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NATIONAL VARIATIONS IN LEGAL TERMINOLOGY. THE BRITISH AND AMERICAN PERSPECTIVE



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Abstract

The aim of the paper is to investigate the cultural specificity underlying the composition of British and American legal terminologies. Despite a common origin in the Anglo-Saxon and Roman legal traditions, British Legal Terminology (BLT) and American Legal Terminology (ALT) have undergone particular developments due to various socio-political, historical, and cultural conditions. The study analyzes distinctions in taxonomic structures, paradigmatic and syntagmatic relations, and the use of proprial terms. Special attention is given to the role of internationalisms and terminological synonymy, revealing how extralinguistic factors influence the evolution and structure of legal language. The findings underscore the dynamic interplay between linguistic universality and national legal identity.

Keywords: *legal terminology, cultural specificity, British legal terminology (BLT), American legal terminology (ALT), internationalisms, synonymy, proprial terms, crime classification, precedent law, terminological system*

Any legal terminology, serving the domains of law and jurisprudence—that is, areas of legal practice and legal science—is closely linked to the everyday and spiritual culture of a society and reflects the national-cultural characteristics of the life of the society to which a given legal system belongs. Throughout its development, legal terminology has always been strongly influenced by extralinguistic reality. Therefore, the composition of legal terminology, like a mirror, reflects a particular "national" path of development that is unique to it. Even the processes of standardization (normalization), the acquisition of strict definitions by terms, and the internationalization of

legal terminology cannot completely eliminate the features introduced into a given legal terminology by national legal cultures. The more different legal cultures are from one another (for instance, Anglo-American common law, which follows the Western legal tradition, and Romanian/Russian codified law), the greater the degree of national-cultural specificity that can be observed in the legal terminology, often marked by intercultural legal gaps. Even in closely related legal terminologies, such as British Legal Terminology (BLT) and American Legal Terminology (ALT), which the latter initially adopted during the formation of a new state, national-cultural differences can be identified in both the composition and semantics of terms. These differences are primarily due to extralinguistic factors and relate to the divergent development of the legal systems of the UK and the USA.

English-speaking populations appeared in what is now the United States in the 17th century, bringing with them the culture of the Old World. The common law system—with all its traditions, methods, and practices—was also introduced by the first settlers. As L. Friedman notes, "American law mainly derives from a single source—English law" (Friedman, 1993, p. 52). Legal terminology was also entirely adopted by American society, but over time, English legal norms began to change under the influence of social, economic, and political factors. Friedman writes: "...life in this wilderness required orders vastly different from those in Stuart England. The complex judicial system of England would not only have seemed laughable in the small, impoverished settlements of Massachusetts, it would have been irrational and simply unviable" (Friedman, 1993, p. 85). Despite the similarities between the New World's legal system and English law, new realities imposed their own conditions, inevitably influencing ALT.

In ALT, an example of the retention of terms archaic to BLT is the direct Latin borrowing *en bene* (full bench). This term is no longer used in BLT but is still common in ALT when describing important court cases: "in the USA for the important cases the bench may be expanded to a larger number, they are sitting *en bene*" (*Black's Law Dictionary*, 1998, p. 364). Another such example is *hue and cry*, a term from ancient times meaning "a special yell to join the chase after the culprit" (Monk, 1991 p. 99). This term has long been out of use in English legal terminology but persists in American usage, meaning "wanted." The term *perpetrator*, which is rarely used in BLT, is used in ALT in its archaic sense of "the person by whose immediate agency a crime occurs"(Black's Law Dictionary 1998, p. 790). The term *citation* means "a writ issued by a court of competent jurisdiction, commanding a person therein named to appear on a day named... A citation is commonly used for minor violations (traffic violations)" (*Black's Law Dictionary*, 1998, p. 166). It is barely used in BLT, as such summonses are only practiced by certain Scottish courts (Monk, 1991, p. 40). Another term not used in BLT but retained in

ALT is *larceny* ("larceny no longer exists in English law, having been replaced by the crime of theft") (*Dictionary of Law,* 1995, p. 135). Archaic terms unused or nearly unused in BLT but widely used in ALT make up about 1% (15 terms).

In addition to archaic terms, outdated classification taxonomies are also preserved in American legal terminology, though they are not static and continually evolve under external influences. An example of national-cultural specificity in these terminological systems can be seen in differences in crime classification. The differences in how semantically related terms are distributed across subfields according to the current regulatory worldview in a given cultural context clearly illustrate the impact of national cultures on legal terminology.

