

# SECURITIES AND EXCHANGE COMMISSION

## FORM 497J

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

Filing Date: **2005-05-02**  
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### FILER

#### **IDS LIFE VARIABLE LIFE SEPARATE ACCOUNT**

CIK: **768836** | IRS No.: **000000000** | State of Incorporation: **MN** | Fiscal Year End: **1231**  
Type: **497J** | Act: **33** | File No.: **033-11165** | Film No.: **05788457**

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May 2, 2005

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

ATTN: Document Control - EDGAR

RE: IDS Life Variable Life Separate Account  
(American Express Variable Universal Life Policy)  
File No. 33-11165/811-4298

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.

Sincerely,

/s/ Mary Ellyn Minenko

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Mary Ellyn Minenko  
Counsel