
The Effects of Gubernatorial Succession: The Good, The Bad, and the Otherwise

by Thad L. Beyle

Ever since the last of the Royal Governors left this colony, the N.C. General Assembly has kept governors on a short leash. That leash grew a bit longer in 1977, however, as first the legislature and then the public approved a constitutional amendment allowing governors and lieutenant governors to seek a second, successive four-year term in office. Gov. James B. Hunt Jr. was the first to succeed himself under that amendment, and now Gov. James G. Martin hopes to do the same. What are the arguments for and against succession? What changes have we wrought with passage of gubernatorial succession? And how has succession affected other branches of government, including the legislative and judicial branches?

Ten years ago this fall, North Carolina voters amended the state's Constitution to allow governors and lieutenant governors to seek a second full term in office.¹ The vote on Nov. 8, 1977 was a victory for Democratic Gov. James B. Hunt Jr., who in his first year as Governor led the fight for the amendment with the help of many of his supporters — and some of his adversaries, who foresaw the day when succession might help Republicans too. Hunt's victory at the polls that day was hardly overwhelming. The amendment passed by fewer than 29,000 votes of the 580,701 cast on the question, 52.5 percent to 47.5 percent — far from a landslide, and considerably less than the 81.7 percent of the vote that four other constitutional amendments averaged that same day.

And it was even more underwhelming in light of the fact that only a fourth of the state's 2.3 million registered voters went to the polls that day. The amendment was adopted by slightly more than 13 percent of the North Carolinians eligible to vote,² but

it has affected everyone in North Carolina because it has significantly altered the way we produce leaders — and how government runs in Raleigh.

With a decade of experience with gubernatorial succession behind us, what have we learned from it? We know the obvious — that succession helps those in power, and may impede the political progress of those who hope for power, but the subtleties of succession's effects are still becoming clear.

As the proponent of the successful change in the Constitution, Jim Hunt was also the first Governor to run for and win a second four-year term in office. Obviously, succession strengthened Hunt, for a time. Now attention has turned to his successor, Republican James G. Martin, and whether Martin will be able to win re-election. The second Repub-

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lican Governor elected during this century, Martin can further solidify the Republican Party in the state if he wins the 1988 election and succeeds himself. Obviously, the right of succession is on Martin's side now. Succession helps the incumbent, not the challenger.

Before succession was adopted, few political observers doubted that the first Republican Governor elected this century, Jim Holshouser (1973-1977), would be followed by a Democrat. That would be something of a restoration of the crown after the strange political circumstances the Democrats created for themselves in 1972, with an unpopular figure, Sen. George McGovern, heading the party's presidential ticket, and the gubernatorial nominee, Hargrove (Skipper) Bowles, peaking too early before the election, after defeating the Democratic lieutenant governor, Pat Taylor, in a hotly contested second primary. These same observers also knew who that Democrat was likely to be — Lt. Gov. Jim Hunt, who was the highest-ranking Democratic official in state government. They were right on both points.

Succession Enhances the Power of Incumbency

For 1988, the scenario is quite similar. Martin, a Republican Governor, elected in a highly volatile political situation which again worked to the Democrats' disadvantage in 1984, will also likely face the Democratic Lieutenant Governor, Robert B. Jordan III, who is the highest ranking Democratic official in state government. Will the Democrats be restored to the Executive Mansion again? Is it, as the philosopher (and baseball catcher) Yogi Berra once posited, "déjà vu all over again"?

Perhaps not. After all, there are two very important differences between the gubernatorial election of 1976 and that projected for 1988 in North Carolina.

■ First, the Republican Party is considerably stronger in the mid-1980s than it was in the mid-1970s. The Iranscam scandal so far has not translated into a Watergate — with its attendant ballot box losses — for the GOP. There are now more North Carolinians voting Republican, and more Republican winners for the GOP down the ballot than in the 1970s. For example, in 1972 registered Republicans made up 23 percent of the registered voters, while in 1986 they were 27.2 percent. In winning the governorship, Holshouser received 51.3 percent of the general election vote, and Martin in 1984 received 54.4 percent.

