem* with the impeachment process is that members of Congress are likely to feel tremendous pressure to forego investigating a president with high approval ratings or substantial popularity.¹⁶

The author goes on to suggest that elected officials should be willing to “undertake political risks” in the process of impeachment. In other words, the passage implies that politicians, who are constrained in their behavior in the pursuit of a variety of goals (including winning elections), can somehow be expected to act non-politically. We do not necessarily disagree with this ideal, but an understanding of impeachment that is centered around it misses the reality that while the focal point of a given impeachment may be understood in legal terms and the process is

structured like a trial, impeachment is fundamentally a political process from beginning to end. Simply put, the men and women who decide the fate of presidents during impeachment proceedings are political beings.

Indeed, James Wilson, an active and prominent participant in the constitutional convention, and subsequently a Supreme Court Justice, declared that impeachments were “proceedings of a political nature . . . confined to political characters, to political crimes and misdemeanors, and to political punishments.”¹⁷ For his part, Alexander Hamilton observed (in *Federalist* 65) that the impeachment process would be denominated POLITICAL:

The prosecution of them, for this reason, will seldom fail to agitate the passions of the whole community, and to divide it into parties more or less friendly or inimical to the accused. In many cases it will connect itself with the pre-existing factions, and will enlist all their animosities, partialities, influence, and interest on one side or on the other; and in such cases there will always be the greatest danger that the decision will be regulated more by the comparative strength of the parties, than by the real demonstrations of innocence or guilt.

During the effort to impeach Associate Justice William O. Douglas of the U.S. Supreme Court in 1970, then minority floor leader Gerald R. Ford (R-MI) proffered perhaps the most evasive but at the same time realistic definition of impeachment. “An impeachable offense,” he said, “is whatever a majority of the House of Representatives considers [it] to be at a given moment in history; conviction results from whatever offense or offenses two-thirds of the other body considers to be sufficiently serious to require removal of the accused from office.”

Ford’s seemingly obvious conclusion was based upon the Kelley Memorandum, within which the perceived intention of the founders was addressed. “If the framers had meant to remove from office only those officials who violated the criminal law,” it read, “a much simpler method than impeachment could have been devised. Since impeachment is such a complex and cumbersome procedure, it must have been directed at conduct which would be outside the purview of the criminal law.”¹⁸

In short, what stands out about the literature on presidential impeachment is that most of the work on the subject has been done by those who adopt a non-political or non-systematic approach to understanding it. Additionally, almost all of the English-language work on impeachment is restricted to the U.S.; there is a distinct lack of scholarship that deals with presidential impeachment in other countries, either individually or comparatively.¹⁹ This book is designed to remedy that situation.

THE PRE-HISTORY OF PRESIDENTIAL IMPEACHMENT

Before discussing presidential impeachment and the factors that lead to impeachment attempts (successful or otherwise), a brief history of the

concept and practice of impeachment is in order. Although many variations for presidential impeachment exist, the basic model for the procedure is found in the U.S. Constitution, which in turn drew upon the British and colonial experience with impeachment.

Impeachment, a legislative trial, was introduced in the fourteenth century in Great Britain. It was used by Parliament against public officials, and occasionally against powerful private citizens, for any variety of misdeeds when prosecution by regular courts was not considered to be practicable (if, for example, a court was susceptible to bribery or intimidation by the accused).²⁰ Impeachment was often used by Parliament as a tool to gain power relative to the Crown and its officials. Similar to the American version of impeachment, the House of Commons (the lower house of the legislature) decided whether to impeach (literally, “to accuse” or “to charge”²¹) an individual, and if impeached, a trial was conducted by the House of Lords (the upper house of the legislature). If convicted, the House of Lords also imposed punishment; unlike in the U.S., punishment sometimes included criminal-type sanctions (even death) as well as removing public officials from office.

In practice, the misdeeds for which an individual might be impeached could be either criminal or political in nature; in other words, unlike in the American variant of the procedure, objectionable policies were considered fair game for impeachment of a public official. Also unlike the U.S. version of the practice, the monarchy (more generally the royal family), as the highest public officials in the land, were considered beyond the purview of the impeachment powers of Parliament.

Although technically they were forbidden to do so, American colonial assemblies adopted and often used the practice of impeachment; the trial was typically conducted before governors’ councils. As in Great Britain, impeachment proceedings were often motivated by political concerns and were also a way of challenging authority. The point is that the framers of the U.S. Constitution were very familiar with impeachment by the time the Constitutional Convention convened (for example, the impeachment of Warren Hastings was being conducted in Parliament while the Constitutional Convention was underway).²²

Chapter 2 discusses the adoption of presidential impeachment provisions during the Convention. What is important to note is that virtually every presidential or semi-presidential democracy since then has adopted constitutional provisions for removal of a sitting president by way of impeachment; this fact, as well as its theoretical implications, are explored in greater detail in the final chapter.

THE FRAMEWORK FOR THIS BOOK

As previously noted, we take the position that presidential impeachment can only be understood as a political phenomenon. The word *impeachment*

generally refers to a political trial to remove a public official. In this book we will usually be talking in terms of the *impeachment process*, by which we mean a process that begins with the formation of some investigative body, typically (though not always) in the legislature, to examine the alleged misdeeds of a president (or those close to him) and subsequent activity surrounding the authorization of a trial to remove the president.²³ In common usage, if a trial is authorized, the president has been formally *impeached*; in places we use the term *impeached* in this sense of the word as well. But the impeachment process also includes a trial, which can ultimately lead to presidential exit from office. Of course not all impeachment efforts reach this stage, a fact we discuss in more detail. The remainder of this section discusses the determinants and stages of presidential impeachment.

