

THE COMPLAINT

Mr G complains that Revolut Ltd (“Revolut”) will not reimburse him money he says he lost when he fell victim to a scam.

Mr G is represented by Rothley Law Limited in this matter. However, where appropriate, I will refer to Mr G 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.

Mr G says he has fallen victim to a cryptocurrency related investment scam he found via LinkedIn. He says scammers deceived him into making transactions to what he thought was a legitimate investment. The transactions in question are:

- **Exchange 1 - £1,002 (16 September 2024)**
 - *Crypto withdrawal (-0.56085741) [failed]*
 - *Crypto withdrawal (-0.56092999)*
- **Exchange 2 - £1,050 (18 September 2024)**
 - *Crypto withdrawal (-0.57877105)*

Mr G disputed the above with Revolut. When Revolut refused to reimburse Mr G, he raised a complaint, which he also referred to our Service.

One of our investigators considered the complaint and did not uphold it. As Mr G 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 he 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

Mr G has provided little in this case by way of evidence showing that he has fallen victim to a scam and suffered a loss. So, it is difficult to make a determination in that respect. It is possible that the scam complained of is connected to another alleged scam (see Mr G's linked Revolut complaint). In any event, I find that this complaint fails for other reasons which I set out below.

- 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 Mr G's complaint involves an allegation that Revolut ought to have intervened in the exchanges concerned to protect her from financial harm – I am satisfied that this complaint falls within our Service's jurisdiction.
- At first blush, Mr G's two exchanges and corresponding withdrawals do not appear to be that unusual – particularly when considering their respective values and the fact Mr G's Revolut account was created on 14 February 2024. I acknowledge that Mr G was making crypto related transactions. But that in and of itself does not mean that his transactions ought to have flagged as suspicious. Buying/exchanging cryptocurrency is a perfectly legitimate exercise.
- That said, Revolut did in fact intervene in the failed crypto withdrawal (mentioned above) flowing from Exchange 1.
- In that intervention, Revolut provided Mr G, in short, with relevant crypto investment warnings and declarations, which he accepted. I find that this intervention was proportionate in the circumstances. For whatever reason, Mr G did not go ahead with the crypto withdrawal, and made it later the same day.

Other points

- In response to the investigator's view, Mr G's representatives submitted, amongst other things, that Revolut ought to have intervened again after the failed crypto withdrawal:
 - Based on the intervention mentioned above, I would not have expected Revolut to have intervened again in this matter. Mr G's response to the intervention would have alleviated any concerns Revolut may have had. Further, I would not have expected another intervention due to the several crypto related transactions Mr G had made prior to Exchanges 1 and 2 (see Mr G's linked Revolut complaint). As these exchanges were made, Mr G's account had become accustomed to crypto related transactions.
 - I am not persuaded that the human intervention threshold has been crossed here. That is, I am not persuaded there were sufficient aggravating features surrounding Mr G's transactions which warranted a human intervention from Revolut.
- Even if it could be argued that Revolut ought to have intervened again and carried out human interventions, I am not persuaded this would have likely made a

difference in the circumstances. Mr G's representatives have submitted, amongst other things, "*... he was still being guided and being convinced by the scammer and had no reason to believe that at this point it was a scam.*" Bearing this in mind, I find that it is likely Mr G would have frustrated any further interventions from Revolut.

- I am not persuaded this is a case where Revolut, contrary to Mr G's instructions, ought to have refused to put Mr G's payments through.
- Turning to recovery. Given the nature of Mr G's transactions (crypto exchanges), recovery in this matter would not be possible. Further or alternatively, the likelihood that even if prompt action had been taken by Revolut on or immediately after the fraud was reported, any of Mr G's money would have been successfully reclaimed seems slim. I say this because of the time that had elapsed between Mr G's transactions and when he reported the scam. In these types of scams, fraudsters tend to withdraw/transfer out their ill-gotten gains immediately to prevent recovery.
- Turning to vulnerability. Mr G's representatives submit that Mr G was vulnerable at the time of the scam due to supporting the daughters of his late brother-in-law. It is submitted that Mr G had to do this by borrowing funds, as he had no savings. There is nothing to suggest Revolut knew or ought to have known about these reasons at the time. Therefore, I do not find that Revolut ought to have dealt with Mr G's payments 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 Mr G to accept or reject my decision before 9 December 2025.

Tony Massiah
Ombudsman