

## TRANSLATING THE PROSECUTOR INTO A LEGAL ATTACHÉ IN INDONESIAN DIPLOMATIC LEGAL TEXTS

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### Abstract

This article examines *legal attaché* as a borrowed term operating within Indonesian diplomatic legal discourse. The term designates the *Atase Kejaksaan*, the prosecutor seconded to an Indonesian embassy abroad, yet it carries institutional connotations drawn from the Federal Bureau of Investigation's law enforcement programme and from international organisational practice that are structurally incongruent with the Indonesian official's prosecutorial identity and normative mandate. The study draws on a purposive corpus of eleven primary documents from December 2025, comprising international diplomatic records, United States federal institutional documentation, and the statutory and regulatory corpus of the Indonesian prosecution service. Through a terminological analysis grounded in translation theory and legal linguistics, the article maps how the borrowed term operates across three institutional registers, namely U.S. federal law enforcement, international organisational administration, and Indonesian diplomatic practice, and compares the institutional profile of *legal attaché* with the normative definition of *Atase Kejaksaan* across four analytical dimensions: appointing authority, professional qualification, accountability structure, and functional mandate. The analysis demonstrates that the borrowed term conceals a near-complete institutional non-equivalence and proposes three rendering strategies, a descriptive rendering, a qualified borrowing, and a functional equivalent, for legal translators and diplomatic drafters handling Indonesian prosecutorial titles in formal bilateral and multilateral instruments. The findings contribute to Legal Translation Studies by applying established terminological frameworks to an under-documented Southeast Asian institutional legal translation context.

**Keywords:** legal attaché, Atase Kejaksaan, borrowing strategy, legal translation, diplomatic discourse

### INTRODUCTION

A prosecutor stationed at an Indonesian embassy abroad occupies two institutional identities simultaneously. Under Indonesian law, that official is an *Atase Kejaksaan*, a rank and title grounded in the statutory framework of the Indonesian prosecution service. The position is defined by specific professional prerequisites, a legally mandated functional scope, and a dual chain of accountability running to the Attorney General and to the Head of Mission. When the same official is introduced to an international audience in English, however, the title undergoes a quiet substitution. *Legal attaché* takes the place of *Atase Kejaksaan*. That substitution appears modest, as it replaces one version of the word *attaché* with another, but it carries the Indonesian official into a terminological register that was shaped elsewhere, by different institutions, for different purposes.

The term *legal attaché* arrived in diplomatic usage through the Federal Bureau of Investigation, whose overseas liaison officers were first formally designated by that title in U.S. embassy rosters in 1942. It has since been adopted, with varying functional meanings, by other

international legal actors, including international organisations whose permanent secretariats employ senior legal officials under the same designation. Neither of these institutional contexts shares the essential features of the Indonesian *Atase Kejaksaan*, which include the prosecutorial professional identity, the appointment by the Minister of Foreign Affairs on the Attorney General's proposal, the mandate for judicial intelligence activities, and the grounding in the statutory authority of the Indonesian prosecution service. Nonetheless, the borrowed term does not simply translate the Indonesian title. It assimilates that title into a foreign institutional referential field, with consequences for precision in cross-border legal communication. Borrowing without institutional grounding creates similar problems across text types. In Indonesian audiovisual translation, Newmark's (1988) borrowing and literal translation procedures generate non-equivalence when terms are transferred without accounting for differences in institutional context or target-audience conventions (Hayuwanti, Krisdiyanta, & Setiarini, 2025; Putra & Hapsari, 2025). Here, however, the institutional asymmetry operates not between screen dialogue and subtitle but between two parallel national legal systems whose terminological boundaries have received no formal standardisation.

Despite growing scholarly attention to equivalence problems in European legal systems and in international institutional settings, the terminological challenges that Southeast Asian national legal titles pose in bilateral and multilateral instruments have received limited systematic treatment. No published study has subjected the English rendering of *Atase Kejaksaan* to terminological analysis, and no institutional instrument or translator's guideline has established a standardised English equivalent for the title. That gap has practical consequences. As December 2025 official sources demonstrate, Indonesian official communications in English apply competing renderings to a single official position, with direct implications for any legal instrument that depends on the precise identification of the official empowered to act on behalf of the Indonesian prosecution service.

