

Aspects of the Romanian State practice regarding the President's relations with the Parliament

Crina Mihaela VERGA, Ph.D

Georga Bacovia University, Bacau, Romania
crina_verga2000@yahoo.com

Abstract: *The aim of this study is to present some relevant aspects of Romanian state practice regarding the cooperation between the head of state and the legislature. The collaboration between the President and the Parliament is a fundamental requirement of the principle of separation of powers, expressed by means of different procedures: addressing messages to Parliament, extending the President's mandate, convening and dissolving Parliament, promulgation of laws, collaboration on forming Government, placing members of Government under criminal prosecution, initiating referendum, constitutional revision, establishing exceptional measures, suspension of the President, impeachment of the head of state for high treason. The disagreements between the Parliament and the Head of state on certain practical aspects of their collaboration created blockages in the exercise of democratic governance. These opposed positions determined the occurrence of legal conflicts of constitutional nature between the two authorities, conflicts that were settled by the Constitutional Court. The latter often acted in an arbitrary manner regarding the excesses of power of the President, who was at the limit of his constitutional prerogatives.*

Keywords: *President; Parliament; relations; Romanian practice.*

Introduction

The area of interest of this study refers to the collaboration between the President and the Parliament, which intervenes in various constitutional procedures or in the exercise of some attributions of the Head of state and of the legislature.

We shall address some relevant aspects of state practice in Romania regarding the relations between the President and the legislature, aspects on which the two public authorities had divergent positions, resulting in a climate of political tension in the exercise of governance.

The conflicting attitudes of the President and the legislature regarding certain circumstances emerged on the political stage were criticised by professionals in the field. These were the object of some legal conflicts of constitutional nature between the two authorities, conflicts which were settled by the Constitutional Court.

The decisions of the Constitutional Court have been extensively commented upon in this paper and they reveal a reserved, even subjective, position of the Court, which failed in its mission of "guarantor of the supremacy of the Constitution".

1. The relations between the President and the Legislature in the process of passing legislation by the Parliament

In the process of passing legislation by the Parliament, *the request for law reconsideration* is a specific attribution of the President, set out in Article 77 paragraph 2 of the Constitution.

Regarding *the limits within which the Parliament reconsiders the law*, the Constitutional Court stated that the analysis of Article 77 paragraph 2 "indicates that *the texts referred to in the Romanian President's request as well as those related to these texts must be reconsidered*, being necessary the technical and legislative correlation of all the provisions of the law. In this context, even some provisions of law, which were not expressly included in the reconsideration request, may be changed. The Parliament

deliberates only within the limits of the reconsideration request, but it is obliged to consider all the texts of the law which relate to an issue raised by the President, even if not expressly indicated in the latter's request. The Parliament, as the sole legislative authority of the country, according to Article 61 paragraph 1 of the Constitution, may adopt any solution that it deems necessary in relation to the demands in the reconsideration request of the President of Romania. Thus, the Parliament may admit the request in whole or in part, may reject it, or may amend in whole or in part certain texts related to the reconsideration request, including by re-correlation of the provisions of the law" [1]. We believe this view expressed by the Court to be fair in this regard.

Regarding *the reconsideration of the law before its promulgation* by the President (Art. 77 para. 2 of the Constitution), on 12 January 2007, the Romanian President, Mr. Traian Băsescu, requested the reconsideration of the *Law amending and supplementing Law no. 3/2000 on the organization and holding of referendum*, referring only to Articles 5 and 12 of the law in his request addressed to the Senate. Following referral to the Constitutional Court, the latter found that the analysis of Article 77, paragraph 2, "showed that the Parliament was to review only the texts indicated by the President of Romania". However, the Court also stated that through the amending law subjected to constitutional review, the Romanian Parliament had exceeded its investiture limits and "had also amended and supplemented other provisions of this law" [2]. thus creating a new law.

