

## The complaint

Miss M complains that Revolut Ltd registered a Cifas marker against her without due cause.

## What happened

The circumstances of this complaint are well known to both parties, so I will not repeat every detail of what happened here. But in summary, Revolut received reports which said that funds which had entered Miss M's account had been sent as a result of a scam. It reviewed her account, and took the decision to close it and refer Miss M to Cifas who registered a fraud prevention marker against her.

Miss M said that she had fallen victim to a scam herself, and she thought she was receiving and moving on funds as part of a legitimate employment opportunity. She complained to Revolut, but it declined to uphold her complaint on the basis that it found that it had adhered to the principles set out by Cifas themselves when applying the marker.

Miss M was unhappy, so she escalated her concerns to our service where one of our investigators looked into what had happened. They did not recommend that Miss M's complaint should be upheld on the basis that they agreed the evidential bar for a Cifas marker had been met in this case. Miss M did not agree, so the case has been passed to me to decide.

## 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.

Revolut, as Cifas members, are obligated to share the details of customers who it has reasonable grounds to believe have been involved in the commission, or attempt to commit, fraud or financial crime. There must be '*clear, relevant and rigorous*' evidence in support of any fraud submissions made by members to Cifas about their customers. The type of Cifas marker loaded against Miss M was for 'misuse of facility'. This relates to a customer's account being used to receive and send on fraudulent funds.

Cifas do accept that there are some circumstances where an individual may be duped into becoming what is known as a 'money-mule', and so its guidance does require members to speak to their customers to determine whether they were witting or not. It further requires members to have enough evidence to show that the consumer was aware that they payment they were receiving was, or might be, from an illegitimate source – though they do not need to know the exact provenance of such funds.

So, the relevant findings for me to make are whether I believe there is sufficient evidence to conclude than on balance, firstly, that the money sent to Miss M was as a result of a fraud; and secondly that Miss M was (or ought to have reasonably been) aware that the funds she received were (or might be) from an illegitimate source.

It does not appear to be in dispute that Miss M had a valid claim to the funds she was sent –

Revolut say they were sent as a result of a fraud, and Miss M says she received them as an innocent victim in a job scam. But for completeness, I have reviewed the evidence from Revolut, including fraud reports sent by individuals who had sent funds to Miss M's account, and I am satisfied that the evidence demonstrates that the funds were sent as a result of a fraud and Miss M had no genuine claim to the funds.

So, the remaining matter in dispute is whether Miss M was a totally unwitting money mule in this case – or whether she was, at any point in the payments, complicit.

I will start by saying that what Miss M says happened is not supported by any evidence or corroboration, which clearly causes some issues in getting to the truth of what happened here. My role is to determine what I think is most likely to have happened – as I can never know for certain what did. Miss M explained the lack of evidence is because the messaging app at the heart of the series of events allows one party to delete all of the messages and this deletes them for the other party, too. But I have also not seen any supporting or corroborating evidence outside of this, so I have had to consider the plausibility of her testimony here in order to determine if I think it was most likely she was or became a witting participant in this scam, such that the Cifas marker ought reasonably remain against her.

Miss M explained that she was the victim of a job scam. She was offered the job by a recruiter, but she was not sure how they had initially contacted her or had her details. She hasn't explained or evidenced a recruitment process, or written details about the job itself. She explained that she believed that she was going to be paid to like content on social media initially, though hasn't provided detail about whether she did this, how she did this or for how long she did this. She said she was added to a group message but has not detailed what this was used for or how she participated in it. She has not mentioned whether she was asked to pay money as part of this task-based job – as we often see in this type of scam. I find that whilst she was generally consistent with her version of events, it has been light on detail about how the scam came about despite being questioned by both Revolut and our service.

Miss M said she did not profit from this scheme, other than what she thought was her pay as she sent on funds she received. But as she was not entitled to pay, she did profit from this scheme. Regardless, one may be guilty of a fraud or financial crime, or the evidential bar may be met for suspecting they might be (such that they must be reported to Cifas) – even in cases where little to no profit has been made personally.

Miss M said the recruiter asked her to become a financial assistant and this was when she began receiving and moving on funds at her supposed employer's instructions. It is unclear why the nature of the role changed. She no longer has evidence of the messages instructing her to move the funds, so I cannot know for sure what she was told about where the money came from or where it was going. She also has not been able to explain why a legitimate company needed to utilise her accounts to move funds, rather than use their own. She was asked to send funds onto cryptocurrency, which would be extremely strange for a legitimate employer to do. Funds were then sent to another bank account which she said she had given them the details of to get paid, because Revolut rejected some payments. This ought to have given further doubt over the scheme. I think these red flags ought to have been a cause for concern from the outset. I appreciate that Miss M said she was young and naive, but she was legally an adult, and I have seen no evidence of any particular vulnerabilities that would mean she was unable to identify the red flags in this 'job opportunity'.

Miss M said that she became suspicious about the opportunity and blocked contact with the recruiter. She said after this she received funds out of the blue (which were later reported as fraudulent) and so she got in touch with the recruiter again and sent the funds to cryptocurrency on their instruction. It is unclear how she got in touch with the recruiter again,

as she seems to have said she was blocked. She said the reason she sent these funds on and followed the recruiter's instructions was because she wanted to put an end to her links to the recruiter and the 'job' due to threats she had received previously. It is unclear why she did not report the matter to the police or financial institutions at this time. This leads me to believe that even if she had been merely an unwitting victim and mule at the start, at this point she most likely knew that she was moving funds with an illegitimate source. In addition to this, she has said she had concerns in late July or early August, but that she did not contact Revolut about it until she started getting reports of disputes in late August, which would seem strange if she truly was an unwitting victim at that time.

### **My final decision**

I do not uphold this complaint and require Revolut Ltd to do nothing further.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss M to accept or reject my decision before 21 May 2026.

Katherine Jones  
**Ombudsman**