It is well known that terminological units are characterized by generic-specific relationships. Since a term always belongs to a specific, strictly hierarchical terminological system, it exists within macro- and microfields that segment this system. According to Yu. Lotman, J. Superanskaya, and B. Golovin, a field is a special area of a term's existence where it possesses all its characteristic features. A field is a system of concepts expressed by terms. Most scholars note that the primary feature of a field is its extralinguistic orientation, which determines how language tools are organized. Due to this extralinguistic conditioning, a single conceptual field may include terms of various origins (direct borrowings, terms formed from the national language, and Greco-Latin elements) (Superanskaya, 1989, p. 113). The professional orientation of any classification activity determines the social aspect of terminological fields.

Changes in the distribution of terms across microfields can be seen in the classification of crimes in BLT and ALT. Initially, the classification systems in English and American legal frameworks were identical. All crimes were categorized as *felony*, *misdemeanor*, and *treason*, with the generic term *crime*. Under the old classification, *felony* included:

- felony at common law;
- capital felony;
- statutory felony.

Misdemeanor was divided into:

- misdemeanor at common law;
- high misdemeanor.

According to this old classification, *treason* and *sedition* were part of the conceptual field represented by the generic term *felony*. This classification existed in English and American law from the late 19th century. However, since 1967, BLT has adopted a new classification based on the direct object of the crime. The old terms are practically no longer used, replaced by compound terms that, as B. Golovin. He notes, tend to emerge in later stages of scientif-

ic development when existing terms require clarification and modification for more precise concept expression (Golovin & Kobrin, 1987, p. 55). In English terminology, the generic term in this taxonomy became *offence*, encompassing what was previously defined as *crime*, which included *felony* and *misdemeanor*. Instead of those older terms, compound terms based on *crime* with various prepositional phrases are now used:

- crime;
- crime against the state;
- crime against justice;
- crime against religion;
- crime against reputations;
- crime against security;
- crime against morality.

Under this new model of legal culture, the redistribution of terms across microfields continues. For instance, *crimes against reputation* include:

- *libel* (defamation in print, writing, pictures, or signs);
- *defamation* (intentional false communication that harms another's reputation);
- *slander* (spoken defamation that damages someone's standing, business, or livelihood) (*Black's Law Dictionary*, 1998).

In modern American legal terminology, the old classification adopted from English law—grouping concepts under *felonies* and *misdemeanors*—still persists. Unlike the English taxonomic system, the generic term is *crime*, not *offence*. The term *criminal offences* includes:

- offences against persons (e.g., murder, manslaughter);
- offences against habitation and occupation (e.g., burglary, arson);
- offences against property (e.g., larceny);
- offences against morality and decency (e.g., adultery);
- offences against public order and government (e.g., treason).

Additionally, in the American legal system, there is a crime classification by degree of severity, where the term *crime* is further divided using letter indices such as A felony, B felony, C felony, and A misdemeanor, B misdemeanor, C misdemeanor. Such classification has never existed in English criminal law.

This divergence in microfield distribution of criminal law terms, even within closely related terminologies and language variants, illustrates how the development of legal systems is deeply influenced by the social context in which they exist—an influence that is reflected in their terminological systems.

The study of the national-cultural specificity of British Legal Terminology (BLT) and American Legal Terminology (ALT) primarily involves identifying the proportion of shared or universal (international) elements within

these terminological systems. Since the majority of terms are common to both BLT and ALT, there is no pressing need to focus on the core body of shared nominals. However, given the prevailing view on the high degree of internationalization in terminological systems, including legal ones, the presence of internationalisms within BLT and ALT warrants special attention. Internationalisms signify the extent to which universality is manifested in terminological systems, as the term "internationalism" generally refers to nominative units found in at least three languages.

Commonalities across languages of different types are always linked to the shared cultural backgrounds of the peoples who speak them. Through close interaction, distinct cultures may merge into a unified cultural entity within a specific region. Languages, however, never fully merge due to structural and typological differences. Nevertheless, intensive cultural ties and interactions give rise to internationalisms in various languages, reflecting shared cultural values. Many scholars define internationalisms as lexical and phraseological units, as well as word-formation elements, that are similar in meaning and form across multiple languages. As Yu. Lotman remarked, "various languages, like the many-eyed Argus, each highlight different facets of the same reality" (Lotman, 1999, p. 178), but the growth of cultural interaction leads to a unification of reality and, consequently, to the emergence of internationalisms.

