

## FFWPU Europe and the Middle East: Japan's Rulers' Hostility to Religion Exposed in Elimination of Family Fed

Knut Holdhus  
April 24, 2026



*Dr. Massimo Introvigne, an Italian scholar specializing in the sociology of religion. He founded and serves as managing director of the Center for Studies on New Religions, an international network of academics focused on the study of new religious movements. He has authored around 70 books and over 100 scholarly articles in this field. Here, speaking in Geneva, Switzerland June 16, 2025*

BITTER  
WINTER

[Bitter Winter](#), the world's leading online magazine on religious liberty and human rights

### **When courts misread faith: The problem of a court's biased legal reasoning when its doctrinal interpretation is entirely based on sources hostile to the religious body being examined**

A 26th March 2026 [Bitter Winter article](#) by Dr. Massimo Introvigne offers a sharply critical reading of the [Tokyo High Court's decision](#) to uphold the dissolution of the [Family Federation for World Peace and Unification](#). Reframing his argument through an even more pointed lens - one that emphasizes selective quotation and reliance on hostile or ideologically motivated sources - the piece can be understood as an indictment not only of the [court's conclusions](#) but of its

methodological foundations. At stake, in this telling, is not merely the fate of a controversial [religious organization](#), but the epistemic standards by which courts interpret belief systems that fall outside mainstream acceptance.

From the outset, Introvigne portrays the High Court's reasoning as structurally compromised. Rather than constructing a balanced or academically grounded account of the [movement](#) founded by [Sun Myung Moon](#) (1920-2012) and [Hak Ja Han](#), the court is said to have assembled a narrative that depends disproportionately on adversarial materials.

Chief among these are the claims and publications of Japan's National Network of Lawyers Against Spiritual Sales - an advocacy group with a long-standing oppositional stance toward the [Family Federation](#). By privileging such sources, while neglecting decades of scholarship by sociologists and historians of religion, the court's decision appears less like a neutral judicial assessment and more like a curated dossier built to substantiate a predetermined conclusion.

This methodological bias is most evident in the court's reconstruction of the [Family Federation's](#) theology. While it begins with a superficially accurate summary - describing the roles of [Sun Myung Moon](#) and his widow [Hak Ja Han](#) as "[True Parents](#)" and articulating the concept of "[restoration](#)" - it quickly pivots

toward an interpretive framework that casts these doctrines in the most cynical possible light. The phrase "offering all things to [God](#)", for example, is reframed not as a spiritual exhortation common to many religious traditions, but as an implicit mandate for financial exploitation. Select quotations emphasizing the importance of monetary contributions are isolated from their broader theological and pastoral contexts, then presented as evidence of systemic coercion.



*Casting religious doctrine in the most cynical possible light: Central activist leftwing lawyers of National Network of Lawyers Against Spiritual Sales (NNLASS). From left: Masaki Kito, Hiroshi Yamaguchi, Yasuo Kawai*

Such interpretive moves are not merely reductive; they risk distorting the internal logic of the belief system itself. Religious language, by its nature, often employs metaphor, symbolism, and exhortation that cannot be meaningfully evaluated through a purely literal or materialist lens. By treating doctrinal statements as if they were operational directives, the court collapses the distinction between belief and practice, thereby rendering any theology that includes sacrificial giving inherently suspect.

The same pattern emerges in the court's treatment of the [Family Federation's](#) global worldview, particularly its characterization of Japan as the "Mother Nation" and Korea as the "Father Nation". Within Unification theology, these designations are part of a broader symbolic cosmology that assigns spiritual roles to various countries. However, the court reduces this complex framework to a single functional claim: that Japanese members are ideologically conditioned to financially support a Korean-centered hierarchy. This interpretation, again, relies on selective emphasis - foregrounding elements that can be construed as exploitative while ignoring those that situate the doctrine within a transnational religious narrative.



*A Japanese woman offering a donation at a meeting. Illustration: Microsoft Designer*

More troubling still is the court's engagement with the concept of "ancestral karma" and the associated practice of "ancestral liberation" rituals. Here, the decision appears to cross from sociological description into theological adjudication. By portraying these rituals primarily as revenue-generating mechanisms, the court implicitly dismisses the underlying beliefs about the afterlife and intergenerational spiritual influence. This is a significant move, as it places the judiciary in the position of evaluating not just the legality of actions, but the plausibility or legitimacy of metaphysical claims.