This article examines that assimilation through a terminological analysis anchored in three categories of primary texts. The first is the HCCH document of 4 December 2025, which records Indonesia's application for HCCH membership. Within that single document, the title *Legal Attaché to the Secretary General* is used for an HCCH official while the Indonesian delegation is designated through conventional diplomatic rank titles, offering a rare opportunity to observe the two terminological practices side by side. A second category is an English-language article published by the Indonesian National Police on 3 December 2025, quoting the Indonesian Charge d'Affaires ad interim in Kuala Lumpur as referring to Indonesian diplomatic officers as *legal attachés*, while Indonesian-language coverage of the same event uses *Atase Hukum* and *Atase Kejaksaan* inconsistently. A third category is the Indonesian regulatory corpus governing *Atase Kejaksaan* from 1979 to the present, comprising Attorney General's decrees, prosecution service regulations, and the Minister of Foreign Affairs Regulation No. 6 of 2024.

Four bodies of scholarship in translation studies and legal linguistics supply the analytical tools for the study. Newmark (1988) provides the procedural taxonomy within which borrowing or transference is assessed as one among several strategic options available when institutional titles cross linguistic borders. Šarčević (1997) supplies the framework of institutional non-equivalence that applies when a borrowed term displaces a nationally specific legal concept. Tiersma (1999) provides the foundational account of how legal vocabulary acquires technical authority through institutional association and loses that authority when terms migrate into different systems. Prieto Ramos (2021) introduces the concept of inter-systemic incongruity to name the structural divergence between legal concepts that a source term and a target term each carry within their respective systems. These frameworks sit within the disciplinary landscape described by Prieto Ramos (2014), whose account of Legal Translation Studies situates terminological inquiry at the intersection of translation theory, comparative law, and legal linguistics. Prieto Ramos and Guzmán (2021) provide a corpus-driven approach to institutional legal translation that informs the study's methodology. Peruzzo's (2022) concept of stipulative correspondence supplies a further analytical category for characterising the terminological vulnerability the use of *legal attaché* creates in Indonesian diplomatic legal texts.

## METHOD

### Research approach

This study is qualitative and descriptive, situated within the tradition of Legal Translation Studies (LTS) as a corpus-based terminological inquiry. The analysis maps the institutional referential range of *legal attaché* across its attested uses in contemporary diplomatic legal texts. It then reconstructs the normative definition of *Atase Kejaksaan* from its legislative sources and compares the two terminological constructs to diagnose the degree of non-equivalence and its communicative consequences. Terminological work across legal systems must begin with comparative legal analysis rather than the search for surface-level denominative correspondences (Prieto Ramos, 2021). The present study follows that sequence. Biel's (2017) multi-perspective framework, which situates legal translation research across the dimensions of product, context, process, and participants, informs the study's attention to both the textual and the institutional dimensions of the terminological problem. Cao (2007) provides a relevant comparative backdrop for analysing legal terminological issues across common-law and civil-law jurisdictions.

### Data collection

The corpus comprises eleven primary documents selected on two criteria: institutional authority and terminological salience. A document meets the institutional authority criterion if it functions as an authoritative source of either the term *legal attaché* or the regulatory definition of *Atase Kejaksaan* within its respective institutional system. It meets the terminological salience criterion if

it defines, deploys, or contextualises one or both terms in a way that illuminates the equivalence question under analysis. Purposive selection is appropriate for corpus-based terminological work in LTS, where the analytical value of each document depends on its institutional status rather than its frequency within a larger text population (Prieto Ramos & Guzmán, 2021). Three categories structure the corpus. The first comprises two international diplomatic documents from December 2025: the HCCH news release recording Indonesia's application for HCCH membership, and the INP English-language article on Indonesian nationals facing capital punishment in Malaysia, which quotes official statements from the Indonesian diplomatic mission in Kuala Lumpur. A second category consists of three documents: the Federal Bureau of Investigation's (FBI) public institutional documentation of its overseas Law Enforcement Attaché (Legat) programme (FBI, n.d.-a; FBI, n.d.-b), and the Vienna Convention on Diplomatic Relations of 1961, which provides the international normative framework for diplomatic staff designations. A third category is the Indonesian regulatory corpus of six documents governing *Atase Kejaksaan*, drawn from the Attorney General's Decrees of 1979, 1986, and 1994 (Kejaksaan Agung Republik Indonesia [Kejaksaan Agung RI], 1979, 1986, 1994), Prosecution Service Regulation No. 3 of 2021 governing personnel assignments, Law No. 11 of 2021 on the Prosecution Service (Indonesia, 2021), and Minister of Foreign Affairs Regulation No. 6 of 2024 on the Functional Diplomat Position (Kementerian Luar Negeri Republik Indonesia [Kementerian Luar Negeri RI], 2024).