In BLT, the first internationalisms appeared as early as the 11th century in the form of Latin terms that spread across Europe to denote core Roman legal concepts. ALT adopted all internationalisms already embedded in BLT. An analysis of BLT and ALT revealed that out of the terms studied, a significant portion (310 units, or 20%) were complete Greco-Latin internationalisms signifying essential legal concepts. For example:

- English: *alimony, amnesty, doctrine, jurisdiction, contract, justice, verdict, penitentiary, extradition, militia, precedent, prostitution, procurator, sodomy, immunity*;
- Russian: *алименты, амнистия, доктрина, юрисдикция, контракт, юстиция, вердикт, пенитенциарий, экстрадиция, милиция, прецедент, проституция, прокурор, содомия, иммунитет*;
- German: *die Alimente, die Amnestie, die Doktrin, die Jurisdiktion, der Kontrakt, das Verdikt, die Prostitution, der Prokurator, die Sodomie, die Immunität, die Justiz*;
- French: *aliments, amnistier, doctrine, contrat, verdict, immunité, jurisdiction, justice, pénitentiaire, extradition, milice, précédent, prostitution, procureur*, etc.

According to this classification, such terms are considered inherently foreign internationalisms. They are deemed complete because of their phonetic, semantic, and orthographic similarity (Golovin & Kobrin, 1987). A second category includes nationally adapted Greco-Latin terms built using Greco-

Latin roots and affixes, integrated into various European legal lexicons. For example:

- Russian: вотум, квазиконтракт, микрослед;
- French: vote, quasi-contrat;
- German: vote, quasi-contract, micro traces.

These are coined to denote new legal concepts within national languages while maintaining terminological consistency through Greco-Latin elements, which are ideal building blocks in many languages.

A third category, particularly relevant to the study of national-cultural features of legal terminology, consists of "national language words with international spread," as defined by E. Wüster. These arise amid increasing internationalization of legal concepts. Although rare in BLT and ALT due to the precedent-based nature of Anglo-American legal culture, such internationalisms from English are beginning to enter codified systems like Russian and German due to the influence of common law practices. As V. Kostomarov observed, English borrowings—particularly from British and American legal discourse—are now a hallmark of modern language evolution, much like the "French flood" of the 18th century. Then, France set the standard for culture and communication; now, that role belongs to the USA. Increasingly, English terms are used even when accurate native equivalents exist (Kostomarov, 1994, p. 87).

In Russian legal terminology, examples of English-derived internationalisms include: *гудвилл* "goodwill", *корнер* "cornering agreement", *пул* "pool agreement", *спот* "spot transaction", *слип* "slip document", *хедж* "hedging", *овердрафт* "overdraft", *свинг* "swing line of credit", *свитч* "switch transactions", *диспач* "despatch payment". Compare to German: der Goodwill, der Corner, der Poolvertrag, der Spotgeschäft, der Slip, das Hedgegeschäft, der Overdraft, der Swing, das Switch-Geschäft, and *der Despatch*.

Other isolated English internationalisms appear across public, civil, criminal, and labor law: *warrant*, *dismissal*, *estoppel*, *lock-out*, *kidnapping*, *racket*—some of which are not officially recognized in Russian legislation (e.g., *kidnapping*, *racket*) but are widely used in legal publications (*A Dictionary of Modern Legal Usage*, pp. 276). These terms, however, are fully integrated into the legal terminologies of German and French.

The presence of internationalisms in different languages highlights the unifying, rather than dividing, aspects of various cultural models. When examining the composition of BLT and ALT, one must note the significant number of legal internationalisms (310 units, or 20%) and their early emergence, particularly Latin-derived terms from the initial stages of BLT's formation. These terms later spread throughout Western legal traditions, including Russian, French, and German terminologies. Today, both BLT and ALT serve as active sources of new internationalisms, and overall, interna-

tionalisms greatly contribute to the structural consistency observed between these two legal terminological systems.

Systemic relationships in terminology are represented through both paradigmatic and syntagmatic relations. The former, as is well known, are based on the similarity of units that belong to the same level of the language system. Paradigmatic relations in terminology primarily concern the similarity of nominative units, which is based on the fact that "these units may resemble each other in certain structural components" (Kostomarov, 1994, p. 87).

Systemic relations manifest in various types of oppositions, where two key characteristics are essential: the correlation of lexemes and the correlation of sememes. Depending on the nature of the relationship between these components, different types of oppositions are distinguished: identity oppositions (homonymy, absolute synonymy), privative oppositions (hypernym-hyponym or generic-specific relations, ideographic synonymy), and equipollent oppositions (antonymy).