2. The Relations between the President and the Parliament in the referendum procedure

The collaboration between Parliament and President is also visible in *the referendum procedure*.

In **Romania**, according to the legislation in force, both a *facultative referendum*, in the shape of a *consultative referendum*, consecrated by Article 90 of the Constitution, and *mandatory referendums* were organized. The latter took place in two situations covered by the fundamental law - *for dismissal from office of the President of Romania*, on the one hand, (Article 95 paragraph 3) and, on the other hand, *for approval of the law on the revision of the Constitution by the people* (Article 151, paragraph 3). A detailed analysis, in another study, of legal regulations regarding referendum in accordance with the practice developed by the Constitutional Court in this matter reveals several aspects. Firstly, one notices repeated changes of electoral law which cannot ensure legal stability in this field. Secondly, the recurrent intervention of the Government in this area, by means of emergency ordinances, is unconstitutional. Thirdly, the Constitutional Court has not defended the letter and spirit of the fundamental law, thus not being a genuine "*guarantor of the supremacy of the Constitution*" which is its mission attributed by the Constitution itself. In this respect, it often issued arbitrary decisions according to political interests [3].

Regarding the implementation of the provisions of Article 90 of the Constitution on holding a consultative referendum, on 25 November 2007, the President, after consulting the Parliament, held a national referendum on the uninominal vote for the election of the members of the Romanian Parliament [4]. *Decree 909/2007* was under review by the Constitutional Court, following an appeal concerning the organization and holding of the national referendum, as it was considered that the subject of the referendum differed from the one on which the Parliament had been consulted and also as the decree did not set the date, but a term for the referendum to take place. Examining these claims, the Court found that they are unfounded. The Constitutional Court stated that the Constitution did not require the President to establish the date of the referendum, but it is to be regulated by law. Thus, it was concluded that "the wording of the analyzed decree allowed determining with certainty the date of the referendum, namely the same date as that for European Parliament elections - previously set for 25 November 2007" [5]. Furthermore, the Constitutional Court invalidated this referendum since the quorum of participation had not meet, this being a requirement imposed by Art. 5 paragraph 2 of the ammended *Law on the organization and holding of referendum* [6].

On September 24th, 2009, through a press statement [7], President Băsescu, after consulting the Parliament, initiated the procedure for organizing and holding the national referendum for the organization in Romania of a unicameral parliament and for the reduction of the number of MPs to a maximum of 300

officials [8]. Accordingly, on 22 November 2009, both the elections for President of Romania and the national referendum took place. Through the referendum, the people were consulted on two issues: the existence of a unicameral parliament and the reduction of the number of MPs to a maximum of 300 persons.

Having the presidential elections and the national referendum simultaneously was possible under the case law of the Constitutional Court [9], according to which the referendum may be held at any time during the year and is not conditioned by parliamentary, presidential, local elections or by those for the European Parliament, which may occur at the same time.

Mandatory referendum, which concerns the dismissal from office of the President, was organized twice, following the suspension from office of the President by the Parliament. In this respect, a first popular consultation took place on 19 May 2007. The carrying out of the referendum of 29 July 2012 was done under the provisions of *Law no. 153/2012 on the approval of the Government Emergency Ordinance no. 41/2012* [10], although the implementation of this law has been criticized on grounds that it was not in force when the referendum had been initiated. The Court invoked that it cannot hold the partial applicability of the law in force at the time of initiation of the referendum procedure (*Government Emergency Ordinance no. 41/2012 amending and supplementing Law no. 3/2000 on the organization and holding of referendum*) and the partial applicability of the law which was subsequently adopted [11] (*Law no. 153/2012*). Likewise, the Court also stated that the provisions of *Law no. 3/2000*, as amended by *G.E.O. no. 41/2012* "could no longer be applied by any public authority involved in the ongoing procedure of referendum [...]; the immediate intervention of the legislature was intended to prevent the development of serious problems related to the establishment of the legal framework applicable to the pending proceedings of the referendum". *The essential problem in this case was that the amendment of Law no. 3/2000 through G.E.O. no. 41/2012 happened after the suspension procedure had been initiated.*

