

FFWPU Europe and Middle East: In Japan Donating to Church Can Get It Banned

Knut Holdhus
July 21, 2026



Attorney Patricia Duval, member of the Paris Bar Association, specializing in international human rights law. Earned a degree in public law from Sorbonne University. Has defended the rights of religious and faith minorities both in France and internationally, including at the European Court of Human Rights (ECtHR), the Council of Europe (CE), the Organization for Security and Co-operation in Europe (OSCE), the European Union (EU), and the United Nations. Author of numerous academic papers on religion and freedom of belief. Here, speaking at the UN Office in Geneva June 16. 2025.



Bitter Winter, the world's leading online magazine on religious liberty and human rights



Voluntarily giving substantial financial support to religious and humanitarian causes can itself become grounds for dissolving a religious organization in Japan. Here, a Japanese woman offering a donation at a meeting. Illustration: Microsoft Designer Image Creator,

Could other faiths be next? A human rights lawyer argues that voluntarily giving donations for religious and humanitarian work became grounds for dissolution

When Japan's Supreme Court [finalized the dissolution](#) of the [Family Federation for World Peace and Unification](#) (formerly the [Unification Church](#)) on 22nd June 2026, the [decision](#) immediately sparked debate far beyond Japan. While government officials and critics of the [movement](#) described the ruling as a necessary response to controversial fundraising practices, others viewed it as a watershed moment for religious liberty. Among the strongest critics was international human rights lawyer Patricia Duval, who argued that the judgment represents a dangerous expansion of state power over religious organizations. In an [article](#) in [Bitter Winter](#), an online magazine specializing in religious liberty and human rights, Paris-based international human rights lawyer Patricia Duval contends that the Supreme Court's decision creates an unprecedented legal precedent. In her view, the Court did not dissolve the [religious corporation](#) because its leaders committed criminal acts or because it engaged in violence or fraud. Instead, she argues, the Court accepted the government's position that the [organization](#) should lose its legal status because its members collected donations that funded religious and humanitarian work around the world.

Duval believes this reasoning has implications extending well beyond one religious movement. If governments can dissolve a religious body because they disapprove of how believers voluntarily donate money in support of their faith and charitable missions, she argues, other religious organizations could one day face similar treatment. She also criticizes the Court for minimizing the practical consequences of dissolution. Although the judges acknowledged that believers would lose their churches and meeting places, they characterized these hardships simply as indirect consequences rather than violations of religious freedom. Duval rejects that distinction, maintaining that confiscating a [religious organization's](#) assets while insisting believers remain free to

worship is both unrealistic and legally inconsistent.

Dissolved for Supporting Humanitarian Work?

Patricia Duval argues that Japan has taken an extraordinary step by dissolving the legal entity of the [Family Federation for World Peace and Unification](#). According to her, this may be the first time in a democratic country that a religious organization has lost its legal status largely because it raised money to support humanitarian and missionary activities around the world.

The [Supreme Court's decision](#) upheld the earlier ruling of the Tokyo High Court, meaning that the [religious corporation](#) would lose its legal identity and its assets could be liquidated. According to Duval, the [religious organization](#) has around 250 churches and hundreds of thousands of members in Japan.

Duval criticizes the Supreme Court for giving only a brief response to the arguments presented by the lawyers representing the [Family Federation](#). She says the Court largely ignored detailed claims that the dissolution violates fundamental freedoms, including freedom of religion and freedom of association.

The Court stated that the dissolution merely removes the legal status of the [religious organization](#). According to the judges, it does not legally prohibit members from practicing their religion.



Taken by the state along with hundreds of other places of worship: The [Family Federation](#) Family Church in Seto, a city of 127,000 inhabitants, to the East of Nagoya, Japan

However, the Court also acknowledged that losing all of the [Federation's](#) buildings and property would create obstacles for believers. It described these difficulties as indirect practical consequences rather than direct legal restrictions.

Duval strongly disagrees with this reasoning. She argues that taking away churches, meeting halls, and other property makes it much harder for believers to practice their faith together. Calling these losses "indirect" does not lessen their direct impact on religious life.

The Court further concluded that members of the [Family Federation](#) had, over many years, collected donations in ways that amounted to civil wrongdoing under Japanese law. These activities, it said, harmed the public welfare.