In addition to these specific types of oppositions, other forms are also found in language; however, as numerous studies have shown, the types mentioned above are the most relevant for terminological systems.

Given that the presence of antonymy in legal terminology is limited and most often associated with the contrast between legal and illegal (e.g., *legal — illegal*, *lawful — unlawful*), which constitutes a legal semantic universal, there is no evidence of national-cultural specificity in the formation of antonyms.

Syntagmatic relations are primarily realized in the formation of compound nominals. These aspects of terminological systematization will be discussed in the following sections from the perspective of how national-cultural specificity manifests in the systemic relations of BLT and ALT.

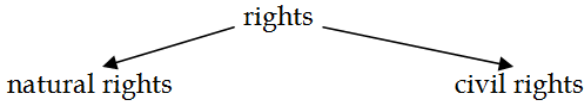
Numerous studies in terminology confirm that any terminological system, as a specific lexical subsystem of language, encompasses virtually all types of paradigmatic relations. However, these relations may be somewhat weakened in terminological systems (e.g., limited homonymy, lack of stylistic synonyms). The leading relationships in terminological systems are hierarchical (hypernym-hyponym) relations, based on hyponymic links— recognized as a universal method for hierarchical organization. These links are founded on logical implicational relationships, which are used for the generic-specific classification of various linguistic units (Kostomarov, 1994, p. 87).

A term's specificity lies in the fact that it exists within a field where it is unambiguous and precise; beyond that field, it loses these properties. Terminological fields are built on generic-specific hierarchical relations, which are evident in established terminological taxonomic structures. National-cultural specificity in the systemic hierarchy of legal terminology is reflected

in the unique distribution of similar terms across microfields, which results from various extralinguistic factors—such as national-cultural characteristics of court systems, law enforcement, and so on. An earlier example illustrated how the distribution of crime-related terms in BLT and ALT microfields differs. A similar pattern can be observed in the taxonomic structure of the microfield of terms denoting "rights" in BLT and ALT.

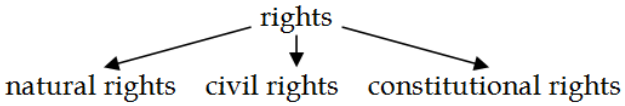
Both BLT and ALT contain taxonomic structures with the generic term *rights*.

In BLT, the structure includes:



The category *civil rights* is further divided into *rights of property*, *voting rights*, *right of personal safety*, *right of privacy*, and others.

In ALT, the taxonomic structure appears as:



Here, *constitutional rights* encompass terms such as *political rights* and *right of defense*, among others. The emergence of a new group—*constitutional rights*—in ALT is due to the fact that the U.S. Constitution holds supreme legal authority, while the United Kingdom lacks a written constitution and, consequently, formal constitutional law. The U.S. Constitution is one of the most fundamental pillars of American legal culture. Unlike in the UK, where core political and civil rights are codified in statutes, in the U.S. these rights are enshrined in the Constitution. Such shifts in legal prioritization, driven by extralinguistic factors like the national-cultural development of each country's political system, led to a redistribution of terms across microfields. In ALT, the term *voting rights* has moved to the group of *constitutional political rights*, rather than *civil rights* as in BLT; similarly, *right of privacy* now belongs to the group of *constitutional civil rights*. The reclassification of these terms under *constitutional rights* in ALT highlights the significant importance these concepts hold within the country's legal culture, as fundamental legal principles are enshrined in the U.S. Constitution. The *right of privacy*, as Judge L. Brandeis once stated, is "the right to be let alone—the most comprehensive of rights and the most valued by civilized men" (Monk 1991, p. 101). The inclusion of this right in the U.S. Constitution once again underscores the high priority given to the concept of privacy in American legal culture.

Synonymy is generally understood as the correspondence in core meaning between lexical, morphological, and phraseological units. However,

synonymy in terminology differs from that in general language. A. Reformatsky emphasizes that "synonyms in general language denote the same thing but relate it to different concepts, thus revealing different properties of that thing through its naming" (Superanskaja, 1993). In terminology, synonyms correspond to the same concept and object. Therefore, some scholars argue that terminology exhibits absolute synonymy—defined by A. Superanskaja as occurring when "words are related through a semantic opposition of identity at the level of core meaning" (Superanskaja, 1993, p. 124), justifying the term "terminological doublets".

