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When Ignorance Shields the Guilty: A Critical Study of Immunity under Mistake in Criminal Law

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Abstract

The doctrine of mistake in criminal law presents a paradox between the principle of ignorantia juris non excusat (ignorance of the law is no excuse) and the concept of mens rea (guilty mind). This paper critically examines how the classic refusal of the mistake of law defense has become a tool of inequality, particularly in the realm of white-collar and corporate crime. Defendants in these areas can exploit the unclear nature of rules or claim selective ignorance to escape liability, while the less privileged are denied the same opportunity. The paper employs a doctrinal and comparative methodology, analyzing the development of the mistake defense, judicial interpretations, and the codification of statutes, including the Bhartiya Nyaya Sanhita (BNS), 2023. The views of scholars such as Simons and Hamdani are considered to elaborate on the philosophical and moral issues surrounding culpability and ignorance. The paper argues that the law's failure to distinguish between reasonable and willful blindness contributes to the inadequacy of the justice system, allowing individuals of privilege to use ignorance as a strategy to avoid accountability. Ultimately, the research proposes a selective and reasonableness-based remedy, suggesting that courts make objective decisions considering the accused's capacity, knowledge availability, and intention. This approach aims to prevent the misuse of the mistake defense as a loophole for the guilty while ensuring genuine justice within the current legal system.

Keywords: Mistake in Criminal Law, Ignorantia Juris Non Excusat, Mens Rea, White-collar Crime, Corporate Crime, Willful Blindness, Mistake of Law, Bhartiya Nyaya Sanhita (BNS).

1. Introduction

It is one of the foundations of the criminal justice system to punish an alleged guilty mind or mens rea. The one, who is persuaded that a possession of other is his, does not possess such guilty state of mind and is not a thief. This argument is what constitutes the mistake of fact defense, which is a general exception accepted in a great part of legal tradition, including the common law and present-day laws like the Bhartiya Nyaya Sanhita (BNS), 2023. This is a mere common sense; it puts the law to our moral notion of guilt.

The law, though, sees a unique advantage, and performs a demarcation which is generally bloody. It clings to the ancient Roman proverbs: ignorantia juris non excusat--ignorance of the law no excuse. The policy of application of the law means that all people are aware of its directives. This, That I, that I can say it illegal, that by way of opening the gates to the propositions of frivolity A general ignorance may enter, and may put the law in the teeth of raging foes (Educaloi, 2022).

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This rigidity in dichotomy is challenged in this paper because it is not the only factor that makes it unstable and unfair. Taking into consideration the hyper-complex financial laws, tortuous tax laws, and crafted in a complex environment of environmental regulations, it is unrealistic, or perhaps unjust, to presuppose perfection of the law. The allegation of this paper says that the doctrine of ignorantia juris that was expected to defend the rule of law has been turned into two-edged sword. On the one hand it penalizes here marginalized and ignorant citizen. Instead, and more to the point of the thesis of this paper, it is an advanced cover on behalf of the guilty.

This "shield" manifests in several ways:

1. **Willful Blindness:** Individuals intentionally avoid confirming facts to maintain a defense of ignorance.
2. **Corporate Structuring:** High-level executives delegate tasks and compartmentalize information, allowing them to plausibly deny knowledge of criminal acts committed by their subordinates for the corporation's benefit.
3. **Exploitation of Complexity:** In highly regulated fields (like finance or pharmaceuticals), actors can claim a "mistake" in interpreting a complex, ambiguous statute, effectively blurring the line between a non-defensible mistake of law and a defensible mistake of fact.

This paper will critically analyze these mechanisms. It will address conceptual boundaries at fact, criminal, and non-criminal case errors based on the decades of scholarship on this concept. It will also compare the operationalizations of these defenses both in the common law tradition and in the new Indian BNS through a comparative prism. Later on this paper will argue that to administer the honestly guilty the penalty demanded by the law requires the development of the law in a manner that goes beyond ordained maxims, and the achievement of structured deniability.

2. Literature Review

This rich academic debates on mistake in criminal law are centered on the conceptual, practical, and philosophical inconsistency of the various ideas of mens rea and public policy.