After the Court ruled - by *Decision no. 3/2012* - on the contestations regarding compliance with the procedure for the organization and holding of the national referendum of 29 July 2012, it also stated on compliance with the procedure for the popular consultation mentioned above. Prior to the judgment of 21 August 2012 - by which the referendum in July 2012 was declared invalid -, in order to objectively know the manner of holding the referendum, the Court asked the Government for the permanent electoral lists, updated according to Article 17 para. 2 of *Law no. 3/2000*, lists based on which the referendum in July 2012 for the dismissal of President Traian Băsescu had been carried out. Also, by means of another address, the Constitutional Court asked the National Institute of Statistics whether it could provide official documents on the census in 2011 and the number of Romanian citizens having the right to vote on 29 July 2012. The Court also addressed the Permanent Electoral Authority to have it specify whether the permanent electoral lists had been updated according to the law, the date of the update and the number of people registered on the permanent electoral lists.

Analyzing the information provided by the above mentioned institutions, the Court found that their answers contained conflicting data [12]. The information submitted to the Constitutional Court showed "a difference of minus 34,654 persons compared to the persons registered on the permanent electoral lists submitted by the Central Electoral Bureau", people who had to be eliminated from these lists. In this case, the Court stated that it had no jurisdiction "in the procedure of updating the permanent voter lists and therefore cannot make changes in the electoral lists". As such, the Court found that the difference in the transmitted data could not determine whether or not a quorum was present and therefore could not lead to the modification of the result of the referendum. Thus, the Constitutional Court invalidated the mandatory referendum held on 29 July 2012 on the dismissal of President Traian Băsescu from office by a vote of six of the nine judges of the Court [13]; it was thus found that at least half plus one of the persons included in the permanent electoral lists did not attend the referendum, which was a prerequisite for the body of constitutional jurisdiction to give a positive solution.

The manner of organization and conduct of the referendum in July 2012 had negative consequences both internally and externally. The conflict situations at political level, that caused the suspension of the President and the organization of the referendum, led to significant reductions in the national economy, to the creation of pronounced confusion among citizens about their fundamental rights and freedoms and also

about the democratic nature of the undertaken actions. Such an initiative was materialized in the issuing of an emergency ordinance by the Government, which was intended for the removal of the Constitutional Court's attribution to rule on the constitutionality of decisions of the Chamber of Deputies plenum, the Senate plenum and the reunited plenum of the two Chambers of the Parliament [14].

3. The relations between the President and the Parliament when adopting divergent positions

The divergent positions of the President and the Parliament, also determined by a number of events that occurred on the Romanian political stage, led to the emergence of legal conflicts of constitutional nature between the two authorities, conflicts that were settled by the Constitutional Court.

In this regard, the Constitutional Court was first noticed by means of two applications for the settlement of the legal conflict of constitutional nature between the President and the Parliament of Romania, submitted by the presidents of the two Chambers. Hence, the president of the Chamber of Deputies argued that the statements concerning the Parliament and the parliamentary parties, made by the President in an interview with the newspaper "Adevărul" published in issue no. 4513 of 6 January 2005, go beyond the constitutional attributions of the President of Romania. The Head of State demanded in that interview, a parliamentary inquiry on the manner the general elections of November 2004 were held, the triggering of the parliamentary procedure to change the two Presidents of the Chambers and emphasized the need for snap parliamentary elections. Likewise, the president of the Senate, who had notified the Court with an application on the same subject, asked the Constitutional Court to issue a "decision to caution the President of Romania on his unconstitutional conduct and oblige him to publicly apologize to the presidents of two Chambers and to all parliamentary structures, which were targeted by his unconstitutional conduct". The Head of state claimed that his incriminated assertions were just simple statements with purely political character. The President of Romania is expressly guaranteed the freedom of political expression and he cannot be held legally responsible "for the political opinions expressed in the exercise of his mandate". The Court's Decision no. 339 of 17 September 2004 which stated that *the constitutional obligation of politic non-partisanship of the President of Romania is not absolute* was also invoked. The Constitutional Court found that the statements of the President of Romania had the character of political opinions, which did not raise a legal conflict of constitutional nature among public authorities. However, the Court emphasized that "the public statements of the representatives of various public authorities, in relation to the context in which they are made and with their specific content, may create confusion, uncertainty or tensions, which then could degenerate into, even legal, conflicts between public authorities" [15].

