

# FFWPU USA: In Japan Judge for Supreme Court Appeal Asked to Recuse Herself

Demian Dunkley  
May 22, 2026



FAMILY FEDERATION

## The Newsletter

May 22, 2026

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**Hello family. Quick Connect update. FFWPU Japan Recusal Motion Against Justice Okino. Bitter Winter article. NABI second generation testimony. Sunday service livestreams.**

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### *News*

## Quick Connect: Judge For Supreme Court Appeal Was Asked to Recuse Herself



On Today's Quick Connect: The judge in the Supreme Court appeal was asked to recuse herself, a Japanese constitutional law scholar's analysis of the High Court's

decision, and NABI continued bravely speaking out amid the dismissal of thousands of church staff.

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## Family Federation Counsel Filed a Recusal Motion Against Justice Masami Okino



Family Federation counsel filed a recusal motion against Justice Masami Okino (沖野眞巳) of the Supreme Court Third Petty Bench, which is handling the dissolution special appeal. Okino served as a keynote speaker at a July 6, 2024 seminar hosted by the Japan Federation of Bar Associations, "Understanding the Reality of Spiritual Sales (Reikan Shoho), Considering Relief and Prevention."

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## A Leading Japanese Constitutional Law scholar opinion on High Court decision

This opinion sets forth the author's legal analysis of the constitutional issues arising in a case (hereinafter, the "present case") in which the Minister of Education, Culture, Sports, Science and Technology (the respondent) petitioned for a dissolution order against the religious corporation Family Federation for World Peace and Unification, previously known as the Unification Church (the special appellant), because it falls within Article 81, paragraph (1), item (i) and the first clause of item (ii) of the Religious Corporations Act (Act No. 126 of 1951).

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## NABI Second Gen Testimony in English



Though my voice may be small, I challenged myself to deliver a speech in English so that my feelings could reach as many people as possible.

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Family Federation counsel filed a recusal motion against Justice Masami Okino (沖野眞己) of the Supreme Court Third Petty Bench, which is handling the dissolution special appeal.

Okino served as a keynote speaker at a July 6, 2024 seminar hosted by the Japan Federation of Bar Associations, "Understanding the Reality of Spiritual Sales (Reikan Shoho), Considering Relief and Prevention."

The other keynote speaker and coordinator at the seminar (attorneys Masaki Gouro (郷路征記) and Akihito Katsumata (勝俣彰仁)) are core members of the National Network of Lawyers Against Spiritual Sales (Zenkoku Benren).

Justice Okino had stated at the seminar that the group's evangelism (dendo) and religious education (kyoka) were fundamentally problematic, leading to violations of religious freedom and of the whole personhood, and that beyond economic harm there is restraint of physical liberty.

According to the recusal motion, the entire seminar proceeded on the premise that the Family Federation was inherently harmful and that all believers were victims under mind control.

Family Federation counsel filed the recusal motion on May 21, arguing these views are clearly hostile and negative, and may "obstruct the fairness of the trial."










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


 **DLI Electronics** @DliElectro19205 · 4h    
 Wonderful for the nat'l net of lawyers the communist proxy in Japan to have proven negative judges on the bench deciding Fam Fed dissolution. It's a dream come true for Xi who sits in the background pulling silk strings of manipulation. Sounds incredible, that's the beauty of it   
    2  33 

 **Reed Darsey**  @ReedDarsey · 1h    
 I hope the ICC investigating Japan takes note of this.   
     9 

 **Ulrich Ganz** @ganz\_ulrich · 9h    
 The Family Federation appears to be struggling to receive neutral treatment from powerful secular institutions during a period of public hostility. Democratic societies have historically failed minorities in similar ways, which is why protecting religious freedom is so vital.   
   6  9  68 

 **Pam Dillard** @PamDillard27847 · 7h    
 The classic so called "cult" slander that FFWPU members are all under some freedom curtailing mind control in order to empty our bank accounts. Personally I love the freedom FFWPU gives to respect and learn from all faiths. We have liberated minds rather than enslaved brains.   
  1  2  5  51 

 **FFWPU Europe & Middle East**  @ffwpueume · 10h    
 This is very worrying. Everyone has the right to a fair and objective trial regardless of public and media pressure, in accordance with the Constitution and the Law. #ReligiousFreedom   
   9  17  108 

 **Robert Beebe**  @RobertHBeebe · 20h    
 Amazing that such a judge would preside over the trial of an organization against whom he has such obvious prejudice.   
   17  23  144 

 **Sungmi Holdhus**  @HoldUs25 · 16h    
 It's almost like she was chosen specifically BECAUSE she has a bias against

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# Constitutional Issues in the Unification Church Dissolution Case. 1. Revisiting the Aum Shinrikyo Decision

by Manabu Ishizaki | May 20, 2026 | [Featured Global](#)

## A leading Japanese Constitutional Law scholar offers a critical analysis of the High Court decision.

by Manabu Ishizaki

Article 1 of 6.



