

**Response to Presidential Reference**  
**IN THE SUPREME COURT OF AZAD JAMMU AND KASHMIR**

**Advisory Jurisdiction**

**Presidential Reference No. 01/2026**

**In the matter of:**

**Reference by the President of Azad Jammu and Kashmir under Article 46-A of the Azad Jammu and Kashmir  
Interim Constitution, 1974**

**WRITTEN RESPONSE / SUBMISSIONS BY SARDAR AFTAB A. KHAN ON BEHALF OF THE JAMMU  
KASHMIR COUNCIL ON FOREIGN AFFAIRS (JKCFA)**

**I. Preliminary Statement**

1. These submissions are respectfully filed to assist this Honourable Court in answering the questions referred by the President of Azad Jammu and Kashmir under Article 46-A of the Azad Jammu and Kashmir Interim Constitution, 1974 (President of AJ&K, 2026).
2. The Reference proceeds on a fundamentally incomplete premise. It presents the Jammu Kashmir Joint Awami Action Committee's demand for reform of the twelve non-territorial/refugee seats as if it were a demand to alter the Constitution by force, intimidation or extra-constitutional means. That framing is factually incorrect, legally unsustainable and contradicted by the Government's own official record (President of AJ&K, 2026; JKJAAC, 2025a; Ministry of KA, GB and SAFRON, 2025a).
3. JKCFA does not ask this Honourable Court to abolish any constitutional provision by judicial fiat. JKCFA does not ask the Executive to bypass Article 33. JKCFAC's position is that the existing arrangement for members of the AJ&K Legislative Assembly elected from constituencies other than AJ&K territorial constituencies has produced a serious democratic, electoral and constitutional imbalance and must be reviewed and reformed through the constitutional process (JKJAAC, 2026e; Khan, 2026b).
4. The Government itself recognised this issue as a legitimate legal and constitutional question. The Muzaffarabad Agreement Monitoring & Implementation framework expressly provided for a High-Powered Legal and Constitutional Committee to deliberate on the issue of members of the AJ&K Assembly other than AJ&K constituencies, with legal experts from the Government of Pakistan, the Government of AJ&K and JKJAAC (JKJAAC, 2025a).
5. The Government of Pakistan then formally notified such a committee by Notification No. LAW-4/8/2025-AJJC dated 29 December 2025, pursuant to the agreement dated 04 October 2025, and the notification stated that the committee was to deliberate on the issue of members of the AJ&K Legislative Assembly other than AJ&K constituencies (Ministry of KA, GB and SAFRON, 2025a).
6. A meeting notice dated 31 December 2025 then convened a meeting of that committee for 02 January 2026, again expressly for deliberation on the issue of members of the AJ&K Legislative Assembly other than AJ&K constituencies (Ministry of KA, GB and SAFRON, 2025b).

7. The committee was further modified by a notification dated 06 January 2026, confirming that the Government continued to treat the committee as valid and operative (Ministry of KA, GB and SAFRON, 2026a).
8. JKJAAC repeatedly participated in and invoked this institutional process. By letter dated 25 November 2025 to the Prime Minister of AJ&K, JKJAAC requested the implementation of the signed agreements, the convening of the Joint Implementation and Monitoring Committee, the establishment of an accountable roadmap, the assignment of departmental responsibility, the confirmation of timelines, and transparency. The same letter expressly reaffirmed JKJAAC's commitment to partnership, dialogue and peaceful democratic engagement (JKJAAC, 2025b).
9. By letter dated 18 February 2026 to the Federal Minister for Kashmir Affairs as Chair of the M&I Committee, JKJAAC acknowledged progress recorded in official minutes, identified areas of non-compliance, and requested activation of the High-Powered Constitutional Committee with a clear reporting schedule and a constitutional way forward (JKJAAC, 2026b).
10. On 05 March 2026, JKJAAC's nominees submitted a written protest before the High-Powered Committee while expressly reaffirming commitment to a lawful, constitutional and democratic resolution of the issue concerning members elected from non-territorial/refugee constituencies. That submission further stated that JKJAAC's presence was intended to demonstrate that JKJAAC did not seek to obstruct institutional dialogue (JKJAAC, 2026d).
11. On 18 May 2026, JKJAAC submitted detailed constitutional questions to the High-Powered Committee concerning dual delimitation standards, equality of suffrage, vote weight, Article 25 of the ICCPR, electoral verification, international law, territorial governance and alternative reform models. The document expressly stated that its purpose was not to deny refugee identity or historical status, but to test whether the present structure remains constitutionally coherent, democratically equitable and institutionally sustainable (JKJAAC, 2026e).
12. The Reference omits this entire chain of events. It thereby converts a dispute over the non-implementation of an agreed constitutional review process into an allegation of coercion and subversion. With respect, that is not a fair presentation of the constitutional facts.