2.1. The Foundational Divide: Fact vs. Law

The literature presents a clear historical and significant separation on the mistake of fact and the mistake of law in the criminal jurisprudence. This is a gap which constitutes the basics of the criminal responsibility in that the state of mind of a defendant i.e. mens rea was indeed guilty or not. The mistake of fact, in simple terms, refers to an individual committing an act of factual error that is true and reasonable without paying attention to the mind aspect of the crime commission. One of the instances is in a normal scenario; a person picks the wrong suitcase at the airport and believes that it belongs to him or her. This is not carried out to deprive the subject of

their property permanently so that the mens rea to commit theft is absolved (LawSikho, 2022; LawColloquy, 2020). On the other hand an error of law is when the party has not clearly understood or is not aware of the existence of a legal prohibition of his actions- e.g. the party has not realized that the possession of a control substance or weapon is a crime.

This has been one of the major differences which has been a main aspect of judicial rationale in common law nations. This has been the old legal doctrine of excising actual errors of fact whilst refusing errors of law in practice in general. According to Miller (2018) and Educaloi (2022), the justification of such rejection is based on the policy rule in which the law is legally consistent and publicly known. When ignorance of law is taken as one of the defences, individuals would always evade liability because they would say that they do not know what they are liable to. It is the maxim that is developed or is codified in the most legal regimes that have been influenced by the English common law, which is partial to certainty and the presumption that everyone is supposed to be aware of the legal regimes that govern their behavior (Wikipedia, 2005).

This rule has its philosophical foundation in the development of social order and deterrence. The law assumes that an existing society is dependent on a stable and predictable legal system over which citizens in the society have no chances to influence the selection of the law. An exception of ignorance would be counterintuitive to this predictability and would foster the willful ignorance on the part of which the wrongdoers escape because of wrongful knowing. Hence general justification is the inflexibility to be grounded on the basis of administrative necessity and popular interest since enquiring into the subjective ignorance of each defendant would place the entire justice system in a state of paralysis.

This, however, is a classical procedure that has become more and more criticized in the modern-day scholarship. The assumption of equal access of law by all people is problematic by itself. As laws, regulations as well as administrative laws become increasingly more complex especially in the economically diversified societies that were technologically advanced at the time it is unrealistic to expect the common citizen to know the laws. The boundaries of the legality regarding the spheres of regulatory dimension, paying taxes, environmental issues and data security cannot be recognized even by specialists. The blind rejection of the mistake of law defenses can thus disproportionately affect the persons who are either illiterate or simply cannot afford a lawyer and indirectly the one who can comprehend or bend the heady rules of law.

This growing imbalance between doctrine and the realities of today shows that it is time to review the initial drawing boundary. The fairness principle (guilt of mind a necessary requirement to be punished) verses policy maxim (universal knowledge of the law) dilemma has remained one of the most important philosophical challenges on the criminal jurisprudence.

2.2. Modern Codifications: The *Bhartiya Nyaya Sanhita*

The debate has evolved over the last several years to reconciliation of the difference between fact and law and this matter inflicts interest among scholars and legislators. After its introduction in India in 2023, the Bhartiya Nyaya Sanhita (BSNS), 2023, is some new rules which supersede the older, colonial-era Indian Penal Code (IPC) of 1860, again provocatively bringing content on the relevance of the mistake defenses and legal reform fascinating. According to Goswami (2025), the correction of the error, actual or otherwise, for the BNS, is exposed to new statutory prism.

As the analysis of Goswami, the section of the General Exceptions of the BNS still has the nature of the provisions in the IPC, especially those that are founded on English common law. However, it has introduced nuance in language that knows the situational context of intention and knowledge. The defense of mistake of fact is even maintained with reference to the fact that the criminal intent can be annuled in case of an honest and reasonable mistake of fact. Indicatively, acts of good faith involving performance of a warrant that is canceled later in time, is not an offense under IPC of Section 76 and 79 (modernized) now clausified in BNS.

As stated by Warren (2025), the BNS error of treatment is closely near to the common law tradition and an increment of focus that is given to the examination of the mens rea and proportionality. It is interesting to note that the new code has been drafted with more contemporary and simple language and is therefore easier to understand by the people and also due to the dynamic moral and social standards of justice. It is more a procedural modernization effort, but this process, in general, heralds the re-examination of the principles of such acts as mistake of law.