Introvigne's critique underscores the historical and comparative dimensions that the court neglects. Practices involving donations tied to rituals for the dead - whether in Catholicism, Buddhism, or other traditions - are widespread and deeply embedded in religious life. The

Catholic doctrine of Purgatory, for instance, has long been associated with Masses offered for the dead,

often accompanied by financial contributions. While abuses in this area did provoke the Protestant Reformation, the core practices themselves persist within mainstream Christianity. By singling out the [Family Federation](#)'s comparable rituals as inherently suspect, the court risks applying a double standard that privileges familiar traditions while pathologizing newer or less socially accepted ones.

This selective scrutiny is compounded by the court's apparent willingness to incorporate unverified or contextually ambiguous statements into its narrative. References to alleged remarks by [Hak Ja Han](#) concerning historical grievances between Korea and Japan are introduced without rigorous examination, yet they serve to reinforce an implicit theme: that the [Family Federation](#)'s leadership harbors antagonistic sentiments and leverages them to justify financial flows from Japan to Korea. Such inclusions, drawn from journalistic or secondary sources, further illustrate the reliance on materials that may be more polemical than probative.

The cumulative effect of these choices is a portrayal of the [Family Federation](#) that borders on caricature. It is depicted less as a multifaceted religious movement with global activities - including missionary work, educational initiatives, and charitable programs - and more as a centralized apparatus for extracting wealth from a specific national constituency. Positive or neutral aspects of its operations are acknowledged only briefly, if at all, and are overshadowed by an emphasis on political activities, particularly anti-communist efforts that have historically drawn criticism from certain ideological quarters.

Introvigne's reframing suggests that this imbalance is not incidental but structurally embedded in the evidentiary base the court chose to privilege. When hostile sources are treated as authoritative, and when presenting a differing scholarship is omitted, the resulting narrative will almost inevitably skew negative. This raises broader questions about how courts should approach the study of religion, especially in cases where the stakes include the dissolution of legally recognized entities.



At a doctrinal level, the decision also touches on the boundaries between legal oversight and religious freedom. By interpreting theological concepts as indicators of wrongdoing, the court risks establishing a precedent in which any belief system that encourages material sacrifice could be scrutinized for coercion. This is a potentially expansive standard, given that many religious traditions incorporate forms of tithing, offerings, or [donations](#) as integral components of spiritual practice.

Dr. Introvigne writes,

"If courts start to treat religious doctrines with suspicion whenever they involve [donations](#), many mainstream traditions could become vulnerable. Catholic Masses for the dead, Buddhist memorial offerings, Shinto rites, and countless other rituals in world religions involve financial contributions. To single out one group's beliefs as illegitimate simply because they include significant donations opens a door that no constitutional democracy should ever open."

The concern, then, is not limited to one organization. If the logic applied in this case were generalized, it could extend to a wide array of religious communities, particularly those whose practices are less familiar or less socially entrenched. The distinction between legitimate regulation of harmful conduct and impermissible intrusion into belief becomes increasingly difficult to maintain when courts engage in interpretive analyses that depend on selective readings and adversarial framing.

In this light, the [Tokyo High Court's decision](#) can be seen as emblematic of a broader tension: the challenge of adjudicating disputes involving religion in a way that is both legally rigorous and epistemically fair. Introvigne's critique, especially when sharpened to emphasize the role of selective quotation and hostile sourcing, argues that this balance was not achieved. Instead, the court produced a narrative that, while internally coherent, rests on a foundation Introvigne describes as too narrow, too biased, and too dismissive of alternative perspectives to sustain the weight of its conclusions.

Whether one agrees with this assessment or not, the issues it raises are consequential. They question the standards of evidence, the interpretation of religious language, and the limits of judicial authority in matters of belief. As such, the case is likely to resonate beyond its immediate context, informing ongoing debates about religious freedom, state power, and the complex interface between law and theology in contemporary societies.