The Tokyo High Court. Credits.

### Introduction

This opinion sets forth the author's legal analysis of the constitutional issues arising in a case (hereinafter, the "present case") in which the Minister of Education, Culture, Sports, Science and Technology (the respondent) petitioned for a dissolution order against the religious corporation Family Federation for World Peace and Unification, previously known as the Unification Church (the special appellant), because it falls within Article 81, paragraph (1), item (i) and the first clause of item (ii) of the Religious Corporations Act (Act No. 126 of 1951).

Introduction: The special appellant has therefore filed a special appeal with the Supreme Court.

### I. The Need to Reconsider the Aum Shinrikyo Decision

#### 1. Summary and Evaluation of the 1996 Supreme Court Decision

The Supreme Court of Japan has addressed the dissolution order system under Article 81 of the Religious Corporations Act in its decision of January 30, 1996 (Minshu, Vol. 50, No. 1, p. 199), concerning the dissolution order against the religious corporation Aum Shinrikyo (hereinafter, the "1996 Decision").

In the 1996 Decision, the Supreme Court held that even if a religious corporation is dissolved pursuant to a dissolution order under Article 81 of the Religious Corporations Act, "believers are not prevented from maintaining a religious organization without juridical personality or from newly forming such an organization; nor are they prevented from engaging in religious acts or from newly preparing facilities and articles for such purposes. In other words, a dissolution order entails no legal effect whatsoever that prohibits or restricts the religious activities of believers."

At the same time, the Court acknowledged that "once a dissolution order against a religious corporation becomes final, liquidation proceedings are carried out (Articles 49(2) and 51), and as a result, property belonging to the religious corporation—including facilities for worship and other items used for religious activities—will be disposed of (see Article 50). Consequently, some impediment may arise to the continuation of religious activities previously conducted by believers using such property. Thus, even if legal regulations concerning religious corporations do not legally restrict religious activities, where they may nevertheless cause some practical hindrance, careful consideration must be given—bearing in mind the importance of freedom of religion as one of the spiritual freedoms guaranteed by the Constitution—as to whether the Constitution permits such regulation."

This reasoning is premised on the view that a dissolution order has no legal effect

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that restricts the freedom of religion or the freedom of association (Article 20, paragraph 1 of the Constitution) of the religious organization or its members, while requiring that any de facto effects be taken into account. The 1996 Decision has therefore been understood as denying a direct connection between dissolution orders and restrictions on the freedom of religious association, on the basis that believers remain free to continue their activities through related religious groups (Eiichiro Takahata, "Dissolution Orders of Religious Corporations and Freedom of Religion: The Aum Shinrikyo Dissolution Case," in Yasunori Hasebe, Kenji Ishikawa, Tsunetoshi Shishido, and Shinji Kojima, editors, "100 Selected Constitutional Cases" [8th Edition], Yuhikaku, 2025, page 87).

However, in light of the fundamental transformation in Japan's legal framework for granting juridical personality to intermediate associations, as well as the significant development of constitutional theories of freedom of association in Japan since then, the 1996 Decision should now be reconsidered and overturned.



Police raid an Aum Shinrikyo building after the sarin gas attack of 1995. Credits.

## 2. Changes in the Evaluation of the 1996 Decision

Today, as Takeshi Inoue (Japanese scholar of constitutional law; speciality: French Constitution and constitutionalism; currently Professor at the Faculty of Law, Kansei Gakuin University) observes, in the dissolution order case concerning the religious corporation Aum Shinrikyo, "even though the central issue concerned the secular question of whether the dissolution of a juridical person was permissible, constitutional scholarship remained focused almost exclusively on Article 20 of the Constitution. There were scarcely any analyses that approached the case as a general issue of the compulsory dissolution of a juridical entity, examining its requirements and procedures from the perspective of freedom of association or the law of organizations" (Takeshi Inoue, "The Legal Theory of Freedom of Association," *Shinzansha*, 2014, pp. 6–7).

This observation typifies a broader shift within Japanese constitutional scholarship toward understanding the case as fundamentally a matter of the legal framework governing juridical persons, rather than solely as an issue of freedom of religion. (In relation to the same case, influential views emphasize the significance of the deprivation of legal personality: "Where the state seeks to revoke legal personality once granted, consideration must be given to the adverse effects this may have on the activities of the organization" [Toru Mori et al., "Constitutional Law: Human Rights," 3rd ed., Yuhikaku, 2022, p. 267]; or, "the revocation of already granted legal personality may be distinguished from cases of initial conferral" [Satoshi Yokodaido, "Reform of the Public Interest Corporation System, Acquisition of Legal Personality, and Freedom of Association," *Hogaku Kenkyu*, vol. 91, no. 1, 2018, p. 154]).

