

Women Against Abuse Legal Center

Executive Director / CEO

June 9, 2026

This analysis benchmarks the total compensation of **Joanna Otero-cruz, Executive Director / CEO** (\$12,685) against **every comparable organization** that fit the selection criteria — **90** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the 0th percentile of comparable organizations

below the typical range for comparable organizations

Benchmarked executive: Joanna Otero-cruz — reported title “EXECUTIVE DIRECTOR & PRESI”, a **direct title match** to the Executive Director / CEO role.

How comparable organizations were selected

SECTOR Organizations sharing the subject's NTEE classification (I80).

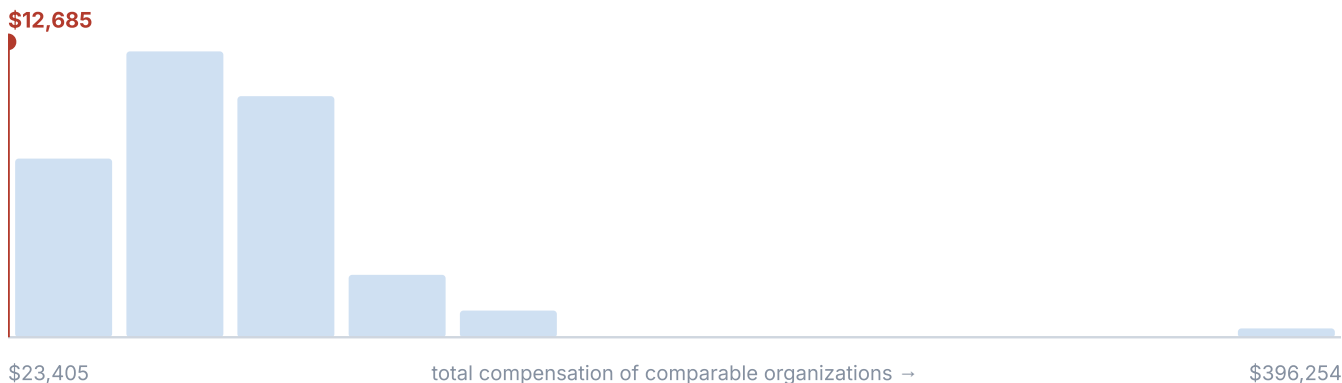
BUDGET Total revenue between \$233,260 and \$522,225 — 0.67x to 1.50x the subject's \$348,150 (the band tightens as size grows).

GEOGRAPHY Same NTEE sector (I80), nationwide + budget 0.67–1.5x revenue.

90 organizations qualified on sector, size, and geography

→ **90** within the band form the benchmarked peer set.

Distribution of comparable compensation



\$45,661

\$59,295

\$79,389

\$96,641

\$122,812

\$12,685



■ Comparable organizations

Each figure is Form 990 Part VII columns D + F (reportable pay plus other compensation and benefits; column F may include amounts from related organizations), normalized to PA cost of living (BEA RPP, 2023) and to its filing year (CPI-U); the reported amount is on each linked 990.

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Equal Access Legal Services Inc	PA	\$353,409	Executive Director	\$90,975	\$88,365	2024
Southwest Georgia Legal Self-help	GA	\$342,337	Executive Di	\$33,182	\$32,497	2024
Legal Resource Center On Violence Against Women Inc	MD	\$340,335	Executive Director	\$117,620	\$104,345	2025
Greater Dayton Volunteer Lawyers Project	OH	\$339,911	Executive Director	\$87,000	\$89,751	2024
Self Help Inc	NM	\$358,462	Executive Dir.	\$60,320	\$65,058	2023
World Immigration Center Inc	NY	\$335,018	Secretary	\$25,829	\$23,405	2023
Pro Bono Organization For Native	HI	\$362,223	Executive Di	\$80,000	\$69,763	2024
Atlantic Area Court Appointed Casa	GA	\$333,808	Director	\$76,016	\$74,446	2024
Monroe County Senior Legal Services	MI	\$363,058	Executive Director	\$69,884	\$70,257	2024
Childrens Advocacy Center Of West Texas Inc	TX	\$363,194	Exec Director	\$66,458	\$64,750	2024
National Veterans Benefits Attorneys Inc	FL	\$365,619	Executive Director	\$48,750	\$45,924	2023
Iron Defense	MI	\$367,750	Executive Director	\$106,570	\$107,139	2024
Trinity Legal Clinic Of Oklahoma	OK	\$326,987	Executive Dir.	\$56,347	\$60,432	2024
Financial Protection Law Center	NC	\$370,385	President/e.d.	\$122,197	\$126,612	2023