Factors That Condition the Process of Presidential Impeachment

We have identified five factors that we suggest condition the emergence and outcome of presidential impeachment attempts. These factors affect the likelihood that an impeachment attempt will be made and how successful it might be, and include (1) the institutional balance of power between the various branches of government; (2) the constitutional and statutory provisions for impeachment; (3) the structure of party politics; (4) presidential popularity prior to allegations of presidential wrongdoing; and (5) other factors, including the media environment, economic conditions, and international pressures.

The Institutional Balance of Power

A description of the constitutional framework of government and the institutional balance of power between the various branches of government is necessary to set the stage for a discussion of impeachment in a particular country. At least one other national institution besides the president is involved in the impeachment and removal process, so understanding the regime structure and the relationship between the various institutions of government is critical to establishing a baseline for a discussion of impeachment.

It matters, for example, if the presidency is fairly weak (i.e., has few legislative powers) vis-a-vis the legislature.²⁴ Here we might expect to see a greater likelihood of an impeachment attempt, if, for example, a president tried to exert influence over the legislature. Conversely, if the president is strong in relation to the legislature, impeachment may be the only constitutional-legal way for a legislature to exert any control over the executive. In Russia, for example, a strong presidency may have led to many of the various impeachment attempts against Boris Yeltsin in the 1990s; these

attempts were also conditioned by conflictual relations between Yeltsin and the legislature prior to the establishment of the present regime.

If the selection process for members of the high courts (e.g., a Constitutional or Supreme Court) or the upper house of the legislature is dominated by the president, and if either (or both) are involved in the trial to remove the president, the removal attempt might theoretically have less chance of success. Importantly, the institutional balance of power varies in its effect on the impeachment process across cases. In other words, the explanatory power of this variable alone may approach insignificance, but explicating it adds needed context. Table 1-1 outlines the structure of the regime in each of the cases we examine.

Constitutional and Statutory Provisions for Impeachment

In almost all countries presidential impeachment is difficult. This is by design, since one of the motivations for settling on some form of presidentialism as opposed to strict parliamentarianism is to achieve a greater degree of executive stability. This said, in some systems, impeaching and removing a president is more difficult than in others. A discussion of the legal provisions for impeachment, both constitutional and statutory, is necessary for understanding both the emergence and course of an impeachment attempt. In particular, which institutions of government are responsible at what stage, and what size majority is required for successfully moving the process to the next phase? Although lower houses of the legislature are in most cases responsible for the actual impeachment (authorizing a trial) itself, in some countries an upper house of the legislature conducts the trial, while in others the high court(s) does so, and in some few others, either the lower house itself or both the high court(s) and the upper house are involved. Of course, more institutions involved in the process mean more potential veto points, making it theoretically more difficult for an impeachment attempt to succeed. Table 1-2 outlines the constitutional and statutory provisions for impeachment in each of the cases in our study.

The Structure of Party Politics

Presidential impeachment is played out between institutions of government that are comprised (with the exception of some presidents) of members of political parties. Unsurprisingly therefore, presidential impeachment typically has distinct partisan overtones. Thus, an overview of the shape of party politics in each country is critical to understanding presidential impeachment, particularly when discussing the organization of the legislature, the partisan composition of legislative committees, and the manner and history of judicial appointments. A focus on party politics

Table 1-1.
Regime Structures

Country (Year of Constitution)	Lower House of Legislature	Upper House of Legislature	Constitutional Court	Supreme Court
<i>Brazil (1988)</i>	House of Deputies; 503 members; 4-year terms	Senate; 81 members; 8-year terms	N/A	11 members; appointed for life (mandatory retirement at age 70); president nominates, Senate approves
<i>Colombia (1991)</i>	Chamber of Representatives; 161 members; 4-year terms	Senate; 102 members; 4-year terms	9 members; 8-year terms; appointed by Senate from list presented by president, Supreme Court, and Council of State	23 members; 8-year terms; appointed by Court itself from list presented by Judicial Council
<i>Madagascar (1992)</i>	Unicameral National Assembly; 150 members; 4-year terms	(N/A; a 90-member Senate, serving 4-year terms, was recently constituted, but not in session during impeachment proceedings)	9 members; 6-year terms; 3 members appointed by President, 2 by National Assembly, 1 by Senate, 3 by Superior Council of Magistrates	11 members (for cases involving members of the government Madagascar also has a 9-member High Court of Justice)
<i>Phillippines (1986)</i>	House of Representatives; currently 216 members; 3-year terms	Senate; 24 members; 6-year terms	N/A	15 members; appointed for life (mandatory retirement at age 70); appointed by president from list of nominees prepared by Judicial and Bar Council

(continues)

Table 1-1. (continued)
Regime Structures

Country (Year of Constitution)	Lower House of Legislature	Upper House of Legislature	Constitutional Court	Supreme Court
<i>Russia (1993)</i>	State Duma; 450 members; 4-year terms	Federation Council; 178 members; 4-year terms	19 members; 15-year terms; president nominates, Federation Council approves	> 100 members; president nominates, Federation Council approves
<i>United States (1789)</i>	House of Representatives; 435 members; 2-year terms	Senate; 100 members; 6-year terms	N/A	9 Members; life terms; president nominates, Senate approves
<i>Venezuela (1961–1999)</i>	House of Deputies; 201 members; 5-year terms	Senate; 46 members; 5-year terms (except for ex-presidents, who are senators for life)	N/A	15 members; 9-year terms, renewable; appointed by a majority (of those present) in joint session of Congress