Table 1. Research corpus: document categories, sources, and institutional registers

Category	Documents	Date	Institutional Register
<b>Category I</b>	HCCH News Release: Indonesia applies to become a member of the HCCH (HCCH, 2025); INP article: Indonesia's legal attaché handles 150 Indonesians facing death penalty in Malaysia (INP, 2025)	Dec 2025	International diplomatic / institutional English-language discourse
<b>Category II</b>	FBI International Operations (FBI, n.d.-a); FBI History of Legal Attachés (FBI, n.d.-b); Vienna Convention on Diplomatic Relations (United Nations, 1961)	1942–present	U.S. federal law enforcement and international treaty discourse
<b>Category III</b>	SK Jaksa Agung 1979; KEP-050/1986; KEP-108/1994; Peraturan Kejaksaan No. 3/2021; UU No. 11/2021; Permenlu No. 6/2024	1979–2024	Indonesian national statutory and regulatory discourse

## Data analysis

The analysis follows a three-step procedure. In the first step, the institutional referents of *legal attaché* in English-language professional discourse are identified and categorised, drawing on Tiersma's (1999) account of how legal vocabulary acquires technical authority through institutional association while retaining the potential for semantic instability when terms migrate across contexts. In the second step, the Indonesian regulatory definition of *Atase Kejaksaan* is reconstructed from the legislative corpus, with attention to its essential institutional features of appointing authority, professional prerequisites, functional mandate, and diplomatic status. In the third step, the two terminological constructs are compared through Šarčević's (1997) equivalence taxonomy, which distinguishes near equivalence, partial equivalence, and non-equivalence, and assessed against Prieto Ramos's (2021) inter-systemic incongruity framework. Newmark's (1988) procedural typology supplies the evaluative frame within which borrowing is weighed against descriptive and functional rendering alternatives.

## RESULTS AND DISCUSSION

### Legal attaché in international diplomatic discourse

Under the Vienna Convention on Diplomatic Relations of 1961, *legal attaché* as a recognised category of diplomatic staff is not defined. Article 7 of the Convention grants the sending state freedom to appoint the members of a mission's staff, noting only that the receiving state may require prior notification of military, naval or air attachés by name. The word *attaché* in the Convention is a generic diplomatic rank, the lowest in the formal hierarchy of the mission and below third secretary, rather than a substantive functional title (United Nations, 1961). *Legal attaché* therefore belongs not to the Convention's definitional vocabulary but to institutional practice that developed independently within national and organisational settings.

The most deeply institutionalised use of the term traces to the Federal Bureau of Investigation. By the end of 1942, FBI special agents posted to U.S. embassies in Bogota, London, and Ottawa were formally carried on the Department of State's diplomatic roster under the title *legal attaché* (FBI, n.d.-b). The contemporary programme operates some sixty offices worldwide covering more than 180 countries. It describes the law enforcement attaché as the FBI Director's personal representative in the country of assignment, responsible for liaison with host-nation law enforcement and security services, coordination of international investigative leads, and facilitation of information exchange (FBI, n.d.-a). Counterintelligence operations are explicitly excluded from the Legat's mandate, as is unilateral investigative action in host countries. The functional profile is therefore that of a senior federal law enforcement agent embedded in a diplomatic setting, operating under the chief of mission's authority and the framework of the Attorney General Guidelines, whose professional identity and institutional authority derive wholly from U.S. domestic law.

A different institutional referent surfaces in the HCCH document of 4 December 2025. Among the participants listed at the ceremony marking Indonesia's application for HCCH membership, the document identifies Dr Louwrens Kiestra as Legal Attaché to the Secretary General (Hague Conference on Private International Law [HCCH], 2025), as a representative of the HCCH rather than a member of the Indonesian delegation. The position designated here is that of a senior legal officer serving the organisation's permanent secretariat. The role concerns the development and interpretation of international private law conventions, the management of member-state relations, and expert legal support to the Secretary General. The appointing authority is the organisation itself, the functional mandate is organisational rather than national, and the professional identity is that of an international civil servant in law.

As Tiersma (1999) argues, legal terms gain definitional weight through their deployment within stable institutional communities. That precision dissolves when terms are extracted from their originating setting and pressed into service elsewhere. Legal terms also express concepts that are system-bound, deriving their meaning from the normative structures of the legal order in which they were formed rather than from any universal referential content (Cao, 2007). *Legal attaché* illustrates the point directly. Within the FBI's programme, the term carries a specific, well-documented professional profile. Within the HCCH's secretariat, it carries a different one. Carried across into Indonesian diplomatic texts as a rendering of *Atase Kejaksaan*, it carries neither, and potentially both, depending on the reader's point of reference. What Prieto Ramos (2021) identifies as inter-systemic incongruity follows directly.

