

THE COMPLAINT

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

Mrs N is represented by Mendelsons Limited in this matter. However, where appropriate, I will refer to Mrs N 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.

Mrs N says she has fallen victim to a cryptocurrency related investment scam. She says fraudsters deceived her into making transactions to what she thought was a legitimate investment. The exchanges and corresponding crypto withdrawals concerned are (these are based on Revolut’s submissions):

Exchange Number	Date	Method / Type	Amount
1	07 March 2024	Exchange	£1,500.00
		Crypto Withdrawal BTC on BITCOIN	0.02683955
2	12 March 2024	Exchange	£3,000.00
		Crypto Withdrawal BTC on BITCOIN	0.05210792
3	12 March 2024	Exchange	£1,200.00
		Crypto Withdrawal BTC on BITCOIN	0.02061087
4	21 March 2024	Exchange	£2,300.00
		Crypto Withdrawal BTC on BITCOIN	0.04311109
5	22 March 2024	Exchange	£15,000.00

		Crypto Withdrawal BTC on BITCOIN	0.19979002
6	24 March 2024	Exchange	£1,500.00
		Crypto Withdrawal BTC on BITCOIN	0.08262318

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

One of our investigators considered the complaint and did not uphold it. As Mrs N 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 Mrs N'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.
- The investigator thought Exchange 1 should have triggered Revolut's fraud detection systems. Part of his reasoning was due to Revolut being aware that Mrs N had fallen victim to a cryptocurrency scam in 2022. Mendelsons have also advanced this argument. Whilst I take the point, I have weighed this against the value of Exchange 1, and the fact it was made some time after the 2022 scam. With these points in mind, I am not persuaded that Exchange 1 should have triggered a human intervention from Revolut by way of an in-app chat.
- I am persuaded however that Exchange 2 should have triggered Revolut's systems prompting it to provide Mrs N with an automated tailored written warning relevant to

cryptocurrency scams, tackling some of the key features of the scam. I say this given the value of Exchange 2 and the fact it was a crypto transaction. Further, I am persuaded that Exchange 5 should have triggered a human intervention from Revolut (by way of in app-chat), given its significant value. Revolut failed to carry out these interventions.

- I am not persuaded the remaining Exchanges should have triggered Revolut's systems (although I acknowledge that some of them resulted in automated warnings). I say this because of the lack of aggravating features surrounding those Exchanges.
- I am not satisfied that if Revolut had carried out the interventions mentioned above, they would have made a difference in the circumstances. I take the view that, on the balance of probabilities, Mrs N would have likely frustrated any attempts from Revolut to try to protect her from financial harm – thereby alleviating any concerns Revolut had. I have reached this conclusion by taking the following points into account:
 - On 22 March 2024, Mrs N attempted a £1,483.35 payment to 'BLL' – this later became Exchange 6. This payment was not ultimately processed, but it did result in an in-app chat intervention. In the chat, when questioned about the payment, Mrs N said "*I am paying back my relative money that I own.*" She also confirmed that there was no third-party involvement. Both of these responses were untrue, as the attempted payment was for an investment and Mrs N was being advised about her transactions. I acknowledge Mendelsons argue that Revolut should have done more here given the previous 2022 scam. However, I do not agree with this because Mrs N decided to cancel the payment altogether. Further, as I mentioned above, much time had passed since the 2022 scam.
 - Revolut provided Mrs N with 'new crypto beneficiary warnings' for the crypto withdrawals resulting from Exchanges 1 and 6. Mrs N did not heed those warnings.
 - I have looked at Mrs N's other complaints with our Service, which also involve her falling victim to scams. I will not be making any determinations regarding the proportionality of the interventions which occurred in those cases. However, I can see that Mrs N was misleading during those interventions. Taking this into account, I cannot ignore the fact that Mrs N appears to have a propensity to mislead her banks when they intervene in her transactions to try to protect her from financial harm.

Taking all the above points together, they suggest that had Revolut intervened in Exchanges 2 and 5 (as described above), it is likely Mrs N would have frustrated such interventions – thereby alleviating any concerns Revolut had. The above points clearly show that Mrs N was under the spell of the scammer(s) at the time. Had Revolut blocked Mrs N's Exchanges, I find she would have likely used her other bank accounts. Finally on this point, it would be remiss of me if I did not highlight the fact that during the interventions which took place in Mrs N's other complaints, she told her banks a litany of lies. To my mind, Mrs N was very much determined to say whatever was necessary to get her payments over the line.

Other points

- If it could be argued that Mrs N's other Exchanges should have triggered automated written warnings or human interventions, I am not persuaded the result of them would

be any different to what I have set out above regarding interventions for Exchanges 2 and 5.

- I am not persuaded this is a case where Revolut, contrary to Mrs N's instructions, should have refused to put her payments through.
- Mendelsons argue that the investigator's findings around causation are speculative. I do not agree with this. The investigator's findings, as well as mine, are based on the balance of probabilities. In Mrs N's case for example, there is contemporaneous evidence which shows she misled her other banks on several occasions during interventions. This, to my mind, suggests that on balance, Mrs N would have done the same in this case.
- Turning to recovery. Mrs N's payments were made for the purpose of purchasing/exchanging cryptocurrency, which would have been forwarded on in this form. Therefore, there would not have been any funds to recover. Further or alternatively, the likelihood that even if prompt action had been taken by Revolut on or immediately after the scam was reported, any of Mrs N's money would have been successfully reclaimed seems slim. I say this because of the time that had elapsed between Mrs N's transactions and when she reported the scam. In these types of scams, scammer(s) tend to withdraw/transfer out their ill-gotten gains immediately to prevent recovery.
- Mendelsons contend Mrs N was vulnerable at the time due to being an inexperienced investor. Having thought about this reason, I am not persuaded it means Mrs N was vulnerable. Further or alternatively, I have not seen anything to suggest Revolut knew or ought to have known about any of Mrs N's personal issues which Mendelsons have set out. Therefore, I do not find that Revolut should have dealt with Mrs N's transactions any differently in this regard.

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 Mrs N to accept or reject my decision before 16 November 2025.

Tony Massiah
Ombudsman