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MICHAEL JONES
As the Administrator of the Estate of
ROBERT JONES
2316 Megann Ct.
Norristown, PA 19401

vs.

DETECTIVE CHRISTOPHER SWEENEY
Philadelphia Police Department
One Franklin Square
Philadelphia, PA 19106
AND
JOHN DOE(1-5) PHILADELPHIA POLICE OFFICERS
Philadelphia Police Department
One Franklin Square
Philadelphia, PA 19106
AND
CITY OF PHILADELPHIA
One Parkway Bldg., 14th Floor
1515 Arch Street
Philadelphia, PA 19102

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

AUGUST TERM 2025

No.:

PLAINTIFF'S COMPLAINT

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance person-ally or by attorney and filing in writing with the court your defense objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.

Philadelphia Bar Association
Lawyer Referral
and Information Service
One Reading Center
Philadelphia, PA 19107
(215) 238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea a visado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede pere dinero o sus propiedades u otros derechos importantes para usted.

Lleva esta demanda a un abogado immediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.

Asociacion de Licenciados
de Filadelfia
Servicio de Referencia e
Informacion Legal
One Reading Center
Filadelfia, PA 19107
(215) 238-1701

Case ID: 250803254

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No.:

PLAINTIFF'S COMPLAINT

INTRODUCTION

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1. This is an action for monetary damages brought under Pennsylvania state law for the assault and battery that resulted in the untimely death of Robert Anthony Jones by the Philadelphia Police Detective Christopher Sweeney. Additionally, after the shooting of Robert Jones, Philadelphia Police Officers engaged in a coordinated effort to obfuscate the truth and shield Detective Sweeney from criminal prosecution while assigning blame to Robert Jones.

2. Venue is proper in Philadelphia County because the conduct that is subject of the claims occurred in Philadelphia County, Pennsylvania.

PARTIES

3. Plaintiff's Decedent Robert Anthony Jones was at all times relevant to this Complaint, a resident of the City and County of Philadelphia and Commonwealth of Pennsylvania who has an address located at 9235 Bluegrass Rd., Apt.2, Philadelphia, PA. 19114-4351.

4. Plaintiff Michael Jones is an adult individual and a resident of the City Norristown and Commonwealth of Pennsylvania who has an address located at 2316 Megann Ct., Norristown, PA, 19401.

5. Michael Jones is the Administrator of the Estate of Robert Anthony Jones. Letters of Administration have been obtained.

6. Defendant, Police Detective Christopher Sweeney with badge No. 939, at all times pertinent to this Complaint, was and is employed by the City of Philadelphia and the Philadelphia Police Department as a police detective, acting under the color of state law pursuant to official policy, custom or practice of the Philadelphia Police Department and/or the City of Philadelphia and is being sued in his individual capacity.

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7. John Doe Philadelphia Police Officers (1-5) were at all times to this Complaint, employed by the City of Philadelphia and the Philadelphia Police Department as police officer(s), acting under the color of state law pursuant to official policy, custom or practice of the Philadelphia Police Department and/or the City of Philadelphia and are being sued in their individual capacity(ies). The John Doe Philadelphia Police Officers engaged in a conspiracy to obfuscate the truth and shield Detective Sweeney from criminal liability while assigning blame to Robert Jones.

8. Defendant, City of Philadelphia is a municipal corporation, located in the Couty of Philadelphia, Commonwealth of Pennsylvania, and owns, operates, manages, directs and controls the City of Philadelphia Police Department which employs the other named and unnamed Philadelphia Police Officers. The City of Philadelphia maintains an office located at 1515 Arch Street, Philadelphia, Pennsylvania, 19103.

9. This complaint specifically seeks relief for and asserts causes of action under Pennsylvania state law.

The Shooting of Robert Anthony Jones and Subsequent Cover-up

10. On October 3, 2024, Philadelphia Police Detective Christopher Sweeney stopped his vehicle on Willits Road near the intersection of Holme Avenue at about 11:30 p.m.