Text: Knut Holdhus, editor

Related to hostile interpretation of belief: [Lawfare: State Uses Legal System in War on Faith](#)

More, related to hostile interpretation of belief: [Scholar Questions Secrecy in Dissolution Case](#)

And more, related to hostile interpretation of belief: [Shocked Author: "Japan Ignores Basics of Justice"](#)

Still more, related to hostile interpretation of belief: [Legal Inconsistencies A Blow to Democracy](#)

Even more, related to hostile interpretation of belief: [Japan: Court Accused of Using Speculation](#)

Also related to hostile interpretation of belief: [MEXT's Legal Spin and "Dissolution at All Costs"](#)

Also related to hostile interpretation of belief: [UN Report: Japan's Lawfare Against Faith Minority](#)

And also related to hostile interpretation of belief: [Protesting No Transparency in Closed-Door Trial](#)

More, related to hostile interpretation of belief: [Dangerous Flaws in Dissolution Order Decried](#)

Also related to hostile interpretation of belief: ["Lawyers Lying and Shaming Japan" for 50 Years](#)

And also related to hostile interpretation of belief: [Japan Following the Way of China](#)

And also related to hostile interpretation of belief: [Japan's Dissolution Case Echoes China's Playbook](#)

More, related to hostile interpretation of belief: [Media/Legal Expert: Communism Behind Persecution](#)

And more, related to hostile interpretation of belief: [Militant Lawyers Dictate Government Policy](#)

More, related to hostile interpretation of belief: [Collusion to Rob Minority of Its Rights](#)

And more, related to hostile interpretation of belief: [State and Media Creating "Today's Non-Citizens"](#)

Still more, related to hostile interpretation of belief: [Japan Copying China: State Seizure of Churches](#)

And still more, related to hostile interpretation of belief: [12 Religious Freedom NGOs Denouncing Japan](#)

More, related to hostile interpretation of belief: [4300 Abductions and Forcible Detentions](#)

And more, related to hostile interpretation of belief: [Japan: Families Fear for Graves of Loved Ones](#)

Yet more, related to hostile interpretation of belief: [Lawyers Manipulating, Coercing, Lying](#)

Also related to hostile interpretation of belief: [Kishida Follows Anti-Family Federation Minister](#)

Also related to hostile interpretation of belief: [Militant Lawyers Dictate Government Policy](#)

Still more, related to hostile interpretation of belief: [Malicious One-Sided Government Source Selection](#)

And still more, related to hostile interpretation of belief: [Japan Urged to Make U-Turn](#)

And yet more, related to hostile interpretation of belief: [Dangerous Precedent to Crush Religions](#)

Even more, related to hostile interpretation of belief: [Japan Following the Way of China](#)

Yet more, related to hostile interpretation of belief: [Japanese Communists' Final War](#)

Still more, related to hostile interpretation of belief: [Political and Social Activism behind Oppression](#)

Still more, related to hostile interpretation of belief: [Dissolution Case: Rule of Law on Trial 4th March](#)



# NEWS AND INSIGHTS

HOME ABOUT ▾ TEACHINGS ▾ TOPICS ▾ GENERAL ▾

Friday, April 24, 2026 11:18

CONTACT US ▾

HAK JA HAN ▾

JAPAN ▾

MEDIA ▾

RELIGIOUS FREEDOM ▾

COMMEMORATING ▾

VARIOUS ▾

REVIEWS ▾

## Religious Freedom In Jeopardy After Dissolution

April 23, 2026 • Knut Holdhus

Share:



**Human rights expert points to dangerous precedent for faith and freedom in Japan as dissolution order puts Japan's basic human rights in jeopardy**

The legal controversy surrounding Japan's [dissolution order](#) against the [Family Federation for World Peace and Unification](#) raises profound concerns about the protection of fundamental human rights, particularly the freedom of religion.

See also [Hostile Interpretation of Belief in Tokyo Court](#)

### More Posts



Hostile Interpretation Of Belief In Tokyo Court

April 24, 2026



Legal Offensive Enters Asset Distribution Phase

April 22, 2026



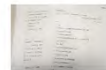
Japan Sued Over "Religious Abuse" Guidelines

April 21, 2026



Cemetery Last Refuge For Displaced Worshippers

April 20, 2026



Scholar: "Unconstitution Invalid" Dissolution

April 19, 2026



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

April 18, 2026



Mental Health Risks Emerge After Dissolution

April 18, 2026



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

In an [analysis](#) published in *Bitter Winter* on 21<sup>st</sup> April, international human rights lawyer Patricia Duval frames the *Tokyo High Court's 4<sup>th</sup> March 2026 decision* not as a routine administrative measure, but as a potentially serious breach of both domestic constitutional guarantees and binding international legal obligations. At the core of the issue lies a tension between state authority

and individual liberties: whether the dissolution of a religious organization can occur without infringing on the essential rights of its adherents.