### **Atase Kejaksaan in Indonesian legal regulations**

The position of *Atase Kejaksaan* has been a formally defined element of the Indonesian diplomatic apparatus since at least 1979 (Kejaksaan Agung RI, 1979). Its most detailed statutory articulation appears in Attorney General's Decree No. 108 of 1994. Article 1 of that Decree defines *Atase Kejaksaan* as a prosecutor placed at an Indonesian diplomatic mission abroad, holding diplomatic status, for the purpose of carrying out the duties, authority, and functions of the Prosecution Service (Kejaksaan Agung RI, 1994, Art. 1). Three features of this definition carry particular institutional weight. First, the officeholder must be a *Jaksa*, a member of the prosecution service holding prosecutorial authority under Indonesian law, with a minimum of ten years' professional experience and a rank of at least Golongan IV/a (Kejaksaan Agung RI, 1994, Art. 6). This requirement ties the position to a specific branch of Indonesian public law and excludes legal professionals from other government bodies. Second, appointment is effected by the Minister of Foreign Affairs on the proposal of the Attorney General, a dual-ministry mechanism that reflects the position's hybrid standing at the intersection of diplomatic protocol and prosecutorial institutional authority (Kejaksaan Agung RI, 1994, Art. 6). Third, the official operates under dual accountability, reporting to the Attorney General for the substance of prosecutorial functions and to

the Head of the Indonesian diplomatic mission for day-to-day administrative matters (Kejaksaan Agung RI, 1994, Art. 2).

Articles 3 and 4 of the 1994 Decree set out the functional mandate. The *Atase Kejaksaan* is responsible for judicial intelligence activities, which the Indonesian term *intelijen yustisial* denotes as intelligence work oriented toward legal rather than national-security objectives. These activities cover ideological, political, economic, social, and security matters as they bear on prosecutorial work. It also involves the collection and analysis of legal data from the host country, assistance to the Head of Mission on legal and law enforcement matters, bilateral cooperation in law and law enforcement, and legal advice to the Attorney General and Head of Mission. Its functional scope is simultaneously narrower and broader than that of the FBI Legat. It is narrower in that the authority is prosecutorial rather than general federal law enforcement. It is broader in that judicial intelligence work, a function without obvious parallel in common-law prosecutorial systems, is formally included.

Prosecution Service Regulation No. 3 of 2021 on the assignment of prosecution service personnel to government and external institutions (Kejaksaan Agung RI, 2021) reinforces this picture at the procedural level. Article 3, paragraph 4 of that Regulation confirms that assignments to Indonesian diplomatic missions abroad are governed by applicable regulations and that posted officials retain their status as civil servants of the prosecution service throughout. Regulatory continuity running from the 1979 Decree through the 1994 Decree to the 2021 Regulation establishes *Atase Kejaksaan* as an institutionally stable legal category with an unbroken normative lineage in Indonesian public law. It is not an informal designation or an ad hoc diplomatic title, but a defined position with specified prerequisites, functions, and accountability relationships.

Minister of Foreign Affairs Regulation No. 6 of 2024 (Kementerian Luar Negeri RI, 2024) adds a further dimension from the foreign affairs side of the arrangement. Article 6(5) of that Regulation lists the *Gelar Diplomatik Efektif*, the effective diplomatic title, assigned within the Functional Diplomat Position hierarchy. Within that hierarchy, *attaché* appears as the lowest rank, below Third Secretary and ascending through to Ambassador. That term *attaché* here is generic in that it designates a diplomatic rank, not an institutional function. The institutional specificity of *Atase Kejaksaan* derives entirely from the qualifier *kejaksaan*, which anchors the rank to the prosecution service rather than to the foreign ministry or any other institutional principal. When the title is rendered as *legal attaché*, that qualifier disappears, and with it the single element that distinguishes the Indonesian official from every other diplomatic officer holding the *attaché* rank.

