

The Norml Foundation

Executive Director / CEO

June 9, 2026

This analysis benchmarks the total compensation of **Keith Stroup, Executive Director / CEO** (\$17,500) against **every comparable organization** that fit the selection criteria — **45** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the **20th** percentile of comparable organizations below the typical range for comparable organizations

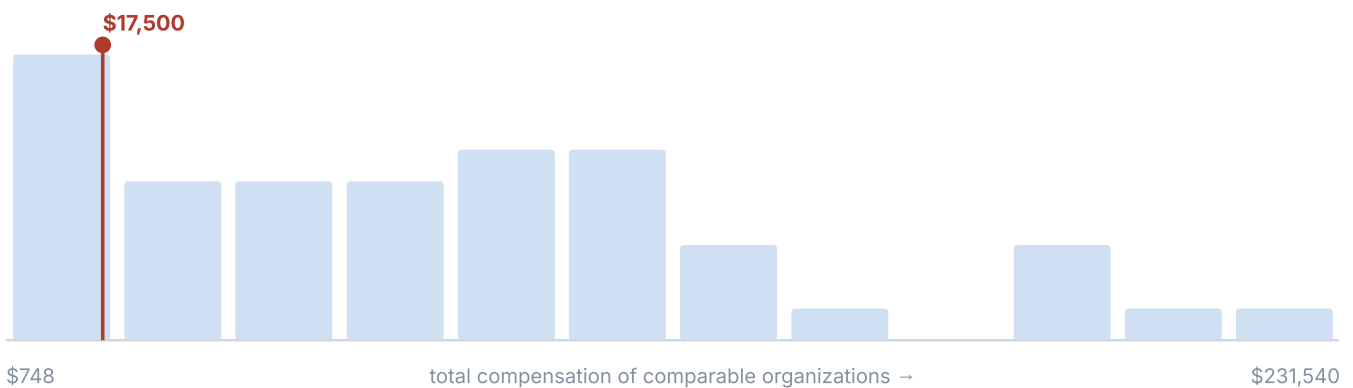
Benchmarked executive: Keith Stroup — reported title "VICE PRESIDENT", selected as the organization's **highest-paid individual** — no exact title match, so confirm this is a comparable role.

How comparable organizations were selected

SECTOR	Organizations sharing the subject's NTEE classification (R99).
BUDGET	Total revenue between \$201,815 and \$451,825 — 0.67x to 1.50x the subject's \$301,217 (the band tightens as size grows).
GEOGRAPHY	Same NTEE sector (R99), nationwide + budget 0.67–1.5x revenue.

45 organizations qualified on sector, size, and geography → **45** within the band form the benchmarked peer set.

Distribution of comparable compensation



\$6,458	\$27,986	\$70,078	\$105,404	\$162,536	\$17,500
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■ 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 DC 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
Vivante Espero	NC	\$295,530	President	\$23,086	\$27,986	2023
Cross-movement Legacy Initiative	CA	\$290,000	President	\$205,000	\$201,723	2024
Take Back The Court Action Fund	CA	\$315,887	President	\$22,945	\$22,578	2024
Survivor Justice Action Inc	TX	\$317,100	Ceo/secretary	\$46,354	\$52,840	2024
Oklahoma Donor Alliance Inc	OK	\$283,764	Executive Director	\$84,000	\$105,404	2024
Bipartisan Climate Action	DC	\$283,645	President	\$5,654	\$5,654	2024
Alaskans Take A Stand	AK	\$323,150	President	\$15,000	\$16,342	2024
Bayard Rustin Center For Social Justice	NJ	\$325,629	Chief Activist	\$130,000	\$132,268	2024
1 Million Madly Motivated Moms	NV	\$276,045	President	\$59,583	\$68,060	2024
Organization For Polyamory And	CA	\$275,610	Executive Dir.	\$69,173	\$70,078	2023
Dont Shoot Portland	OR	\$273,365	Program Direct	\$160,000	\$174,323	2023
Organize Tennessee	TN	\$334,041	Executive Di	\$54,450	\$69,902	2022
World Without Hate Inc	WA	\$266,442	Founder & President	\$38,000	\$39,915	2023
Formed Foundation	DC	\$255,102	Director	\$27,500	\$27,500	2024
No More A Stranger Foundation	UT	\$254,010	Executive Director	\$45,831	\$53,453	2024
Move To Amend	CA	\$253,286	Director	\$4,800	\$4,863	2023
Brandworkers International Inc	NY	\$355,015	Executive Director	\$74,972	\$79,481	2023

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Cuba Study Group Inc	DC	\$246,841	Executive Director	\$170,984	\$176,034	2023
Christian Family Life Services Inc	ND	\$355,938	Director	\$60,449	\$77,828	2023
New York Center For Law & Justice Inc	NY	\$357,362	Executive Director	\$113,124	\$119,929	2023
Oregon Donor Alliance	OR	\$365,500	Executive Director	\$116,089	\$122,853	2024
Leadmo Action	MO	\$234,670	Executive Director	\$64,174	\$79,745	2023
El MOvimiento Sigue Inc	CO	\$234,078	Director	\$5,000	\$5,625	2023
Filipino Migrant Center	CA	\$371,775	Exec Director	\$101,185	\$99,567	2024
50 Roses Foundation	MO	\$226,165	Executive Director	\$27,500	\$33,192	2024

Comp (reported) is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to DC cost of living and 2024 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 DC 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	45 organizations. Compensation range \$748–\$231,540; filing years 2022–2024.
SIZE BASIS	Matched on total revenue (\$301,217); for reference, expenses \$301,821 and assets \$34,988.
ROLE MATCH	Keith Stroup, reported title <i>"VICE PRESIDENT"</i> , benchmarked as Executive Director / CEO. Selected as the organization's highest-paid individual without an exact title match — the board should confirm this is a comparable role.
RELATED-ORG PAY	6 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	1 peer 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	20 th
Total compensation (D + F), as reported (no adjustments)	20 th
Reportable pay only (column D), adjusted	29 th
All sources (D + E + F), adjusted	20 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 (Keith Stroup) 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 45 similarly situated organizations (Same NTEE sector (R99), nationwide + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$17,500 is reasonable (approximately the 20th 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.