## **II. Material Facts Omitted or Understated in the Reference**

13. The Muzaffarabad Agreement implementation materials record that after negotiations on 03–04 October 2025, a Monitoring and Implementation Committee was to oversee and implement the agreement, resolve disputes, formulate working methodology, define timelines, review privileges and monitor implementation (JKJAAC, 2025a).
14. Those Terms of Reference expressly included a High-Powered Committee of legal and constitutional experts to deliberate on the issue of members of the AJ&K Assembly other than AJ&K constituencies (JKJAAC, 2025a).
15. The same M&I checklist treated the formation of that committee as an immediate item and stated that, till submission of its final report, provisions, concessions, allocation of funds and status of ministries under existing arrangements would be held in abeyance (JKJAAC, 2025a).
16. This official record demolishes the allegation that JKJAAC invented an extra-constitutional demand outside the institutional framework. The issue was accepted by the State itself as one requiring legal and constitutional deliberation.

17. JKJAAC's 25 November 2025 letter to the Prime Minister of AJ&K requested urgent directions to the Chief Secretary to convene the Joint Implementation and Monitoring Committee, establish an accountable roadmap, assign departmental responsibility, confirm timelines and ensure transparency (JKJAAC, 2025b).

18. JKJAAC's 09 February 2026 letter to the Prime Minister of Pakistan welcomed the Prime Minister's reaffirmation of the Muzaffarabad Agreement and stated that JKJAAC remained committed to participating fully and constructively in the Monitoring & Implementation mechanism to strengthen institutional credibility, transparency and meaningful implementation (JKJAAC, 2026a).

19. JKJAAC's legal and procedural position paper described lawful remedies for non-implementation, including formal notices, RTI requests, structured mediation within the M&I process, mandamus and judicial review (JKJAAC, 2026c).

20. This record is inconsistent with the Reference's repeated characterisation of JKJAAC as seeking constitutional change through brute force or coercion.

21. The Ministry of Foreign Affairs of Pakistan publicly stated that the people of AJ&K freely enjoy civil and political rights and that Pakistan remains committed to upholding their dignity, safeguarding their rights, including the right to peaceful assembly and protest, respecting their sentiments and advancing their socio-economic development (Ministry of Foreign Affairs, 298/2025, 03 October 2025).

22. JKJAAC's letters repeatedly relied on this official statement as the basis for peaceful democratic engagement (JKJAAC, 2025b; JKJAAC, 2026a).

23. The State cannot represent peaceful assembly and protest as evidence of democratic freedom internationally, while simultaneously asking this Honourable Court to treat peaceful constitutional reform mobilisation as subversion domestically.

### **III. The Constitutional Character of the Dispute**

24. JKJAAC accepts that Article 22 presently contains the non-territorial/refugee seat arrangement. JKJAAC also accepts that alteration of a constitutional provision must proceed through the constitutional amendment mechanism, including Article 33 where applicable (Azad Government of the State of Jammu and Kashmir, 1974).

25. The legal issue, however, is not whether Article 22 can be bypassed. It cannot. The issue is whether citizens and civil society may peacefully demand that competent constitutional organs amend, recalibrate or reform Article 22. They plainly may.

