

**IN THE DISTRICT COURT OF CRAWFORD COUNTY, KANSAS**

**THE STATE OF KANSAS,  
PLAINTIFF,**

**VS.**

**ANDREW A HABJAN, III,  
DEFENDANT.**

**CASE NO.**

**INFORMATION/COMPLAINT**

I, Christina M. Lloyd, the undersigned Deputy County Attorney, in the name and by the authority and on behalf of the State of Kansas, for Information against the above-named Defendant, Andrew A Habjan, III, come now here and give to the Court to understand and be informed and do give the Court the following information:

**COUNT 1.** That on or about June 3, 2025, in Crawford County, Kansas, ANDREW A HABJAN III did unlawfully, feloniously, and without authority enter into, or remain within, a means of conveyance of persons or property, to wit: a semi-trailer owned by Jake's Fireworks, with the intent to commit a theft therein, Burglary of a Vehicle, a severity level 9 nonperson felony, in violation of K.S.A. 21-5807(a)(3) & (c)(1)(A)(iii).

**COUNT 2.** That on or about June 3, 2025, in Crawford County, Kansas, ANDREW A HABJAN III did unlawfully obtain or exert unauthorized control over property or services, to wit: fireworks, with the intent to permanently deprive the owner, to-wit: Jake's Fireworks, of the possession, use, or benefit of the property or services, of a value of less than \$1,500, Theft, a class A nonperson misdemeanor, in violation of K.S.A. 21-5801(a)(1) & (b)(4).



Christina M. Lloyd, #27440  
Deputy County Attorney

STATE OF KANSAS                    )  
  ) SS:  
COUNTY OF CRAWFORD         )

I, Christina M. Lloyd, being of lawful age, duly sworn on oath, say that I am the Deputy County Attorney, in the State of Kansas and that I am informed and verily believe that the facts and allegations set forth in the within information are true, so help me God.



Christina M. Lloyd, #27440  
Deputy County Attorney

Subscribed and sworn to before me by Christina M. Lloyd this 5th day of June, 2025.



Carma Burns  
NOTARY PUBLIC

My Appointment Expires: August 4, 2025

**ENDORSEMENT OF WITNESSES:**  
Detective Toney Asquith