

THE ROLE AND LEGAL RESPONSIBILITY OF INTERMEDIARIES IN NARCOTICS SALE AND PURCHASE CASES INVOLVING THE DEATH PENALTY (Analysis of Decision Number 355/Pid.Sus/2025/PN Mdn)

Junaidi Pelawi^{1*}, Tri Reni Novita²

^{1,2*} Faculty of Law, Universitas Muslim Nusantara (UMN) Al Washliyah, Indonesia,
Email: Jpelawi383@gmail.com, trireni@umnaw.ac.id

Abstract

Based on the results of the study, it shows that the role of intermediaries in the process of narcotics distribution and sales based on decision number 355 / Pid.Sus / 2025 / PN Mdn is that they are an integral part of an organized criminal network with a high level of hierarchy and systematization. Intermediaries not only function as liaisons between main dealers and consumers, but also carry out important tasks such as transportation, distribution, and security of prohibited goods. Their main motivation is driven by large economic profits, with incentives in the form of significant wages and commissions. The legal responsibility given to intermediaries in narcotics cases based on decision number 355 / Pid.Sus / 2025 / PN Mdn is criminal legal responsibility in the form of the death penalty because it is legally and convincingly proven guilty of committing a crime "without the right to be an intermediary in the sale and purchase of class I narcotics with a total of 29,000 grams of crystal methamphetamine and 39,000 ecstasy pills" hidden in green plastic bags of Guanyinwang brand.

Keywords: (Role, Legal Responsibility, Intermediary Actors, Narcotics Trading, Death Penalty)

1. Introduction

The distribution and abuse of narcotics in Indonesia constitute a serious and continuing concern. In efforts to combat narcotics crime, the criminal justice system plays an important role in enforcing the law and imposing sanctions on offenders. One element requiring particular attention is the role of intermediaries, namely persons who may not directly distribute narcotics but participate in and bear responsibility for the conduct. In narcotics cases, intermediaries generally act as links or distribution coordinators who facilitate the movement of narcotics from producers to end users. Their involvement has significant legal implications, particularly with respect to criminal responsibility, including the possibility of the death penalty under narcotics legislation. The application of the death penalty is itself controversial because it concerns justice, human rights, and the effectiveness of punishment in reducing narcotics distribution. Decision Number 355/Pid.Sus/2025/PN Mdn provides a relevant case for analysis, especially regarding the role and legal responsibility of an intermediary involved in the distribution of Category I narcotics and subjected to the death penalty. Analysis of this decision is important to determine whether the court properly considered the relevant legal aspects when determining the defendant's responsibility and punishment and how the death penalty is applied to an intermediary in the context of narcotics crime. This study therefore aims to conduct a legal analysis of the role and legal responsibility of intermediaries in narcotics cases resulting in the imposition of the death penalty, particularly through examination of the decision.

2. Methodology

This study employs normative legal research, namely research conducted by examining laws and regulations that apply or are applied to a particular legal issue. Normative legal research is often referred to as doctrinal research because its objects of study are statutory documents and legal literature. The study is library-based (library research), conducted by reviewing books and literature relevant to the research topic.

The research uses two approaches: the statute approach and the case approach. The statute approach examines regulations relating to the role and legal responsibility of intermediaries in narcotics sale and purchase cases involving the death penalty, namely the Criminal Code, the Criminal Procedure Code, Law No. 2 of 2002 concerning the Indonesian National Police, and Law No. 35 of 2009 concerning Narcotics. The case approach is conducted through an in-depth analysis of Medan District Court Decision Number 355/Pid.Sus/2025/PN Mdn as the principal object of this study.

The data used are secondary data consisting of primary, secondary, and tertiary legal materials. Primary legal materials include relevant laws and regulations and court decisions. Secondary legal materials comprise books, scholarly journals, and research results relating to the legal responsibility of intermediaries in narcotics sale and purchase cases involving the death penalty. Tertiary legal materials include legal dictionaries and legal encyclopedias. Data were collected through library research.

The data were analyzed qualitatively by interpreting the legal norms and legal facts contained in the court decision. The results are presented systematically to provide a comprehensive description of the legal responsibility of intermediaries in narcotics sale and purchase cases involving the death penalty.