11. Upon information and belief, Detective Sweeney, a 14-year veteran of the Philadelphia Police Department, was off-duty at the time but was armed with his service gun and his police badge.

12. Robert Anthony Jones was traveling on Willits Road when he noticed Detective Sweeney's vehicle appearing to be disabled on Willits Road.

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13. Robert Anthony Jones, who was trained to provide roadside assistance and was wearing his bright-yellow roadside assistance vest, approached what he believed to be a disabled vehicle, and a driver stranded.

14. Upon information and belief, Detective Sweeney flashed his badge at Robert Anthony Jones and mouthed/yelled to him that he is a Philadelphia police officer.

15. Upon information and belief, Detective Sweeney used his personally owned, but nonetheless, service weapon in the commission of the shooting of Robert Jones.

16. Detective Sweeney, while seated safely in his vehicle in the driver's seat with his windows up, shoot through his own car windows multiple times and killed Robert Jones.

17. At no point did Robert Jones have a gun, a knife, or any type of sharp instrument that could be used as a weapon.

18. At no point did Robert Jones present any physical harm or physically threaten Detective Sweeney such that the use of deadly force was justified.

19. Before Robert Jones had any opportunity whatsoever to comply with any law enforcement commands to back up and/or place his hands behind his back. Detective Sweeney summarily shoots Robert Jones through the driver's side window at point blank range.

20. Robert Jones was incapacitated after the first gunshot, however the Detective Sweeney continued to fire into the Plaintiff's Decedent, continuing to strike him with numerous gunshots well after he was incapacitated in a manner that was excessive, unnecessary, and constituted an assault and battery on the Plaintiff and was unauthorized under the law.

21. Following the shooting, efforts were made to avoid saying anything to the public while the police were fervently searched for a weapon and for ways to assign blame on Robert

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Jones for the shooting. The crime committed by Detective Sweeney was covered up because of the combined efforts of the John Doe police officers and Detective Sweeney.

22. Organized and concerted effort by the Defendants and other officers present to ensure that *nothing* about what happened is relayed verbally to the media and/or the Office of the District Attorney.

23. Simply put, the Philadelphia Police Department, including the Detective Sweeney thought that they could unlawfully kill a Philadelphia Citizen, and cover it up.

24. Robert Jones wrongful death was a result of the actions and/or inactions of the Defendants set forth herein and was due in no part to the Plaintiff's Decedents actions or inactions.

25. Detective Sweeney's actions, by pointing a gun at Robert Jones knowingly, intentionally, and willfully and wantonly placed the Plaintiff's Decedent in reasonable apprehension of immediate harmful or offensive contact or touching – i.e. the fear he was going to be shot by Detective Sweeney.

26. Detective Sweeney's actions by pointing a gun at the Robert Jones knowingly, intentionally, and willfully and wantonly placed the Plaintiff's Decedent in reasonable apprehension of immediate harmful or offensive contact or touching – i.e. the fear he was going to be shot by Defendant Officer Dial who was point a gun at him and screaming at him that he was going to shoot him, and who did in fact shoot him and kill him.

27. As a result of the aforementioned actions and failures, Plaintiff's Decedent suffered both serious mental and physical injuries, including but not limited to numerous gunshot wounds, and injuries caused by those gunshot wounds including broken bones in the body, not limited to the arm and the leg, internal injuries to the stomach, internal bleeding, all of which he suffered prior to his death.

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28. As a direct and proximate result of the Defendants' conduct acting jointly and/or severally, Plaintiff's Decedent died on October 3, 2024.

29. As a direct and proximate result of the Defendant's conduct, jointly and/or severally, the Plaintiff's Decedent suffered great conscious physical pain and suffering, trauma, mental anguish, embarrassment, and humiliation prior to his death and did suffer consciously for prior to his wrongful death.

30. As a direct and proximate result Defendant's conduct acting jointly and/or severally, Plaintiff's Decedent's daily activities, occupation and usual life's pleasures were forever extinguished.

31. As a direct and proximate result of the conduct of the Defendants, acting jointly and/or severally, Plaintiff's Decedent's earnings, earning capacity and employment opportunities were terminated.