■ Second, the power of incumbency lies this time with Governor Martin. That power is of enormous import, as evidenced by the 1980 election when Hunt won re-election in a landslide, 62 to 37 percent, over Republican nominee I. Beverly Lake Jr., himself a late refugee from the Democratic Party. Why is incumbency so important? Gerald Benjamin, a political scientist who watches state politics from his New York state vantage point, argues that there are two important, but intangible, values associated with incumbency: the reluctance of voters to "fire someone for reasons of partisanship or ideology who seems to be doing an adequate job," and the "image of invincibility" that may grow up around an incumbent over a period of time.³

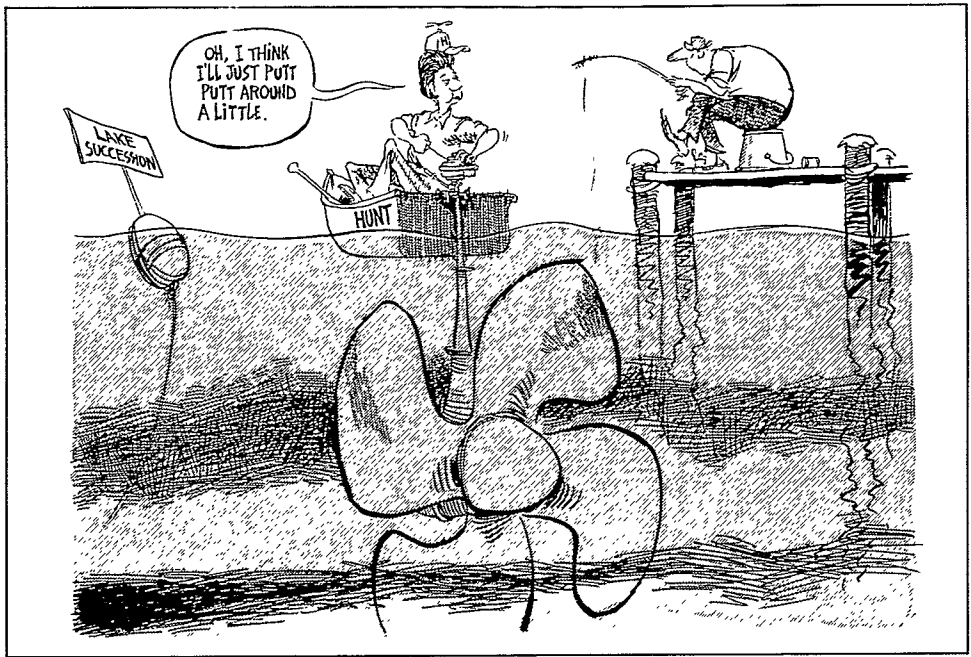
The results of recent gubernatorial elections bolster Benjamin's point. Since 1977, sixty-two of the 84 incumbent U.S. governors who ran for re-election won — a 74 percent success rate. Since 1984, nearly 80 percent of the incumbent governors — 19 of 24 — have won another term.⁴ That mirrors what is happening in races involving incumbents in other positions in our political system. Chances are that a governor who can run again, *will* win again. Betting the farm on a Democratic restoration, in the face of these numbers, and with an incumbent who can succeed himself primed for 1988, might be foolish.

Succession Doesn't Guarantee Political Machines

The fear that Jim Hunt would use succession to fashion a lasting political machine was dispelled by the 1984 elections. Remember, a political machine is what the other politician has; a political organization is what you and your associates have. Political machines, like beauty, are in the eye of the beholder — or the opposition. They must endure, even when their leader is running for another office, and they must recruit and elect successful candidates for other offices. But Hunt's organization failed this twin test.

During Governor Hunt's eight-year tenure, his Democratic organization was arguably the strongest in this state since before the Second World War. But that organization's strength was tested in Hunt's 1984 challenge for incumbent U.S. Sen. Jesse Helms' seat, and it failed the test when Hunt lost — narrowly — to Helms after a bitter and expensive campaign. Hunt's political organization worked exclusively in the Senate race, and after the election had no other political irons in the fire.

