

The complaint

Mr H is complaining that Revolut Ltd didn't do enough to prevent him from falling victim to an investment scam.

The complaint is brought on his behalf by a professional representative but for ease I'll mainly refer to Mr H here.

What happened

Mr H says that in 2022 he came across an investment opportunity online which I'll call T. He was invited to social media chat groups with people he met online and was convinced T was a good investment. He opened an account with T and after a few months of good results he invested further. He says his investment in T subsequently became worthless and it was then that he thought he'd been the victim of a scam.

Mr H says he made the following payments, by transfer, to invest in T from Revolut:

Payment number	Date	Payee	Amount (in GBP equivalent)
1	29 September 2022	Limited company	£5,000 (payment made in US Dollars)
2	30 September 2022	Limited company	£5,000 (payment made in US Dollars)
3	10 November 2022	Individual 1	£1050
4	10 November 2022	Individual 2	£853
5	10 November 2022	Individual 1	£197
6	19 November 2022	Individual 3	£5,000
7	19 November 2022	Individual 4	£5,000
8	30 November 2022	Individual 5	£2,100

I've highlighted Payment 3 and Payment 5 as Mr H's representative initially reported these as one total payment of £1,247 rather than as separate payments which added up to this amount. Both Revolut and the Investigator said they couldn't locate a payment of £1,247 and Mr H's representative didn't clarify that these were the payments it meant to report in response to the Investigator's view. I've included them here because I think it was Mr H's intention to include them, but it doesn't make a difference to an overall outcome.

Mr H complained to Revolut about what had happened, and it asked him for some more information and evidence about the payments and the source of the funds he said he'd invested in T. It then issued its final response letter, in which it said it needed more information to complete its investigation, but also gave referral rights to the Financial Ombudsman Service.

Mr H brought his complaint to us but our Investigator didn't uphold it. They said, in summary:

- they weren't persuaded that T was a scam;
- there was little evidence that the disputed payments were invested in T;
- they wouldn't have expected Revolut to have intervened directly to question Mr H about the payments; and
- even if Revolut had intervened directly, it was unlikely the payments would have been prevented because T was regulated in an overseas jurisdiction and there was little negative information about T available at that time - so Revolut wouldn't have been concerned that Mr H was making payments to a scam.

Mr H didn't agree with the Investigator. He provided further reasoning around why he thought T was operating as a scam and also explained that he thought Revolut should have intervened directly and this would have prevented the payments he made.

Mr H's complaint has now been passed to me for review and a decision.

What I've 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'm not upholding Mr H's complaint. I'll explain why.

In line with the Payment Services Regulations 2017, consumers are generally liable for payments they authorise. Revolut is expected to process authorised payment instructions without undue delay. But it also has long-standing obligations to help protect customers from financial harm from fraud and scams.

Those obligations are however predicated on there having been a fraud or scam. And so, it would only be reasonable for me to consider whether Revolut is responsible for the loss Mr H claims to have suffered if, indeed, the disputed payments had been lost to a scam.

Mr H has argued in some detail why he believes T was operating as a scam as opposed to offering a high-risk investment opportunity as a result of which he's suffered a loss. But from what I've seen, I'm not persuaded that it was. T's website said that the investment it was offering was high risk and might not be suitable for all investors. I can see that when Mr H says he made the payments to T it was incorporated in an overseas jurisdiction, and it was also regulated in that jurisdiction. The International Organization of Securities Commissions (IOSCO) did publish a warning about T in late 2023 and its broker's licence was revoked in late 2024. But while this could indicate concerns about T's conduct this doesn't mean that it was set up to defraud customers.

In any event, I don't think Mr H has provided sufficient evidence to show that the payments he is disputing went on to be invested in T. Mr H has provided some evidence that he held an account on T's platform which showed a balance so it seems that he invested in T at

some point, but there is little to show that these particular payments from Revolut were subsequently invested in T (for example evidence to show the equivalent amounts being paid on to T, or correspondence relating to T referring to the these payments in particular).

I would add that although I can see that Payments 1 and 2 came from another account held in Mr H's own name the remaining payments appear to have been funded by credits to Mr H's account from various third parties. Although the Investigator asked for evidence of where the funds Mr H says he invested in T came from that's not been provided for all the disputed payments, so I don't think I've seen enough evidence that the loss Mr H is claiming is all his own.

For completeness, I'll also go on to briefly address Mr H's further points about whether Revolut ought to have done more to prevent the disputed payments.

I agree with the Investigator that I wouldn't necessarily have expected Revolut to have intervened at all here given the value and destination of the disputed payments, the fact that they were reasonably spread out over two months and aside from the first two, the payments were generally to different individuals. But I can see that Revolut did intervene by asking for the payment purpose for both Payment 1 and Payment 8. Although the option of "*investment*" was available, for both payments Mr H said the payment was for "*something else*". While I appreciate "*something else*" could encompass a range of purposes, Revolut gave a scam warning based on its assessment of the most likely scam risk based on this payment purpose, which I think was proportionate to the circumstances of the payments at the time they were made.

Even if Revolut had intervened directly, it's unlikely the payments would have been prevented. I say this because in a conversation with Mr H about the circumstances of the payments I don't think Revolut or Mr H would have been particularly concerned that he was potentially investing in a scam, given T's regulation status and the absence of much adverse information about it being available at the time.

Revolut didn't attempt to recover Mr H's funds but I don't think this was unreasonable. In the circumstances of the payments I don't think Revolut would have been able to take any action here which was likely to result in the funds being successfully recovered.

I'm sorry to disappoint Mr H. But for the reasons I've explained, I don't think I've seen enough evidence that he's suffered the loss he's claimed to a scam. And even if I had, I don't think Revolut ought to have done anything else to prevent the payments he made.

My final decision

My final decision is that I'm not upholding Mr H's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr H to accept or reject my decision before 15 August 2025.

Helen Sutcliffe
Ombudsman