32. As a direct and proximate result of the conduct of the Defendants acting jointly and/or severally, the Estate of Robert Jones incurred liability for medical services, funeral and household expenses.

COUNT I
MICHEAL JONES ADMINISTRATRIX OF THE ESTATE OF ROBERT JONES
v. POLICE DETECTIVE CHRISTOPHER SWEENEY
ASSAULT AND BATTERY

33. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if set forth herein at length.

34. By the conduct set forth above, by assaulting, battering, and shooting Plaintiff, Defendants, each individually and jointly and/or severally, used unreasonable force and caused and intended to cause harmful and offensive contact with the body of Plaintiff, or placing the

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Plaintiff's Decedent in reasonable apprehension and fear of immediate harmful or offensive contact or touching – i.e. the fear he was going to be shot – same constituting assault and battery.

35. It was the actions of Detective Sweeny which caused the Plaintiff's injuries and his wrongful death, and which the Plaintiff would not have suffered harm from the assault and battery which resulted in his wrongful death were it not for the actions of the Detective Sweeney.

36. By the conduct set forth above, Detective Sweeney, caused and intended to cause Plaintiff immediate and harmful injury.

37. As a direct and proximate result of the aforementioned conduct, Plaintiff suffered physical injury and pain, emotional distress, humiliation, mental and physical pain and anguish as well as economic and such other losses as will be established at trial.

WHEREFORE, Plaintiff Michael Jones, Administratrix of the Estate of Robert Jones demands judgment against Defendants, Detective Sweeney and John Doe (1-5) Philadelphia Police Officers, jointly and/or severally, in an amount in excess of Fifty Thousand ($50,000.00) Dollars in compensatory damages, punitive damages costs and such other further relief the court shall deem appropriate.

COUNT II
MICHEAL JONES ADMINISTRATRIX OF THE ESTATE OF ROBERT JONES
v. JOHN DOE (1-5) PHILADELPHIA POLICE OFFCERS
CIVIL CONSPIRACY

38. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as if set forth herein at length.

39. Immediately following the shooting and upon arrival to the scene of the crime, the John Doe Officers (1-5) worked in concert together to protect Detective Sweeney by creating and/or supporting Detective Sweeney's false narrative that the shooting was the result of a road rage incident in which Robert Jones was the aggressor.

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40. Evidence that Robert Jones did not have a weapon, was not aggressive, was wearing a bright-yellow roadside assistance vest was ignored while the officers looked, unsuccessfully, for any type of instrument or weapon nearby that they could assign to Robert Jones as justification for the shooting.

41. Upon information and belief, the Defendants worked in concert to create a false narrative and manipulated the crime scene so that Detective Sweeney story that he was protecting himself would stand scrutiny by the Office of the District Attorney.

WHEREFORE, Plaintiff Michael Jones, Administratrix of the Estate of Robert Jones demands judgment against Defendants, Detective Sweeney and John Doe (1-5) Philadelphia Police Officers, jointly and/or severally, in an amount in excess of Fifty Thousand ($50,000.00) Dollars in compensatory damages, punitive damages costs and such other further relief the court shall deem appropriate.

COUNT III
MICHAEL JONES ADMINISTRATRIX OF THE ESTATE OF ROBERT JONES
v. POLICE DETECTIVE CHRISTOPHER SWEENEY
WRONGFUL DEATH

42. Plaintiff re-avers and incorporates the preceding paragraphs as though set forth herein at length.

43. Plaintiff brings this action pursuant to the Wrongful Death Act 42 Pa. C.S.A. Section 8301 and claims all damages recoverable under the Pennsylvania Wrongful Death Act.

44. The names and last known addresses of all persons who may be entitled by law to recover damages, as well as their relationship to Decedent Robert Jones are as follows:

a. Sharon Jones, Mother - 2710 Cantrell Terrace, Philadelphia, PA 19145

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45. As a direct and proximate result of the foregoing, the Decedent's Wrongful Death beneficiaries have been, continue to be, and will in the future be deprived of his counsel, services, companionship and society.