By focusing on that one race, Hunt's organiza-



Dwane Powell, The News and Observer

Hunt machine ensures passage of gubernatorial succession amendment to state constitution

tion did not try to control other races. It did not back a candidate in other races, nor did it seek to control the size of the field. Democrats crowded the slate for the gubernatorial nomination in that same 1984 election. Ten Democrats sought the party's nomination that year, and six of them were considered fairly serious candidates. The outcome of the two Democratic Party primaries was so divisive that a major candidate, Eddie Knox, bolted the party with some of his relatives and supporters. Further, a Republican won the general election, which is the organization's most grievous error—losing the source of its power. In effect, whatever political organization Hunt built was a personal one, but one tied to state government interests and not necessarily to national interests.

Now Martin has his own opportunity to build a political machine. But rather than using that machine strictly to further his own political ambition, Martin appears instead to be building his own party in hopes of making further GOP inroads in the legislature and in other state and local offices. State Sen. Laurence Cobb (R-Mecklenburg), the Senate Minority Leader, says, "There is no question but that Martin's interest is in building up the state Republican Party and in strengthening the two-party system in North Carolina. I have seen no evidence that the Governor is trying to embark on a political career beyond the governorship."

Succession Clogs the Political Ladder

One of succession's major effects has been to slow down—some say clog up—the process of producing new leaders in North Carolina. Because governors and lieutenant governors can serve two terms, as U.S. Sen. Terry Sanford puts it, "there will only be half as many governors. A lot of people have the ambition to run, but won't get the chance."⁵

Prior to 1977, the changeover in North Carolina leadership was regular—a new governor and lieutenant governor every four years, and a new speaker of the House (elected by the House) every two years. But in 1980, both Gov. Jim Hunt and Lt. Gov. Jimmy Green were re-elected, forcing those with ambition for higher office to bide their time—or get beat by the incumbent. Green, for one, had wanted to run for governor in 1980, but chose to stand for re-election rather than challenge the powerful Hunt. Most other candidates chose not to run that year, too.

That meant the Senate leadership would stay in place, and the House anticipated that by re-electing Speaker Carl Stewart to an unprecedented second two-year term in 1979. This was a way for the House to maintain continuity of leadership and elevate it to the same stature as the Senate and the Governor. In 1981, Liston Ramsey succeeded Stewart in the first of his four terms as Speaker—and no one doubts that

Ramsey will be able to hold the post as long as he wants it.

Curiously, Ramsey thinks succession had little to do with the multi-term speakership. "I think that [more than one term for speakers] was coming anyhow, because it had happened in other states," says Ramsey. "Its time was coming, although possibly it made it happen a little earlier than normal." Ramsey has not sought higher office, preferring to stay in the House, and frustrating the desire of his fellow House members who might aspire to the speakership.

That frustration stems from the fact that other House members can't move up to the speakership —

a clogging of the political ladder that former Republican state Sen. Wendell Sawyer of Greensboro calls "the clustering of unbreakable power." As former Gov. Jim Holshouser puts it, "The Speaker has apparently decided to run in perpetuity, and I never thought we'd have in North Carolina what South Carolina has had — a speaker for life. I doubt that's a healthy thing." That shifts the focus of potential candidates from House leadership to the lieutenant governorship.

North Carolina gets some of its new governors from the office of lieutenant governor. In the post-World War II era, the office has produced Govs.