In accordance with suggestions by the researchers (SSRI, 2024), the BNS provides a discrete statutory rubric, by the standards of which the traditional doctrines are supposed to be confronted with the obstacle of contemporary situations, particularly in the Indian socio-legal environment. The new codification empowers the courts to review how the hard and fast nature of mistake of law continues to be fair within the digital regulation era, the business-trans-national world, and the complex system of administration. This can be seen with increased use of the cyber laws and financial regulatory requirements which compel individuals unknowingly to engage in an activity which is illegal due to the obscurantist or emerging requirements.

The BNS is therefore, a continuum and a potential breakage with the former doctrines. Though this does not permit exactly the maxim ignorantia juris non excusat, it affords interpretative flexibility as it applies to identifying reasonable ignorance especially in a case situation where the law is ambiguous or unavailable. According to Goswami (2025), this leeway may establish a new justice system that would be more of a just system the one that punishes the people who intend to do a bad act but not those who do it under a criminal error.

Furthermore, the fact that the BNS has become an unalterable focal point of the general legal reform movement in India is a sign that the philosophy of legislation has been shifted considerably. It repossesses itself and ceases to be subject to the assumption of universal law literacy of the colonial type but instead by the possibility of a time to come to be even able even to accept context-sensitive justifications, based on the reasonableness and not necessarily exclusionary. This development is in line with other developments that are taking place in the rest of the world with regards to the legal systems that are beginning to question the possibility of strict liability of ignorance to remain consistent with any modern day democratic ideals of fairness, proportions, and access to justice.

2.3. Conceptual Challenges: The Blurring Line

There is abundant critical literature which indicates that the distinction between fact and law is not quite as long and sound as we might imagine: the distinction is too conceptually feeble, and practically invalid. These researchers such as Simons (2009) stress that the cases in the real world scenario do not necessarily fit in either one category but are, in fact, hybrid errors, which consist of both factual and legal misunderstanding.

To illustrate, a user caught in possession of a controlled substance and who truthfully thinks it is aspirin would have to be thought of. This can be referred to as the error of fact as the individual had no knowledge of the nature of the physical object. However, it can also be classified as an error of law in the case where the same person takes into consideration that carrying the said substance is, also, not an offense. The difficulty is how much, when one is to commence and where the other begins. In practice, these distinctions are often based on judicial interpretation as opposed to objective standards and such a result might lead to unequal and even biased outcomes.

Simons (2012) proceeds to treat this statement further to the error he terms as a noncriminal law of the time a human being makes an error in a case coupled in civil law that would prove to be a criminal offense on a later date. In order to describe such case, a citizen who believes that there is a valid right to him to use a property under a civil set-up, and is then accused of committing criminal trespass, the demarcation between the presence of a civil misunderstanding and the wrongdoing is dull. Once this occurs, it will reduce the reasoning of a human being and blameworthy moral Cartesian acts to refer to the error either as a factual or a legal one.

Through such conceptual matters, more international questions are raised as to fairness and proportionality in criminal responsibility. Suppose that the ultimate purpose of criminal law is to serve moral blameful acts, then, it would seem as though penalizing individuals that act under an honest, but faulty understanding of legality would be bringing about all manner of inconsistencies to the idea of culpability. In addition, where the legal regulations are technical and dynamic, as in the case of the environmental law, securities law or international trade, when an average patient can hardly be able to distinguish between legal and illegal behaviour at all times.

This kind of critical analysis of the scholarship shows how structural inequality is built into the doctrine. It is the attorneys and others in the legal community who steal the gray areas of the law to be and is happy to be uninformed, and the common people in the society very rarely get the opportunity to appeal to the gray areas of the law since they know very little or nothing about law. Thus the categorical rigidity existing now in reality and law may defend systemic injustice to the benefit of individuals who have greater access to the legal professionals.

These advances have led to other academicians putting towards the defence of a reasonableness based test whereinby the defendant must then demonstrate that his/her mistake of fact or law was committed in good faith and that circumstances relative to the mistake are such that a reasonable individual would have placed him/her. It would also retain the deterrence value in ignorantia juris non excusat it would be lenient when the ignorantia is in fact non-culpable ignorance. Some propose a compromise defense model, according to which the mistake of law is able to mitigate, but not remove the criminal culpability.