### **Borrowing strategy and its terminological consequences**

Newmark (1988) identifies transference, commonly described as borrowing, as the direct importation of a source-language term into the target text without semantic transformation. Its appeal in legal and diplomatic settings rests on several advantages: it avoids the reductive risks of

paraphrase, preserves institutional specificity, and offers lexical economy. Borrowing is most defensible where the source term is formally transparent or where surrounding context supplies the necessary disambiguation. Where the source concept is institution-specific, a descriptive or functional rendering may serve communicative precision better. In Indonesian subtitle translation, Putra and Hapsari (2025) show that translation methods operate on a continuum, with translators combining semantic and communicative approaches according to communicative priority. A comparable pattern emerges in legal text domains. Nugroho and Johanes (2024) document that translators routinely apply Anglo-Saxon judicial terms such as ‘verdict’ to civil-law judicial decisions without accounting for the different institutional systems each term presupposes, producing a terminological mismatch that misrepresents the legal source. That finding questions borrowing as a default strategy when target-language readers cannot draw on the source-system institutional knowledge that gives the term its meaning. When the borrowed term already occupies established semantic territory in the target language and carries its own professional associations and institutional connotations, the risk of terminological displacement is acute.

That is the situation with *legal attaché* as a rendering of *Atase Kejaksaan*. This term is not coined freshly to represent the Indonesian concept. It is drawn from a pre-existing English-language institutional lexicon in which it designates primarily an FBI law enforcement officer serving in a diplomatic setting and, in international organisational practice, a legal officer of an intergovernmental body. Any translator or drafter who reaches for *legal attaché* is not borrowing a neutral container but importing a term pre-loaded with referential content that was built elsewhere and for other purposes.

Šarčević (1997) established that legal terms are embedded in the normative structures of the legal systems that deploy them. Transferring a term across systems without accounting for those normative structures invites non-equivalence, which arises when the target-language term refers to a concept that is functionally incompatible with the source concept, notwithstanding terminological similarity. Under this taxonomy, the Indonesian *Atase Kejaksaan* is a prosecution service civil servant appointed under a dual-ministry mechanism, performing prosecutorial intelligence and bilateral legal cooperation functions. The FBI Legal Attaché is a federal law enforcement agent appointed by the Bureau, performing liaison and counterterrorism functions under chief-of-mission authority. The HCCH Legal Attaché to the Secretary General is an international civil servant appointed by an intergovernmental organisation, serving the organisation’s secretariat. What the three share is the surface feature of being lawyers operating within a diplomatic setting. Their appointing authorities, functional mandates, institutional affiliations, and normative grounding all differ. Under Šarčević’s (1997) taxonomy, this constitutes near-complete non-equivalence at the institutional level rather than mere partial equivalence.

The divergence across the four institutional dimensions can be traced with precision. The first dimension is appointing authority. The *Atase Kejaksaan* is appointed by the Minister of Foreign

Affairs on the formal proposal of the Attorney General, a dual-ministry mechanism that anchors the position simultaneously to the prosecution service and to the diplomatic corps (Kejaksaan Agung RI, 1994, Art. 6). The FBI Legat is designated by the Bureau through the Director’s authority, subject to the Attorney General Guidelines, with the Department of State carrying the officer on its diplomatic roster as a formality of host-country protocol. The HCCH Legal Attaché to the Secretary General is appointed through the organisation’s own internal personnel procedures, without reference to any national ministry (HCCH, 2025). The second dimension is the professional qualification requirement. The *Atase Kejaksaan* must be a *Jaksa*, a career member of the Indonesian prosecution service with a minimum of ten years’ service and a rank of at least Golongan IV/a (Kejaksaan Agung RI, 1994, Art. 6). The FBI Legat must be a serving FBI special agent. The HCCH position requires demonstrated expertise in international private law and the organisation’s working languages. These qualifications are not interchangeable. The third dimension is accountability structure. The *Atase Kejaksaan* operates under dual accountability, reporting to the Attorney General for prosecutorial matters and to the Head of Mission for administrative purposes (Kejaksaan Agung RI, 1994, Art. 2). The Legat reports to the FBI Director and to the chief of mission. The HCCH Legal Attaché reports to the Secretary General. The fourth dimension is the normative instrument that creates and defines the position. The *Atase Kejaksaan* is created by statute and defined by a continuous series of executive instruments spanning four decades (Kejaksaan Agung RI, 1979, 1986, 1994, 2021). The Legat programme operates under administrative guidelines rather than statute. That HCCH position is defined by the organisation’s internal administrative structure rather than by national law. Across all four dimensions, the three institutional constructs occupy entirely separate regulatory and professional territories. The word *attaché* in each title reflects nothing more than the generic diplomatic rank that both the Vienna Convention and Permenlu No. 6 of 2024 recognise as the lowest in the mission hierarchy (Kementerian Luar Negeri RI, 2024; United Nations, 1961). That shared surface label constitutes the principal point of contact among three institutionally distinct positions.