3. Research Results and Discussion

The widespread distribution and sale of narcotics have become a serious concern in many countries, including Indonesia. This phenomenon poses major challenges to law enforcement, public health, and national security. Factors contributing to the prevalence of narcotics distribution and sales include the ease of access and movement through international and domestic routes, high demand among users arising from social, economic, and psychological factors, the existence of large syndicate networks that secretly control narcotics distribution, and the use of digital technology and social media for illegal promotion and transactions.

The modus operandi of narcotics distribution and sales generally involves intermediaries acting cautiously, reflecting the complexity and sophistication of narcotics syndicate networks. Intermediaries connect producers with dealers and dealers with end consumers. They usually operate secretly and carefully in order to avoid detection by law-enforcement authorities. Intermediaries may be individuals or groups with broad and organized networks.

Narcotics distribution and sales are carried out with considerable caution, including the use of false identities and incomplete documents during transactions; encrypted messages, instant-messaging applications, or social media for coordination; particular codes, signals, or secret language to conceal intent; and transactions conducted in secure and closed locations known only to members of the network.

Narcotics are delivered through methods designed to avoid detection, including vehicles, parcels, or postal services. Narcotics may be concealed in other goods such as food, clothing, or personal belongings. Intermediaries may be positioned at different geographic points to slow and complicate tracing, while members may be rotated or replaced periodically. Networks may also employ strict internal supervision and control as well as technology and intelligence systems to monitor activities and identify risks.

These cautious and organized methods create major challenges for narcotics eradication. Law-enforcement and prevention strategies must therefore keep pace with evolving methods of operation in order to improve the effectiveness of enforcement.

Intermediaries play an important and strategic role in narcotics distribution and sales because they serve as key links between producers and end consumers. They operate as distribution channels connecting different levels of the narcotics network, from producers and large and medium-scale dealers to smaller consumers. In this way, they help ensure the flow of goods from their source to local and international markets.

Intermediaries arrange and coordinate transactions, including delivery schedules, payments, and the transfer of goods. They often use payment systems that are difficult to trace and confidential communications to avoid detection. They work carefully to protect themselves from legal risks such as arrest and investigation, generally relying on internal security networks and secure communication methods. They also arrange the concealment of narcotics in shipments, vehicles, or other packages. Deliveries are conducted cautiously to avoid inspection and arrest, including through illegal routes and sophisticated operational methods.

In relation to the role of intermediaries in narcotics distribution and sales under Decision Number 355/Pid.Sus/2025/PN Mdn, further analysis was conducted. Based on an interview with Mr. Frans Effendi Manurung, S.H., M.H., a judge at the Medan District Court, he explained how the court assessed the role of the intermediary on the basis of the facts revealed at trial in this decision, as follows:

The judge considered the role of the intermediary in narcotics distribution to be important and crucial because intermediaries connect suppliers with the principal actors who distribute narcotics to the public. Based on the facts established at trial, the judge found that the intermediary actively participated in the distribution process, demonstrating a high level of involvement and legal responsibility. The evidence showed that the defendant, Muhammad Fauzi, as an intermediary, played a strategic role in facilitating narcotics distribution, so an appropriate sentence was considered necessary in the interests of justice and deterrence.

In the researcher's analysis, the judge's answer reflects a detailed understanding of the strategic role and importance of intermediaries in narcotics distribution networks. The judge emphasized that an intermediary is not merely a link but may play an active and significant role in distributing narcotics from suppliers to principal distributors who then circulate them in the community. This assessment was based on trial facts showing the direct involvement of the defendant, Muhammad Fauzi, in facilitating narcotics distribution and therefore supporting a high degree of legal responsibility.

The researcher considers that this assessment reflects an approach intended to be fair and proportionate by treating the responsibility of intermediaries as an integral part of narcotics eradication. An appropriate sentence was viewed as necessary to create deterrence and uphold justice while emphasizing that active participation in a narcotics network cannot be treated as insignificant.

The researcher nevertheless notes the importance of preventive and rehabilitative aspects so that law enforcement is not oriented solely toward punishment but also seeks to reduce future opportunities for intermediary involvement through prevention and community-empowerment programs. Overall, the judicial assessment reflects a concern for substantive justice and a commitment to effective and humane narcotics law enforcement.