For BLT—and, by extension, ALT which adopted it—this formative period occurred in the 11th–12th centuries, when secular jurisdiction strengthened and many translations of the Justinian Code and related documents introduced a range of calques that became synonymous with direct Latin borrowings still in use today. As a result, chains of terminological doublets emerged—for example, the term *criminal* has a series of doublet synonyms: *criminal*, *offender*, *culprit*, *perpetrator*. *Criminal* stems from the Latin *crimen* ("guilt"); *culprit* is also of Latin origin; while *offender* and *perpetrator* were borrowed from French. Of these, *offender* and *perpetrator* are polysemous, referring not only to a person who committed a crime (like *criminal* and *culprit*), but also to someone who committed a non-criminal offense, thus forming another doublet chain with *wrong-doer*.

In ALT, semantic narrowing of BLT-originated terms has led to the formation of synonymic sets that are absent in BLT. For example, *complaint* in ALT has lost the semantic feature of 'equity' (Monk, 1991, pp. 224–225), influenced by extralinguistic factors such as the desire to simplify court procedures in the New World's evolving democratic system. Thus, *complaint* came to mean "the original or initial pleading by which an action is commenced under Codes or Rules of Civil Procedure" (*Black's Law Dictionary*, 1998, p. 196). Unlike in BLT, where it is synonymous with *suit* and *claim*, in ALT it is also synonymous with *plea* and *action*.

Examples of doublets in BLT and ALT include: *euthanasia — mercy killing*, *vex-action — litigation*, *pro bono — legal service free of charge*, *par delictum — equal guilt*, *polygamy — plural marriage*, *plea negotiations — plea bargain*, *perjury — false swearing — false oath*, *deceit — false representation — false statement*, *forfeiture — seizure*, *faked alibi — false alibi*, *International law — Law of nations*, *Substantial law — Law of substance*, *Natural law — Law of nature*, etc. BLT and ALT contain 375 such doublets (25%), a high number attributed to the influence of Latin and French borrowings and socio-political factors like the separation of secular and ecclesiastical jurisdictions and the subsequent lexical divergence from Latin.

Another source of synonymy is euphemism, driven by social and psychological taboos. Euphemistic legal synonyms are unique to BLT and ALT,

arising from the socially charged nature of legal terminology. For instance, *capital punishment* is a euphemism for *death penalty*, replacing the word *death* with the more neutral *capital*. Similarly, *capital case* and *capital crime* euphemize the concept of state execution, reflecting a cultural aversion to explicit references to death.

Synonyms also emerge for sensitive terms like *rape*, which is often referred to euphemistically as *carnal knowledge*, *ravishment*, or *carnal abuse*. These alternatives arose to avoid socially taboo expressions, especially in the context of crimes against women. *Ravishment*, originally meaning "abduction" or "robbery," entered legal usage via metaphor, and over time, its euphemistic quality diminished. However, legal distinctions persist: *ravishment* is not used for crimes against minors, where *statutory rape* and *carnal knowledge* are preferred (*Black's Law Dictionary*, 1998, p. 146).

BLT offers five terms for "lawsuit": *action*, *complaint*, *claim*, *plea*, *lawsuit*. Not all are true doublets—only *suit*, *lawsuit*, *action*, and *plea* are full or near-synonyms. *Complaint* and *claim* function as doublets, but distinctions remain. For instance, *claim* denotes "to demand as one's right," and carries the semantic component 'equity' (*Black's Law Dictionary*, 1998, p. 169), while *suit* encompasses broader concepts across common law and equity (p. 1000). This indicates ideographic rather than full synonymy.

Such cases highlight that legal terms, like general language lexemes, follow universal linguistic rules and are not fully isolated. This is especially true for public-political terminologies like law, which reflect societal and cultural trends and are thus more susceptible to extralinguistic influences, reducing their terminological precision compared to technical fields.

Metaphoric usage—such as *ravishment* for *rape*—illustrates how meaning shifts are contextually driven, as C. Delameillieure notes: scientific metaphors depend on broader intellectual and cultural paradigms (Delameillieure, 2022). The choice of *ravishment* was likely intentional, aligned with its original meaning of "woman's abduction," which excludes its use for child-related offenses.

Partial synonymy among lawsuit terms also reflects England's historical legal development. According to C. Delameillieure, medieval English court proceedings were so theatrical and convoluted that distinguishing law from spectacle was difficult. Justice was hindered by rigid forms of pleading, and the creation of equity courts with simpler forms like *bill of complaint* aimed to correct this. Over time, *suit* became a general term encompassing both common law and equity (Delameillieure, 2022, pp. 272–273).