Table 2. Comparative institutional profile: *Atase Kejaksaan*, *FBI Legal Attaché*, and *HCCH Legal Attaché*

<b>Dimension</b>	<b><i>Atase Kejaksaan</i> (Indonesia)</b>	<b><i>FBI Legal Attaché</i> (USA)</b>	<b><i>HCCH Legal Attaché</i> (International)</b>
<b>Appointing authority</b>	Minister of Foreign Affairs on proposal of Attorney General; dual-ministry mechanism (Kejaksaan Agung RI, 1994, Art. 6)	FBI Director; Department of State diplomatic roster (protocol formality)	Organisation’s internal personnel procedures; no national ministry involved (HCCH, 2025)
<b>Professional qualification</b>	Career <i>Jaksa</i> ; ≥10 years’ service; rank Golongan IV/a minimum (Kejaksaan	Serving FBI special agent	Expertise in international private law; organisation’s working languages

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 Agung RI, 1994, Art. 6)
 

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<b>Accountability structure</b>	Attorney General (prosecutorial matters) and Head of Mission (administrative matters) (Kejaksaan Agung RI, 1994, Art. 2)	General matters) and chief of mission (country-level authority)	FBI Director (operational) and chief of mission (country-level authority)	Secretary General of the HCCH
<b>Functional mandate</b>	Judicial intelligence ( <i>intelijen yustisial</i> ); bilateral legal cooperation; legal opinion; MLA coordination (Kejaksaan Agung RI, 1994, Arts. 3–4)	intelligence <i>yustisial</i> ); legal legal	Law enforcement liaison; counterterrorism coordination; investigative lead management (FBI, n.d.-a)	International private law convention support; member-state relations management; secretariat legal advisory (HCCH, 2025)
<b>Normative instrument</b>	National statute (UU 11/2021) and executive decrees, 1979–2021 (Kejaksaan Agung RI, 1979, 1986, 1994, 2021)	National statute (UU 11/2021) and executive decrees, 1979–2021	Attorney General Guidelines; no statutory basis for Legat title	Internal organisational rules; independent of national law

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Peruzzo (2022) offers a category that names this situation more precisely. The concept of stipulative correspondence designates the lexical relation established between a term referring to a concept embedded in a specific legal system and a term used in a target language, which is not the language in which that legal system is ordinarily expressed, to refer to the same concept. The relation operates at the lexical rather than the conceptual level: unlike translation equivalence between parallel legal systems, it does not presuppose any alignment between the normative structures of the source and target legal orders. A critical feature of stipulative correspondence, as Peruzzo shows, is its context dependence. When a stipulative term is isolated from its documentary setting, the connection with the source legal system may be lost, and the meaning with it. Applied to the present case, *legal attaché* as a rendering of *Atase Kejaksaan* exhibits precisely this vulnerability. Its connection to the Indonesian prosecutorial system depends entirely on the surrounding regulatory and documentary context. Outside that context, the term reverts to its pre-existing institutional referents in U.S. law enforcement and international organisational practice, referents that carry incompatible professional profiles. The stipulative relation, rather than stabilising the term, leaves it open to misreading by counterparts who bring different institutional assumptions to the text.

Prieto Ramos (2021) argues that terminological work between legal systems must focus on comparative legal analysis rather than the search for denominative correspondences, because pre-established denominative correspondences often conceal structural divergences that only comparative legal inquiry can expose. The incongruity between *Atase Kejaksaan* and *legal attaché* is inter-systemic in exactly this sense. It does not arise from any lexical deficiency, as English

could readily accommodate Prosecution Attaché or Attorney General's Attaché as a more transparent rendering. It arises from the structural divergence between the Indonesian public-law construct and the Anglo-American institutional constructs that the borrowed term has come to represent through historical use. *Legal attaché*, used without qualification, hides that structural divergence behind apparent terminological familiarity.

### Implications for Indonesian diplomatic legal texts

The December 2025 documents make the practical dimensions of this terminological gap visible. The HCCH text of 4 December 2025 presents both sides of the problem within a single document. The title Legal Attaché to the Secretary General appears as the official designation of Dr Louwrens Kiestra of the HCCH secretariat. The Indonesian delegation, by contrast, is described through conventional Vienna Convention rank titles: Deputy Chief of Mission, Minister Counsellor, Counsellor, and Third Secretary. *Legal attaché* does not appear anywhere in the Indonesian delegation list. The distributional pattern is telling: *legal attaché*, in international institutional practice, designates an organisational role rather than a bilateral diplomatic one. International organisations generate distinctive legal text types governed by institutional rather than national normative frameworks (Prieto Ramos & Guzmán, 2021). The HCCH's use of *legal attaché* for its own permanent secretariat staff exemplifies precisely this institutional self-designating function. The Indonesian government's own diplomatic self-presentation at the same formal multilateral event does not use the term for its officials, confirming that the term occupies different institutional territory in each context.

