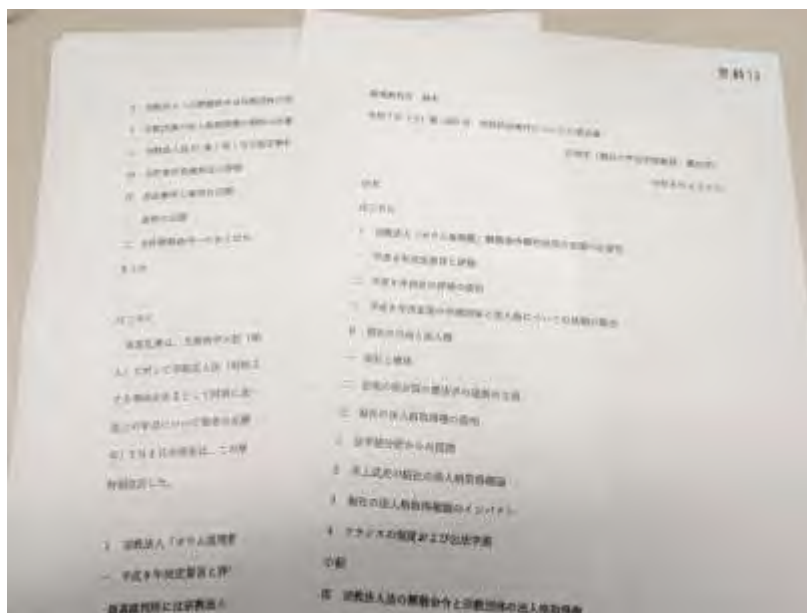


FFWPU Europe and Middle East: Scholar - Japan's Unconstitutional, Invalid Dissolution of Family Fed

Knut Holdhus
April 19, 2026



Opinion letter submitted to the Supreme Court by Professor Manabu Ishizaki of Ryukoku University regarding the [Family Federation's special appeal](#)



Expert calls dissolution order against Family Federation "unconstitutional and invalid", claiming it constitutes a serious human rights violation that threatens freedom of faith and association

Tokyo, 18th April 2026 - Published as an article in the Japanese newspaper [Sekai Nippo](#). Republished with permission. Translated from Japanese. [Original article](#).

[NEWS Close-Up]

Revoking the Corporate Status of the Family Federation Deprives It of Freedom of Religion

Dissolution Order Against Family Federation Is Unconstitutional and Invalid, Says Ryukoku University Professor Manabu Ishizaki



From the X account of constitutional scholar Manabu Ishizaki 20th March 2026 by the religious freedom investigative team of the editorial department of [Sekai Nippo](#)

The [dissolution order](#) against the [Family Federation for World Peace and Unification](#) (formerly the [Unification Church](#)) does not merely strip it of its status as a religious corporation, but constitutes a serious human rights violation that takes away freedom of religion and freedom of association, rendering it "unconstitutional and invalid". This warning comes from Professor Manabu Ishizaki (石崎学) of Ryukoku University, a constitutional law specialist. In a 29-page opinion submitted to the Supreme Court, he also raises concerns about dissolution decisions based on uncertain grounds and non-public court proceedings.

See also [Scholar Questions Secrecy in Dissolution Case](#)

"The [liquidators](#), in managing and disposing of the assets of the [liquidating corporation](#), should, to the extent that it does not interfere with liquidation duties and taking into account the degree of necessity, permit believers to use facilities, thereby giving due consideration to the freedom of religion of believers belonging to a [religious organization](#) that continue to exist."

Guidelines for liquidation formulated last October by the Ministry of Education, Culture, Sports, Science and Technology (MEXT) explained that believers' freedom of religion would be guaranteed even if the [religious corporation](#) lost its legal status. However, what awaited believers in reality was being [barred from entering churches](#) - the foundation of their faith - and being [deprived](#) of places for worship and prayer.