Another source of synonymy comes from professional slang entering formal terminology. For example, *hijacking*, originally slang, became a synonym for *air piracy*. While *hijacking* refers broadly to the forcible seizure of planes, ships, or trains, *air piracy* is more narrowly defined (*Black's Law Dic-*

tionary, 1998, pp. 45, 113). Similarly, *wash sale*, a term from financial slang, became formalized in law as a synonym for "offsetting sale and purchase of the same asset within a short time" due to its brevity.

The presence of synonyms in BLT and ALT underscores that legal terminology, especially in the socio-political sphere, cannot be completely insulated from general language phenomena. Differences in synonymic sets between the two reflect extralinguistic factors, such as the integration of professional slang and the need to differentiate legal concepts.

Homonymy is understood as the phonetic coincidence of two or more linguistic units that differ in meaning. Various types of homonymy are distinguished:

- Phonetic (coincidence in sound);
- Graphic (coincidence in spelling only);
- Morphological (coincidence of words belonging to different parts of speech).

However, according to several scholars, homonymy in terminology is limited in scope. Barbara T. Cummings, R. A. Hudson, David M. Steinberg, Hall E.T. argue that interdisciplinary terminological homonymy is the most common form (Golovin & Kobrin, 1987). Within a single terminological system, it is more accurate to speak of polysemy rather than homonymy.

The analysis of homonymy in BLT and ALT is particularly intriguing, as both terminological systems belong to the same field, are genetically very close, based on different variants of the same language, and serve closely related, yet distinct, legal cultures.

At the early stages of its development, as mentioned earlier, ALT fully adopted BLT. However, when English legal terms were transferred to the American legal system, some of them developed entirely new meanings under the influence of new legal traditions, customs, and socio-political realities. These new meanings rendered the terms homonymous with their British counterparts. This type of homonymy can be described as intersystem homonymy specific to different variants of the same language.

Examples of such homonymy include:

- *Solicitor General*: Deputy Attorney General (UK); Deputy Minister of Justice (US);
- *Commonwealth*: The British Commonwealth of Nations (UK); a state within the US (e.g., Pennsylvania, Virginia);
- *County*: A shire (UK); a district within a US state;
- *Marshal*: Court official (UK); a federal law enforcement officer in each US judicial district (US) (*Dictionary of Law*, 1995, p. 149).

This type of homonymy arises from a complex interaction of internal and external factors. Internally, it is influenced by the asymmetry between form and meaning in linguistic signs, which is further amplified by external fac-

tors such as the limited nature of any language's vocabulary versus the limitless complexity of the real world. Additionally, the distinctive evolution of American English contributed to this form of homonymy.

Beyond intersystem homonymy, BLT and ALT also exhibit cases of interfield homonymy, resulting from transterminologization. For example, the term *deposition* in both BLT and ALT means "the testimony of a witness taken upon oral questions or written interrogations, not in open court" (*Black's Law Dictionary*, 1998, p. 302), whereas in microelectronics, it refers to "a coating obtained through deposition"(*Dictionary of Law*, 1995, p. 32).

Similarly, the term *trial* in BLT and ALT refers to "a judicial examination and determination of issues between parties to an action, whether of law or fact, before a court with jurisdiction" (*Black's Law Dictionary*, 1998, p. 1045), while in engineering, it means "test, trial run" (*Dictionary of Law*, 1995, p. 432).

Thus, this analysis reveals instances of both intersystem homonymy across English variants (BLT and ALT) and interfield homonymy. The presence of intersystem homonymy reflects the national-cultural specificity of BLT and ALT in terms of paradigmatic relationships, where identical-form terms denote different concepts, with such distinctions marked in only one variant of English.

In general, syntagmatic relations, as manifested in the formation of compound terms, are determined by the capabilities of the language system. As such, no significant differences are observed in the models for forming compound terms in BLT (British Legal Terminology) and ALT (American Legal Terminology), except for cases where ALT uses a letter index to modify the base term (e.g., *felony A*, *felony B*, *felony C*).

Differences in the collocational behavior of base terms with various modifiers in BLT and ALT have been noted. For example: *House — House of Lords*, *House of Commons* (BLT) versus *House of Representatives* (ALT); *green book* (BLT) versus *white book* (ALT), among others (see also § 3.4). These differences in word combination result from the linguistic systems themselves and often lead to the creation of non-equivalent terms in BLT and ALT.

