

American Indian Cultural Center Management

Executive Director / CEO

EIN 833895482

OK · NTEE A11

FY ending 2023-06-30

June 9, 2026

This analysis benchmarks the total compensation of **James Pepper Henry, Executive Director / CEO** (\$11,054) against **every comparable organization** that fit the selection criteria — **41** in total — drawn systematically from IRS Form 990 filings, not a hand-picked subset.

Compensation sits at approximately the **22nd** percentile of comparable organizations below the typical range for comparable organizations

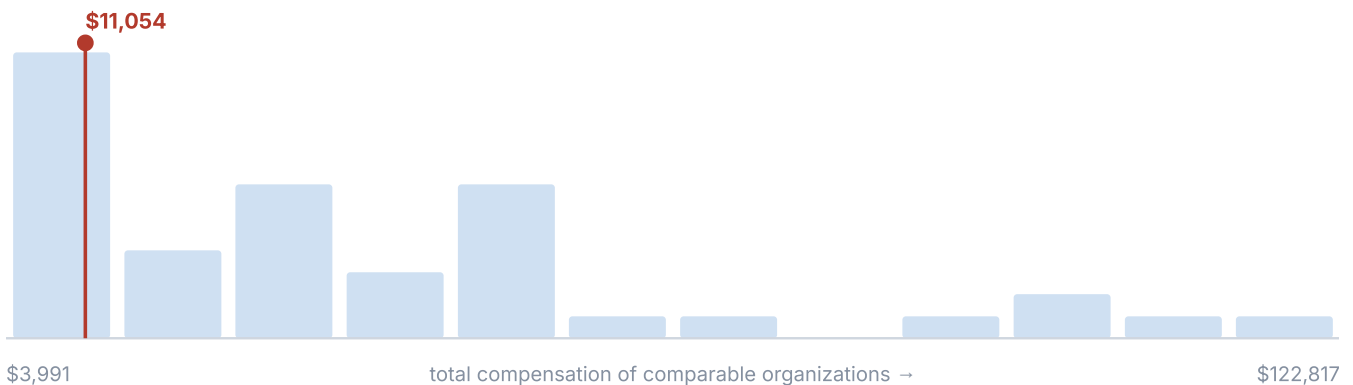
Benchmarked executive: James Pepper Henry — reported title "CEO", a **direct title match** to the Executive Director / CEO role.

How comparable organizations were selected

SECTOR	Organizations sharing the subject's NTEE classification (A11).
BUDGET	Total revenue between \$213,047 and \$476,973 — 0.67x to 1.50x the subject's \$317,982 (the band tightens as size grows).
GEOGRAPHY	Same NTEE sector (A11), nationwide + budget 0.67–1.5x revenue.

41 organizations qualified on sector, size, and geography → **41** within the band form the benchmarked peer set.

Distribution of comparable compensation



\$7,481 10TH	\$12,036 25TH	\$28,678 MEDIAN	\$49,846 75TH	\$85,221 90TH	\$11,054 THIS ORG · 22ND
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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 OK 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
Ives Torres Foundation	CA	\$312,816	Director	\$67,826	\$51,663	2024
Wisconsin Broadcasters Association	WI	\$328,474	President And Ceo	\$21,960	\$20,230	2024
San Bernardino County Museum Association	CA	\$299,234	Executive Director	\$142,923	\$108,864	2024
Florida Federation Of Colorguards	FL	\$342,402	President	\$22,590	\$18,237	2025
Artsquest Foundation	PA	\$292,257	Executive Director	\$135,613	\$122,817	2023
Act Market Street	CA	\$348,689	Executive Director/president	\$17,368	\$13,620	2023
Aspen Santa Fe Ballet Endowment Inc	CO	\$287,124	Executive Director	\$6,890	\$5,827	2024
The Columbia Memorial Space Science Lear	CA	\$284,088	President & Executive Dire	\$81,528	\$63,934	2023
Saginaw Valley Naval Ship Museum	MI	\$282,281	Secretary	\$26,180	\$23,836	2024
Armory Theater Fund	OR	\$355,915	Pcs Director Of Finance	\$8,871	\$7,481	2023
Houston Boychoir Inc	TX	\$366,020	Executive Dir.	\$10,000	\$8,824	2024
Klcs Education Foundation	CA	\$366,307	President	\$71,223	\$55,852	2023
Oxnard Downtowners Foundation Inc	CA	\$268,741	Chairman	\$32,160	\$24,496	2024

ORGANIZATION	STATE	REVENUE	MATCHED TITLE	COMP (REPORTED)	COMP (ADJUSTED)	FY
Athletes In Rochester Incorporated	NY	\$264,832	President	\$64,911	\$53,268	2023
Friends Of Wisconsin Singers Inc	WI	\$260,294	Member At Large	\$4,966	\$4,710	2023
Naz Real Estate Holding Company	MN	\$378,002	President & Ceo	\$33,773	\$28,678	2025
Majestic Theatre	NH	\$252,553	Treasurer	\$7,475	\$6,268	2023
Ftc Qalich Inc	MS	\$244,935	Director	\$10,528	\$10,343	2024
Cast 447 Minna Llc	CA	\$242,257	Manager	\$11,688	\$8,903	2024
Cabinet Of Curiosity Inc Nfp	IL	\$237,150	President	\$13,662	\$12,198	2023
Cabots Museum Foundation	CA	\$235,940	Executive Dir.	\$70,000	\$53,319	2024
Bill And Sara Morgan Real Estate	TX	\$235,673	Secretary	\$53,774	\$47,449	2024
Capitol Theatre Center Foundation	PA	\$403,559	Executive Di	\$47,796	\$42,044	2024
Gates Chili Color Guard Parents Inc	NY	\$404,683	Executive Director	\$12,366	\$10,148	2023
Eugene Symphony Foundation	OR	\$231,088	Executive Dir.	\$13,181	\$11,116	2023

Comp (reported) is the figure on each organization's Form 990 (columns D + F); **Comp (adjusted)** normalizes it to OK 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 OK 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	41 organizations. Compensation range \$3,991–\$122,817; filing years 2023–2025.
SIZE BASIS	Matched on total revenue (\$317,982); for reference, expenses \$2,542,837 and assets \$10,441,061. Revenue and expenses diverge this year — revenue may misrepresent operating size; weigh the expense-based view.
ROLE MATCH	James Pepper Henry, reported title "CEO", benchmarked as Executive Director / CEO. The title maps directly to this role.
RELATED-ORG PAY	20 peers report related-organization compensation (column E), which the D + F benchmark does not fully capture; review where material.
OUTLIERS	2 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	22 nd
Total compensation (D + F), as reported (no adjustments)	17 th
Reportable pay only (column D), adjusted	0 th
All sources (D + E + F), adjusted	98 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 (James Pepper Henry) 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 41 similarly situated organizations (Same NTEE sector (A11), nationwide + budget 0.67–1.5× revenue).

3. The authorized body determined that total compensation of \$11,054 is reasonable (approximately the 22nd 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.