Japan's Constitution explicitly mandates adherence to international law through Article 98, paragraph 2, which requires the faithful observance of treaties ratified by the state. Among these is the *International Covenant on Civil and Political Rights* (ICCPR), a cornerstone document that



### International Covenant on Civil and Political Rights

protects freedom of thought, conscience, and religion under Article 18. This provision extends beyond private belief to include the public and communal expression of religion – through worship, teaching, and the establishment of institutions necessary for religious life. Duval argues that any state action interfering with these dimensions must meet strict criteria: it must be lawful, necessary, and proportionate to legitimate aims such as public safety or the protection of others' rights.

The *Tokyo High Court's ruling*, however, appears to downplay these obligations. By devoting minimal attention to international law considerations, the decision suggests a narrow interpretation of the legal consequences of dissolving a religious entity. The court maintains that stripping an organization of its legal personality affects only its "secular" functions – such as property ownership or financial management – while leaving believers' religious practices untouched. This distinction forms the backbone of the court's justification: if religious acts themselves are not directly prohibited, then no violation of religious freedom has occurred.

Yet this reasoning is deeply contested. Duval highlights a critical inconsistency in the court's own acknowledgment that dissolution inevitably leads to the [liquidation of assets](#), including [places of worship](#). Such outcomes, the court admits, may create obstacles for believers attempting to continue their religious activities. This concession undermines the claim that the measure is purely administrative. If the practical effect of dissolution is to disrupt communal worship, [limit access to religious spaces](#), and dismantle organizational structures, then it constitutes a tangible interference with the exercise of religion.

From a human rights perspective, this distinction between "legal personality" and "religious practice" is artificial. Religious freedom, as protected under international law, is not confined to internal belief or isolated acts of worship. It encompasses the collective dimension of religion – the ability of individuals to organize, gather, and sustain their faith communities over time. Removing the legal framework that enables these activities effectively erodes the substance of the right itself.

**588** ADDED TO THE FEDERAL LIST OF EXTREMISTS/TERRORISTS (ROSFINMONITORING)

Being on this publicly accessible list stigmatizes believers, hindering their ability to find employment. Other consequences include having their bank accounts blocked and facing difficulties in obtaining or renewing insurance policies, selling property, managing investments, receiving inheritances, or even purchasing mobile phone SIM cards.

This

*Persecution of Jehovah's Witnesses in Russia, where the authorities have managed to brand them as a terrorist organization. Screenshot from "Eighth-Anniversary Special Report", describing the situation as of 1st March 2025.*

Categories

Send us a message

First Name \* Last Name

Email \*

Your Message \*

Submit

interpretation is reinforced by international jurisprudence. The *United Nations Human Rights Committee*, which oversees the implementation of the ICCPR, has consistently held that dissolving a religious organization can violate Article 18. In the 2023 case of *Vladimir Yurlov and others v. Russia*, the Committee found that the dissolution of a local religious association deprived its members of essential rights. Although the state argued that individuals remain free to practice their beliefs informally, the Committee emphasized that the loss of legal status stripped them of critical capacities: owning or renting property, maintaining bank accounts, securing legal protection, and conducting public religious activities. These are not peripheral privileges but integral components of religious life in modern societies.



*Courtroom of the European Court of Human Rights in Strasbourg. Photo (2014): Adrian Gryczuk / Wikimedia Commons. License: CC ASA 3.0 Poland*

The same principle is echoed in European human rights law. The *European Court of Human Rights* has characterized the dissolution of a religious organization as one of the most severe forms of interference with religious freedom. Such a measure, it has stated, requires exceptionally strong justification to be considered necessary in a democratic society. The rationale is clear: dismantling an established religious structure does not merely regulate it – it effectively disables the community's ability to function.

Applying these standards to the Japanese context raises serious doubts about the proportionality and necessity of the [High Court's decision](#). Even if the state pursues legitimate objectives, such as addressing alleged misconduct, the means chosen must be the least restrictive available. Dissolution, by its nature, is an extreme remedy. It eliminates the institutional foundation upon which believers rely to practice their faith collectively. As such, it risks overstepping the permissible limits of state intervention.

Moreover, the implications extend beyond freedom of religion alone. Duval underscores that other rights protected under the ICCPR are also at stake, including freedom of expression and freedom of association. Religious organizations often serve as platforms for collective expression and social engagement. Their dissolution can therefore silence voices, fragment communities, and restrict individuals' ability to associate around shared beliefs. These overlapping areas reinforce the argument that the [High Court's ruling](#) cannot be viewed in isolation; it affects a broader ecosystem of civil liberties.