26. A demand for a constitutional amendment is not itself unconstitutional. If it were, no constitutional reform movement could exist. Article 33 exists precisely because constitutional arrangements may require democratic reconsideration.

27. The Reference wrongly equates two very different propositions: first, unlawful alteration of the Constitution outside the prescribed process; and second, lawful public advocacy for alteration of the Constitution through the prescribed process (President of AJ&K, 2026).

28. JKJAAC stands firmly in the second category.

### **IV. The Government's Own Conduct Creates Legitimate Expectation**

29. The Government entered into a negotiated agreement, adopted implementation ToRs, recognised a High-Powered Legal and Constitutional Committee, issued official notifications, convened meetings, accepted JKJAAC nominees and

engaged on the issue (JKJAAC, 2025a; Ministry of KA, GB and SAFRON, 2025a; Ministry of KA, GB and SAFRON, 2025b; Ministry of KA, GB and SAFRON, 2026a).

30. These actions created a legitimate expectation that the issue of members of the AJ&K Assembly other than AJ&K constituencies would be resolved through structured constitutional deliberation.

31. JKJAAC's legal position paper correctly framed the matter through principles of legitimate expectation, procedural fairness, reasonableness, public trust, duty to give reasons and judicial review (JKJAAC, 2026c).

32. Having created that legitimate expectation, the State cannot fairly abandon the agreed process and then characterise public insistence upon its implementation as subversion.

33. The Court is respectfully requested to view the Reference through this lens: the present controversy arises not because JKJAAC rejected constitutional process, but because the agreed constitutional process was not implemented in letter and spirit.

## **V. The Electoral Equality and Delimitation Anomaly**

34. The official Delimitation Commission Notification dated 14 February 2020 expressly records two different bases for constituencies within the same Legislative Assembly: territorial constituencies in AJ&K were distributed, as far as possible, on the basis of population according to the 2017 Interim Census, while constituencies for reserved refugee seats were based on the number of registered voters (AJK Election Commission, 2020).

35. The same notification lists 33 territorial constituencies within AJ&K and then separately lists refugee/non-territorial constituencies spread across Pakistan's provinces, divisions, districts, Rawalpindi municipal wards, Islamabad Capital Territory and Khyber Pakhtunkhwa (AJK Election Commission, 2020).

36. JKJAAC's 18 May 2026 questions to the High-Powered Committee therefore asked what constitutional or statutory provision authorises the same Legislative Assembly to be constituted through two separate apportionment principles: population for territorial seats and registered voters for refugee/non-territorial seats (JKJAAC, 2026e).

37. JKJAAC also asked whether Article 22 protects refugee representation in principle or a permanently fixed allocation of twelve seats irrespective of demographic, electoral or representational change (JKJAAC, 2026e).

38. JKCFA's questions further placed before the Committee the issue of vote weight, noting that 33 territorial seats represented approximately 2.95 million registered voters while 12 refugee seats represented approximately 405,034 registered voters, and asked how such disparities could be reconciled with constitutional equality and democratic norms of equal suffrage (JKJAAC, 2026e).

39. Later policy work updated the voter figures and recorded that 33 territorial constituencies represented 3,365,839 registered voters while 12 non-territorial constituencies represented 438,546 registered voters; on that basis, 12 non-territorial seats constituted 26.7 per cent of the Assembly while the non-territorial electorate represented approximately 11.5 per cent of the total registered electorate (Khan, 2026b).

40. This is a serious constitutional equality question. It is not sedition. It is not subversion. It is precisely the sort of question that a constitutional democracy should be able to examine through institutional mechanisms.

## **VI. JKJAAC Does Not Deny Refugee Identity or the Wider Kashmir Cause**

41. The Reference suggests that reform of the twelve seats would undermine the unity and identity of the State of Jammu and Kashmir or the right of self-determination. That suggestion is incorrect (President of AJ&K, 2026).