According to the judgment, the fundraising was carried out under the organized guidance by the [religious organization](#). The Court referred to the [founder's](#) teaching that Japanese believers should make financial sacrifices to support religious and humanitarian work in other countries. On that basis, it found that the [Family Federation](#) itself had encouraged the fundraising.

Duval emphasizes that the government never proved that the [religious organization](#) committed criminal offenses. No leaders were prosecuted for crimes such as fraud or extortion. Instead, the government relied on civil court judgments involving former members in order to justify dissolving the [religious corporation](#).

She also notes that the donations were not intended for personal enrichment or commercial profit. According to information presented during the case, the [Family Federation](#) and related organizations

operate in nearly 200 countries. Donations collected in Japan helped finance outreach work as well as schools, women's programs, and other charitable projects in Asia, Africa, Europe, Latin America, and elsewhere.



Supported by donations from the Japanese movement. Jamoo2 Vocational School in Senegal

Duval argues that the Court effectively treated these international activities as evidence against the [Federation](#). Because Japanese believers were making unusually large donations, courts concluded that they must have been psychologically manipulated into doing so.

She rejects this conclusion. In her view, many former members who later challenged their donations had previously been subjected to forced confinement and so-called deprogramming or faith-breaking by opponents of the [religious organization](#). For decades, she writes, thousands of members were abducted, confined, and pressured to abandon their faith. She argues that the dissolution order is the final result of this long campaign against the [movement](#).

Duval says the ruling sends a troubling message. It suggests that voluntarily giving substantial financial support to religious and humanitarian causes can itself become grounds for dissolving a religious organization if authorities believe such giving is socially unacceptable.

She finds this especially unfortunate because, in her opinion, the [Family Federation](#) has supported humanitarian projects that have benefited disadvantaged communities around the world. She writes that volunteers in African countries and elsewhere are now facing the difficult task of explaining that schools, women's centers, and other projects have lost financial support because of the Japanese court decision.

Finally, Duval criticizes what she sees as a contradiction in the Supreme Court's reasoning. The Court said that members remain free to continue practicing their religion as individuals or as an informal group. Yet it also justified dissolution by saying there was a risk that the [religious organization](#) would continue encouraging donations in the future.

According to Duval, these two conclusions cannot easily be reconciled. If believers continue following the same religious teachings, she argues, any new organization they establish could again be accused of engaging in the same fundraising activities and could once more face dissolution.

For Duval, this reveals what she considers the central flaw in the decision. She believes the ruling ultimately targets not simply the legal corporation but the religious beliefs and practices themselves. In her view, that amounts to an infringement of the rights to freedom of religion, peaceful assembly, and association, rights that democratic societies are expected to protect for all faith communities.

Text: Knut Holdhus, editor

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political pressure, media narratives, and judicial decision-making threatening fundamental legal principles



Logo of *Bitter Winter*, the world's leading online magazine on religious liberty and human rights.

Dr. Massimo Introvigne, Italian sociologist of religion, founder of *CESNUR*, specializing in new religious movements and religious liberty. A prolific author, he has advised governments and international bodies, and served as OSCE Representative on combating racism, xenophobia, and intolerance against Christians worldwide and comments on contemporary religious controversies. Here speaking at the UN Office at Geneva on 16th June 2025. Screenshot from video by UPF.

Bitter Winter, the world's leading online magazine on religious liberty and human rights, published on 10th July an [article](#) with rare behind-the-scenes insight into the legal

campaign to dissolve Japan's *Family Federation for World Peace and Unification* – formerly known as the *Unification Church*. The report was headlined “[How Japan's Unification Church Case Went Off the Rails: Attorney Nakayama's Inside Account](#)”.

See also [When Giving Becomes Grounds for Dissolution](#)

In this [article](#), Italian sociologist of religion Dr. Massimo Introvigne summarizes a lengthy conversation between literary critic Eitaro Ogawa (小川榮太郎) and attorney Tatsuki Nakayama (中山達樹), one of the lawyers representing the *Family Federation*. Rather than presenting a general defense of the *religious organization's* theology or practices, Nakayama focuses on what he considers serious procedural and legal shortcomings in the dissolution proceedings. His account argues that the case illustrates how political pressure, media narratives, and judicial decision-making can become intertwined in ways that threaten fundamental legal principles.