Dissolution Order Restricts "Right to Acquire Legal Personality for Religious

Organizations"



Professor Ishizaki points out that a dissolution order against a religious corporation constitutes a restriction on the constitutional right known as the "right of religious organizations to acquire legal personality". For this reason, he argues that state intervention in the form of a dissolution order must be approached with extreme caution and applied only in limited circumstances. He asserts that the right to acquire legal personality is included within the constitutional rights of freedom of association (Article 21, Paragraph 1) and freedom of religion (Article 20, Paragraph 1), and that without legal personality, freedom of association is effectively constrained.

In discussing this right, Ishizaki emphasizes the importance of viewing constitutional structure not merely as a relationship between "state" and "individual", but as a three-part structure that also includes "intermediate organizations" such as religious groups, non-profit organizations (NPOs), local groups, and civic organizations.

On his X (formerly Twitter) account, he wrote:

"If the [Supreme Court](#) denies the right of associations to acquire legal personality, the damage to associations in our country will be enormous. It would also mean rejecting the tripartite structure of state, intermediate organizations, and individuals in constitutional understanding, making the impact extremely serious."

His argument trended on X, with many expressing hope that it would become a central issue in the [special appeal](#).

In 1995, Aum Shinrikyo [See editor's note 1 below], which carried out the Tokyo subway sarin attack, met the dissolution criteria of having "committed acts in violation of laws and regulations that are clearly recognized as significantly harming public welfare" (Religious Corporations Act, Article 81, Paragraph 1, Item 1). At that time, it was stated that "since a religious group can continue to exist without legal personality, a dissolution order does not restrict freedom of religion." However, Ishizaki points out that in reality, the revocation of legal personality made it difficult to own facilities and equipment or conduct transactions with third parties, effectively imposing severe constraints on the organization's activities.



Illegality Cannot Be Recognized Based on Speculation

On the other hand, in the case of the [Family Federation](#), which has not committed criminal offenses, the Tokyo High Court recognized a vague risk - stating there was a "possibility" of significantly harming public welfare - as a "clear" danger. The court also noted that after the [religious organization](#) issued a "compliance declaration" in 2009 [See editor's note 2 below], "the number of cases and amount of damages related to improper donation solicitations are not necessarily clear."

Ishizaki criticizes the High Court's recognition of unlawfulness based on speculation as a "misinterpretation of the Constitution". He warns that using ambiguous standards such as "future risk" or "speculation" could set a

precedent allowing the state to easily strip organizations of legal personality. This could threaten the freedoms of not only religious organizations but also NPOs, civic groups, and all forms of associations.

Non-Public Proceedings Violate the Constitution

Additionally, he takes issue with the fact that the dissolution of the [Family Federation](#) is treated as a "non-contentious case" [See editor's note 3 below], meaning proceedings are not open to the public. Given that

dissolution restricts the constitutional right to acquire legal personality, he argues it should be treated as "inherently a purely contentious case", and that the current handling violates Article 82, Paragraph 1 of the Constitution, which guarantees public trials.

On X, Ishizaki also noted that if corporate rights are established through the [special appeal](#), constitutional protections would extend beyond religious organizations to various forms of associations.

He encouraged believers, stating that they are "in a position not only to protect their own faith, but also to improve the operation of our Constitution." Ishizaki urged them to "do their best to have the Supreme Court recognize the 'right of religious organizations to acquire legal personality' as a constitutional right."

See also [Scholar Questions Secrecy in Dissolution Case](#)

[Editor's note 1: Aum Shinrikyo, a Buddhist new religious movement founded in 1984 by Shoko Asahara, preaching apocalyptic prophecies. It was dissolved in 1996 due to its leaders' criminal acts, including the Tokyo subway sarin gas attack in 1995 and the Matsumoto sarin incident in 1994.]

[Editor's note 2: The 2009 compliance declaration of the [Unification Church](#) of Japan (now the [Family Federation for World Peace and Unification](#)) was a formal commitment by the [organization](#) to reform its practices in response to longstanding public criticism and legal challenges.

The [Unification Church](#) in Japan had faced numerous allegations related to recruitment tactics and donation solicitation, termed "spiritual sales" (靈感商法) by a hostile network of activist lawyers who had declared the [religious organization](#) an enemy. These issues led to multiple lawsuits orchestrated by the activist lawyers and significant media backlash. This prompted the [organization](#) to take measures to restore its reputation and demonstrate compliance with legal and ethical standards.