2.4. Culpability, Cost, and Strategic Ignorance The best literature and the major topic of the thesis elucidated in the paper is the relationship between ignorance and culpability. A. Hamdani (2007) study investigates the cost of ignorance and how it is related to mens rea. The concern is whether punishing individuals is just given that the cost of studying law is prohibitively expensive.

The latter is the most cut-throat in the sphere of corporations. The Georgia Criminal Law Review (n.d.) specifically touches on the incentives where the Model Penal Code (a major cause of influence on the U.S. criminal law) may generate the ignorance among corporate executives. The present paper is a report concerning how both the shortsightedness of some component of the corporation and the spread of responsibility on the management level allow the most senior players to escape the sophistication of possessing knowledge, as they continue to enjoy the benefits of their crime. It is with this process that the ignorant seek shelter to the guilty. The priorities of the law in the subjective knowledge of the facts cannot possibly embrace the guilty ignorance.

2.5. Gaps in the Literature There is a gap in the literature regarding the way in which the conceptual vices of the defenses are made practical into a legal defense weapon particularly in respect to sophisticated actors. This paper intends to fill that gap and is aimed at tying in abstract criticism of the fact/law divide with practical, strategic implementation of the concept of structured ignorance in both the corporate and complex crime by using the BNS as a contemporary day case study.

3. Methodology

This study will employ a **qualitative, doctrinal, and comparative research methodology**.

1. **Doctrinal Analysis:** The main part of the paper will be a doctrinal analysis of the law of mistake. This involves:
    a. **Textual Analysis:** To interpret its statutory law relating to mistake of fact in common law countries, a close review of first-hand legal texts, namely, the chapters on the general exceptions in Bhartiya Nyaya Sanhita, 2023, to inquire about whether it covers the mistake of law.
    b. **Case Law Review:** Overview of landmark cases (courts such as the UK, the USA, and the Indian jurisdiction) involving the definition of the boundaries of the mistake of fact and mistake of law. This will concentrate on the instances in which the defense was contentious or one in which the area of willful blindness occurred.
2. **Comparative Analysis:** The paper will analyze the traditional approach of common law (Reddy, 2025) in place of the mistaken and the codified structure of the BNS (Goswami, 2025; Warren, 2025). This analogy will evaluate the fact that whether or not the new Indian code has improved on the known defects of the common law doctrine or just re-coded them and left the same loopholes open.
3. **Conceptual and Critical Analysis:** This research will also heavily rely on the secondary sources presented especially the theoretical concepts of legal experts (Simons, 2009, 2012; Hamdani, 2007). The methodology will be to:
    a. **Synthesize:** Integrate the theoretical critiques of the fact/law distinction.
    b. **Apply:** Put these critiques into practice by evaluating imaginary and real-life cases involving white-collar and corporate crime (Georgia Criminal Law Review, 2025).
    c. **Evaluate:** Assess the *consequences* of the legal rules, focusing on how they create "perverse incentives" (i.e., incentivizing ignorance).

The approach unites the academic commentary with the critical analysis of legal texts, case law, and critical analysis of the legal texts as it does not entail collection of empirical data but rather tends to construct an argument regarding the functional and ethical inadequacies of the law.

4. Discussion

This section critically examines the doctrines and transits to their questionable applications based on their just foundations.

4.1. The Necessary Shield: The Moral Case for Mistake of Fact The defense of mistake of fact is no exception to criminal law; it is a condition of a moral criminal law. Punishing someone who has no mens rea of committing an offence is to separate the law and culpability.

- **Negating *Mens Rea***: In this defense, the defendant must prove that he/she lacked the necessary state of the mind. In case the crime is the possessing of stolen goods having the knowledge involved, the honest (and conceivably reasonable) belief that the goods have been the result of some legitimate gift is a direct denial of the aspect of having the knowledge."
- **The BNS Framework:** In such passages as those based on the former IPC (e.g., Section 76 and 79), this is codified. It justifies one who acting in good faith (i.e. without intention to commit an act of law) by reason of a mistake of fact, believes himself to be bound/justified by law.
- **The "Good Faith" Qualifier:** It is important that the term good faith (with all the connotations of due care and attention) has been added. It does not allow the defense to be applied in a haphazard manner. It would not be on good faith to put on an "ostrich defense" (deliberately avoiding facts). This is however hard to police as we will see.