Nakayama explains that he became involved shortly after the assassination of former prime minister Shinzo Abe (安倍晋三) in July 2022, when another lawyer informed him that dozens of law firms had declined to represent the *Family Federation*. Although he had no personal connection to the *religious movement* and was not a believer, he found it disturbing that so many attorneys were unwilling to accept the case. To him, this suggested an atmosphere in which professional and reputational concerns discouraged legal representation of an unpopular client. Believing that every party deserves competent legal counsel regardless of public opinion, he agreed to take the case despite anticipating criticism.

One of Nakayama's principal arguments concerns the government's sudden change in legal position. He notes that Japanese officials had initially concluded that dissolution was not legally justified because the *Family Federation* had not been convicted of criminal offenses comparable to those committed by Aum Shinrikyo (オウム真理教) [\[See editor's note 1 below\]](#), whose dissolution followed acts of terrorism. According to Nakayama, this position *changed abruptly* after political pressure emerged within the Diet, *the national legislature of Japan*. He argues that the government reversed course without presenting significant new evidence or a convincing legal rationale, raising concerns that political considerations had begun to outweigh established legal standards. Introvigne writes,



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“Then, in Diet testimony, Prime Minister Fumio Kishida reversed the position overnight, without providing a legal or factual explanation.

Nakayama was stunned. He recalls how embarrassing it was to report this internationally, because Japan is supposed to be governed by law, not by the whims of individuals. Later, he learned what had triggered the reversal. According to Nakayama, Constitutional Democratic Party lawmaker Konishi warned Kishida that if he did not move toward dissolution, he would be labeled ‘a billboard for the [Unification Church](#)’. Nakayama calls it a form of political intimidation. Kishida, he argues, flipped instantly. Ogawa notes that a Cabinet decision [overturned in a single night](#), without new evidence, means the dissolution process began without legal foundation.”

The article also examines the evidence collected during the



Hiroyuki Konishi.
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Fumio Kishida, here delivering a speech at the UN Climate Change Conference in Glasgow (COP26) 2nd Nov. 2021. Photo: [首相官邸ホームページ / Wikimedia Commons](#). License: [CC Attr 4.0 Int.](#) Cropped

government’s investigation. Nakayama questions the reliability of witness testimony submitted in support of dissolution. He points to the extensive use of anonymous statements, arguing that anonymity limited opportunities for meaningful cross-examination or independent verification. He further claims that many written affidavits contained remarkably similar wording, suggesting that they may have been prepared using standardized templates rather than reflecting entirely independent personal accounts. Even more seriously, he alleges that some individuals later disputed statements attributed to them. If such claims were substantiated, they would raise important questions about the integrity of the evidentiary process.

Another central issue is the legal standard required for dissolving a [religious corporation](#). Japanese law generally requires that dissolution be justified by conduct that clearly and seriously harms the public welfare. Nakayama contends that the courts applied this standard far more broadly than intended. He argues that after the [Family Federation](#) announced compliance reforms in 2009 [\[See editor’s note 2 below\]](#), relatively few civil judgments were entered against the [religious organization](#). In his view, describing the remaining incidents as sufficiently serious to justify dissolution represented a significant expansion of previous judicial interpretation.

Nakayama is especially critical of later court decisions, which he believes relied on speculative reasoning rather than clearly established misconduct. He argues that treating settlements as evidence of wrongdoing, or suggesting that unlawful conduct might have occurred without making definitive findings, weakens the traditional presumption that legal conclusions should rest upon proven facts rather than possibility or inference. Introvigne points out,

“The Tokyo High Court went further. Presiding Judge Motoko Miki treated settlements as evidence of civil torts and relied on the unprecedented reasoning that “the possibility of unlawful conduct cannot be ruled out.” Nakayama believes this was dishonest and unjust. In his entire career, he had never seen anything so extraordinary. Ogawa compares it to sentencing someone to death for shoplifting. He notes that if courts use extreme language without evidence, public opinion will assume extreme wrongdoing even when none exists.”

