

This analysis benchmarks the total compensation of **Amber Atherton, Executive Director / CEO** (\$37,394) against **every comparable organization** that fit the selection criteria — **53** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the 8th percentile of comparable organizations

below the typical range for comparable organizations

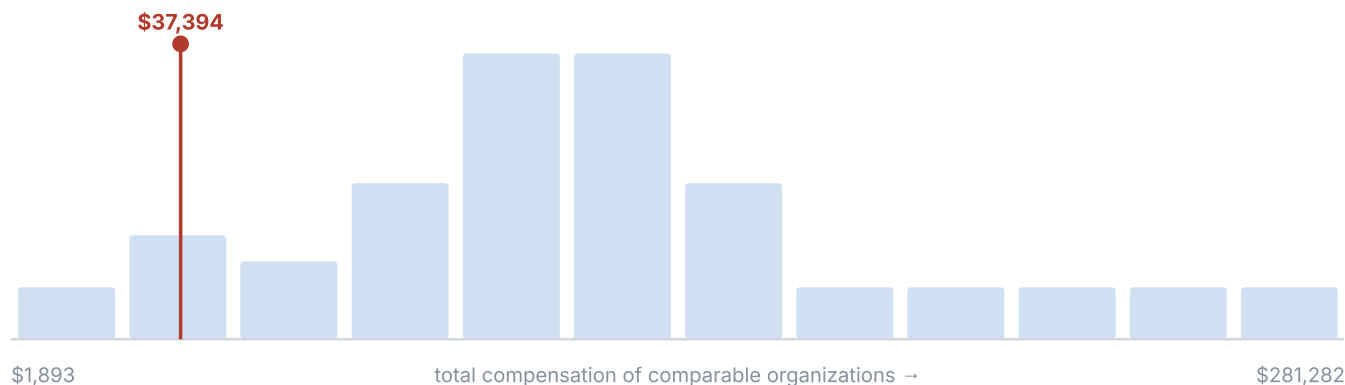
Benchmarked executive: Amber Atherton — reported title “EXECUTIVE DI”, a **direct title match** to the Executive Director / CEO role.

How comparable organizations were selected

SECTOR	Organizations sharing the subject's NTEE classification (S41).
BUDGET	Total revenue between \$282,116 and \$631,605 — 0.67x to 1.50x the subject's \$421,070 (the band tightens as size grows).
GEOGRAPHY	Same NTEE sector (S41) + CA + budget 0.67–1.5x revenue.

53 organizations qualified on sector, size, and geography → **53** within the band form the benchmarked peer set.

Distribution of comparable compensation



\$47,400	\$91,595	\$120,671	\$152,981	\$216,807	\$37,394
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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 CA 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
International Serum Industry Association	CA	\$420,217	Ceo	\$124,615	\$121,040	2024
90 Minds Inc	CA	\$425,280	Executive Director	\$94,300	\$91,595	2024
Medical Staff Of University Of	CA	\$414,604	President	\$48,000	\$46,623	2024
Anderson Valley Winegrowers Association Inc	CA	\$408,095	Executive Director	\$98,601	\$95,772	2024
Alameda Chamber Of Commerce	CA	\$435,716	President & Ceo	\$147,804	\$143,564	2024
Placer Nevada County Medical Society	CA	\$435,982	Executive Director	\$98,250	\$95,431	2024
San Diego Military Advisory Council	CA	\$402,363	President & Ceo	\$100,000	\$100,000	2023
Innovation Tri-valley Leadership	CA	\$391,544	Ceo	\$102,692	\$97,175	2025
Central Valley Business Federation	CA	\$451,104	Ceo	\$158,180	\$153,642	2024
Sustain Social (Fka Sustain Oc)	CA	\$451,607	President	\$256,366	\$249,011	2024
California Wind Energy Association	CA	\$452,468	Exec Dir/sec	\$124,235	\$120,671	2024
Housing Contractors Of California	CA	\$386,344	Dir. Of Risk Mgmt	\$166,916	\$166,916	2023
Oak Park Business Association	CA	\$374,255	Executive Dir.	\$84,000	\$84,000	2023
California Attractions And Parks	CA	\$371,560	Executive Di	\$209,249	\$209,249	2023
Golden State Power Cooperative	CA	\$370,753	General Manager	\$289,590	\$281,282	2024

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Bioenergy Association Of California	CA	\$365,894	Executive Dir.	\$225,156	\$218,696	2024
Vernon Chamber Of Commerce	CA	\$363,674	President & Ceo	\$127,467	\$123,810	2024
450 Mhz Alliance	CA	\$357,310	Director	\$102,800	\$99,851	2024
Medical Staff Of Childrens Hospital &	CA	\$487,290	President	\$35,000	\$33,996	2024
Town Of Los Gatos Chamber Of Commerce	CA	\$490,915	Exe Dir/secretary	\$129,465	\$122,509	2025
Contractors Assoc Of	CA	\$494,054	Executive Dir.	\$110,801	\$110,801	2023
Inland Empire Tourism Council	CA	\$344,902	Executive Director	\$268,738	\$261,028	2024
Stockton Boulevard Partnership Inc	CA	\$504,367	Executive Dir.	\$73,875	\$71,756	2024
Rainbow Chamber Of Commerce	CA	\$337,313	Exe Director	\$99,102	\$93,778	2025
Visit Morgan Hill	CA	\$329,596	Executive Director	\$148,883	\$140,884	2025

Comp (reported) is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to CA 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 CA 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 53 organizations. Compensation range \$1,893–\$281,282; filing years 2023–2025.

SIZE BASIS Matched on total revenue (\$421,070); for reference, expenses \$271,819 and assets \$298,773.

ROLE MATCH	Amber Atherton, reported title " <i>EXECUTIVE DI</i> ", benchmarked as Executive Director / CEO. The title maps directly to this role.
RELATED-ORG PAY	1 peer report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	4 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	8 th
Total compensation (D + F), as reported (no adjustments)	8 th
Reportable pay only (column D), adjusted	8 th
All sources (D + E + F), adjusted	8 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 (Amber Atherton) 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 53 similarly situated organizations (Same NTEE sector (S41) + CA + budget 0.67–1.5× revenue).
3. The authorized body determined that total compensation of \$37,394 is reasonable (approximately the 8th 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.