4.2. The Rotting Foundation: The Unsuitability of *Ignorantia Juris* The maxim ignorantia juris non excusat is based on a legal fiction: that all citizens are cognizant of the law. Although such fiction might work in an age of a small number, either simple or common sense laws (e.g. malum in se offenses such as murder or theft), it cannot be sustained in a modern regulatory state.

- **The Problem of Complexity:** Current law also contains malum prohibitum crimes known as crimes as criminal only because they are criminal (e.g. obscure financial reporting rules, environmental discharge limits, complex tax codes).
- **The "Cost of Knowledge":** Based upon the work of Hamdani (2007), the cost to a common citizen, to a small business owner, acquiring and maintaining perfect legal knowledge, is basically infinite.
- **Injustice:** The stringent regulation may therefore play the role of punishing those who are just not morally guilty but just capsizing in a pool of regulation. It does not take the difference between the citizen who was unable to know the law and the citizen who did not bother to know.

4.3. The Strategic Shield: How the Guilty Exploit Ignorance This is the main thesis. The simplistic categories of the legal (fact/law, knowledge/ignorance) are easily used by advanced actors.

- **The "Willful Blindness" Gambit:** The reason is the development of the so-called doctrine of the Willful Blindness or conscious avoidance by the law. According to this doctrine, when a defendant

intentionally evaded the acquisition of a high probability fact, the law can designate him as having the same.

- **The Loophole:** This is a high mark to the prosecutors. The executive must have an uncertainty approach that is practically certain that the criminal act is taking place and he should not affirm it. The intelligent executive just does not find himself in a predicament to be almost confident."

- **Structured Ignorance in the Corporate Context:** This is the strongest armor. According to the argument presented by the Georgia Criminal Law Review (n.d.), a contemporary corporation is the ideal means of creating ignorance.
  - **Scenario:** A CEO provides aggressive (yet no more or less illegal) profit goals. These targets are attained by a mid-level manager through dumping of toxic waste unlawfully or by bribery. The CEO will never inquire on how the targets are achieved.
  - **The Defense:** The CEO, when prosecuted, states that he did not know this illegal activity. They were not aware of the issues (the dumping, the bribe), thus they do not have mens rea. The corporate hierarchy insulates them.
  - **The Failure of the Law:** The law fails in this case since it aims at getting actual knowledge. A CEO is not guilty of the crime of neglect in his supervision, or even of recklessness (in the majority of laws). The act is not aimed to reprimand a guilty neglect to investigate. The carefully constituted and nurtured ignorance of the CEO covers them in the offenses that they implicitly encouraged.

4.4. The Blurring of Fact and Law as a Sophisticated Defense Drawing on Simons (2009, 2012), sophisticated actors exploit the ambiguity between fact and law.

- **The "Interpretation" Defense:** In specialized regulatory areas (such as securities law), a group of highly paid attorneys can give a complicated and good-faith (but ultimately erroneous) reading of a regulation that allows a profitable but unlawful act.
- **The Shield:** The executive asserts that it was not confused about the law (no defense), but confused about the fact of their legal duties, upon the advice of their lawyers. Mostly it is presented in terms of relying on advice or an error concerning a non-criminal aspect of the law.
- **The BNS:** The BNS seems to have no solution to such ambiguity. Its dependence on the distinction between the simple and the fact/law inherited by the 19 th -century IPC is hardly suited to the 21 st century corporate crime.

5. Conclusion

Mistake in criminal law defense shows a system against itself. It appropriately attempts to safeguard the morally innocent by entailing mens rea, and permitance of mistake of fact, defence. It is at the same time a hold onto the archaic fiction that ignorance of the law is no defence, which is unfairly applied on the common man and uselessly imposed on the high power.

As discussed in this paper, this doctrinal incoherence poses a fatal weakness. The dichotomous terms of fact and law, know and unknowledge, ignorance and non-ignorance are simply insignificant to the tactics of strategic ignorance and systematized deniability of contemporary white-collar and corporate crime. The in-place formulation of the law is incentivizing executives to learn as little as possible, to outsource dirty work, and construct plausible deniability into their corporate organizations. In such a scenario the ignorance is not a state-of-mind, but a developed asset, a legal shelter.

By reproducing by a large extent the traditional common law exceptions, the Bhartiya Nyaya Sanhita, 2023 has lost the opportunity to innovate and deal with this 21 st century issue.