Throughout the conversation, both Nakayama and Ogawa argue that the legal proceedings cannot be understood apart from the broader social climate that developed after Abe's 2022-assassination. They suggest that sustained media coverage, intense political debate, and widespread public hostility created an environment in which objective legal assessment became increasingly difficult. In their view, once the [Family Federation](#) became widely associated with national tragedy and political scandal, legal institutions faced enormous pressure to respond in ways that reflected prevailing public sentiment.

To illustrate this concern, Nakayama compares the situation to earlier episodes in Japanese history in which public fear and social prejudice contributed to unfair treatment of marginalized groups. Introvigne writes,

“Nakayama cites physician Tetsu Nakamura, who once described the hysteria surrounding Hansen's disease [\[See editor's note 3 below\]](#) as ‘faceless cruelty’. He warns that Japan may now be entering a similar cycle: a tragic game of Old Maid, where no one knows who will be targeted next.”



*Arran Reeve, suffering from **leprosy, Hansen's disease**, ca. 1886. Copperplate heliogravure by Pierre Arents. [Public domain](#) image*

The attorney's point is not that the cases are identical, but rather that societies sometimes allow collective emotions to influence legal institutions in ways that become regrettable in hindsight. He warns that when legal decisions appear to follow public opinion rather than established legal standards, the consequences may extend far beyond a single [religious organization](#).

Ultimately, Introvigne presents this interview not simply as a discussion about the [Family Federation](#) but as a broader reflection on the health of democratic institutions. Regardless of one's opinion of the religious organization itself, Nakayama argues that the essential question is whether unpopular groups continue to receive equal protection under the law. If governments, courts, and the media become mutually reinforcing forces that shape outcomes before legal processes have run their course, he believes the rule of law itself is placed at risk.

The article therefore invites readers to consider a larger constitutional question: how should democratic societies balance accountability for alleged misconduct with procedural fairness, judicial independence, and religious freedom? Nakayama's account raises important issues about the relationship between politics, public opinion, and the administration of justice – issues that extend well beyond Japan and resonate in many democratic societies today.

See also [When Giving Becomes Grounds for Dissolution](#)

Text: Knut Holdhus, editor

Featured image above: Attorney Tatsuki Nakayama (中山達樹) and literary critic Eitaro Ogawa (小川榮太郎). Photo: [Bitter Winter](#)

[Editor’s note 1: Aum Shinrikyo (オウム真理教), 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. “Aum” (オウム – alternatively anglicized as Ōmu) is the phonetic spelling of the Sanskrit syllable “Aum” (or Om). “Shinrikyo” means literally “religion of truth”.

[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: Hansen’s disease is the medical term for what was historically called **leprosy**. It’s a chronic infectious disease caused by the bacterium *Mycobacterium leprae* (and in some cases *M. lepromatosis*).

The term “Hansen’s disease” comes from Gerhard Armauer Hansen, the Norwegian scientist who identified the causative bacterium in 1873. The modern name is preferred to reduce the stigma historically associated with “leprosy.”

In the above article, Tatsuki Nakayama (中山達樹) references Hansen’s disease because of its **social and historical impact**, especially in countries like Japan, where patients were once **isolated in sanatoria** due to fear and misunderstanding, even after effective treatments existed.]

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Unification Church in Japan: Dissolved for Funding Humanitarian Activities

by Patricia Duval | Jun 26, 2026 | [Op-eds Global](#)

What crime did the religious organization commit? Apparently, collecting donations to support its charitable endeavors abroad.

by Patricia Duval



Justice Eriko Watanabe presided over the court that rendered a decision offensive to both religious liberty and common sense.

Maybe for the first time in the history of democracies, Japan has now dissolved a Church legal entity because it funded humanitarian activities worldwide.

It is the exact rationale given by the Japanese Supreme Court on June 22, 2026, to reject the appeal against the dissolution order of the Tokyo High Court, and uphold that the entire religion of the former Unification Church (now known as the Family Federation for World Peace and Unification) gathering 250 Churches and hundreds of thousands of believers throughout Japan, should be deprived of legal entity and all its assets liquidated.

Without addressing the numerous arguments presented by the defense attorneys, the Supreme Court answered only in a few paragraphs to the argument of violation of the believers’ rights to freedom of religion or belief and freedom of association.

The Court dismissed the argument out of hand, giving the following reasoning: “A dissolution order has no legal effect other than causing the religious corporation to lose its juridical personality, and is not accompanied by any legal effect whatsoever prohibiting or restricting the religious activities of its adherents.”

