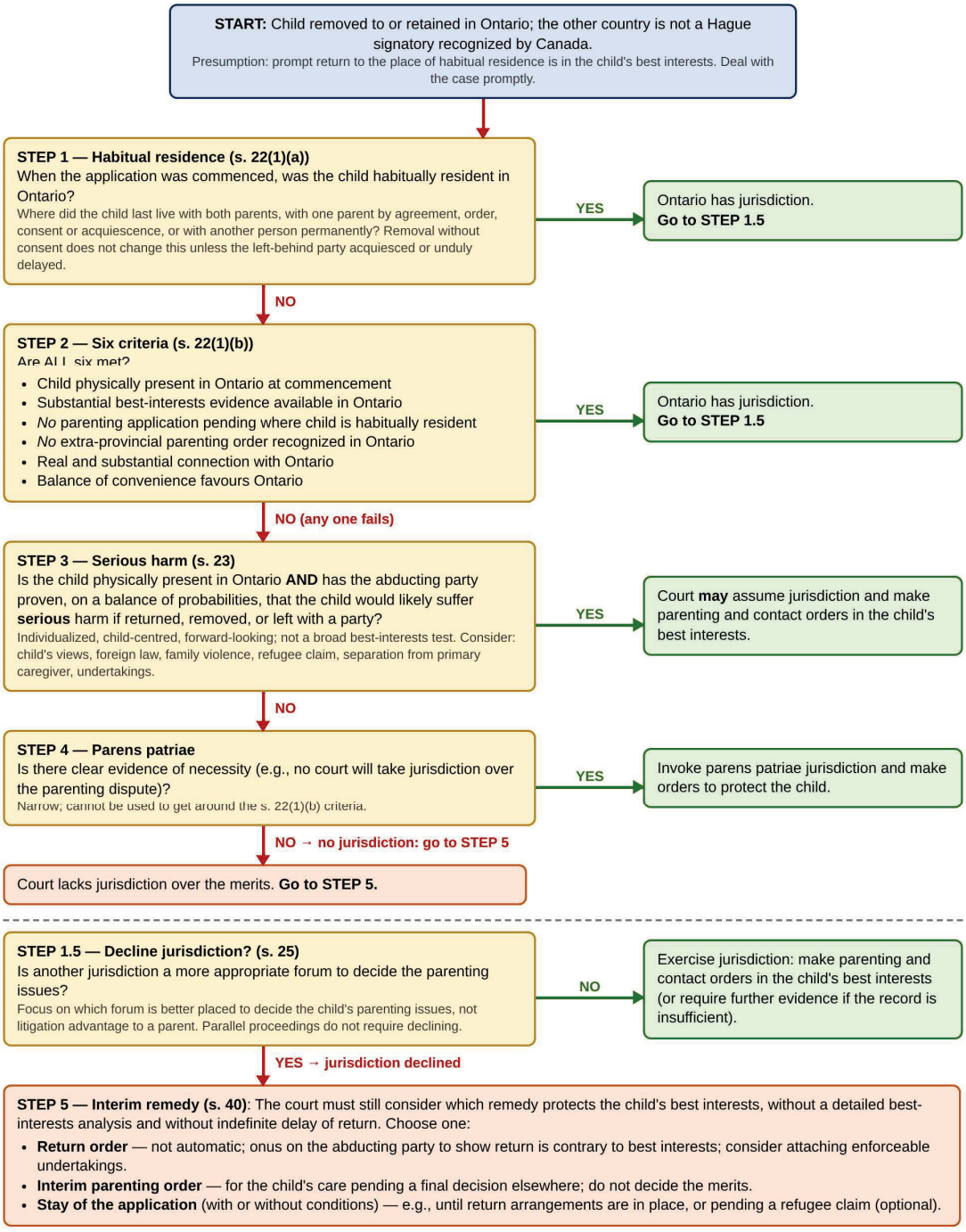
Non-Hague Wrongful Removal and Retention: Judicial Decision Flowchart

Ontario — Part III, *Children's Law Reform Act* (CLRA). Only one basis of jurisdiction needs to be established.



Prepared by **Epstein Cole** for use by the AFCC-O's 18th Annual Conference. This "roadmap" refer and rely upon the noted sections of the *Children's Law Reform Act*, R.S.O. 1990, c. C.12 and relevant case law to October 13 2026, and is an Appendix to a paper by Brynne Thomas, Epstein Cole LLP, *Navigating Wrongful Removals and Retentions in the Non-Hague Context: A Roadmap*.