

SECURITIES AND EXCHANGE COMMISSION

FORM 497J

Certification of no change in definitive materials under paragraph (j) of Securities Act Rule 497

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ACL VARIABLE ANNUITY ACCOUNT 2

CIK: **1004875** | IRS No.: **000000000** | State of Incorporation: **NY** | Fiscal Year End: **1231**
Type: **497J** | Act: **33** | File No.: **333-101051** | Film No.: **05788435**

Mailing Address
50606 AXP FINANCIAL
CENTER
MINNEAPOLIS MN 55474

Business Address
50606 AXP FINANCIAL
CENTER
MINNEAPOLIS MN 55474
6126713678

May 2, 2005

VIA EDGAR

Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, DC 20549-1004

ATTN: Document Control - EDGAR

Re: ACL Variable Annuity Account 2
American Express Endeavor Select(SM) Variable Annuity
American Express Innovations(R) Select Variable Annuity
American Express Innovations(R) Variable Annuity
Post-Effective Amendment No. 9 on Form N-4
File Nos. 333-101051 and 811-07511

Dear Commissioners:

Registrant certifies that the form of prospectus and Statement of Additional Information that would have been filed under paragraph (c) of Rule 497 would not have differed from that contained in the most recent Registration Statement or Amendment, and the text of the most recent Registration Statement or Amendment has been filed electronically.

Very truly yours,

/s/ Eric Marhoun

Eric Marhoun
Counsel