

## The complaint

Mr A complains Revolut Ltd recorded a marker against him on a fraud database. He doesn't think it's treated him fairly.

## What happened

Mr A held an account with Revolut Ltd. In April 2025 he received a number of payments into his account from third parties, through bank transfers<sup>1</sup>. Shortly afterwards, Mr A transferred the funds out. However, the incoming payments were later reported as fraudulent to Revolut.

Revolut restricted the account and requested information to support why Mr A had received the payments and was entitled to the funds. When it didn't get a response, it completed its review and decided to record a marker at Cifas, as it believed he had been complicit in receiving fraudulent funds. It also closed Mr A's account.

Mr A found out about the marker and complained to Revolut that he'd not done anything to cause this. He said that he'd been introduced to cryptocurrency trading by a contact he'd met on Facebook. I shall refer to this party as X. Mr A says X had presented themselves as knowledgeable and offered to teach him to trade, which required linking their crypto accounts to his. He said that because of his limited understanding of crypto, he'd trusted X. Then, he'd had several unexpected payments arrive, after which X messaged him, insisting the money was from his "uncle", asking him to forward the funds on because they were experiencing banking issues. Mr A told Revolut that he'd questioned X about this but after their persistent pleading and assurances, he'd agreed to do this and sent the funds on.

Mr A said he was shocked when Revolut restricted and closed his account, and that when he'd attempted to reach out to X for clarification, he'd blocked him on all platforms. Mr A said he'd been manipulated and used as an unwitting money mule. He gave Revolut WhatsApp and Snapchat messages of his engagement with X.

Revolut reviewed the information but didn't think it had made a mistake in the steps it had taken. Dissatisfied, Mr A contacted us to challenge the decision. He said the fraud marker was affecting him both personally and financially and Revolut had refused to remove it, even after he'd told it that he'd not done anything wrong.

One of our investigators gathered information. He acknowledged what Mr A had said but believed the circumstances suggested Mr A would've reasonably known he was involved in something illegitimate at the time and his actions had facilitated the payment of fraudulent funds into and out of his account. He thought it was more likely than not that he had been complicit in receiving fraudulent funds and Revolut had met the bar for loading the fraud marker.

Mr A didn't agree. He said he'd made a mistake in trusting someone, who'd misled him. But none of this involved criminal intent.

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<sup>1</sup> Other payments were reverted by Revolut and so didn't credit Mr A's account.

When the investigator didn't change the outcome, the case was put forward for 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.

I'm sorry to disappoint Mr A but I'm not upholding his complaint, and I'll explain why. The marker that Revolut has filed is intended to record that there's been a 'misuse of facility' – relating to using the account to receive fraudulent funds. To file such a marker, it's not required to prove beyond reasonable doubt that Mr A is guilty of a fraud or financial crime, but it must show that there are grounds for more than mere suspicion or concern. The relevant guidance says, there must be reasonable grounds to believe that an identified fraud or financial crime has been committed or attempted, and the evidence must be clear, relevant, and rigorous.

What this means in practice is that the business must first be able to show that fraudulent funds have entered Mr A's account, whether they are retained or pass through the account. Secondly, the business will need to have strong evidence to show that Mr A was deliberately dishonest in receiving the fraudulent payments and knew they were, or might be illegitimate payments. This can include allowing someone else to use their account to receive an illegitimate payment. But a marker should not be registered against someone who was unwitting; there should be enough evidence to show complicity.

To meet the standard of proof required to register a fraud marker; the business must carry out checks of sufficient depth and retain records of these. This should include giving the account holder the opportunity to explain the activity on their account to understand their level of knowledge and intention.

So, I need to decide whether I think Revolut has enough evidence to show fraudulent funds entered Mr A's account, and he was complicit. And I'm satisfied that it has. I'll explain why by addressing what I consider are the salient points.

Revolut has provided evidence that it received a number of reports from different banks, saying that funds which entered Mr A's account was because of fraud. Looking at what was reported, I'm satisfied Revolut had reasonable evidence of scams and needed to make enquiries to meet its regulatory obligations to investigate such matters.

Revolut contacted Mr A in his banking app and by sending him emails and push notifications as it needed to understand the activity on his account, so I'm satisfied that he was given a fair opportunity to explain his side of things. I share Revolut's concerns that Mr A didn't respond and hasn't satisfactorily explained why. And the available evidence also shows that he had control of his account as he'd previously accessed the banking app chat to ask why some transactions had "reverted".

I think that if the account activity had only come about in the circumstances that Mr A has described, I can't see why he couldn't have said this to Revolut, when it was clearly attempting to reach him and get him to explain some of the transactions. Instead, Mr A didn't stipulate this to Revolut. Considering this, I think Revolut had sufficient grounds to record the fraud marker and close the account.

Revolut also decided to retain the marker, after reviewing the case following Mr A's complaint and further information. I've looked at everything, and find its position justified. There simply isn't enough to explain why X's uncle would need to arrange for his customers to pay Mr A and couldn't have had the funds paid directly to X instead. Or how payments

from X's uncle would relate to Mr A learning to trade. I think all of this would have been apparent to Mr A at the time and especially as this wasn't just a single payment; there were several incoming payments. I've also reviewed the video recording of the interactions Mr A says he had with X, but in that recording, the messages are dated after the fraudulent activity took place, so it's difficult to place much weight on them. Thinking about everything, the circumstances suggest there was a lot more going on here and I agree with the investigator that Mr A hasn't been able to explain things to a reasonable level.

Ultimately, I must look at the available evidence and decide if I think Revolut has enough information to support its actions, with the reports it received, the account activity and considering Mr A's explanation and I believe it has enough. It follows that I don't find its actions were unfair to record the marker, maintain it and close the account (for completeness there's provision for that in the account terms). All things considered, I won't be requiring any further action to be taken to resolve this complaint.

I'm sorry to give Mr A disappointing news but after weighing everything, these are my conclusions, and this decision completes our review of the complaint.

### **My final decision**

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr A to accept or reject my decision before 23 February 2026.

Sarita Taylor  
**Ombudsman**