

BALLANTYNE STRONG, INC.
Form SD
May 26, 2016

UNITED STATES

SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

BALLANTYNE STRONG, INC.

(Exact name of registrant as specified in its charter)

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| Delaware | 1-13906 | 47-0587703 |
| (State or other jurisdiction of incorporation or organization) | (Commission File No.) | (IRS Employer Identification Number) |

| | |
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| 13710 FNB Parkway, Suite 400 | |
| Omaha, Nebraska | 68154 |
| (Address of principal executive offices) | (Zip Code) |

Nathan D. Legband– (402) 453-4444

(Name and telephone number, including area code, of the person
to contact in connection with this report)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2015.

SECTION 1 – CONFLICT MINERALS DISCLOSURE

Item 1.01 Conflict Minerals Disclosure and Report

Ballantyne Strong, Inc. is a holding company with diverse business activities focused on serving the cinema, retail, financial and government markets. In 2015, under our Strong® trademark, we designed, engineered, manufactured, and supplied long-range followspots and other lighting products for architectural, theatrical, promotional, stage and studio purposes. We sold the assets of our lighting business in December 2015 and as of that date we do not manufacture or contract to manufacture any products that would fall within the scope of Rule 13p-1. However, we will continue to maintain appropriate disclosure controls and procedures to provide for compliance with our obligations under Rule 13p-1.

We have determined that tin and tantalum, being two of the “conflict minerals” listed in Rule 13p-1, were necessary to the functionality or production of certain specialty lighting products that we manufactured during the calendar year ended December 31, 2015. During that period, we believe the introduction of tin or tantalum into our lighting products was limited to the following circumstances:

- (a) the use of tin and tantalum in generic “off-the-shelf” capacitors incorporated into certain of our specialty lighting products; and
- (b) the use of tin in generic “off-the-shelf” solder used to assemble circuit boards into a single integrated electronic component used for lighting control.

We do not make purchases of raw ore or unrefined tin, tantalum or other conflict minerals directly from mines, smelters or refiners. To the best of our knowledge, there was no other tin, tantalum, tungsten or gold necessary to the functionality or production of products that we manufactured during calendar year 2015.

We have made a good faith survey of each of our third-party suppliers of the capacitors and the solder used in our lighting products and have asked them to provide us with information regarding their conflicts mineral policies, their supply chains and the countries of origins of the tin and tantalum contained in these capacitors and solder. Based on the information provided to us, we have no reason to believe that any of the tin or tantalum used by these suppliers in the capacitors and solder we obtained from them originated in the Democratic Republic of the Congo (“DRC”) or any of the adjoining countries that shares an internationally recognized border with the DRC. We believe that the process we followed to make this determination constituted a reasonable country of origin inquiry.

We have posted this report on Form SD on our internet website at <http://www.ballantynestrong.com/investors/shareholder-info/> —SEC Filings. The content of our website is referenced herein for general information only and is not incorporated by reference into this report on Form SD.

Item 1.02 Exhibit

Based on the information obtained through the reasonable country of origin inquiry described in Item 1.01 of this report on Form SD, we have not included a Conflict Minerals Report as an exhibit hereto.

SECTION 2 – EXHIBITS

Item 2.01 Exhibits

Exhibit 1.01 – Not applicable

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, as amended, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

BALLANTYNE STRONG, INC.

Date: May 26, 2016 By: */s/ Nathan D. Legband*
Nathan D. Legband
Senior Vice President and Chief Financial Officer

