



September 29, 2026

Send via email & certified mail

D'rinda Randall, Chair
Republican Party of Texas
807 Brazos Street, Suite 701
Austin, Texas 78701
512-477-9821
info@texasgop.org

Re: Nathan Sheets is Statutorily Ineligible to Serve as Agriculture Commissioner

Dear Ms. Randall,

The public record shows that Nathan Sheets is not qualified to serve as Texas' next Agriculture Commissioner because he does not meet the criteria for that office as set forth in Texas law. As chair of the Republican Party of Texas, it is your statutory duty to "promptly review" the relevant facts related to his qualification for office.¹ If you agree with us that the record demonstrates that Mr. Sheets is not qualified, it is your additional duty to declare him ineligible to serve as Texas Commissioner of Agriculture.²

The Texas legislature has long required that the Agriculture Commissioner has hands-on experience in farming and knowledge of the agricultural business.³ In 1989, the legislature further tightened its requirement into strict, testable criteria, dictating just four paths for qualification. Since then, Texas Agriculture Code §11.005 requires that a

¹ Tex. Elec. Code § 145.003(g).

² See Tex. Elec. Code § 145.003(b).

³ Earlier versions of the law required "an experienced and practical farmer [with] knowledge of agriculture, manufacturing and general industry." See Ken Herman, *Donald Trump and Sid Miller, sort of together again*, Austin-Am. Statesman (Oct. 25, 2018), <https://www.statesman.com/story/news/politics/state/2018/10/25/herman-why-sid-miller-trumps-man-in-texas-wasnt-with-president-at-rally/9455164007/>.



prospective Agriculture Commissioner has been engaged for five of the last 10 years in the “business of agriculture,” a term that is strictly defined.⁴ Eligibility can alternatively be established through five years of work at a governmental agricultural agency or at the Texas Agricultural Council, or through five years of personally owning and operating a ranch or farm that qualifies for “agricultural use” under Texas Tax law.⁵

Mr. Sheets is a businessman from the Dallas metroplex. He does not claim to have worked at a governmental agricultural agency or at the Texas Agriculture Council. While his campaign website boasts that Mr. Sheets now owns and operates Honey Rock Ranch – “a 10,000-acre property in West Texas that was once part of the historic 6666’s Ranch”⁶ – he purchased this multi-million dollar property in May 2022, after he sold his honey business to a private equity firm in January of that year.⁷ Thus, Mr. Sheets’ ranch ownership is well under the five-year bar; it also cannot meet the “agricultural use” requirements because it is owned by a LLC and not by Mr. Sheets directly.⁸

Accordingly, in order for Mr. Sheets to be eligible for the public role he is now seeking, he must have been engaged in “the business of agriculture,” which is specifically defined as:

⁴ Tex. Agric. Code §11.005(a)&(b).

⁵ *Id.*, at §11.005(a); Tex. Tax Code § 23.42(a) governs eligibility for agricultural-use appraisal pursuant to Tex. Const. art. VIII, § 1-d, which is described as “restrictive, applying only to land owned by families or individuals. Agriculture must be the property owner’s primary occupation and source of income.” Tex. Comptroller of Pub. Accts., *Manual for the Appraisal of Agricultural Land* 1 (Oct. 2024), <https://comptroller.texas.gov/taxes/property-tax/docs/96-300.pdf>.

⁶ See generally *About Nate Sheets*, [Natesheets.com](https://natesheets.com) (last accessed Aug. 19, 2026), <https://natesheets.com/about-nate-sheets/>.

⁷ Deed histories for each of the ranch’s parcels are available on the King County Appraisal District website at <https://www.kingcad.org/home> (owner ID: R147914). The sale’s announcement was distributed via *Business Wire* in January 2022. See Press Release, Sweet Harvest Foods, Nature Nate’s Honey Co., the Number-One U.S. Branded Honey Company, Merges with Sweet Harvest Foods to Grow the Honey and Natural Sweetener Market (Jan. 4, 2022), <https://www.businesswire.com/news/home/20220104005072/en/Nature-Nates-Honey-Co.-the-Number-One-U.S.-Branded-Honey-Company-Merges-with-Sweet-Harvest-Foods-to-Grow-the-Honey-and-Natural-Sweetener-Market>.

⁸ The ranch is owned by Honey Rock Ranch LLC, a corporate entity Mr. Sheets created in 2022.



1. “the production of crops for human or animal consumption, or planting seed;
2. floriculture, viticulture, horticulture, or aquaculture;
3. the raising or keeping of livestock; or
4. the processing of any of the products [listed above].”⁹

In Texas, when the legislature has “supplied its own definition” of a term, that definition governs, and the “plain language of the statute as written” must be enforced.¹⁰

It is well known that Mr. Sheets is the founder and former CEO of Nature Nate’s, a honey business. As the company put it in a 2019 court filing, “Nature Nate’s purchases honey from a variety of sources. These sources ship honey to Nature Nate’s in large drums and Nature Nate’s packages the honey for sale to consumers.”¹¹ This description echoes the company’s website, which describes how the company “partner(s) with beekeepers” to obtain its honey, and then tests the honey, warms it, bottles it and ships it.¹²

These activities fall outside the definition of the “business of agriculture” in Texas Agriculture Code §11.005(b).