42. JKCFA's own materials expressly recognise that AJK is more than a local administrative authority. The paper titled "Azad Kashmir: More Than a Local Authority" argues that AJK is an interim constitutional government connected to the unresolved status of the State of Jammu and Kashmir, the UN plebiscite framework and the broader State Subject community (Khan, 2026a).

43. That same paper recognises that representation of refugees from Indian-administered areas underlines AJK's wider constitutional logic, while also stating that the fixed twelve non-territorial seats, their methods, role and character create electoral imbalance, federal interference, manipulation and disenfranchisement of AJK residents, requiring dialogue and appropriate constitutional amendments (Khan, 2026a).

44. JKJAAC's 18 May 2026 questions expressly stated that the purpose of raising these issues was not to deny refugee identity, historical status or the rights of displaced State Subjects, but to evaluate whether the current institutional structure remains compatible with constitutional democracy, electoral parity and equal representation (JKJAAC, 2026e).

45. The policy paper "Win-Win Formula for Reforming Non-Territorial Seats" similarly proposes not the erasure of refugee identity but a constitutionally protected recalibration from twelve seats to four seats, preserving political and symbolic recognition while correcting distortion in electoral weight (Khan, 2026b).

46. Therefore, JKJAAC's position is not anti-refugee, anti-State Subject or anti-Kashmir cause. It is a democratic reform position: preserve identity, restore proportionality and strengthen legitimacy.

## **VII. UN Resolutions and International Law Do Not Mandate Exactly Twelve Full-Voting Refugee Seats**

47. The Reference relies on the UNCIP framework and the ideology of self-determination to imply that the twelve seats are indispensable. With respect, that argument conflates the right of self-determination with a particular internal seat-allocation formula (President of AJ&K, 2026).

48. The AJ&K constitutional preamble refers to the future status of Jammu and Kashmir being determined according to the freely expressed will of the people and UNCIP resolutions (Azad Government of the State of Jammu and Kashmir, 1974).

49. But the UN resolutions do not require AJ&K to maintain exactly twelve full-voting refugee/non-territorial seats in the Legislative Assembly. JKJAAC specifically asked the High-Powered Committee whether any UN Security Council Resolution, UNCIP Resolution, ICCPR provision or recognised rule of international law explicitly requires that exact arrangement (JKJAAC, 2026e).

50. Available independent analysis similarly records that the UN resolutions do not prescribe reserved migrant/refugee seats in the AJ&K Legislative Assembly; they address ceasefire, demilitarisation and ascertainment of the will of the people (Azadi Times, 2025; Hayat, 2025).

51. The legal identity of refugees and State Subjects may be preserved through State Subject status, consultative representation, proportional representation, Council representation, advisory structures or other constitutionally designed mechanisms. It does not follow that twelve full-voting seats in their current form are permanently required.

## **VIII. Peaceful Public Mobilisation Is Constitutionally Protected**

52. The Reference repeatedly uses expressions such as coercion, brute force, threat of force and subversion. JKJAAC respectfully submits that this language unfairly criminalises a public movement whose documentary record shows repeated reliance on dialogue, agreement, monitoring, legal notices, constitutional questions and institutional participation (President of AJ&K, 2026; JKJAAC, 2025b; JKJAAC, 2026b; JKJAAC, 2026c; JKJAAC, 2026d; JKJAAC, 2026e).

53. JKJAAC's 09 February 2026 letter to the Prime Minister of Pakistan described its 38-point Charter as a people-centred governance and development framework covering justice and human rights, compensation and social protection, constitutional and representation reform, governance, health, education, energy, economy, land, infrastructure, water and telecom upgrades (JKJAAC, 2026a).

54. The April 2026 Urgent Memorandum expressly stated that JKJAAC has carried forward a peaceful and lawful public struggle for fundamental rights, constitutional dignity, public ownership over resources and democratic self-governance (JKJAAC, 2026f).

