

## FFWPU Europe and Middle East: Cemetery Last Refuge in Japan for Family Fed Worshippers

Knut Holdhus  
April 20, 2026



*The Supreme Court in Chiyoda Ward, Tokyo, Japan*



[Sekai Nippo](#)

**As final appeal against "unconstitutional" dissolution order has been filed to Supreme Court, loss of worship spaces deepens crisis for Family Federation believers as they gather at their last refuge - a cemetery**

Tokyo, 17th April 2026 - Published as an article in the Japanese newspaper [Sekai Nippo](#). Republished with permission. Translated from Japanese. [Original article](#).

[Part 9 (final) of a Series] In Search of a Spiritual Anchor - One Month After the Dissolution of the Family Federation

**The Future of Believers Entrusted to a Special Appeal**

by the Religious Freedom Investigative Team of the editorial department of [Sekai Nippo](#)

See part 1 of the series: [Beyond the Ban Believers Sustain Community](#)

See part 2 of the series: [Transparency Concerns: Non-Disclosure of Records](#)

See part 3 of the series: [Believers' Social Exclusion, Loss of Civil Rights](#)

See part 4 of the series: [Media's Role: Frenzy, Silence, and Consequences](#)

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The [Family Federation for World Peace and Unification](#) (formerly the [Unification Church](#)), which has entered [liquidation](#) proceedings, filed a [special appeal](#) with the Supreme Court of Japan on 9th March against the [dissolution order](#) issued by the Tokyo High Court. On 25th March, it submitted a statement of

reasons for the appeal. The [religious organization](#) argues that including civil torts under the Civil Code as grounds for dissolution and handling the procedure as a non-public non-contentious case [See editor's note 1 below] are [unconstitutional](#).



*Setsu Kobayashi, author, constitutional scholar and professor emeritus at Keio University, Japan (2015)*

The [religious organization](#) also pointed out that since its 2009 "compliance declaration" [See editor's note 2 below], no specific acts or facts constituting alleged "unlawful acts" by its followers have been identified or established. Despite this, the court recognized as fact that "inappropriate donation solicitations constituting acts wrongful according to civil law continued even after the declaration" [See editor's note 2 below] and issued the [dissolution order](#). The [religious organization](#) claims this represents "a serious departure from the fundamental structure of judicial proceedings" and violates the right to a fair trial.

In response to the [High Court's decision](#), well-known figures who felt deep concern and a sense of crisis have also submitted opinion statements to the [Supreme Court](#). Constitutional scholar Setsu Kobayashi (小林節), Professor Emeritus at Keio University, emphasized that the case involves freedom of religion - considered a "preferred fundamental right". He argued that

restrictions should be allowed only when there is a "clear and present danger", and that "less restrictive means" must be chosen. He criticized dismissing the impact of the [religious organization's](#) dissolution on believers as merely "indirect and de facto", and called the justification for a closed trial "far-fetched".



*Attorney Nobuya Fukumoto at Tokyo press conference March 25, 2025*

Attorney Nobuya Fukumoto (福本修也), representing the [Family Federation](#), stated on his law firm's website that "the High Court's logic - asserting, based on assumptions and speculation, that measures under the Act on Prevention of Improper Donation Solicitation are ineffective and that a dissolution order is indispensable - is completely flawed." He called on the [Supreme Court](#) to "avoid being swayed by public sentiment, calmly confront sound arguments head-on, and, after careful deliberation, render a wise judgment."

Placing their last hopes in the [special appeal](#), believers are enduring difficult times during which they are unable to enter religious facilities now under the control of a court-appointed [liquidator](#). Meanwhile, on 11th April, more than 500 believers visited the Minegashiro Cemetery (Central Japan Cemetery) in Suzuka City, Mie Prefecture - where the graves of fellow believers are located - to pay their respects. This was a "joint graveside visit" event organized by the Central Japan Bereaved

Families Association.

According to the association, an annual joint memorial service called the "Central Japan Seiwa Festival" had previously been held at this time of year. As an alternative event, and in accordance with policies set by the [liquidator](#), it was organized by the bereaved families' association rather than the [religious organization](#).