For the law to be effective and just, it must evolve.

1. **Re-evaluate *Ignorantia Juris***: The law must reconsider a narrowed version of mistake of law, where the law is obscure and complex, and the mistake was an ordinary misunderstanding such as would protect the ordinary citizen but not the sophisticated lawbreaker who ought to have been aware better.
2. **Codify "Willful Blindness" Plus:** The law ought to be made less demanding as regards the shoulder of willful blindness. Perhaps, a shift toward a more lenient standard of corporate supervisors, i.e., toward a standard of recklessness/negligence, i.e., they should have known is required to lift the corporate veil.
3. **Focus on Culpable Indifference:** The legislation needs to devise a means of penalising the guilty negligence in inquiry. A high-pressure environment, which is predictably prone to crime, is created by an executive and painstakingly evaded in regards to the placing the executive in the position of learning the facts is culpes. The ignorance they choose to have is not their fault and it ought to be treated by the law.

The doctrine of mistake will still be used as a cover-up to the guilty until these reforms are considered, diminishing the trust that the community has on the concept of equal justice before the law.

References

1. Educaloi, *Ignorance of the Law is No Excuse* (13 January 2022) https://educaloi.qc.ca/en/capsules/ignorance-of-the-law-is-no-excuse
2. *Georgia Criminal Law Review*, *How the Model Penal Code Incentivizes Ignorance among Corporate Executives* (n.d.) https://digitalcommons.law.uga.edu/cgi/viewcontent.cgi?article=1050&context=gclr
3. Goswami A., *Shielding Justice: A Comprehensive Analysis of the General Exceptions under the Bhartiya Nyaya Sanhita, 2023*, *International Journal of Law and Legal Research* (16 May 2025) https://www.ijllr.com/post/shielding-justice-a-comprehensive-analysis-of-the-general-exceptions-under-the-bharatiya-nyaya-sanh
4. Hamdani A., "Mens Rea and the Cost of Ignorance" (2007) 93(3) *Virginia Law Review* 415 https://virginialawreview.org/wp-content/uploads/2020/12/415.pdf
5. *LawColloquy*, *Mistake of Fact* (30 November 2020) https://lawcolloquy.com/publications/blog/mistake-of-fact/169
6. *LawSikho (iPleaders)*, *Mistake of Fact and Mistake of Law as a Defence* (27 January 2022) https://blog.ipleaders.in/mistake-fact-mistake-law-defence/
7. Miller J. L., *Ignorance of the Law is Not an Excuse*, *New Jersey State Bar Foundation* (22 April 2018) https://njsbf.org/2018/04/23/ignorance-of-the-law-is-not-an-excuse/
8. *Oxford Academic*, *A General Definition of the Defence of Mistake of Law*, *Oxford University Press* (3 August 2022) https://academic.oup.com/book/44023/chapter/371882126
9. Reddy S. A., *Mistake as a Defence in Common Law* (23 October 2025) https://www.scribd.com/doc/282063715/Mistake-as-a-defence-in-common-law
10. Simons K., "Mistake of Fact or Mistake of Criminal Law?" (2009) 3(2) *Criminal Law and Philosophy* 213–231 https://scholarship.law.bu.edu/faculty_scholarship/723/
11. Simons K., "Ignorance and Mistake of Criminal Law, Noncriminal Law, and Fact" (2012) *Boston University Scholarly Commons* https://scholarship.law.bu.edu/cgi/viewcontent.cgi?article=1018&context=faculty_scholarship
12. Simons K. W., "Mistake and Impossibility, Law and Fact, and Culpability" (1990) 81(2) *Journal of Criminal Law and Criminology* 447–475 https://scholarlycommons.law.northwestern.edu/context/jclc/article/6666/viewcontent/24_81JCrimL_Criminology447_1990_1991_.pdf
13. *SSRN*, *General Exceptions in Indian Criminal Law: Part I* (23 January 2024)
14. Warren A., *Mistake of Fact and Mistake of Law in BNS* (23 October 2025) https://www.scribd.com/document/783731285/mistake-of-fat-and-mistake-of-law-bns
15. *Wikipedia*, *Ignorantia Juris Non Excusat* (2005) https://en.wikipedia.org/wiki/Ignorantia_juris_non_excusat