The upcoming review by [Japan's Supreme Court](#) is thus of critical importance. It presents an opportunity to reassess the balance between state authority and individual rights, and to ensure that domestic law aligns with international commitments. A failure to do so would not only impact the members of the [Family Federation](#) but could set a precedent with far-reaching consequences for religious freedom in Japan.

In essence, the [dissolution order](#) is not merely about one organization but about the integrity of human rights protections in a democratic society. If the dissolution of a religious entity can proceed under the assumption that it leaves believers' rights intact, despite clear evidence of practical rights violations, then the safeguards enshrined in both national and international law risk becoming hollow. Duval's analysis calls for a more rigorous and principled approach – one that recognizes that the deprivation of institutional support is, in effect, a deprivation of the freedom it is meant to sustain.

See also [Hostile Interpretation of Belief in Tokyo Court](#)

**Text:** Knut Holdhus, editor

**Featured image** above: 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 16<sup>th</sup> June 2025. Edited screenshot from UPF video.

**Related to religious freedom in jeopardy:** [Lawfare: State Uses Legal System in War on Faith](#)

More, related to religious freedom in jeopardy: [Scholar Questions Secrecy in Dissolution Case](#)

And more, related to religious freedom in jeopardy: [Shocked Author: "Japan Ignores Basics of Justice"](#)

Still more, related to religious freedom in jeopardy: [Legal Inconsistencies A Blow to Democracy](#)

Even more, related to religious freedom in jeopardy: [Japan: Court Accused of Using Speculation](#)

Also related to religious freedom in jeopardy: [MEXT's Legal Spin and "Dissolution at All Costs"](#)

Also related to religious freedom in jeopardy: [UN Report: Japan's Lawfare Against Faith Minority](#)

And also related to religious freedom in jeopardy: [Protesting No Transparency in Closed-Door Trial](#)

More, related to religious freedom in jeopardy: [Dangerous Flaws in Dissolution Order Decried](#)

Also related to religious freedom in jeopardy: ["Lawyers Lying and Shaming Japan" for 50 Years](#)

And also related to religious freedom in jeopardy: [Japan Following the Way of China](#)

And also related to religious freedom in jeopardy: [Japan's Dissolution Case Echoes China's Playbook](#)

More, related to religious freedom in jeopardy: [Media/Legal Expert: Communism Behind Persecution](#)

And more, related to religious freedom in jeopardy: [Militant Lawyers Dictate Government Policy](#)

More, related to religious freedom in jeopardy: [Collusion to Rob Minority of Its Rights](#)

And more, related to religious freedom in jeopardy: [State and Media Creating "Today's Non-Citizens"](#)

Still more, related to religious freedom in jeopardy: [Japan Copying China: State Seizure of Churches](#)

And still more, related to religious freedom in jeopardy: [12 Religious Freedom NGOs Denouncing Japan](#)

More, related to religious freedom in jeopardy: [4300 Abductions and Forcible Detentions](#)

And more, related to religious freedom in jeopardy: [Japan: Families Fear for Graves of Loved Ones](#)

Yet more, related to religious freedom in jeopardy: [Lawyers Manipulating, Coercing, Lying](#)

Also related to religious freedom in jeopardy: [Kishida Follows Anti-Family Federation Minister](#)

Also related to religious freedom in jeopardy: [Militant Lawyers Dictate Government Policy](#)

Still more, related to religious freedom in jeopardy: [Malicious One-Sided Government Source Selection](#)

And still more, related to religious freedom in jeopardy: [Japan Urged to Make U-Turn](#)

And yet more, related to religious freedom in jeopardy: [Dangerous Precedent to Crush Religions](#)

Even more, related to religious freedom in jeopardy: [Japan Following the Way of China](#)

Yet more, related to religious freedom in jeopardy: [Japanese Communists' Final War](#)

Still more, related to religious freedom in jeopardy: [Political and Social Activism behind Oppression](#)

Still more, related to religious freedom in jeopardy: [Dissolution Case: Rule of Law on Trial 4th March](#)

« Previous  
Legal Offensive Enters Asse... Hostile Interpretation Of Be... Next »



#### GET STARTED

[Home](#) [Privacy Policy](#)

#### SUBSCRIBE TO OUR NEWSLETTER

First Name

Last Name

Your Email Address

I consent to have this website store my submitted information so they can respond to my inquiry

Follow us