Based on the research results and discussion, the role of intermediaries in narcotics distribution and sales under Decision Number 355/Pid.Sus/2025/PN Mdn shows that they form an integral part of an organized criminal network characterized by a high degree of hierarchy and systematization. They do not merely connect principal dealers and consumers but also perform important tasks such as transportation, distribution, and safeguarding

prohibited goods. Their principal motivation is substantial economic profit, including significant wages and commissions. They carry out these roles using sophisticated operational strategies and tactics, such as coded communications, hiding places, and distribution routes designed to avoid arrest. The network also demonstrates developed risk-management practices and a clear hierarchy that support the effectiveness and continuity of the illegal activity. The existence and active role of intermediaries therefore show that law enforcement must be continuous and comprehensive, addressing the entire chain, including intermediaries, as part of an effective narcotics-eradication strategy.

Legal responsibility in narcotics sale and purchase cases refers to the legal obligations borne by an intermediary or other participant involved in the distribution, transportation, or sale of narcotics under Law Number 35 of 2009 concerning Narcotics and other relevant legislation.

Such responsibility incorporates the principle of legality: an intermediary may be criminally punished when it is legally and convincingly proven that the person committed an offense under the provisions of narcotics legislation, including offenses concerning possession, distribution, or manufacture of narcotics.

It also includes personal responsibility, meaning that each individual involved in the illegal activity bears personal responsibility for his or her conduct, including an intermediary acting as a connector, transporter, or distributor. Depending on the degree of involvement, seriousness of the conduct, and statutory penalty, an intermediary may be subject to imprisonment, a fine, or another criminal sanction.

Forms of responsibility may include criminal responsibility for the narcotics offense and administrative and/or civil responsibility where losses arise from the activity. Accordingly, legal responsibility for an intermediary in a narcotics case is the process through which the intermediary is subjected to legal proceedings under criminal law as an expression of justice and an effort to prevent the further spread of narcotics. The intermediary must bear personal responsibility for his or her role and conduct in the illegal activity.

Further analysis was conducted concerning the legal responsibility imposed on intermediaries in the narcotics case under Decision Number 355/Pid.Sus/2025/PN Mdn. Based on an interview with Mr. Frans Effendi Manurung, S.H., M.H., a judge at the Medan District Court, he explained that the legal responsibility imposed on an intermediary must be based on the level of involvement and the role performed in the narcotics distribution process. Because intermediaries operate as important links in distribution, they bear substantial responsibility that must be addressed through law. The legal responsibility imposed should therefore reflect their degree of fault and contribution to the offense and should also consider prevention and deterrence. In this case, because the defendant Muhammad Fauzi was proven to have played an active and important role as a principal intermediary, the judge considered that legal responsibility should be firmly imposed in accordance with applicable law.

In the researcher's analysis, the judge's answer emphasizes that legal responsibility for a narcotics intermediary should be based on the degree of involvement and the actual role played in distribution. The researcher considers that this reflects the principles of justice and proportionality in sentencing, under which the defendant Muhammad Fauzi's degree of fault and contribution become principal factors in determining the sanction.

The researcher also notes that the judge treated prevention and deterrence as important considerations, consistent with the principal objectives of the criminal justice system in combating narcotics crime. The conclusion that Muhammad Fauzi, having been proven active and to have acted as a principal intermediary, should be dealt with firmly reflects a strict approach grounded in evidence and applicable law.

The researcher adds, however, that the application of this principle requires clear evidentiary standards so that responsibility is not determined subjectively and the principle of

justice remains protected. Sentencing should also consider all relevant legal aspects and facts established in the case to ensure that the punishment imposed is appropriate and not excessive.

Overall, the researcher considers that the judge's answer demonstrates an appropriate understanding of the importance of imposing legal responsibility fairly and proportionately on narcotics intermediaries, particularly those who play active and strategic roles in distribution networks.

Based on the research results and discussion, the legal responsibility imposed on the intermediary in the narcotics case under Decision Number 355/Pid.Sus/2025/PN Mdn took the form of criminal responsibility through the death penalty after the defendant was legally and convincingly proven guilty of the offense of 'without right acting as an intermediary in the sale and purchase of Category I narcotics, consisting of 29,000 grams of crystal methamphetamine and 39,000 ecstasy pills,' concealed in green plastic bags bearing the Guanyinwang brand. The judgment indicates that an intermediary proven to have actively and importantly participated in narcotics distribution may be subjected to severe punishment, including the death penalty, for purposes of deterrence and law enforcement. The judge considered direct involvement in delivering and channeling the narcotics to be a major factor strengthening the intermediary's legal responsibility.