55. The same memorandum stated that JKJAAC is not opposed to the democratic process, but supports reforms before the 2026 general elections to restore public confidence, ensure near-equal vote value, create a transparent electoral environment and empower the AJK Government and Legislative Assembly (JKJAAC, 2026f).

56. The memorandum further stated that dialogue remained open until 31 May 2026 and that JKJAAC's objective was not confrontation, but dignified implementation of agreed demands and restoration of public trust (JKJAAC, 2026f).

57. JKJAAC does not claim any right to violence, destruction of property, armed action, intimidation of voters or physical prevention of elections. Any individual unlawful act, if proved according to law, may be dealt with individually by the competent forum.

58. But the State cannot use allegations of public-order risk to extinguish the rights of peaceful assembly, association, expression, negotiation and constitutional advocacy.

## **IX. Elections Must Be Timely, But Also Credible and Fair**

59. JKJAAC does not oppose elections. JKJAAC's position is that elections must be credible, transparent, fair and based on equal or near-equal vote value (JKJAAC, 2026f).

60. The April 2026 Urgent Memorandum requested constitutional and electoral reforms before the 2026 general elections, including voter-list revision, publication of voter lists by union councils and polling stations, fair delimitation on approximately equal registered-voter basis, disclosure of development funds and assets, and overseas Kashmiri voting rights (JKJAAC, 2026f).

61. The Reference treats timely elections and reform demands as mutually exclusive. They are not. A constitutional democracy can hold timely elections while also addressing electoral defects through lawful processes.

62. If the Court considers that immediate amendment by an outgoing Assembly is institutionally inappropriate, the answer is not to criminalise reform advocacy. The answer is to preserve constitutional process, direct or advise time-bound deliberation, require reasoned decisions, and allow the incoming Assembly to consider reform on the basis of a completed record.

## X. Constructive Reform Alternatives Exist

63. The Government's Reference presents a false binary: either retain the twelve seats unchanged or surrender the Constitution to coercion. The documentary record shows a third path: constitutional recalibration through Article 33 and related electoral law amendments (President of AJ&K, 2026; Khan, 2026b).

64. The Win-Win Formula proposes reducing non-territorial seats to four constitutionally protected seats, using registered-electorate proportionality, while preserving refugee and State Subject recognition (Khan, 2026b).

65. That proposal recommends amending Article 22 rather than bypassing it, removing the rigid 6+6 bifurcation, introducing a single proportional framework, amending the Elections Act, auditing non-territorial voter rolls, and applying a transition clause so that the revised arrangement takes effect from the next Assembly term (Khan, 2026b).

66. It further proposes reinvesting released seats into broader democratic inclusion, including youth, persons with disabilities, Ladakh/Gilgit-Baltistan and overseas Kashmiris (Khan, 2026b).

67. Whether this precise formula is adopted is for the competent political and constitutional organs. But its existence proves that JKJAAC's position is not destructive. JKJAAC has placed before the State a lawful, transitional, constitutionally amendable and consensus-capable reform path.

## XI. Proposed Answers to the Questions of Law

### Question 1

*Whether Articles 22, 33 and 57 permit alteration, abridgement or abolition of the twelve refugee seats otherwise than by constitutional amendment; and whether a demand to abolish such seats through coercion, brute force and mass obstruction is constitutionally competent or legally maintainable.*

Any alteration, reduction, restructuring or abolition of the twelve non-territorial/refugee seats must be made through the constitutional process, including Article 33 where applicable.

However, a peaceful public demand that the competent constitutional organs initiate such an amendment is constitutionally competent, legally maintainable and protected as political expression, association and democratic participation.

JKJAAC's demand is not for an amendment outside Article 33. JKJAAC's demand is for implementation of an already agreed legal and constitutional review process, followed by reform through constitutional means (JKJAAC, 2025a; JKJAAC, 2026c).

Therefore, the correct answer is that unconstitutional alteration is impermissible, but peaceful advocacy for constitutional alteration is lawful.