Then admitting that the deprivation of all the places of worship still represented “some impediment to the religious activities carried out by the Family Federation for World Peace and Unification as a religious organization and by its adherents,” the Court found that such “impediment is no more than an indirect and de facto consequence accompanying the dissolution order.”

Same with their freedom of assembly: the fact that parishioners cannot gather anymore is also a de facto consequence of the dissolution.

So the “impediment” of confiscating all the Church’s assets acquired with parishioners’ donations and preventing members from gathering there anymore is just collateral damage caused by the dissolution—which was purportedly made necessary by the harmful behavior of the Church members raising donations for their nonprofit humanitarian activities.

The Court explained that “the appellant’s adherents continuously engaged, over the long period from 1973 to 2022, in acts of soliciting donations constituting tortious conduct,” deemed unacceptable under “social norms ” therefore causing significant harm to “public welfare ”

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social norms, therefore causing significant harm to public health.

And the Court added: “Furthermore, those tortious acts were carried out under the organized involvement of the appellant. Specifically, based on the policy of the founder of the appellant’s doctrine and others that believers in Japan should provide economic assistance to countries throughout the world, even by making personal sacrifices, the appellant requested its adherents to solicit donations.”

As there was no criminal conduct by the Unification Church, the government relied on civil torts to obtain judicial dissolution.

As they could not find any crimes—and no prosecutions were ever initiated against Church representatives for extortion—they used civil tort cases filed by ex-members under constraint after being forcefully confined and “deprogrammed.”

And as there was no personal enrichment and no profit-making, they ruled that the Church wanted to squeeze the Japanese people dry to help people in other countries, in particular, Africa and other poor countries.

According to the information provided in the dissolution case file, the Unification Church and related associations are present in 194 countries worldwide for missionary activities. Donations from Japan have been used for missionary work in Asia, Africa, Europe, Latin America, and other countries globally.

According to Japanese civil court case law, it is not “normal” to make large donations intended for the Unification Church. The courts concluded that the Japanese individuals must therefore have been “brainwashed” to have reached that point.

Forced abduction and confinement, followed by forcible “persuasion” by a traditional Protestant pastor, were intended to help them come to their senses. It is precisely this type of “deprogramming” that has been practiced for half a century on approximately 4,300 members of the Unification Church in Japan.

The dissolution of the Church is simply the culmination of this process and the conclusion of a setup.

Apparently, collecting donations to help people in other countries is considered a serious crime, and the Japanese must be particularly helpless and gullible for the State to have to protect them—against their will—from the risk of being mentally manipulated into making donations for humanitarian causes.

However, Japan should be delighted and proud to have an organization that is restoring its image on the international stage, given that it was previously viewed as a selfish and racist country due to its policy of completely excluding foreigners.

Today, Church volunteers in Africa and other countries facing hardship are grappling with the challenge of informing local communities that funding for their schools and women’s support centers has been cut off—a problem that the Japanese government clearly does not care about in the least.

Finally, the Court concluded that “there remains a risk that, in the future, it will continue to require its adherents to solicit donations,” therefore dissolution is “unavoidable.”

Thus, the Supreme Court affirmed, on the one hand, that parishioners could continue to practice their faith as an informal association of believers, but held, on the other hand, that there was a risk that the same situation could recur, since religious doctrine itself calls for helping one’s fellow human beings throughout the world.

This is, in fact, utter hypocrisy. From a logical standpoint, given the wording of the decision, any new association of believers based on the same religious doctrine could be subject to a new request for dissolution by the government.

This constitutes a clear violation of the members’ rights to freedom of religion or belief, as well as to freedom of assembly and association.

Japan, Religious Liberty, Unification Church



Patricia Duval

Patricia Duval is an attorney and a member of the Paris Bar. She has a Master in Public Law from La Sorbonne University, and specializes in international human rights



University, and specializes in international human rights law. She has defended the rights of minorities of religion or belief in domestic and international fora, and before international institutions such as the European Court of Human Rights, the Council of Europe, the Organization for Security and Co-operation in Europe, the European Union, and the United Nations. She has also published numerous scholarly articles on freedom of religion or belief.



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