4. The relations between the President and the Parliament in the procedure concerning the request of criminal investigation of members of the Government

Cooperation between the president and the legislature also takes place in *the procedure concerning the request for criminal investigation of the members of the Government for acts committed in the exercise of their office* (Art. 109 para. 2 of the Constitution), procedure initiated by the President of Romania, the Chamber of Deputies or the Senate. As we shall present below, in this area also there were disagreements between the two public authorities. Thus, the Constitutional Court was asked to rule on the applications submitted by the president of the Chamber of Deputies and the president of the Senate on the existence of *a legal conflict of constitutional nature between the President of Romania, the Ministry of Justice and the Prosecutor's Office by the High Court of Cassation and Justice, on the one hand, and the Romanian Parliament, on the other hand*. The authors of the request considered that this conflict was triggered by the President of Romania, who asked, at the request of the Prosecutor's Office by the High Court of Cassation and Justice, for the criminal investigation of current and former ministers, who currently have the quality of MPs, and also by the refusal of the Prosecutor's Office by the High Court of Cassation and Justice to submit to both Chambers of Parliament the case files that substantiate the requests of the President of Romania for

the initiation of criminal investigation of the nominated persons (Adrian Năstase, Miron Mitrea, Paul Păcuraru and Codruț Sereș).

Following the examination of the case, the Constitutional Court stated that "there was no legal conflict of constitutional nature between the President of Romania, on the one hand, and the two Chambers of Parliament, on the other hand, since through the request for the initiation of criminal investigation against former and current members of the Government, upon notification by the Public Ministry, the Romanian President has exercised his attribution stipulated in Art. 109 para. (2) of the Constitution" [16].

The Court held, however, that there was a legal conflict of constitutional nature between the Public Ministry - the Prosecutor's Office by the High Court of Cassation and Justice, on the one hand, and the two Chambers of Parliament, on the other hand, conflict arising from the different ways in which these public authorities interpreted and applied the provisions of Art. 109 para. (2) first thesis of the Constitution regarding the requests for criminal investigation of members and former members of the Government for acts committed in the exercise of their office and who, at the time of the requests, are also deputies or senators. In this regard, the Court held that "the Public Ministry – the Prosecutor's Office by the High Court of Cassation and Justice – would notify the President of Romania to request the criminal investigation of members and former members of Government who, at the time of the referral, were not deputies or senators". The delivery of this decision was preceded by the fact that on 16 January 2008 the President of Romania sent to the Acting Minister of Justice, Teodor Viorel Meleşcanu, the requests for the initiation of criminal investigation of four members or former members of the Government, who were also MPs.