### Question 2

*Whether the present Assembly, near the end of its tenure, is competent or suited to entertain such a fundamental amendment, and whether such change belongs to the incoming Assembly.*

A near-expiry Assembly should exercise constitutional restraint in making fundamental structural changes without adequate consultation.

However, the proximity of elections cannot be used to freeze a disputed electoral structure or to delegitimise demands for reform.

If the final amendment by the present Assembly is considered institutionally unsuitable, the proper course is to complete the High-Powered Committee's work, publish its findings, audit the electoral data, and place the matter before the incoming Assembly for decision.

The Court should not answer Question 2 in a manner that immunises the existing twelve-seat arrangement from scrutiny merely because elections are approaching.

A transitional amendment model is available under which reform would take effect from the next Assembly term, thereby avoiding disruption to the existing Assembly (Khan, 2026b).

### **Question 3**

*Whether demand to abolish an entrenched constitutional provision by threat or force amounts to subversion, having regard to accession ideology, UNCIP responsibilities and Articles 56/7/Preamble/Third Schedule.*

Demand by threat or actual use of force to bypass the Constitution would be unlawful. JKJAAC does not claim such a right.

Peaceful demand for constitutional reform is not subversion. It is a recognised feature of democratic constitutional life.

The UNCIP framework and right of self-determination do not mandate the exact present arrangement of twelve full-voting non-territorial/refugee seats (JKJAAC, 2026e; Azadi Times, 2025; Hayat, 2025).

JKJAAC expressly recognises AJK's wider constitutional identity and the rights of displaced State Subjects, but argues that the present fixed numerical arrangement requires democratic recalibration (Khan, 2026a; Khan, 2026b).

Therefore, peaceful reform advocacy is not contrary to the Kashmir cause. On the contrary, democratic legitimacy strengthens the moral and constitutional standing of the Kashmir cause.

### **Question 4**

*Whether freedom of assembly and association extends to a movement whose declared object is to obstruct elections or compel an extra-constitutional amendment.*

Fundamental rights protect peaceful assembly, association, expression, negotiation, strike and democratic mobilisation.

They do not protect violence, armed action, destruction of property, intimidation or physical obstruction of voters.

JKJAAC's record shows repeated commitment to peaceful, lawful and constitutional engagement, including letters to the Prime Minister of Pakistan, the Prime Minister of AJ&K, the M&I Chair and the High-Powered Committee (JKJAAC, 2025b; JKJAAC, 2026a; JKJAAC, 2026b; JKJAAC, 2026d; JKJAAC, 2026f).

The Ministry of Foreign Affairs of Pakistan itself affirmed the right of the people of AJ&K to peaceful assembly and protest (Ministry of Foreign Affairs, 2025).

The Court may therefore clarify that peaceful protest is protected, while unlawful conduct may be regulated by proportionate measures strictly in accordance with law.

### **Question 5**

*Whether the Government is constitutionally obliged to reject extra-constitutional demands, hold elections within time, and take lawful measures to preserve public order and protect the electoral process.*

The Government is bound to hold elections within the Constitution and preserve public order through lawful, proportionate and rights-respecting measures.

The Government is also bound to act fairly, honour its agreements, protect legitimate expectations, engage with constitutional grievances, and complete the review processes it formally created.

Lawful measures cannot include blanket suppression of peaceful dissent, abandonment of a notified constitutional committee, criminalisation of reform advocacy, or refusal to provide reasons for non-implementation of agreed processes. The Government's duty is not merely to reject demands. Its constitutional duty is to distinguish between unlawful coercion and lawful constitutional advocacy, and to respond to the latter through institutions, dialogue and reasoned decision-making.