The [religious organization](#) pledged to stop possibly unethical donation practices, including what the hostile network of lawyers claimed amounted to "pressuring members into making large financial contributions under spiritual pretexts."

This was in response to accusations from the same activist lawyers that followers "were being manipulated into giving away substantial amounts of money or property."

The [Unification Church](#) stated it would enhance internal oversight to ensure compliance with ethical and legal standards. Measures included better training for leaders and stricter guidelines for evangelization and solicitation of donations.

After this compliance declaration, there was a significant decrease in the number of lawsuits against the [Unification Church](#) - since 2015 called the [Family Federation](#). The [religious organization](#) has used this as evidence that it has improved its practices and should not be subject to [dissolution](#).]

[Editor's note 3: A non-contentious case refers to a legal matter where there is no dispute between parties. These cases typically involve administrative, procedural, or uncontested legal actions, such as probate (handling a deceased person's estate), uncontested divorces, adoption, or registering a trademark. Since there are no opposing parties or legal conflicts, these cases usually proceed smoothly through the legal system without litigation.]

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"Church Closure" Risks In South Korea's New Bill

April 18, 2026 • Knut Holdhus



South Korea's controversial religion bill sparks fierce debate over Lee administration's obvious attempt to exercise extensive state power over religion as "church closures" loom

"Why Korea's new religion bill is rattling Protestant churches" was the headline of an article published by The Korea Times on 17th April. The English-language daily writes that South Korea is once again confronting a sensitive and deeply rooted constitutional question: how far should the state go in regulating religion, particularly when faith-based organizations are accused of intersecting with politics?

The Korea Times

The logo of The Korea Times

See also [Christian Groups Decry Lee's Faith Control Laws](#)

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A newly proposed amendment to the Civil Act from the left-leaning Lee Jae-myung (이재명) administration has ignited a contentious national debate, exposing fault lines not only between lawmakers and religious leaders, but also within the country's diverse Protestant community. The bill, which, according to the governing coalition, aims to sanction religious groups accused of systematic political interference, has drawn strong reactions – ranging from support among liberally minded scholars to alarm and resistance among conservative church leaders.

At the center of the controversy lies a push by the current Lee administration for the political realm to control the religious realm, in a way similar to recent steps for the political branch of government to control the country's judiciary.

The new legislation was introduced by the governing parties in the wake of developments in Japan, where a court ordered the dissolution of the [Family Federation for World Peace and Unification](#) following allegations tied to its political entanglements. Inspired in part by that precedent, South Korean lawmakers are now considering whether similar legal mechanisms are necessary to prevent what they describe as "religious organizations

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exerting undue political influence or violating election laws under the guise of spiritual activity."



Controversial new law interpreted as targeting the Shincheonji Church of Jesus. Here, its logo.



Controversial new law interpreted as targeting the Family Federation for World Peace and Unification. Here its logo

According to [The Korea Times](#), the proposed bill would grant the government the authority to revoke legal recognition of religious organizations and even confiscate their assets if they are found to have "engaged in political interference that harms the public interest." While the measure is widely interpreted as targeting controversial groups such as the [Family Federation](#) and [Shincheonji Church of Jesus](#) [[See editor's note below](#)], its language is broad enough to raise concerns about potential overreach. Critics argue that the bill's

lack of precise definitions could allow authorities to apply it selectively – or even politically – against mainstream religious institutions.

This ambiguity has fueled anxiety among Protestant leaders, particularly those aligned with conservative or politically active congregations. Many pastors perceive the legislation not as a narrowly tailored regulatory tool, but as a potential instrument of suppression. Some have gone so far as to label it a "Church Closure Act", warning that it could be used to silence religious voices critical of the government. For these leaders, preaching on social or political issues is not an abuse of religious freedom but an essential component of their faith practice.