Table 1. Arguments Made For and Against The Gubernatorial Succession Amendment During the 1977 Debate

For	Against
To allow Jim Hunt to seek another term	To stop Jim Hunt from seeking another term
To retain good governors	To bring in new blood to the office
To take advantage of a governor's experience in office another term	To force governors to act quickly and not politick for another term
To give a governor time to master the state's bureaucracy	To prompt governors to use the State Personnel Act to control bureaucrats
To provide continuity and diminish four-year cyclical breaks in leadership	To keep an orderly flow of new candidates and replenish the state's supply of new leaders
To allow governors the same right to run again that legislators, judges, and others have	To energize voters and political groups by offering new candidates every four years
To prevent a new governor from being a "lame duck" as soon as he or she takes office	To involve new and more people with regular elections bringing in new leaders
To strengthen the office of governor in N.C., one of the nation's weakest	To prevent accumulation of too much power by a multi-term governor, and preserve checks and balances
To allow N.C. governors to work with national figures from other states and accomplish more	To prevent a governor from so constantly running for re-election during a first term that he accomplishes little
To free up governors from being surrounded by people jockeying for position in the next governor's race, and thus restricting a governor's leadership	To prevent creating a political machine or dynasty for the incumbent, which could overpower other parts of the political system
To give the people the right to decide whether to keep a governor in office	

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“No person elected to the office of Governor or Lieutenant Governor shall be eligible for election to more than two consecutive terms of the same office.”

— Article III, Sec. 2 (2),
N.C. Constitution

■

Luther Hodges Sr. in the 1950s, Bob Scott in the 1960s, and Jim Hunt in the 1970s. Now Bob Jordan is attempting to use the office as a steppingstone in the 1980s. Among Democrats, only Terry Sanford and Dan Moore in the 1960s — both former legislators and well known attorneys, and Moore had been a well-known judge — did not first serve as a lieutenant governor en route to the governorship. The two Republican governors came from legislative bodies — Jim Holshouser from the state House, and Martin from the U.S. House of Representatives.

Because the lieutenant governor's office is perceived as a good way-station for the governorship, many Democrats announce they are thinking of seeking that office and set up an exploratory committee to determine whether the political waters are warm enough for a plunge. The “exploratory committee” business is a euphemism for seeing whether you are known to anyone who counts politically (aside from your friends and neighbors), you might make a good run for the office, and most importantly, that you are a person whom the political bankrollers might bless with some money. There is more testing than running, though, as many contenders fail one or all of these questions. But a growing number of potential candidates are out there testing, and the office of greatest interest to them is the lieutenant governorship.

Curiously, the other officers in the Council of State, all of whom run for election and re-election statewide, have not become part of this political ladder-climbing. Most of these officers find these positions as their ultimate office either by their own choice or by the realities of politics in the state, and

therefore seek no further upward mobility. The office of attorney general may be a rung on the ladder in some other states, but not in North Carolina. The losing Democratic candidate in 1984, Rufus T. Edmisten, tried to use this office as the last rung on the ladder to the governorship, but lost to Martin. But then, so did the lieutenant governor, James C. Green, try to use his office to gain the governorship, but Green didn't even survive the primary.

Nonetheless, holding a high statewide office increases a candidate's chances for winning the governorship. In the last round of gubernatorial elections across the nation, 1983-1986, there were 54 separate contests; of these, incumbents won 19, former governors won five, and sitting or former lieutenant governors won another five.⁶ Six attorneys general won the governorship during the period, while two state treasurers and one former state auditor also grabbed the gubernatorial brass ring. Thus, more than 70 percent of the governors winning election between 1983 and 1986 had held these state level positions.

Does Succession Strengthen the Executive Branch?

When succession was debated during the 1977 General Assembly, opponents feared that succession might cede too much power to the executive branch, making it superior to the judicial branch and upsetting the delicate balance of powers among the branches of government. But what has happened over the past decade is that all three branches of our state government have increased in their power and their exercise of it, but the system of checks and balances has remained intact. Only some of this increase in power has come as an effect of the succession amendment.

Without question, the General Assembly's leadership selection process did change during this period. Obviously, with a lieutenant governor able to preside over and thereby run the Senate for an eight-year period,⁷ and with a multi-term speakership, the legislative branch became stronger in relation to the executive branch. In fact, it is the speaker of the House who holds what every North Carolina governor has sought — the ability to stop or veto action of the other house and the governor.