The INP article of 3 December 2025 presents a contrasting case (Indonesian National Police [INP], 2025). The report quotes the Indonesian Charge d'Affaires ad interim in Kuala Lumpur, Danang Waskito, as stating that the embassy's legal attachés ensure every Indonesian receives proper legal assistance and a fair trial. The term is used in the plural and applied to the Consul General's offices in Johor Bahru and Penang as well. The Indonesian-language coverage of the same event uses *Atase Hukum* and *Atase Kejaksaan* inconsistently. Neither term corresponds precisely to the English *legal attaché* as the INP article deploys it, since *Atase Hukum* refers to an official of the Ministry of Law rather than of the prosecution service. The same institutional event, covered simultaneously in two languages and across multiple authoritative official sources, generates three distinct terminological renderings for what appears to be a single official position. This degree of internal inconsistency is not merely an editorial problem. It is a terminological problem with direct implications for any legal instrument that depends on the precise identification of the official empowered to act on behalf of the Indonesian prosecution service.

The authority that the *Atase Kejaksaan* holds is not symbolic. Under the 1994 Decree and its successors, the position carries documented functions that include providing legal opinions and expert testimony, coordinating mutual legal assistance procedures, and acting as the prosecution

service's representative for criminal cooperation purposes (Hutagalung, 2023; Kejaksaan Agung RI, 1994, Art. 4). In instruments where institutional identity determines whether an official has the authority to sign, receive, or act on a formal legal request, the substitution of *legal attaché* for *Atase Kejaksaan* without qualification creates a category risk. A counterpart reading the instrument through the lens of FBI Legat practice or HCCH organisational usage may draw conclusions about the Indonesian official's authority and mandate that the Indonesian regulatory framework does not support.

Three rendering strategies are available that avoid this risk. A descriptive rendering such as Prosecution Attaché or Attorney General's Attaché makes the institutional affiliation explicit and requires no prior knowledge of Indonesian administrative law. It is the most appropriate choice for instruments addressed to counterparts in common-law jurisdictions where the FBI Legat profile might otherwise be assumed. A qualified borrowing such as Legal Attaché (*Atase Kejaksaan*) retains the term that Indonesian official communications already use in English while supplying the Indonesian title as an anchor that allows specialised readers to verify the official's institutional identity against Indonesian sources. Nielsen (2022) advocates a proscriptive approach in legal translation dictionaries for culture-bound term variants, where all variants are presented but one form is explicitly recommended. Translators and diplomatic drafters can apply the same logic when selecting among the three strategies proposed here: the recommended form is made clear while the alternatives remain visible. Qualified borrowing follows precisely this logic. It suits contexts where terminological continuity with existing Indonesian practice is important, such as bilateral treaty instruments where the title has already appeared in earlier drafts. A functional equivalent such as Indonesian Prosecutorial Attaché emphasises the prosecutorial rather than the generic legal character of the role and is likely the most precise option for mutual legal assistance instruments where the distinction between prosecutorial and law enforcement authority carries substantive legal weight. The choice among these alternatives requires a prior comparative legal analysis of both systems rather than a search for the most familiar-sounding English equivalent (Prieto Ramos, 2021). Hutagalung and Hermanu (2025) document institutional communication challenges within Indonesian prosecutorial bodies that point to a wider pattern of under-theorised translation practice. Dewi, Wijaya, and Hidayat (2020) document in commercial contract translation that most English legal terms are rendered using ordinary Indonesian words rather than established legal equivalents, and the same term frequently receives different translations across documents, a result they attribute to the absence of standardised Indonesian legal terminology. Listyo, Laksman-Huntley, and Dewi (2024) extend this finding, showing that legal archaisms receive multiple divergent Indonesian renderings within the same document because direct equivalents do not exist and translators must rely on context-dependent paraphrasing instead. The three-way terminological inconsistency identified in the present study across Indonesian official sources for a single diplomatic title reflects the same underlying cause: the absence of a

standardised, institutionally anchored Indonesian legal terminology that maps reliably onto English-language counterparts. That pattern warrants sustained attention from institutional drafters and translation studies researchers alike.

