

Mille Lacs Trails Inc

Executive Director / CEO

EIN 411864766

MN · NTEE S12

FY ending 2023-12-31

June 9, 2026

This analysis benchmarks the total compensation of **John Coombs, Executive Director / CEO** (\$19,519) against **every comparable organization** that fit the selection criteria — **16** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the **31st** percentile of comparable organizations

within the typical range

Benchmarked executive: John Coombs — reported title "CEO", a **direct title match** to the Executive Director / CEO role.

How comparable organizations were selected

SECTOR Organizations sharing the subject's NTEE classification (S12).

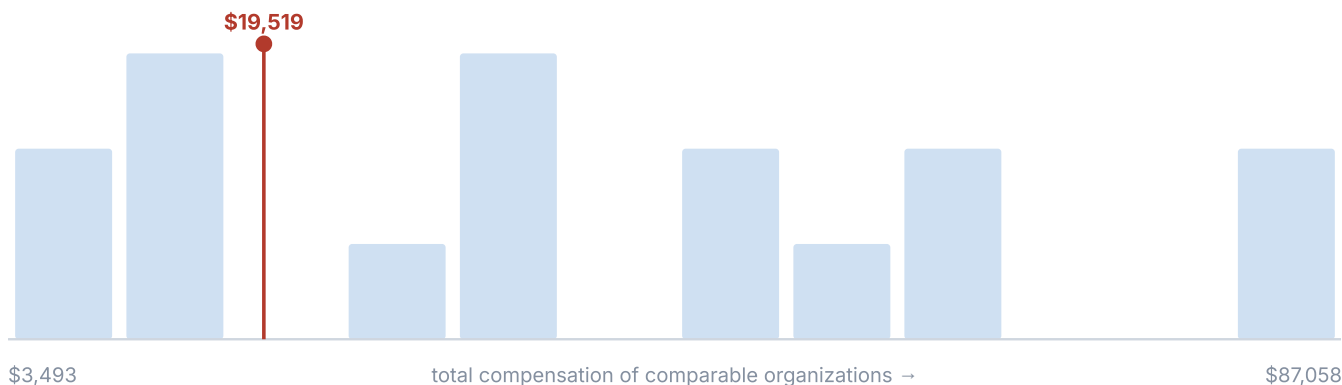
BUDGET Total revenue between \$152,905 and \$342,325 — 0.67x to 1.50x the subject's \$228,217 (the band tightens as size grows).

GEOGRAPHY Same NTEE sector (S12), nationwide + budget 0.67–1.5x revenue.

16 organizations qualified on sector, size, and geography

→ **16** within the band form the benchmarked peer set.

Distribution of comparable compensation



\$7,515

\$12,497

\$35,654

\$58,008

\$74,046

\$19,519



■ 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 MN 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
One Family Productions	VA	\$225,753	Executive Director	\$12,150	\$11,531	2024
Las Vegas New Mexico Community Foun	NM	\$234,504	Executive Di	\$11,777	\$12,819	2023
Invest Buffalo Niagara Foundation Inc	NY	\$221,253	President & Ceo	\$40,239	\$35,743	2024
Olympia Center Inc	FL	\$240,797	Executive Director	\$34,000	\$31,398	2024
Tri-county Economic Development	KY	\$254,784	President	\$10,222	\$10,796	2024
Love In The Name Of Christ Of Yakima	WA	\$254,990	Executive Dir.	\$57,289	\$51,908	2023
Eagle Ranch Housing Corporation	CO	\$187,182	Administrator	\$3,600	\$3,493	2023
Kankakee Riverfront Society Inc	IL	\$269,393	Executive Dir.	\$87,500	\$87,058	2023
Brilliance Labs	OR	\$184,887	President And Executive Director	\$48,900	\$45,958	2023
Nuvista Light & Electric Cooperative Inc	AK	\$275,014	Executive Director	\$90,874	\$85,403	2024
Hoover Helps	AL	\$180,024	Executive Director	\$53,511	\$56,827	2024
Fernandina Beach Main Street	FL	\$280,800	Executive Di	\$66,654	\$61,552	2024
Snow Approach Foundation Inc	NC	\$304,863	Board Chair	\$4,168	\$4,233	2024
Haitian American Center For Social Economic Dev Az	AZ	\$308,687	Executive Director	\$36,541	\$35,565	2023

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Bipoc Support Foundation	CA	\$326,085	Executive Dir.	\$73,855	\$62,689	2024
Ndn Fund Inc	SD	\$337,231	Managing Director	\$25,501	\$27,665	2024

Comp (reported) is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to MN 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 MN 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	16 organizations. Compensation range \$3,493–\$87,058; filing years 2023–2024.
SIZE BASIS	Matched on total revenue (\$228,217); for reference, expenses \$227,208 and assets \$985,486.
ROLE MATCH	John Coombs, reported title "CEO", benchmarked as Executive Director / CEO. The title maps directly to this role.
RELATED-ORG PAY	4 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.

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

BASIS	SUBJECT PERCENTILE
Total compensation (D + F), cost-of-living + inflation adjusted — the PeerBasis default	31st
Total compensation (D + F), as reported (no adjustments)	31st
Reportable pay only (column D), adjusted	44th
All sources (D + E + F), adjusted	19th

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 (John Coombs) 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 16 similarly situated organizations (Same NTEE sector (S12), nationwide + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$19,519 is reasonable (approximately the 31st 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.