The legislature's exercise of its new strength has manifested itself in a number of subtle and not-so-subtle ways, and in fact began years before succession was adopted. Experts can debate endlessly the degree to which succession has spurred legislative

nibbling at the executive branch, but the fact remains that it has — through such inter-branch excursions as attempting to establish a legislative veto of executive agency rules, meddling with special provisions in budget bills, or attempting to influence executive branch boards and commissions with legislative appointments.

As leadership questions have changed in the past decade, process questions have also — most evident in the rising importance of the third branch of state government, the courts. As the legislature has intruded into the executive branch — moving across the line drawn by the separation of powers' clause in the North Carolina Constitution and onto gubernatorial turf — the state's Supreme Court has stepped in to referee the problems, usually in the executive branch's favor.

First, in January 1982, the Supreme Court called a halt to the practice of appointing legislators to the policymaking Environmental Management Commission.⁸ Under a ruling by the Attorney General, the reasoning of this court decision extended to 36 additional boards and commissions, including the powerful, legislator-dominated Advisory Budget Commission, which had worked with the governor in developing the biennial budget for decades.⁹ A month after these decisions, the N.C. Supreme Court issued an advisory opinion that a statute giving legislators new powers to review federal block grants and to review and approve any transfer of funds by the governor of more than 10 percent of a budget line item to another line item, was unconstitutional.¹⁰ Then in 1983, a U.S. Supreme Court decision declared the legislative veto unconstitutional at the national level.¹¹ This decision undermined its use in state legislatures, including North Carolina's. After the loss of the legislative veto over agency rules, the legislature rewrote the Administrative Procedure Act to restrain rulemaking authority of state agencies. Thus the state Supreme Court has been thrust into this legislative-executive conflict as the ultimate arbiter — another actor with a veto.

Succession did not cause this intra-branch wrangling, of course. Part of it is normal sibling rivalry between two branches of government, without regard to which party is in power. North Carolina's General Assembly always has held its chief executive on a short rein — at least since the last of the Royal Governors hightailed it for other climes. For example, North Carolina's governor remains the sole governor in the country without any form of veto power. And part of it is certainly due to partisan politics. The Democrats control the legisla-

tive branch, while Republicans control the executive branch. The two do not get along well — nor did they from 1973-1977, during Holshouser's rein. When there exists such a power split, when strong personalities clash, and when an election looms, tension pervades the governmental process and tinges both the legislative and executive arms of government.

That tension is certainly one reason for legislative dissatisfaction with succession. Speaker Ramsey, once a supporter of succession, has changed his mind. "I don't see any good that comes of it. What happens is that governors are extremely careful during their first four years in office, and they don't come out with anything the state really needs," he says.

Lieutenant Governor Jordan, while not as outspoken about it, has also had second thoughts about succession. "I have some serious second thoughts about it because of the way it has affected the process of government. For the Democratic Party, it was part of the problem in 1984, when we had too many candidates for the gubernatorial nomination. And I think succession may benefit the person in office a lot more than it does the state."

"...there will only be half as many governors. A lot of people have the ambition to run, but won't get the chance."

— U.S. Sen. Terry Sanford

One thoughtful critic is former state Rep. Parks Helms of Charlotte, who once ran against Ramsey for speaker, and lost. Helms now is running for lieutenant governor in 1988, and he says the next lieutenant governor must deal with the vast changes that succession has wrought on the legislative branch. "It's certainly an advantage to the governor to be able to succeed himself," says Helms, "but it's also a good example of the law of unintended consequences, with its effect on the legislative branch. That effect has been far more significant than on the executive branch, and I have some reservations about legislative succession. I fear it may be moving us much more quickly to a full-time, professional legislature rather than a citizen legislature."