In another case, by *Decision no. 665/2007*, the Court found that the provisions of Art. 23 paragraphs 2 and 3 of Law 115/1999 [17] are unconstitutional and that through these provisions, the provisions of Art. 15 para. 2 (the retroactivity of more favorable criminal law), of Art. 16 para. 1 (equality before law), Art. 21 para. 3 of the Constitution (the right to a fair trial) were violated. In support of this decision, the Court held that "the alleged offenses, whose burden of proof rested with the author of the constitutional challenge, had been committed under the rule of the previous regulation, which established a derogating procedure from the common law on the matter, the same for members of Government in office, and for those who no longer are in office. Given the purpose of such proceedings, of protection of the mandate exercised by Government members and thereby of protection of the public interest, it could and should be classified as a more favorable regulation in the sense of Article 15 paragraph 2 of the Constitution in relation the regulation of common law". According to a previous decision of the Court, this measure of protection of public interest persisted even after members of the Government had left office, hence the Court concluded that "the exemption of former members of Government [...] from the special derogating procedure provided for members of Government, according to a random criterion, established according to the time of the initiation of the procedure during or after the end of the mandate, was a violation of the principle of equal treatment enshrined in Art. 16 para. (1) of the Constitution". It was also held that through the provisions of Article 23 of Law no.115/1999, Article 21 on the right to a fair trial was also breached because the enforcement of common law for former government members "entailed, for them, the deprivation of legal guarantees of protection of the mandate exercised in such a quality, protection which persisted after the termination of that mandate" [18].

5. The relations between the President and the Parliament in the procedure of appointing members of the Government

The Constitutional Court also received an application from the President of the Senate, asking the Court to order the Government "to remedy the situation created by the violation of Art. 85 para. 3 of the Constitution, by annulling the unlawful issued acts" and also to oblige the Prime Minister of Romania, in his application of Art. 85 para. 3 of the Constitution, to ask the Romanian Parliament for "approval on the appointment of certain members of the Government". In this case, the Head of State, by *Decree no. 1360/2009*, took note of the resignation of several ministers - members of the Social Democratic Party - and issued decrees for the appointment of members of the Government as interim ministers - members of the

Liberal Democratic Party - for taking over the vacant Minister portfolios. The Court found that by the decrees issued by the President in this case, there were not appointed new ministers as holders of the vacant positions, but ministers from within the same cabinet to ensure the interim until the appointment of new ministers, within the period of 45 days provided by Art. 107, paragraph 4 of the Constitution. In this situation Article 107, paragraph 4 on interim applies and not Article 85 paragraph 3 of the Constitution, which applies in case of "government reshuffle". In its decision, the Constitutional Court found that there was no constitutional conflict between the Parliament and the President of Romania [19].

Another application of the President of the Senate to the Constitutional Court for settlement of a legal conflict of constitutional nature between the Parliament and the President of Romania, was motivated by the violation of the constitutional right of the Romanian Parliament to approve the appointment of certain members of the Government, its right in its exercise of the attribution regulated by Article 85 para. 1 in conjunction with Article 85 paragraph 3 of the Constitution. The facts which determined this application were as follows: by Decree no. 1357/2009, the Romanian President ordered, at the Prime Minister's proposal, the dismissal of Mr. Dan Nica, Deputy Prime Minister, Minister of Administration and Interior, representative of the Social Democratic Party; on the same day, the President issued Decree no. 1358/2009, which ordered the appointment of Mr. Vasile Blaga, Minister of Regional Development and Housing, as Interim Deputy Prime Minister, Minister of Administration and Interior; the President of the Senate considered that the President's appointment, at the proposal of the Prime Minister, of a member of the Liberal Democratic Party to take over the portfolios of Deputy Prime Minister and Minister of Administration and Interior (previously held by a member of the Social Democratic Party) led to the change of the political structure or composition of the Government, as it was validated by Parliament on 22 December 2008. It was argued, therefore, that "the President arrogated to himself the power to change the political composition of the Government, although this attribution belongs, according to Article 85 paragraph 3 of the Constitution, exclusively to the Parliament of Romania". It was also added that, through the decree for appointing Mr. Blaga, the provisions of Article 107, paragraph 4 of the Constitution were also violated, this article being interpreted in the meaning that the president does not have the possibility to appoint an interim minister, in case of termination, by revocation, of the office of the previous minister.