*"Central Japan (Chu-Nihon) Cemetery" spreads across a mountain area in Suzuka City, Mie Prefecture,*

## *Japan*

Initially, attendance was expected to be at most around 200 people, but in reality, more than 500 participated - far exceeding expectations. Jiro Nakabayashi (中林次郎), head of the association, said,

"Above all, we wanted people to feel glad they came. We made efforts to provide even better hospitality than at the Seiwa Festival, including boxed meals, pork soup, and ice cream."

Possibly influenced by the Tokyo High Court's [4th March decision](#) to uphold the dissolution order, he added,

"I feel that many people came not only to visit graves but also looking forward to reconnecting with others they haven't seen in a long time."

One participant, a woman in her 30s living in the Chubu region, said she joined the event partly due to concerns about the future of the cemetery. She felt relieved that she was able to visit the graves without issue this time, saying,

"Perhaps we've gotten past the concern that the cemetery itself might become subject to liquidation."

However, she also expressed ongoing anxiety, noting,

"Given the strong voice of opponents of the [Family Federation](#) in the media, if something happens again, I think worries about the graves will resurface."

The psychological suffering of believers who have lost places for worship and community is immeasurable. The prospect of also losing the cemetery would be an unbearable burden. At present, the cemetery is the only place connected to the [organization](#) where believers - who cannot even enter [church sanctuaries](#) - can gather.

Whether believers will be able to regain their "spiritual anchor" (信仰の寄る辺), and whether Japanese society can reconsider what "religious freedom" truly means, now stand at a critical turning point.

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(End of series)

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**[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.

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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](#).]

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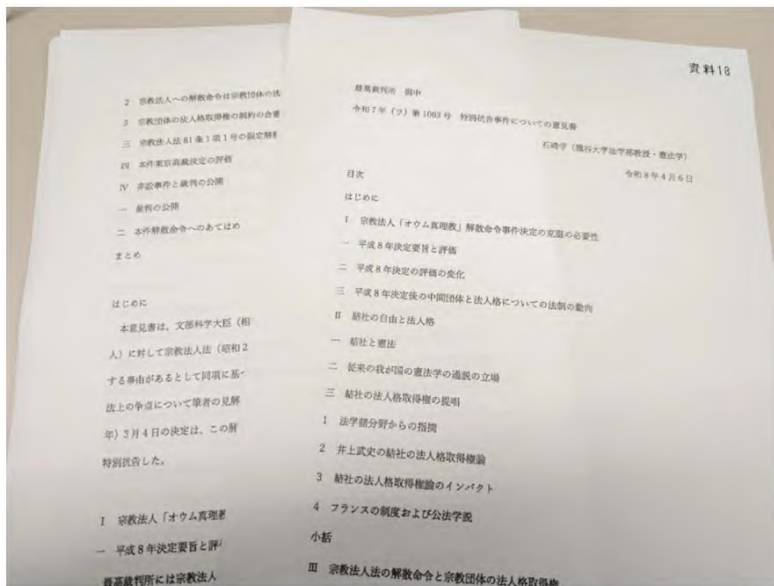
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# Scholar: "Unconstitutional, Invalid" Dissolution

April 19, 2026 • Knut Holdhus



**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, 18<sup>th</sup> 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

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](#)



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私大教員。憲法学者。

From the X account of constitutional scholar Manabu Ishizaki 20th March 2026. Screenshot

"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"



Constitutional expert claims court order to dissolve the Family Federation is "unconstitutional and invalid". Illustration: ChatGPT, 19th April 2026.

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."





**Constitutionally highly problematic proceedings** against [Family Federation](#) were held behind closed doors in the joint building of the Tokyo High Court, Tokyo District Court, and Tokyo Summary Court in Chiyoda Ward, Tokyo, Japan. Photo (2012): Rs1421 / Wikimedia Commons. License: [CC ASA 3.0 Unp](#)

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](#)

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**Featured image** above: Opinion letter submitted to the Supreme Court by Professor Manabu Ishizaki (石埜学) of Ryukoku University regarding the [Family Federation's special appeal](#). Photo: [Sekai Nippo](#)

**[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.]

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