Of particular interest in terms of national-cultural specificity are so-called *proprial terms*—compound legal terms containing onymic elements (i.e., proper names). In many terminological systems, borrowing of onymic elements promotes internationalization, as is common in medical terminology (Kostomarov, 1994). For example: *maladie de Roger* appears identically in English, German, and French. However, such transfer is not feasible in legal proprial terminology, as will be demonstrated.

Typically, proprial terms are represented in two types: eponymic and toponymic, where one element is a proper name (either a toponym or an anthroponym), e.g., *Grander cases*, *Bruton error*, *Lord Campbell Act*, *Mallory rule*,

Massachusetts rule, etc. According to our data, such multi-word proprial terms make up 47 units, or 3% of the analyzed terms.

These terms form through syntagmatic relationships in compound term creation. Legal proprial terms in BLT and ALT can be divided into three subgroups:

- *Toponymic compounds*: e.g., *Dartmouth College Case*, *Massachusetts ballots*;
- *Eponymic compounds*: e.g., *Drago Doctrine*, *Lord Mansfield rule*, *Anton Piller Order*;
- *Case law terms*—names of landmark decisions by the U.S. Supreme Court or House of Lords that have become terms themselves, consisting of anthroponyms or combinations of anthroponyms and toponyms: e.g., *Marbury v. Madison*, *Furman v. Georgia*, *Mapp v. Ohio*.

The presence of proprial terms in both BLT and ALT stems from their basis in *precedent law*. In both English and American legal traditions, legal principles are formed through the collective opinion of judges on specific cases, which then become binding for future similar cases. Compared to codified systems, precedent systems are more personalized, often incorporating the names of influential legal figures into legal doctrines or statutes to highlight individual contributions—e.g., *Durham rule*, *Lynch law*, *Lanham Trademark Act*, *Sherman Act*.

Notably, terms of the third subgroup are more prevalent in ALT than BLT. Still, BLT includes examples like *Rylands v. Fletcher*, *Mersian v. Moody's*. The wider use of such case-named terms in ALT reflects the U.S. legal culture's dual foundation in both precedent and constitutional law. The U.S. Constitution grants the Supreme Court the authority to invalidate laws that contradict constitutional principles. As Monk notes, the U.S. Supreme Court holds precedent in less reverence than its British counterpart (Monk, 1991, p. 51).

Case names that have led to constitutional amendments—and thus the development of new legal principles—have themselves become terms:

- *Mapp v. Ohio* (1961: evidence illegally obtained by state officers inadmissible in court, 4th Amendment basis);
- *Marbury v. Madison* (1803: established judicial review over acts of Congress);
- *Furman v. Georgia* (ruling that the discriminatory use of capital punishment is unconstitutional).

The brevity requirement for terms further supports the use of such proprial compounds over descriptive phrases.

Particularly notable is *Miranda v. Arizona* (landmark case establishing principles of voluntary confession). Ernesto Miranda's confession under coercion led to the Supreme Court voiding his conviction and establishing a new constitutional norm. This generated a taxonomic structure in ALT based on *Miranda v. Arizona*, including terms like:

- *Miranda rule*: "prior to any custodial interrogation, the person must be warned of his rights";
- *Miranda hearings*: "a pre-trial proceeding to ensure Miranda rights were upheld" (*Black's Law Dictionary*, 1998, p. 890). Synonymous doublets of *Miranda rule* include *Miranda warnings* and *Miranda rulings* (Monk, 1991, p. 126).

This analysis shows that proprial terms are characteristic of both BLT and ALT, denoting concepts from precedent-based systems where laws are associated with individuals. Such terminology is generally absent in more abstract, codified systems (e.g., Russian law). Legal proprial terms are clearly tied to the national-cultural identity of BLT and ALT, unlike medical proprial terms which may be transferable across systems (Kostomarov, 1994).

To sum it up, we can say that the origins of legal terms and concepts can already be traced back to the Proto-Indo-European language, which attests to the fundamental role of legal relationships in ensuring societal safety—a prerequisite for survival. From the earliest stages of its development, law was closely tied to both religion (ritual-priestly culture) and everyday culture. The emerging language of law was based on the general language understood by all members of society, which is why legal terminology is considered to have developed naturally.

In the laws of Anglo-Saxon kings, it is already possible to identify various thematic groups of nominatives: terms for monetary fines (*bot*, *half-leod*, *wergeld*), crimes (*fore-steel*, *weg-worte*), and maintenance of peace and order (*frith*). From the 11th century, English legal culture began evolving within the Western legal tradition. During this period, law separated from religion, professional legal practitioners emerged, and the science of law—jurisprudence—was established.