## 3. Legal Developments Concerning Intermediate Associations and Legal Personality After the 1996 Decision

The shift in the evaluation of the 1996 Decision described above is grounded in the fundamental transformation, in recent years, of Japan's legal framework for granting juridical personality to intermediate associations. It is therefore useful to briefly survey these developments.

Historically, in Japan, the principal legal mechanism for granting juridical personality to non-profit intermediate associations was Article 34 of the Civil Code (Act No. 89 of 1896), which provided for the establishment of public-interest incorporated associations and foundations. This system adopted a permission-based approach under the supervision of the competent administrative authority, and eligibility for juridical personality was limited to organizations serving public-interest purposes. At the same time, special statutes were gradually enacted to grant juridical personality to specific types of organizations, including the Consumer Cooperatives Act (1948), the Medical Care Act (1948), the Private Schools Act (1949), the Social Welfare Act (1951), and the Religious Corporations Act (1951). Under these regimes, juridical personality was granted by authorization or certification from the relevant administrative authority in each sector.

From the Meiji period through the early Heisei era, there was no general legal framework for granting juridical personality to intermediate associations as such,

nor was such a need widely recognized.

A turning point came with the enactment of the Act on Promotion of Specified Nonprofit Activities in 1998. This statute granted juridical personality to civic activity groups operating in specified fields (initially 17, later expanded to 20), adopting a certification system closely resembling a rule-based approach. It thereby opened a path for intermediate associations—neither necessarily public-interest entities nor established under special statutes—to obtain juridical personality.

Further reform followed with the enactment of the Intermediate Corporation Act in 2001 (effective April 2002). This law enabled a wide range of intermediate associations, such as alumni groups and various clubs, to acquire juridical personality, regardless of whether their purposes were public-interest or for-profit, and introduced a rule-based system that allowed incorporation through registration alone.

The decisive transformation came with the 2008 reform of the public interest corporation system (for an overview of the legal reforms relating to the public interest corporation system, see Ikuko Komachiya et al., “Q&A: Commentary on the General Incorporated Associations Act and Public Interest Corporation Act,” Sanseido, 2008). Three related statutes enacted in 2006—the Act on General Incorporated Associations and General Incorporated Foundations, the Act on Authorization of Public Interest Incorporated Associations and Public Interest Incorporated Foundations, and the Act on Arrangement of Relevant Acts—entered into force in December 2008. The Intermediate Corporation Act was repealed; existing intermediate corporations were automatically converted into general incorporated associations without additional procedures; and Article 34 of the Civil Code was abolished. As a result, general incorporated associations and foundations could be established solely through registration under a rule-based system, enabling a broad range of intermediate associations to avail themselves of juridical personality regardless of the public-interest nature of their activities. In addition, public interest incorporated associations and foundations could be established among these entities upon receiving a public-interest certification from a third-party commission.

Among these reforms, Takeshi Inoue characterizes the Act on General Incorporated Associations and General Incorporated Foundations, from a legal-theoretical perspective, as “legislation guaranteeing the freedom of association” (Takeshi Inoue, *op. cit.*, p. 325).

Today, in light of this fundamental transformation in the legal framework for granting juridical personality to intermediate associations, influential constitutional theories have emerged in Japan asserting that conferring juridical personality on such associations is a constitutional requirement. The following section, therefore, turns to recent developments in constitutional scholarship.

[Aum Shinrikyo, Japan, Religious Liberty, Unification Church](#)



**Manabu Ishizaki**

**Manabu Ishizaki** (photo omitted for privacy reasons) is a Japanese constitutional scholar and professor in the Department of Law, Faculty of Law, Ryukoku University.

Born in 1968 in Kanagawa Prefecture, he graduated from

the Department of Law at the Faculty of Law, Meiji University, in 1992. He completed the doctoral program at the Graduate School of Law, Ritsumeikan University, in 1997. He became an assistant at the Faculty of Law, Asia University in 1998, a full-time lecturer in 1999, and an associate professor in 2002. He became a professor at the Ryukoku University Law School in 2010 and at the Faculty of Law, Ryukoku University, in 2017. Professor Ishizaki specializes in constitutional law, with research focusing on modern human rights theory, Article 9 of the Japanese Constitution, and the rights of persons with a psychiatric disability. His major publications include “The Transition of Human Rights” and “Real Constitutional Law” (co-edited).



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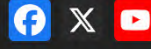
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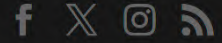


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