## **XII. Prayer**

In view of the foregoing, it is respectfully prayed that this Honourable Court may be pleased to answer the Reference as follows:

1. Article 22 may be altered only through the constitutional process, including Article 33 where applicable.
2. Peaceful advocacy for amendment, abolition, reduction, conversion or recalibration of the twelve non-territorial/refugee seats is constitutionally lawful and cannot be treated as subversion.
3. The Government's own agreement, ToRs, notifications and committee process demonstrate that the issue is a legitimate constitutional question, not an inherently unlawful demand.
4. The right of self-determination, UNCIP framework and State Subject identity do not require the permanent continuation of exactly twelve full-voting refugee/non-territorial seats in their present form.
5. Peaceful assembly, protest, association and constitutional reform advocacy remain protected, subject only to reasonable, proportionate and lawful restrictions against specific unlawful conduct.
6. The Government must hold elections within the constitutional timeframe, but must also ensure that electoral processes remain credible, transparent and consistent with democratic equality.
7. The Government should complete or revive the High-Powered Legal and Constitutional Committee process, publish its report, disclose relevant electoral data, provide reasons for any disagreement, and place any proposed reform before the competent constitutional forum.
8. Any future public-order measures must be lawful, proportionate, non-punitive and rights-respecting, and must not criminalise peaceful constitutional dissent.

## **XIII. Concluding Argument**

My Lords, the Reference presents this matter as a contest between the Constitution and coercion. That is not the true controversy. The true controversy is between an agreed constitutional review process and its non-implementation. The Government itself agreed to a High-Powered Legal and Constitutional Committee on members elected from constituencies other than AJ&K constituencies, notified that committee, convened meetings and accepted JKJAAC nominees. JKJAAC repeatedly wrote to the Prime Minister of Pakistan, the Prime Minister of AJ&K, the M&I Chair and the High-Powered Committee seeking implementation, timelines, written compliance and constitutional deliberation. JKJAAC accepts that Article 22 can only be amended through the Constitution. But a peaceful demand for constitutional amendment is not subversion. The official Delimitation Commission record itself shows a structural anomaly: territorial constituencies are based on census population, while refugee constituencies are based on registered voters spread across Pakistan. JKJAAC's case is one of equal vote, fair delimitation, democratic legitimacy and constitutional recalibration.

The Court may advise that no amendment can bypass Article 33, but it should also advise that peaceful reform advocacy is lawful, that the Government must honour its own committee process, and that public order measures must not suppress constitutional dissent.

**JKJAAC does not seek to shrink AJK’s constitutional identity; it seeks to democratise it. AJK is more than a local authority, but that wider constitutional role must be exercised through equal, accountable and proportionate representation. The present twelve-seat structure is not sacred or immutable. It is amendable, and JKJAAC has pursued lawful, constitutional and institutional routes for its reform.**

## **XIX. Annexure List**

- Annexure A — Presidential Reference dated 03 June 2026.
- Annexure B — Ministry of Foreign Affairs Press Statement No. 298/2025 recognising the rights of AJK people, including peaceful assembly and protest.
- Annexure C — Muzaffarabad Agreement M&I ToRs and Checklist dated 05 November 2025.
- Annexure D — JKJAAC letter dated 25 November 2025 to Prime Minister AJ&K.
- Annexure E — Federal Government Notification dated 29 December 2025 constituting High-Powered Committee.
- Annexure F — Meeting Notice dated 31 December 2025.
- Annexure G — Modification Notification dated 06 January 2026.
- Annexure H — JKJAAC letter dated 09 February 2026 to Prime Minister of Pakistan.
- Annexure I — JKJAAC letter dated 18 February 2026 to Federal Minister for Kashmir Affairs / M&I Chair.
- Annexure J — JKJAAC legal and procedural position paper on implementation of the Muzaffarabad Agreement.
- Annexure K — JKJAAC Conditional Participation and Formal Protest dated 05 March 2026.
- Annexure L — AJK Delimitation Commission Notification dated 14 February 2020.
- Annexure M — JKJAAC Questions for High-Powered Committee dated 18 May 2026.
- Annexure N — Azad Kashmir: More Than a Local Authority.
- Annexure O — From Protest to Promise.
- Annexure P — Win-Win Formula for Reforming Non-Territorial Seats.
- Annexure Q — Urgent Memorandum dated April 2026.

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