

THE COMPLAINT

Miss H complains Revolut Ltd (“Revolut”) will not reimburse her money she says she lost when she fell victim to a scam.

Miss H is represented by CEL Solicitors (“CEL”) in this matter. However, where appropriate, I will refer to Miss H solely in this decision for ease of reading.

WHAT HAPPENED

The circumstances of this complaint are well known to all parties concerned, so I will not repeat them again here in detail. However, I will provide an overview.

Miss H says she has fallen victim to ‘two’ cryptocurrency related investment scams within a short period. She says scammer(s) deceived her into making payments to what she thought was a legitimate investment.

I do not intend on setting out a detailed list of all the transactions in question. I say this given the volume and the fact that neither party in this matter has disputed the list of transactions the investigator at first instance set out in their assessment. Instead, I will provide a summary. The transactions concerned appear to be:

- Approximately 20+ exchanges to BTC amounting to circa £18,000 in total.
- Made from March to June 2024.
- Once exchanged, the crypto was withdrawn/sent to external wallet(s).
- Exchanges ranging from approximately £20 to £3,000.

Miss H disputed the above with Revolut. When Revolut refused to reimburse Miss H, she raised a complaint, which she also referred to our Service.

One of our investigators considered the complaint and did not uphold it. As Miss H did not accept the investigator’s findings, this matter has been passed to me to make a decision.

WHAT I HAVE DECIDED – AND WHY

I’ve considered all the available evidence and arguments to decide what’s fair and reasonable in the circumstances of this complaint.

Having done so, I find that the investigator at first instance was right to reach the conclusion they did. This is for reasons I set out in this decision.

I would like to say at the outset that I have summarised this complaint in far less detail than the parties involved. I want to stress that no discourtesy is intended by this. If there is a submission I have not addressed, it is not because I have ignored the point. It is simply because my findings focus on what I consider to be the central issues in this complaint.

Further, under section 225 of the Financial Services and Markets Act 2000, I am required to resolve complaints quickly and with minimum formality.

Key findings

- Firms – such as Revolut – are regulated and authorised for payment activities, which include the accepting of deposits into an account. The exchange of money into another currency is generally considered ancillary to a regulated or otherwise covered activity – and our rules allow us to consider ancillary activities. I take the view that an exchange by a firm of fiat currency into cryptocurrency that is subsequently sent out externally can also be an ancillary activity, and therefore complaints about this fall within our jurisdiction. Given this – and the fact that Miss H’s complaint involves an allegation that Revolut should have intervened in the exchanges concerned to protect her from financial harm – I am satisfied that this complaint falls within our Service’s jurisdiction.
- I am satisfied that Miss H’s £3,085 exchange to BTC on 2 June 2024 (“the Exchange”) ought to have appeared out of character to Revolut. Consequently, I take the view that the Exchange should have triggered Revolut’s fraud detection systems prompting it to intervene to try to protect Miss H from financial harm. I say this given the value of the Exchange and the fact the transaction was crypto in nature.
- I am satisfied that a proportionate intervention to the aggravating features surrounding the Exchange would have been for Revolut to have provided Miss H with a ‘better’ automated scam warning tailored to the likely cryptocurrency related scam she was at risk from. For example, Revolut should have done this by asking Miss H a series of automated questions designed to narrow down the type of cryptocurrency related scam risk associated with the payment transaction she was making.
- However, I am not satisfied that if Revolut had carried out such an intervention it would have made a difference in the circumstances. I take the view that, on the balance of probabilities, it is unlikely Miss H would have heeded such an automated warning. I have reached this conclusion by taking the following points into account:
 - Revolut carried out at least three in-app chat interventions regarding Miss H’s attempted crypto payments before the Exchange. During those chats, Revolut questioned Miss H about her transactions and provided her with relevant investment scam warnings. Miss H confirmed, amongst other things, that she was making the payments to her own accounts, understood the risks involved and that there was no third party involvement (which was untrue). In addition to this, Miss H provided Revolut with relevant screenshots concerning her payments.
 - In addition to the in-app chat interventions, Revolut provided Miss H with several automated warnings before and after the Exchange. These warnings set out the following:
 - *‘Something doesn’t look right ... We think you’re being scammed ... 99.2% Higher risk than typical transaction.’*
 - *‘This could be a crypto scam ... Beware of social media promotions ... Do your crypto research ... Don’t be rushed.’*
 - Payment questionnaires that Miss H completed, which warned her

about fraudsters.

- Transfer reviews and risk agreements, whereby Miss H confirmed that, *'Revolut has warned me that this payment is suspicious and I understand the risk of losing my money.'*
 - Miss H did not heed any of the above warnings.
 - CEL's submissions set out several examples explaining why Miss H trusted the scammer(s) at the time, which includes the fact that Miss H was induced by the 'profits' she saw on her trading platform. For example, *"Your customer [Miss H] recalls that this company also was able to recover the initial £1,000.00 she had lost in the previous scam which further [encouraged] your customer that the scam was genuine."*
- Taking all the above points together, they suggest that had Revolut provided Miss H with the warning (described above) regarding the Exchange, it is unlikely she would have heeded it. The above points clearly show that Miss H was under the spell of the scammer at the time and was determined to make her transactions.

Other points

- As mentioned above, Revolut carried out several interventions in this matter using various methods. By and large, I find that these interventions were proportionate to the risk identified and the information Miss H provided Revolut.
- I am not satisfied that the other exchanges/payments in this case which did not trigger, should have done so. I say this given the absence of any significant aggravating factors surrounding these other exchanges/payments. Even if it could be argued otherwise, I am not persuaded the result of any intervention would be any different to what I have set out above regarding the interventions Revolut did carry out.
- I can see that it appears Miss H reported the 'first scam' to Revolut on 4 April 2024. So, I have thought about whether Revolut should have done more to prevent Miss H's losses after this point. During an in-app intervention on 5 April 2024, a Revolut agent asked Miss H if the transaction she was attempting was connected to the scam she reported on 4 April 2024. Miss H confirmed that it was not. Given this, plus Revolut's interventions regarding transactions towards the 'second scam' and its obligation to execute Miss H's payments – I would not have expected Revolut to have done more.
- Regarding recovery, Miss H's crypto withdrawals were made from her Revolut account to other account(s) in her name. Thereafter, those funds were either moved directly to the fraudsters, or, if not – Miss H should be able to withdraw them from her account(s). Further or alternatively, as Miss H's payments were made to purchase cryptocurrency – which would have been forwarded on in this form – there would not have been any funds to recover.

Conclusion

Taking all the above points together, I do not find that Revolut has done anything wrong in the circumstances of this complaint. Therefore, I will not be directing Revolut to do anything further.

In my judgment, this is a fair and reasonable outcome in the circumstances of this complaint.

MY FINAL DECISION

For the reasons set out above, my final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss H to accept or reject my decision before 10 October 2025.

Tony Massiah
Ombudsman