The debate has been especially intense among figures who have previously engaged in political advocacy. For instance, pastor Son Hyun-bo (손현보) of the Segyero Church (세계로교회) in Busan who supported former conservative President Yoon Suk-yeol (윤석열) and participated in election-related activities, argue that his actions were mischaracterized as illegal campaigning. Conservative pastors contend that expressing moral or political views from a religious platform should not be equated with partisan interference. From their perspective, the principle of separating religion and state is meant to prevent state control over religion – not to exclude religious perspectives from public discourse.



Kept long-term in tiny cell under inhuman conditions after expressing his views on policies of the Lee administration: Pastor Son Hyun-bo, here August 2025. Photo: [Bitter Winter](#)

This interpretation, however, is not universally accepted. Legal scholars and theologians have pointed out that the constitutional principle in question – South Korea's prohibition on establishing a state religion and its mandate for separation – serves a dual purpose. It protects religious freedom while also safeguarding democratic institutions from undue influence by organized faith groups. In this view, the issue is not whether religious individuals can participate in politics, but whether institutional religion should wield structured political power.



Mike Johnson, speaker of the United States House of Representatives since 2023. Here, at the [IRF Summit](#) 31st Jan. 2024. Photo: [Yosuke Yamazaki](#).

Interestingly, the Korean debate echoes similar tensions in other parts of the world, particularly in the United States, where the concept of church-state separation has long been contested. There, [The Korea Times](#) points out, some political and religious leaders, e.g. House Speaker Mike Johnson, argue that the principle has been misinterpreted, claiming it was intended to shield religious institutions from government interference rather than to exclude religion from policymaking. This perspective has gained traction alongside the rise of what the article calls "Christian nationalism", a movement that seeks to integrate religious identity more directly into national politics.

Back in South Korea, however, many within the broader Protestant community are urging caution. Major umbrella organizations, like [United Christian Churches of Korea](#) and the [National Council of Churches in Korea](#), representing a wide spectrum of churches have expressed concern about the bill's potential for misuse. They do not necessarily oppose the

"progressive" Lee Jae-myung administration's goal of dismantling and seizing the assets of what some traditional Christians perceive as "heretical" movements, like the [Family Federation](#) and [Shincheonji Church of Jesus](#) [[See editor's note below](#)]. Yet, South Korean protestants generally emphasize the need for clear legal standards and safeguards against administrative abuse. Without such protections, they warn, the legislation could inadvertently undermine religious freedom rather than strengthen it.

At the same time, a number of theologians and church scholars are calling attention to the risks of politicizing religion itself. They argue that when religious institutions become closely aligned with political agendas, they risk compromising their moral authority. Faith, in this sense, becomes instrumentalized – used as a tool to advance specific political goals rather than as a source of ethical guidance. Over time, this can erode public trust in religious organizations and blur the distinction between spiritual leadership and political activism.

Some scholars have also highlighted the broader societal implications of the current debate. As public attention focuses on constitutional interpretation and political conflict, there is a risk that the stated motivation behind the bill – addressing legal violations by certain religious groups – may be sidelined by an administration seeking control over the religious realm.

Ultimately, the debate over South Korea's proposed religion bill raises fundamental questions about the relationship between religion and politics in today's highly polarized world. Authoritarian states already have next to total control over religion. What is truly striking, is how powerful politicians in democratic nation like South Korea and Japan have become advocates of a policy toward religion that is reminiscent of how today's China deals with the religious issue.

[See also *Christian Groups Decry Lee's Faith Control Laws*](#)

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Text: Knut Haldhus, editor

Featured image above: *Protesting "church closure bill" proposed by left-leaning Lee Jae-myung administration. Illustration: ChatGPT 18th April 2026.*

[Editor's note: Shincheonji, officially known as *Shincheonji Church of Jesus, the Temple of the Tabernacle of the Testimony*, is a new religious movement founded in South Korea in 1984 by Lee Man-hee, who claims to be the promised pastor mentioned in the Bible's Book of Revelation. Shincheonji teaches that the Book of Revelation is being fulfilled through its church and that Lee Man-hee has received divine revelation to interpret it.]

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