Despite various enforcement efforts, law enforcement against narcotics intermediaries continues to face numerous obstacles. Limited evidence, hidden and sophisticated networks, and resistance by offenders frequently hinder investigation and enforcement. Legal and human-resource challenges also constitute significant constraints.

This situation demonstrates the need for a detailed understanding of the challenges and obstacles encountered in law enforcement against narcotics crime. Identifying the roots of these problems can support the development of more effective and efficient strategies for comprehensive and sustainable narcotics eradication.

Based on the research results and discussion, law enforcement against intermediaries in narcotics sale and purchase cases who are sentenced to death under Decision Number 355/Pid.Sus/2025/PN Mdn faces complex challenges and obstacles. Principal challenges include an evidentiary process requiring strong proof that satisfies high legal standards and the risk of error in determining the role of intermediaries, whose involvement is often concealed and difficult to establish conclusively. Other obstacles include limited access to digital evidence, financial transactions, and communications, which makes comprehensive disclosure difficult. External factors, including social resistance and objections from members of the public and international organizations, may also affect the process of carrying out the death penalty, which must be undertaken carefully, in accordance with procedure, and with attention to human rights. Law-enforcement authorities and judges seek to address these obstacles through measures such as improving institutional capacity, coordinating among agencies, using information technology, and adopting approaches grounded in justice and human rights. This reflects an awareness of the need to balance firm law enforcement with the protection of human rights while ensuring fair and transparent judicial proceedings.

4. Conclusion

The role of intermediaries in narcotics distribution and sales under Decision Number 355/Pid.Sus/2025/PN Mdn shows that they form an integral part of an organized criminal network with a high degree of hierarchy and systematization. Intermediaries do not merely connect principal dealers and consumers but also perform important tasks such as transportation, distribution, and safeguarding prohibited goods. Their principal motivation is substantial economic profit, including significant wages and commissions. They perform these roles through sophisticated strategies and operational tactics, such as coded

communications, hiding places, and distribution routes designed to avoid arrest. The network also demonstrates developed risk-management practices and a clear hierarchy that strengthen the effectiveness and continuity of the illegal activity. Their presence and active role therefore demonstrate that law-enforcement efforts must be continuous and comprehensive and must address the entire chain, including intermediaries, as part of an effective narcotics-eradication strategy.

The legal responsibility imposed on the intermediary in the narcotics case under Decision Number 355/Pid.Sus/2025/PN Mdn was criminal responsibility in the form of the death penalty after the defendant was legally and convincingly proven guilty of the offense of 'without right acting as an intermediary in the sale and purchase of Category I narcotics, consisting of 29,000 grams of crystal methamphetamine and 39,000 ecstasy pills,' concealed in green plastic bags bearing the Guanyinwang brand. The judgment indicates that an intermediary proven to have played an active and important role in narcotics distribution may receive a severe sanction, including the death penalty, as an expression of deterrence and law enforcement. The judge considered the role of an intermediary, particularly direct involvement in delivery and distribution, to be a major factor strengthening legal responsibility.

Acknowledgments

The authors express their gratitude to all parties who provided support and contributed to the preparation of this study. Appreciation is extended to law-enforcement officials and related parties who provided access to the court decision and supporting data relevant to the research object. The authors also thank academics and researchers whose works served as important references in developing the theoretical framework and legal analysis of this study. Special gratitude is extended to the authors' families for their prayers, moral support, and motivation throughout the research and writing process. The authors recognize that this study still has limitations; therefore, constructive criticism and suggestions are welcomed for the improvement of future research.