Strategy 1	Strategy 2	Strategy 3
<b>Prosecution Attaché</b>	<b>Legal Attaché (<i>Atase Kejaksaan</i>)</b>	<b>Indonesian Prosecutorial Attaché</b>
<i>Descriptive rendering</i>	<i>Qualified borrowing</i>	<i>Functional equivalent</i>
Best for: counterparts in common-law jurisdictions where FBI Legat profile may be assumed	Best for: bilateral instruments where the title has appeared in earlier drafts; specialised readers with access to Indonesian sources	Best for: mutual legal assistance instruments where prosecutorial vs. law enforcement authority carries legal weight
<b>Highest institutional transparency</b>	<b>Terminological continuity + anchor</b>	<b>Highest functional precision</b>

Figure 1. Rendering strategy spectrum for *Atase Kejaksaan* in Indonesian diplomatic legal texts (based on Newmark, 1988; Prieto Ramos, 2021)

The gap this article identifies in translation practice has a counterpart in legal-normative scholarship. Budijarto (2020), approaching the same institutional position from a normative legal perspective, found that successive regulatory instruments governing the *Atase Kejaksaan* had left the position’s mandate inadequately articulated even in the Indonesian-language regulatory framework itself. That two disciplines, arriving from different directions, identify the same institutional gap points to a problem rooted in the position’s hybrid institutional identity rather than in any individual translation decision. For language professionals and institutional drafters, the alignment of these findings means that the rendering strategies proposed above address a documented institutional reality, not a hypothetical one.

## CONCLUSION

*Legal attaché*, as currently used in Indonesian diplomatic legal texts to render *Atase Kejaksaan*, is a terminologically underdetermined borrowing. The borrowed term carries institutional connotations drawn from the FBI’s law enforcement attaché programme and from international organisational usage that are largely incongruent with the Indonesian official’s prosecutorial identity, appointment mechanism, and normative mandate as defined across a continuous legislative record from 1979 to the present. The December 2025 corpus documents this incongruence in practice. Indonesian official English-language communications use *legal attaché* without disambiguation, Indonesian-language sources apply competing terms to the same role, and international institutional documents use *legal attaché* for a different position altogether.

The terminological imprecision carries concrete legal consequences. In mutual legal assistance instruments, extradition treaties, and prisoner transfer conventions, the precise identification of the official authorised to receive, transmit, or act on a formal legal request is a condition of the instrument's operability, not a formality. A counterpart authority reading *legal attaché* through the lens of FBI Legat practice may treat the Indonesian official as a law enforcement agent rather than a prosecutor, drawing conclusions about institutional competence and signatory authority that Indonesian law does not support. At the level of treaty interpretation, terminological ambiguity in the parties' designations creates a risk that the same title will be understood differently across the instrument's official language versions, with consequences for the allocation of obligations and the scope of immunities. Diplomatic authority confusion of this kind can render a formal legal request technically defective and obstruct the bilateral cooperation the instrument was designed to enable.

The article contributes to LTS by applying Newmark's (1988) borrowing framework, Šarčević's (1997) non-equivalence taxonomy, Prieto Ramos's (2021) inter-systemic incongruity analysis, and Peruzzo's (2022) stipulative correspondence category to an Indonesian institutional legal translation context that has attracted limited scholarly attention. LTS has produced a substantial body of work on equivalence problems in European legal systems and in international institutional settings. The specific challenges of Southeast Asian national legal terminology in bilateral and multilateral instruments remain comparatively under-documented. Prieto Ramos (2014) has described Legal Translation Studies as an interdiscipline whose distinctive value rests on the combination of comparative legal analysis with terminological inquiry, a combination that the present case study illustrates can be applied productively to institutional contexts well beyond the European settings that have dominated LTS research. *Atase Kejaksaan* represents one such case, but the analytical method applied here transfers readily to the broader array of Indonesian sectoral attaché titles whose English renderings are similarly underspecified.

Future work might trace the treatment of *Atase Kejaksaan* across a wider corpus of bilateral instruments, including extradition treaties, mutual legal assistance agreements, and prisoner transfer conventions, to document whether and how the terminological inconsistency identified here affects the legal operability of those instruments. A parallel examination of *Atase Hukum* and its English renderings, given the observed conflation of the two titles in both official and media sources, would clarify a terminological boundary that currently remains blurred even within Indonesian institutional practice. At the institutional level, collaboration between the Attorney General's Office, the Ministry of Foreign Affairs, and professional translators and terminologists to establish standardised English-language equivalents for Indonesian prosecutorial titles would represent a practical step toward resolving the ambiguity that this analysis has described.

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