First, Nature Nate’s does not engage in the “production of crops” because it does not “produce” anything at all — it mixes, packages, ships and markets honey that has come from other beekeepers. Nor is honey a “crop.” Examples abound to support this commonsense understanding of the term:

- “Bees and honey” are regulated by the Texas Agricultural Code in a special section entitled “Bees and Nonlivestock Animal Industry” that falls under Title 6

⁹ Tex. Agric. Code § 11.005(b)(1)–(4).

¹⁰ *Entergy Gulf States, Inc. v. Summers*, 282 S.W.3d 433, 437 (Tex. 2009).

¹¹ *Def. N. Dall. Honey Co.’s Mot. to Dismiss Pls.’ Am. Compl. & Mem. in Supp. Thereof* at 2, *Pierce v. N. Dall. Honey Co.*, No. 3:19-cv-00410-X (N.D. Tex. Apr. 10, 2019) (ECF No. 14).

¹² Nate’s Honey Co., Raw & Unfiltered, <https://nateshoney.com/raw-unfiltered/> (last visited Sept. 28, 2026).



“Production, Processing, and Sale of *Animal Products*” — as opposed to plants and crops. Honey is defined as “the nectar of plants that has been transformed by, and is the natural product of, bees . . . ,” underscoring that honey is a product of animals and not of the soil.¹³

- Similarly, the Texas Comptroller’s description of “agricultural use” specifically separates “raising or keeping bees for pollination” from “[c]ultivating the soil, producing crops.”¹⁴
- Likewise, in its definitive “Census of Agriculture” assessment of U.S. farming and ranching, the U.S. Department of Agriculture classifies honey as a special animal product, distinct from any and all crops.¹⁵

Second, the law specifically lists “floriculture, viticulture, horticulture, or aquaculture” as qualifying businesses — expressly omitting apiculture, or beekeeping. This is particularly significant because other parts of the Agricultural Code list apiculture together but separately from these other practices. Thus, apiculture is seen by the legislature as distinct from, for instance, “horticulture” (which is the science and business of growing plants like fruits, vegetables and flowers).¹⁶ Words in Texas laws are supposed to be read plainly and the legislature is assumed to mean what it says.

Third, it’s not clear that Nature Nate’s has bees itself. But even if the company had bees at some point, bees are not livestock by definition under Texas law. “[L]ivestock’ means

¹³ Tex. Agric. Code § 131.001(14).

¹⁴ *Manual for the Appraisal of Agricultural Land*, *supra* n. 5, at 6.

¹⁵ U.S. Dep’t of Agric., Nat’l Agric. Stat. Serv., 2022 Census of Agriculture: United States Summary and State Data tbls. 32 & 33 (Vol. 1, Geographic Area Series, Feb. 2024), https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_2_US_State_Level/usv1.pdf.

¹⁶ See, e.g., Tex. Agric. Code § 12.0175(e) (“In this section, ‘Texas agricultural product’ means an agricultural, *apicultural*, horticultural, silvicultural, viticultural, or vegetable product.”) (emphasis added); Tex. Agric. Code § 52.002(1). (“‘Agricultural products’ includes horticultural, viticultural, forestry, dairy, livestock, poultry, and *bee products* and any farm and ranch product.”) (emphasis added).



cattle, horses, mules, asses, sheep, goats, llamas, alpacas, exotic livestock, including elk and elk hybrids, and hogs, unless otherwise defined.”¹⁷

Finally, the fourth prong covers the “processing” of products listed in prongs (1)-(3). As discussed above, honey production is a distinct activity that involves neither cultivating plants nor raising livestock in the conventional sense. Because honey is not a crop, not horticulture, and not livestock, processing honey is not covered under this final prong.

The public record shows that Mr. Sheets is facially ineligible for the office he seeks. Now that you have been presented with this information, you have a legal duty to “promptly review” Mr. Sheet’s eligibility.¹⁸ We thus request that you respond to this letter no later than 3 business days from today, and publicly share your findings and conclusions with the Texas electorate.

Our legal team is available at your convenience to discuss the evidence and claims presented herein, or to otherwise assist with your investigation. We look forward to hearing from you.

Very Truly Yours,

A handwritten signature in dark ink, appearing to read 'Mimi Marziani', is shown on a light-colored, textured background.

Mimi Marziani
Texas Bar No. 24091906
Joaquin Gonzalez

¹⁷ Tex. Agric. Code § 1.003(3).

¹⁸ Tex. Elec. Code § 145.003(g).



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