In its decision [20], the Court held that the provisions of Article 85 paragraph 3 of the Constitution do not apply to appointment of interim ministers, but only to appointment of new members of the Government. Designating one or several interim ministers does not mean a government reshuffle, the essence of which is the replacement of government members with persons who are not on the list approved by the Parliament at the appointment of the Government.

The Court also found that Article 107, paragraph 3 of the Constitution governed the interim of the office of prime minister, while Article 107, paragraph 4 provided that the rules set forth in paragraph 3 on the prime minister are "*accordingly*" applicable to ministers, too. Therefore, the provisions of Article 107, paragraph 3 of the Constitution must be adapted, given that ministers may be dismissed by the President of Romania, unlike the Prime Minister, for whom Article 107 paragraph 2 of the Constitution specifically provides that cannot be revoked. In conclusion, the Court found that there was no legal conflict of constitutional nature between the Romanian Parliament and the President of Romania in connection with the issuance by the Romanian President of the decree for the appointment of an interim minister, mentioned in the application.

Another conflict situation was created in 2008, when the Romanian President sent a letter to the Presidents of both Chambers of Parliament [21], requesting an extraordinary session of Parliament in the first decade of July 2008, to debate the requests for criminal investigation of former ministers, who were at the time members of Parliament, requests sent by the Prosecutor's Office by the High Court of Cassation and Justice and the Directorate for Investigating Organized Crime and Terrorism as well as to debate and adopt the law on the organization and functioning of the Court of Accounts, given the fact that since 1 June 2008 it operated without a legal basis. With respect to this request, the Permanent Bureaus of the two Chambers, in their meeting on 2 July 2008, rejected the request of the President, without providing reasons, deciding not to convene an extraordinary session.

6. The relations between the President and the Parliament reflected in the transmitted messages

The collaboration between the president and the legislative power was also reflected in the messages "*concerning the main political issues of the nation*" sent by the President to the Parliament.

The provisions relating to the receipt and debate of the President's messages by the legislature were the subject of some controversy, resolved by the Constitutional Court [22]. In this regard, in accordance with *Constitutional Court's Decision no. 87/1994* [23], it was affirmed that "*the message was an exclusive and unilateral act of the President, which did not produce legal effects as did a decree*". This interpretation was determined, starting from Article 100 of the Constitution, according to which some decrees of the President of Romania are to be countersigned by the Prime Minister. It was determined, therefore, the legal regime of the message.

The previously mentioned decision stated that there was an obligation of the Chambers reunited in a joint meeting to receive the message, but "no constitutional provision required the submission of this message to Parliament for debate". As further justification for this view, the Constitutional Court objectively found that "as a principle, the President might not participate in parliamentary debate, because this would mean to commit his political responsibility, which would be contrary to his constitutional position". This rule only applies to the messages provided by Art. 88 of the fundamental law, as, in the situation covered by Art. 92 para. 3 of the Constitution, the president is present at the parliamentary debate. As noted in the doctrine, nothing prevents the Parliament to debate an issue raised by the message received and even adopt a measure on the basis of that debate [24].

Following the above discussed Court decision, the Parliament complied with the position expressed by the Constitutional Court and amended the Decision on the *Regulation of joint meetings of the Chamber of Deputies and the Senate* [25]. Thus, according to the case law of the Court "at the request of the President of Romania, the received message addressed to the Parliament shall be given precedence on the agenda of that day or, where appropriate, of the requested date. After receiving the message, Parliament may decide whether to debate it" [26].

7. The relations between the President and the Parliament in the procedure of suspension from office of the President

In **Romania**, under the mutual control of public authorities, the Parliament can suspend the President from office, a prerogative which was applied twice since the adoption of the 1991 Constitution, with the changes that occurred in 2003.

Following referral by the Parliament to the body of constitutional jurisdiction, the latter issued advisory opinions on the proposal to suspend the President from office [27]. Each time, the Constitutional Court disapproved the appropriateness of such a measure undertaken by the Parliament, stating that the President of Romania had not committed serious acts that violate the Constitution. The suspension from office prompted a referendum for dismissal of the President, which we have discussed in detail above.