It was during this time that legal terminology solidified into a structured system. The Western legal tradition was the primary extralinguistic factor influencing the development and composition of BLT (British Legal Terminology). This early period was marked by numerous direct Latin borrowings, as the Western legal tradition was rooted in Roman law. Under Latin's influence, legal terminology fully separated from the general language, and words previously used in everyday speech became legal terms with specialized definitions comprehensible only to legal professionals. Today, both BLT and its derivative ALT (American Legal Terminology) retain a significant number of direct Latin borrowings—180 terms, or 12%—which reflects the profound influence of Roman legal culture on English legal tradition via the Latin language.

In addition to direct borrowings, BLT contains many Latin calques such as *after the event* (from *ex post facto*), *invoice* (from *pro forma*), etc. The emergence of Latin calques in BLT was the result of legal language democratization initiated by Edward III, who mandated court proceedings in English.

A second group of borrowings identified in both BLT and ALT consists of direct French borrowings and indirect Latin borrowings that entered through French. These borrowings resulted from the Norman Conquest and the imposition of Norman legal culture. During this period of bilingualism, Anglo-Saxon terms were largely supplanted by French or Latin-derived equivalents, such as *felony*, *tort*, *defence*, *justice*, etc. Today, BLT and ALT contain about 30 such terms (2%). The scarcity of borrowings from other languages reflects the limited influence of non-English legal cultures on English legal development and its associated terminology.

The core body of terms in BLT and ALT is shared, representing concepts common to both terminological systems and often universal across other languages' systems. Due to the genetic closeness of BLT and ALT and the limitations of this study, the universality of terms was explored only in the context of terminological internationalization. This aspect is crucial because both systems were built upon borrowings from Latin and French, with many such terms denoting legal concepts considered universal.

An analysis of BLT and ALT reveals national-cultural differences despite their shared origins. These differences stem from extralinguistic factors such as political, social, and economic divergences between the UK and the USA, which led to differences in ideology, moral norms, and everyday culture.

To examine these national-cultural differences, the proportion of universal elements was identified using internationalisms. The study found 310 such terms—20% of the total. There is also a trend toward the spread of English internationalisms to other languages, driven by the convergence of precedent-based and codified legal systems, with the former influencing the latter's principles and terminology.

National-cultural specificity in BLT and ALT appears in systemic relationships, including paradigmatic (hierarchical, synonymic, and homonymic) and syntagmatic structures. In hierarchical systems based on hypernym-hyponym relations, specificity manifests through the different distribution of terms across microfields within taxonomic structures. This redistribution of formally and semantically similar terms across microfields reflects the unique national evolution of terminologies. Such redistribution is evident in BLT and ALT for categories such as *crimes*, *rights*, and *precedents*. For instance, the crime classification differences stem from the preservation of an older system in ALT, while the recognition of the U.S. Constitution influenced shifts in rights-related terminologies.

National specificity is also evident in the formation of microfields of proprial terms—compound legal terms containing proper names. New taxonomies based on proprial terms may emerge in ALT, particularly those resulting from precedent development, e.g., the taxonomy under *Miranda v. Arizona.*

Both absolute and ideographic synonymy were found in BLT and ALT. Synonymy results from numerous Latin borrowings and calques, e.g., *en*

bene — full bench, *euthanasia — mercy killing*, as well as from terms of French or Latin origin like *tort — wrong*, *culprit — criminal — offender — wrong-doer*.

Some euphemisms, serving as stylistic devices for softening, also contribute to synonymy, such as *death penalty — capital punishment*, *rape — carnal knowledge*. Professionalisms that have become terms, like *wash sale* — "a fictitious kind of sale," are another source.

Ideographic synonymy in BLT and ALT often results from broadening or narrowing denotative meanings, e.g., *rape — carnal knowledge — ravishment*. Homonymy includes both intersystem and interdisciplinary types, with the former reflecting national-cultural specificity.

From a syntagmatic perspective, the national-cultural specificity of BLT and ALT is most evident in proprial terms—unique to precedent systems like English and American law, but not typical of codified systems like Russian law. These include case names that influenced U.S. constitutional amendments (*Coker v. Georgia*, *United States v. Nixon*), law names (*Sherman Act*, *Malloney Act*, *Lynch Law*), and doctrines (*Deep Rock doctrine*, *Fauntleroy doctrine*). Though relatively few—47 terms or 3%—these proprial terms vividly reflect the cultural distinctiveness of the precedent-based legal system.

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