References

Books

- A. Fuad Usfa, Pengantar Hukum Pidana, UMM Press, Malang, (2024)
Adami Chazawi, Stesel Pidana. Tindak Pidana. Teori-teori Pemidanaan & Batas Berlakunya Hukum Pidana, PT. Raja Grafindo Persada, Jakarta., (2018)
Andi Sofyan dan Nur Azisa, Buku Ajar Hukum Pidana, Pustaka Pena Press, Makassar, (2016)
Azheri, Corporate Social Responsibility: Dari Voluntary Menjadi Mandatory, PT Raja Grafindo Persada, Jakarta, (2021)
Bambang Sunggono, Metodologi Penelitian Hukum, Raja Grafindo Persada, Jakarta, (2024)
Hans Kelsen, Teori Hukum Murni, Nuansa & Nusa Media, Bandung, (2020)
Jur. Andi Hamzah, Hukum Pidana Indonesia, Sinar Grafika, Jakarta, (2017)
Leden Marpaung, Asas-Teori-Praktik Hukum Pidana, Sinar Grafika, Jakarta, (2020)
M.Yahya Harahap, Hukum Acara Perdata, Sinar Grafika, Jakarta, (2023)
Mardani, Penyalahgunaan Narkoba dalam Perspektif Hukum Islam dan Hukum Pidana Nasional, Rajawali Perss, Jakarta, (2020)
Moh. Taufik Makarao dkk, Tindak Pidana Narkotika, Penerbit Ghalia Indonesia, Bogor, (2023)

- Neni Sri Imaniyanti dan Panji Adam, Pengantar Hukum Indonesia, Sinar Grafika, Jakarta, (2019)
- P.A.F Lamintang, Hukum Penitensier Indonesia, Armico, Bandung, (1988)
- Pemerintah Indonesia, Undang-Undang Tentang Narkotika, UU No. 35 Tahun 2009, Sekretariat Negara RI, Jakarta, (2019)
- Peter Mahmud Marzuki, Penelitian Hukum, Prenada Media Group, Surabaya, (2015)
- Ridwan HR, Hukum Administrasi Negara, Rajawali Pers, Jakarta, (2024)
- Samidjo, Pengantar Hukum Indonesia, Armico, Bandung, (1985)
- Shidarta, Hukum Perlindungan Konsumen Indonesia, PT.Grasindo, Jakarta, (2020)
- Surjono Sukanto, Pengantar Penelitian Hukum, Penerbit Universitas Indonesia, Jakarta, (2023)
- Widyarsono A.S, Menumpas Bandar Menyongsong Fajar, PT Prenada, Jakarta, (2023)
- Wirjono Prodjodikoro, Asas-Asas Hukum Pidana Indonesia, Refika Aditama, Bandung, (2019)
- Wirjono Prodjodikoro, Hukum Acara Pidana di Indonesia, Sumur Bandung, Bandung, (2000)
- Yon Artiono Arbaí, Aku Menolak Hukuman Mati: Telaah Atas Penerapan Pidana Mati, Grafika Mardi Yuana, Bogor, (2017)

Legislation

- Indonesian Criminal Code (KUHP)
- Indonesian Criminal Procedure Code (KUHAP)
- Law Number 2 of 2002 concerning the Indonesian National Police
- Law Number 35 of 2009 concerning Narcotics
- Medan District Court Decision Number 355/Pid.Sus/2025/PN Mdn

Journal Articles

- Anisa Nazaila Idris dkk, Analisis tentang Problematika Penegakan Hukum terhadap Pelaku Tindak Pidana Narkotika, Jurnal Aliansi, Vol. 2, No. 6, 2025
- Bagas Endri Oktaviyana dan I Gusti Agung Ngurah Agung, Pertanggungjawaban Hukum Terhadap Pelaku Tindak Pidana Secara Melawan Hukum Menjadi Perantara Dalam Jual Beli Narkotika Golongan 1 (Studi Kasus Putusan Pengadilan Negeri Jakarta Utara Nomor 211/Pid.Sus/2023/PN Jkt.Utr), Jurnal Iblam Law Review, Vol. 4, No. 4, 2024
- Chandyta Silviani dan Rendi Prayuda, “Analisis Modus Operandi Penyelundupan Narkotika Di Perbatasan Indonesia-Malaysia (Studi Kasus Kabupaten Kepulauan Meranti Provinsi Riau Tahun 2017-2022)”, Jurnal of Diplomacy and International Studies, Vol. 1, No. 3, (2023)
- Chartika Junike Kiarking, “Penyalahgunaan Narkotika Menurut Hukum Pidana dan Undang-Undang Nomor 35 Tahun 2009 Tentang Narkotika”, Jurnal Lex Crimen, Vol. 6, No. 1, (2017)
- Daud Hidayat Lubis, Pertanggungjawaban Pidana Anak Menurut Hukum Pidana Positif Dan Hukum Pidana Islam, Skripsi, Fakultas Hukum Universitas Sumatera Utara, (2023)
- Dewa Ayu Risma Pranasita, I Nyoman Gede Sugiarta, Kade Richa Mulyawati, “Modus Operandi Penyelundupan Narkotika Sindikat Kejahatan Transnasional Terorganisasi Dalam Perspektif Kriminologi (Studi Kasus Di Polda Bali)”, Jurnal Analogi Hukum, Vol. 5, No. 3, (2023)
- Dwi Alfianto, dkk, Pertanggungjawaban Perdata dan Tanggung Gugat Dalam Perkara Wanprestasi Dan Perbuatan Melawan Hukum, Jurnal JPM, Vol. 4, No. 6, (2024)
- E.Z. Leasa, Penerapan Sanksi Pidana Dan Sanksi Tindakan (Double Track System) Dalam Kebijakan Legislasi, Jurnal Sasi, Vol. 16, No. 4, (2010)
- Ghina Syakirah Darusslam dkk, Problematika Penegakan Hukum Terhadap Tindak Pidana Narkotika di Indonesia, Jurnal Ilmiah Multidisiplin, Vol. 3, No. 4, 2026