Conclusions

In **Romania**, since the first term of President Bănescu, the relations between the President and the Parliament have gradually become tense and deteriorated following some opposite positions assumed by the two public authorities in the governance process.

This study highlights some constitutional procedures of cooperation between the President and the legislature, procedures in which there were obvious differences. In this regard, some events that took place on the Romanian political stage led to the emergence of legal conflicts of constitutional nature between the two state bodies, conflicts which were settled by the Constitutional Court.

The divergent positions of the Parliament and the Head of state regarding certain practical aspects of their collaboration have created a climate of political tension, which had negative consequences on the exercise of democratic governance.

Furthermore, by its decisions, the Constitutional Court has often manifested a reserved, even arbitrary attitude concerning the manner of action of the Head of state in relation with the legislature. This fact led to some slippages of the President in the exercise of his prerogatives.

References

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- [9] *The Constitutional Court's Decision no. 14/2007*, published in the Official Journal, Part I, no. 162 of 7 March 2007; *The Constitutional Court's Decision no. 355/2007*, op. cit.
- [10] *Law no. 153/2012 for the approval of the Government Emergency Ordinance no. 41/2012 amending and supplementing Law no. 3/2000 on the organization and holding of referendum*, published in the Official Journal, Part I, no. 511 of 24 July 2012, repealed some provisions of the *Government Emergency Ordinance no. 41/2012* (Article I, point 1).
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- [12] *The Constitutional Court's Decision no. 6 of 21 August 2012 on the procedure for organizing and holding the national referendum of 29 July 2012 for the dismissal of the President of Romania, Mr. Traian Băsescu, and on the confirmation of its results*, published in the Official Journal Part I, no. 616 of 27 August 2012 (According to Decision no. 6 of 21 August 2012, the only number that, according to data provided by the Government, may be taken into account in updating the permanent electoral lists is that of 34,654 persons, representing: deceased persons, persons having the status of Romanian citizen residing abroad, persons who have lost the Romanian citizenship, persons without voting rights, mentally ill persons who lost their electoral rights, persons with corrections of the Personal Identification Number (CNP). These persons "have to be eliminated from the permanent electoral lists used at the national referendum of 29 July 2012 by mayors and community public services of persons' registration under the local councils").
- [13] At the referendum of 29 July 2012, out of the total 18,292,464 persons registered on the permanent electoral lists, 8,459,053 people (46.24%) participated in the vote, out of which 7,403,836 (87.52%)

- answered "YES" to the question "Do you agree with the dismissal of the President of Romania?" and 943,375 (11.15%) answered "NO".
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- [23] *The Constitutional Court's Decision no. 87/1994*, published in the Official Journal, Part I, no. 29 of 14 October 1994.
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- [25] *Decision no. 13/1995 on amending and supplementing Article 7 of the Regulation of joint meetings of the Chamber of Deputies and the Senate*, published in the Official Journal, Part I, no. 136 of 5 July 1995.
- [26] *Decision no. 4 of 3 March 1992 on the Regulation of joint meetings of the Chamber of Deputies and the Senate*, published in the Official Journal, Part I, no. 34 of 4 March 1992, as subsequently amended and supplemented.
- [27] *Advisory Opinion no. 1 of 5 July 1994 on the proposal for suspension from office of the President of Romania*, published in the Official Journal no. 166 of 16 July 1994; *Advisory Opinion no. 1 of 5 April 2007 on the proposal for suspension from office of the President of Romania, Mr. Traian Băsescu*, published in the Official Journal, Part I, no. 258 of 18 April 2007; *Advisory Opinion No. 1 of 6 July 2012 on the proposal for suspension from office of the President of Romania, Mr. Traian Băsescu*, published in the Official Journal no. 456 of 6 July 2012.