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Emergency Legal Responders	LA	\$317,714	Executive Director	\$80,125	\$88,473	2023
The Joseph Project Inc	MI	\$314,352	President	\$30,000	\$31,051	2023
Student Legal Services Inc	NY	\$312,839	Director	\$94,906	\$81,377	2025
Arizona Justice For Our Neighbors	AZ	\$312,535	Executive Dir.	\$95,351	\$89,317	2024
The Association Of The Federal Bar Of The State Of New Jersey	NJ	\$384,805	Executive Director	\$64,700	\$54,815	2025
Legal Works Inc	OH	\$385,248	Non Voting M	\$94,000	\$99,837	2023
Servicios Legales Comunitarios Inc	PR	\$309,343	Chief Operating Officer	\$68,151	\$66,196	2024
Oklahoma Access To Justice Foundation	OK	\$387,073	Executive Director	\$78,869	\$84,588	2024
Court Appointed Special Advocates	TX	\$387,568	Executive Di	\$66,867	\$65,149	2024
Connect Immigration	CO	\$306,327	Executive Director	\$87,000	\$81,254	2024
Neighborhood Legal Support Of Kansas City	MO	\$390,055	Executive Director	\$98,099	\$101,201	2024

Comp (reported) is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to PA cost of living and 2023 dollars. Click any organization to verify the figure on ProPublica.

■ Methodology

Comparable organizations were drawn from electronically filed IRS Form 990 returns and matched on sector (NTEE code), budget (a size-adaptive revenue band that tightens as the organization grows), and geography (same-state first, broadening only when too few peers qualify); every organization within the band forms the peer set. To compare fairly across regions and years, peer compensation is normalized to PA cost of living (BEA Regional Price Parities, 2023) and to the subject's filing year (CPI-U). The figure benchmarked is Form 990 Part VII, Section A, columns D + F — reportable pay plus other compensation, benefits, and deferred amounts (column F may include amounts from related organizations) — with the chief executive matched by role. Related-organization amounts (column E) and institutional trustees are excluded. Full methodology: peerbasis.org/methodology.

■ Sample, role match & sensitivity

PEER COUNT **90** organizations. Compensation range \$23,405–\$396,254; filing years 2023–2025.

SIZE BASIS	Matched on total revenue (\$348,150); for reference, expenses \$343,421 and assets \$168,581.
ROLE MATCH	Joanna Otero-cruz, reported title " <i>EXECUTIVE DIRECTOR & PRESI</i> ", benchmarked as Executive Director / CEO. The title maps directly to this role.
OUTLIERS	3 peers fall outside 1.5× the interquartile range — consider whether any reflect one-time payments (severance, deferred-comp payouts).

Sensitivity — the subject's percentile under alternative compensation definitions:

BASIS	SUBJECT PERCENTILE
Total compensation (D + F), cost-of-living + inflation adjusted — the PeerBasis default	0 th
Total compensation (D + F), as reported (no adjustments)	0 th
Reportable pay only (column D), adjusted	0 th
All sources (D + E + F), adjusted	99 th

If the percentile moves materially across these definitions, the result is sensitive to methodology choices, and the board should weigh which basis best fits its facts.

● Rebuttable presumption of reasonableness • 26 CFR 53.4958-6

Compensation paid by a tax-exempt organization is presumed reasonable — shifting the burden to the IRS — when three requirements are met. This report supplies the comparability data for the second. The board should record the following in its minutes *concurrently* with its decision:

Draft board minutes – executive compensation

1. The compensation of the Executive Director / CEO (Joanna Otero-cruz) was approved in advance by [the Board / Compensation Committee], composed of members with no conflict of interest with respect to the arrangement.
2. Prior to its determination, the authorized body obtained and relied upon appropriate comparability data, namely the PeerBasis Compensation Comparability Determination dated June 9, 2026, comparing compensation against 90 similarly situated organizations (Same NTEE sector (I80), nationwide + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$12,685 is reasonable (approximately the 0th percentile of comparable organizations) and documented the basis for this determination concurrently, on [date], by a vote of [__ for / __ against].

Sources: IRS Form 990 e-file data (apps.irs.gov); IRS Business Master File (NTEE classification). Every figure traces to an original public filing — click any organization above to verify it on ProPublica. PeerBasis is a service of Prismind Analytics; its [methodology is published](#), was commissioned for independent adversarial review, and discloses its own limitations. This report is comparability

data to support a board's good-faith determination under IRC 4958; it is not legal or tax advice. Generated by PeerBasis on June 9, 2026.