46. As a direct and proximate result of the Defendant's conduct as set forth above, which is incorporated herein, Decedent Robert Jones' Wrongful Death beneficiaries suffered, are suffering and will, for an indefinite period of time in the future, suffer damages, injuries and losses, including but not limited to, a loss of financial support, and the beneficiaries have been wrongfully deprived of the contributions they would have received from him, including monies which he would have provided for items such as clothing, food, shelter, medical care, education and entertainment, recreation and gifts

47. As a direct and proximate result of the Defendant's negligent and/or careless conduct as set forth above, which is incorporated herein, Decedent Robert Jones' Wrongful Death beneficiaries have been caused to incur and pay various expenses from medical treatment, hospital care, custodial care, nursing care and medications, and funeral and other expenses related to his death.

WHEREFORE, Plaintiff Michael Jones, Administratrix of the Estate of Robert Jones demands judgment against Defendants, Detective Sweeney and John Doe (1-5) Philadelphia Police Officers, jointly and/or severally, in an amount in excess of Fifty Thousand ($50,000.00) Dollars in compensatory damages, punitive damages costs and such other further relief the court shall deem appropriate.

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COUNT IV
MICHEAL JONES ADMINISTRATRIX OF THE ESTATE OF ROBERT JONES
v. POLICE DETECTIVE CHRISTOPHER SWEENEY
SURVIVAL ACTION

48. Plaintiff reavers and incorporates the preceding paragraphs as though set forth herein at length.

49. Plaintiff brings this action on behalf of the Decedent Robert Jones, by virtue of the Survival Act, 42 Pa.C.S.A. §8302, and claims all benefits of the Survival Act on behalf of Decedent Robert Jones' Estate and other persons entitled to recover under law.

50. As a direct and proximate result of the Defendant's conduct as set forth above, which is incorporated herein, Plaintiff claims on behalf of the Estate of Robert Jones, all damages suffered by the Estate by reason of the death of Decedent Robert Jones, including without limit the generality of the following: the severe injuries to Decedent Robert Jones which resulted in his death; the anxiety, horror, fear of impending death, mental disturbance, pain, suffering and other tangible losses which Decedent Robert Jones suffered prior to his death, the loss of past, present, and future earning capacity suffered by Decedent Robert Jones from the date of his death until the time in the future he would have lived had he not died as a result of the injuries he sustained; expenses for medical care, the loss and total limitation and deprivation of his normal activities until the time of his death.

WHEREFORE, Plaintiff Michael Jones, Administratrix of the Estate of Robert Jones demands judgment against Defendants, Detective Sweeney and John Doe (1-5) Philadelphia Police Officers, jointly and/or severally, in an amount in excess of Fifty Thousand ($50,000.00) Dollars in compensatory damages, punitive damages costs and such other further relief the court shall deem appropriate.

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Respectfully submitted,

LAW OFFICES OF SHAKA JOHNSON

By:*/s/ Shaka Johnson*_____
SHAKA JOHNSON, ESQUIRE

STAMPONE O'BRIEN DILSHEIMER HOLLOWAY

By:___*/s/ Kevin O'Brien*_____
KEVIN P. O'BRIEN, ESQUIRE
BROCK J. ATKINS, ESQUIRE
Attorneys for the Plaintiff

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Docusign Envelope ID: 5CC5951F-7E01-4B34-9D9F-B675095F3B37

VERIFICATION

MICHAEL JONES, ADMINISTRATOR OF THE ESTATE OF ROBERT JONES states that he is the Plaintiff herein, that he is acquainted with the facts set forth in the foregoing pleading, that the same are true and correct to the best of his information, knowledge and belief and that this statement is made subject to the penalties of 18 Pa.C.S.A. Section 4904 relating to unsworn falsifications to authorities.

Signed by:
Michael Jones
EDF10F22F42E432...

MICHAEL JONES, ADMINISTRATOR OF
THE ESTATE OF ROBERT JONES

Dated 8/19/2025

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