- Harab Zafrulloh, Persepsi Pandangan Hukum dan Masyarakat dalam Pengertian Hukuman Mati dan Penjara Seumur Hidup dalam Penerapan Sanksi Pidana, Jurnal Thengkyang Universitas Sjakhyakirti Palembang, Vol. 2, No. 1, (2019)
- Hasanal Mulkan, Hukuman Mati Dalam Sistem Hukum Pidana Indonesia Ditinjau Dari Perspektif Hukum Islam, Jurnal Hukum Doctrinal, Vol. 4, No. 1, (2019)
- Hikmah Putri Amalia, Naida Andhita Pasa, Salsabila Nur Sahara D, “Problematisasi Penegakan Hukum Terhadap Tindak Pidana Narkotika di Indonesia”, Jurnal Laboratorium Syariah dan Hukum, Vol. 5, No. 3, (2024)
- Kiki Nitalia Hasibuan, Masalah Pertanggung Jawab Hukum Dalam Kasus MisSelling, Skripsi, Fakultas Hukum Universitas Indonesia, (2011)
- Komang Adi Utama Putra, Pertanggungjawaban Perdata Bagi Pelaku Pelanggaran Kekayaan Intelektual dalam Era Digital, Jurnal Demokrasi, Vol. 1, No. 4, (2024)
- Marji Wibowo dkk, Pertanggungjawaban Pidana Terhadap Pelaku Perantara Dalam Jual Beli Narkotika Golongan I Berdasarkan Putusan Nomor 177/Pid.Sus/2023 Mjk, Jurnal Court Review, Vol. 5, No. 5, 2025
- Moh. Kholilul Rokhim dan Nurbaedah, “Tinjauan Yuridis Pemidanaan Terhadap Perantara Dalam Transaksi Narkotika (Studi Putusan Perkara Nomor 162/Pid.Sus/2021/PN KDR Dan Putusan Perkara Nomor 25/Pid.Sus/2023/PN KDR)”, Jurnal Mizan, Vol. 14, No. 1, (2025)
- Mohanis, Penerapan Sanksi Pidana terhadap Kurir Narkotika dalam Tinjauan Undang-Undang Nomor 35 Tahun 2009 Tentang Narkotika (Studi Putusan Pengadilan Negeri Kebumen Perkara Nomor 139/Pid.B/2010/PN.Kbm, Jurnal Block Caving Vol. 21, No. 1, (2015)
- Novia Nanda Pertiwi, Kajian Kriminologi Peran Perantara dalam peredaran narkortika jenis sabu di Kabupaten Bangka Tengah, Jurnal Pagaruyung, Vol. 9, No. 1, (2025)
- Oktir Nebi, “Faktor Penyebab Pengguna Narkotika di Kalangan Masyarakat”, Jurnal Wajah Hukum, Vol. 3, No. 1, (2018)
- Sumarlin Adam, “Dampak Narkotika Pada Psikologi Dan Kesehatan Masyarakat,” Jurnal Komunikasi Penyiaran Islam IAIN Sultan Amai Gorontalo, Vol. 1, No. 1, (2012)