Table 2. Gubernatorial Succession by State

State	Length of Term in Years	Maximum Number of Terms Allowed	Joint Election of Governor and Lieutenant Governor
Alabama	4	2	No
Alaska	4	2	Yes
Arizona	4	No Limit	(c)
Arkansas	4	No Limit	No
California	4	No Limit	No
Colorado	4	No Limit	Yes
Connecticut	4	No Limit	Yes
Delaware	4	2(a)	No
Florida	4	2	Yes
Georgia	4	2	No
Hawaii	4	2	Yes
Idaho	4	No Limit	No
Illinois	4	No Limit	Yes
Indiana	4	2	Yes
Iowa	4	No Limit	No
Kansas	4	2	Yes
Kentucky	4	(b)	No
Louisiana	4	2	No
Maine	4	2	(c)
Maryland	4	2	Yes
Massachusetts	4	No Limit	Yes
Michigan	4	No Limit	Yes
Minnesota	4	No Limit	Yes
Mississippi	4	(b)	No
Missouri	4	2(a)	No
Montana	4	No Limit	Yes
Nebraska	4	2	Yes
Nevada	4	2	No

And, says Helms, "Perhaps even more troublesome is what succession is doing to the balance of power between the legislative and the executive branches of government. It goes far beyond party politics and gets into the area of checks and balances between the branches. It raises the question of whether the governor should have the veto in view of the fact that legislative succession has given the

General Assembly much more power that it has ever had before."

There was talk in the 1985 session of repealing succession, but members were reluctant to do so, perhaps out of concern that it might be viewed as a partisan move. So succession remains a part of the political landscape, a symbol of an attempt to improve state government.

Table 2. Gubernatorial Succession by State, *continued*

State	Length of Term in Years	Maximum Number of Terms Allowed	Joint Election of Governor and Lieutenant Governor
New Hampshire	2	No Limit	(c)
New Jersey	4	2	(c)
New Mexico	4	(b)	Yes
New York	4	No Limit	Yes
North Carolina	4	2(d)	No
North Dakota	4	No Limit	Yes
Ohio	4	2	Yes
Oklahoma	4	2	No
Oregon	4	2	(c)
Pennsylvania	4	2	Yes
Rhode Island	2	No Limit	No
South Carolina	4	2	No
South Dakota	4	2	Yes
Tennessee	4	2	No
Texas	4	No Limit	No
Utah	4	No Limit	Yes
Vermont	2	No Limit	No
Virginia	4	(b)	No
Washington	4	No Limit	No
West Virginia	4	2	(c)
Wisconsin	4	No Limit	Yes
Wyoming	4	No Limit	(c)

Key:

(a)-Absolute two-term limit, but not necessarily consecutive.

(b)-Successive terms forbidden.

(c)-No lieutenant governor.

(d)-Individuals limited to two consecutive terms, but may serve again after a break in service.

Source: The Book of the States, 1986-1987 Edition

In the past three decades, states generally have sought to upgrade their governments and make them more able to address the needs of the citizens. North Carolina had already taken major steps in that direction with the adoption of a new Constitution in 1971 and a reorganization of the executive branch from 1971-1975. The U.S. Supreme Court decisions in 1962 and 1964 mandating fair reapportionment of

state legislatures brought fresh blood and new drive into all state legislatures. And as Larry Sabato has observed, the quality of our elected officials in the states had increased considerably since the 1950s.¹² "Once ill-prepared to govern and less-prepared to lead, governors have welcomed a new breed of vigorous, incisive and thoroughly trained leaders into their ranks," says Sabato.

What If Succession Had Failed in 1977?

Suppose succession had not passed in 1977 — then what?

■ For one thing, Jim Hunt would have been a one-term governor like his predecessors, and Lt. Gov. Jimmy Green would have been in a strong position to seek the governorship in 1980. Would he have won? Who knows — but the record shows Green didn't in 1984 after eight years as lieutenant governor, when he finally got a chance to go for the gold.

■ Second, the 1980 elections would have been very different. The selection of a new governor is of great political interest to the state, and considerable attention would have been focused on that race — and not as much space, money, or time would have been available for the U.S. Senate race in which East Carolina University Professor John East, a Republican, upset incumbent U.S. Sen. Robert B. Morgan, a Democrat, by a margin of only 10,411 votes. Because there were no heated or vigorous gubernatorial contests that year, media attention focused intensely upon that race, and the exposure may have helped the relatively unknown East edge the incumbent Morgan.

