

NOTE: Where it is feasible, a syllabus (headnote) will be released, as is being done in connection with this case, at the time the opinion is issued. The syllabus constitutes no part of the opinion of the Court but has been prepared by the Reporter of Decisions for the convenience of the reader. See *United States v. Detroit Lumber Co.*, 200 U. S. 321, 337.

# SUPREME COURT OF THE UNITED STATES

Syllabus

## RATZLAF v. UNITED STATES

CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

No. 92-1196. Argued November 1, 1993—Decided January 11, 1994

As here relevant, federal law requires a domestic bank involved in a cash transaction exceeding \$10,000 to file a report with the Secretary of the Treasury, 31 U. S. C. §5313(a), 31 CFR §103.22(a); makes it illegal to "structure" a transaction—*i.e.*, to break up a single transaction above the reporting threshold into two or more separate transactions—"for the purpose of evading the reporting requiremen[t]," 31 U. S. C. §5324(3); and sets out criminal penalties for "[a] person willfully violating" the antistructuring provision, §5322(a). After the judge at petitioner Waldemar Ratzlaf's trial on charges of violating §§5322(a) and 5324(3) instructed the jury that the Government had to prove both that the defendant knew of the §5313(a) reporting obligation and that he attempted to evade that obligation, but did not have to prove that he knew the structuring in which he engaged was unlawful, Ratzlaf was convicted, fined, and sentenced to prison. In affirming, the Court of Appeals upheld the trial court's construction of the legislation.

*Held:* To give effect to §5322(a)'s "willfulness" requirement, the Government must prove that the defendant acted with knowledge that the structuring he or she undertook was unlawful, not simply that the defendant's purpose was to circumvent a bank's reporting obligation. Section 5324 itself forbids structuring with a "purpose of evading the [§5313(a)] reporting requirements," and the lower courts erred in treating the "willfulness" requirement essentially as words of no consequence. Viewing §§5322(a) and 5324(3) in light of the complex of provisions in which they are embedded, it is significant that the omnibus "willfulness" requirement, when

applied to other provisions in the same statutory subchapter, consistently has been read by the Courts of Appeals to require both knowledge of the reporting requirement *and* a specific intent to commit the crime or to disobey the law. The "willfulness" requirement must be construed the same way each time it is called into play. Because currency structuring is not inevitably nefarious, this Court is unpersuaded by the United States' argument that structuring is so obviously "evil" or inherently "bad" that the "willfulness" requirement is satisfied irrespective of the defendant's knowledge of the illegality of structuring. The interpretation adopted in this case does not dishonor the venerable principle that ignorance of the law generally is no defense to a criminal charge, for Congress may decree otherwise in particular contexts, and has done so in the present instance. Pp. 5-15.

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976 F. 2d 1280, reversed and remanded.

GINSBURG, J., delivered the opinion of the Court, in which STEVENS, SCALIA, KENNEDY, and SOUTER, JJ., joined. BLACKMUN, J., filed a dissenting opinion, in which REHNQUIST, C. J., and O'CONNOR and THOMAS, JJ., joined.