■ Third, it is possible that without the amendment, we would have seen a Republican candidate winning the governorship in 1980. National Republican coattails might have been long enough for Republican Ronald Reagan to help carry a Republican nominee to victory in the governor's race against a non-incumbent Democrat.

■ Fourth, in 1984, with the strong run by President Reagan in his re-election bid, and with the U.S. Senate re-election campaign tilting in U.S. Sen. Jesse Helms' direction, we might well have seen a second Republican gubernatorial victory.

Remember, Republican candidates have won the votes of this state's electorate in three of the last four presidential elections, four of the last six U.S. Senate elections, and two of the last four gubernatorial elections. That's a record of nine wins in the last 14 major statewide elections, all for the GOP. A winning record of 62.4 percent for the GOP in recent top races should be enough to give Democrats indignation.


A Weak Governorship Remains

Was the succession amendment passed in 1977 a savior for the Democratic Party in this state? It did allow the Democratic Party, through the governorship of Jim Hunt, to control state government for

eight rather than just four years. But it didn't guarantee Hunt lasting power. It served him well while he was governor, but then its benefits transferred to Governor Martin when he took office. Now it benefits Martin and his administration in two ways:

■ it gives him the right to run again and serve eight years in a row;

■ and the prospect that Governor Martin will be in office that long strengthens his power within the state and nationally because the political world knows that Martin may be in charge for an extended period.

Despite Martin's enhanced power, North Carolina's governor still is relatively weak, compared to his colleagues in other states in terms of the formal powers available; only Texas and South Carolina provide their governors with less formal power with which to fulfill a mandate.¹³ And given the sort of relations between the two branches in recent years, the legislative branch isn't likely to cede any new powers to the executive branch any time soon. Any help the governor of North Carolina will get will have to come from North Carolina's judicial branch — the ultimate arbiter of power in a system of checks and balances. 

FOOTNOTES

¹Article III, Section 2, Constitution of North Carolina, as approved Nov. 8, 1977 (authorized by Chapter 363 of the 1977 Session Laws of North Carolina).

²Martin Donsky, "13.2% of Voters Decide Succession Issue," *The News and Observer* of Raleigh, Nov. 10, 1977, pp. 1 & 8.

³Gerald Benjamin, "The Power of Incumbency," *Empire State Report* magazine, April 1987, pp. 33-37.

⁴*State Government: CQ's Guide to Current Issues and Activities, 1987-88*, Congressional Quarterly Press, 1987, p. 90.

⁵Mary Anne Rhyne, "Personal Races Dead, Say Former Governors," *The News and Observer*, Jan. 3, 1984, p. 5B

⁶*State Government*, p. 96.

⁷Steve Adams and Richard Bostic, "The Lieutenant Governor — A Legislative or Executive Office?," *N.C. Insight*, Vol. 5, No. 3, November 1982, pp. 2-10.

⁸*State ex. rel. Wallace v. Bone*, 304 N.C. 591, SE 2d 79 (1982).

⁹Opinion of the Attorney General, Jan. 19, 1982. See also Lacy Maddox, "Separation of Powers in North Carolina," in *Boards, Commissions, and Councils in the Executive Branch of North Carolina State Government*, N.C. Center for Public Policy Research, January 1985, p. 44.

¹⁰*Advisory Opinion in re Separation of Powers*, 304 N.C. 767 (Appendix).

¹¹*Immigration and Naturalization Service v. Jagdish Rai Chadha* 462 U.S. 919, 77 L.Ed. 2d 317, 103 S. Ct. 2764 (1983).

¹²Larry Sabato, *Goodbye to Good-Time Charlie: The American Governorship Transformed, 1950-1975*, Lexington Books, 1978, p. 1.

¹³Thad L. Beyle, "How Powerful is the North Carolina Governor?," *N.C. Insight*, Vol. 4, No. 4, December 1981, pp. 3-11.